Initial Study
For
Laguna College of Art and Design North Campus Student Center Project

Prepared For:

City of Laguna Beach
Community Development Department
505 Forest Avenue
Laguna Beach, CA 92651

Date: August 2023

EcoTierra consulting

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I. INTRODUCTION

A. INTRODUCTION AND REGULATORY GUIDANCE

An Initial Study (IS) is conducted by a lead agency to determine if a project may have a significant effect on the environment (CEQA Guidelines Section 15063[a]). If there is substantial evidence that a project may have a significant effect on the environment, an Environmental Impact Report (EIR) must be prepared, in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15064(a). However, if the lead agency determines the impacts are, or can be reduced to, less than significant, a Mitigated Negative Declaration (MND) or Negative Declaration (ND) may be prepared instead of an EIR (CEQA Guidelines Section 15070[b]). Pursuant to CEQA Guidelines Section 15070, a MND or ND is appropriate when the project's Initial Study identifies potentially significant effects, but:

a. Revisions to the project plan were made that would avoid or reduce the effects to a point where clearly no significant effects would occur; and

b. There is no substantial evidence that the project, as revised, may have a significant effect on the environment.

This IS prepared by the City of Laguna Beach (including an attached Environmental Checklist form) determined that the proposed project will not have a significant environmental effect, and the preparation of an EIR is not required. This IS/MND has been prepared in accordance with Section 15070 of the State California Environmental Quality Act (CEQA) Guidelines.

B. LEAD AGENCY

The lead agency is the public agency with primary responsibility over a proposed project. In accordance with CEQA Guidelines Section 15051(b)(1), "the lead agency will normally be the agency with general governmental powers." The project would be approved by the City of Laguna Beach. Therefore, based on the criteria described above, the City of Laguna Beach, Community Development Department, Planning Division is the lead agency for the proposed project.

C. PURPOSE AND DOCUMENT OGRANIZATION

The purpose of this IS/MND is to evaluate the potential environmental effects of the project. The document is divided into the following sections:

I. INTRODUCTION

This section provides an introduction and describes the purpose and organization of this document.

II. INITIAL STUDY CHECKLIST

This section includes the project background and a detailed description of the project. This section describes the environmental setting for each of the environmental subject areas; evaluates a range of impacts classified as “no impact,” “less than significant impact,” “less than significant impact with mitigation incorporated,” or “potentially significant impact” in response to the environmental checklist and provides an environmental determination for the project.

II. INITIAL STUDY CHECKLIST

A. PROJECT DESCRIPTION

1. Project Title:

Laguna College of Art and Design (LCAD) North Campus Student Center Project

2. Lead Agency Name and Address:

City of Laguna Beach
Community Development Department, Planning Division
505 Forest Avenue
Laguna Beach, CA 92651

3. Lead Agency Contact Person and Phone Number:

Anthony Viera
Principal Planner
949.497.0398
aviera@lagunabeachcity.net

4. Project Location:

2825 and 2851 Laguna Canyon Road
Laguna Beach, CA 92651

5. Applicant's Name and Address:

Laguna College of Art and Design
2222 Laguna Canyon Road
Laguna Beach, CA 92651

6. General Plan Land Use Designations:

Industrial (I)

7. Zoning Designation:

M-1A, Light Industrial

8. Surrounding Land Uses and Setting:

Surrounding land uses include open space areas to the north, south and east and commercial and residential land uses to the northeast and west. Surrounding land use designations include Industrial, Residential/Hillside Protection, Permanent Open Space, and Public/Institutional.

9. Description of Project:

Project Setting

The approximately 3.6-acre (158,558 square feet) rectangular shaped project site is located on the Laguna College of Art and Design (LCAD) North Campus. The project site consists of two parcels (APNs 632-081-14 and -15). The majority of the approximately 3.6-acre project site is developed with

buildings, parking lot, associated ornamental vegetation, and paved areas. **Figure 1, Regional Location** and **Figure 2, Project Site Boundary** show the project's regional location and project site boundaries.

The North Campus includes three existing buildings (Buildings A, B and C) and a surface parking area. Buildings A and B are used for educational instruction. Building C is vacant and not safe for occupancy. The current 152 stall parking lot is used for LCAD staff and student parking. **Figures 3** and **4** show the existing buildings and parking areas on the project site.

The project site is surrounded by urbanized areas to the west of Laguna Canyon Road, south of Laguna Canyon Road and Laguna Coast Wilderness Park, and north of Aliso and Wood Canyons Wilderness Park. The project site is located immediately adjacent to Big Bend Restoration site to the east; the parcel to the south is an undeveloped, naturally vegetated steep mountainside with numerous large native oak tree species and walking trails that are managed by Orange County (OC) Parks. A public walking trail is located along a portion of the south edge of the site, extending along the eastern edge to Laguna Canyon Road.

The project site is located in a Very High Fire Hazard Severity Zone and Fuel Modification Zone. Areas along the western and southern edge of the project site, and which are currently developed, were previously mapped as containing High Value and Very High Value Habitat.

Project Components

The project includes demolition of Building C and the existing asphalt parking lot and construction of a two-story, approximately 21,977 square foot Student Center. The Student Center would include a gallery, multi-purpose conference rooms, café/lounge, and lobby on the 1st floor. Visual communication classrooms, offices, and a meeting room would be located on the 2nd floor. **Figure 5, Project Site Plan** shows the overall site plan. **Figures 6** and **7** show 1st and 2nd floor plans for the Student Center.

The Student Center would be fire hardened, which means a Type I-B structure that is code compliant, ignition resistive, and fully sprinklered. Type I-B buildings are designed to hold fire in or keep fire out for an extended period of time and built with noncombustible materials; the buildings walls, columns, floors, and roofs are constructed with noncombustible concrete, steel, and/or composite materials. All rooms of the new Student Center nearby would be fitted with an upgraded Ordinary Hazard Group 2 automatic fire sprinkler system conforming to National Fire Protection Association (NFPA) 13 commercial building requirements and NFPA 25 maintenance requirements. Exterior sidewall sprinklers would be provided on the east, west, and south sides of the building.

Site improvements would include exterior spaces to support student collaboration including patios, turf areas, landscaping, and other similar improvements. The project would include reconfiguration and expansion of the existing parking lot to provide 187 parking spaces. No changes are proposed for Buildings A and B.

Other project components include the installation of landscaping, pedestrian pathways, site lighting, driveway improvements, and connection to offsite utilities (sewer, domestic water, electrical, telecommunications) in the right-of-way on Laguna Canyon Road. The project would include stormwater detention features such as debris basins and/or other appropriate features, including stormwater detention system located below the parking lot.

The project would remove up to 51 trees, retaining trees in the High Value Habitat Boundary, to the west and east of Buildings A and B, and along the Laguna Canyon Road frontage. **Figure 8, Demolition Plan** shows proposed demolition and tree removal. Landscaping improvements would include planting of drought resistant trees, shrubs, and ornamental grasses. The planting plan is shown in **Figure 9, Planting Plan**.

The project would include implementation of a Fuel Modification Plan on a portion of the site.

Construction

Typical construction equipment would be used during project construction, including bulldozers, dump trucks, and excavator trucks. Construction staging would be located on the project site and an Erosion Control Plan, including sediment control best management practices (BMPs) would be implemented during construction.

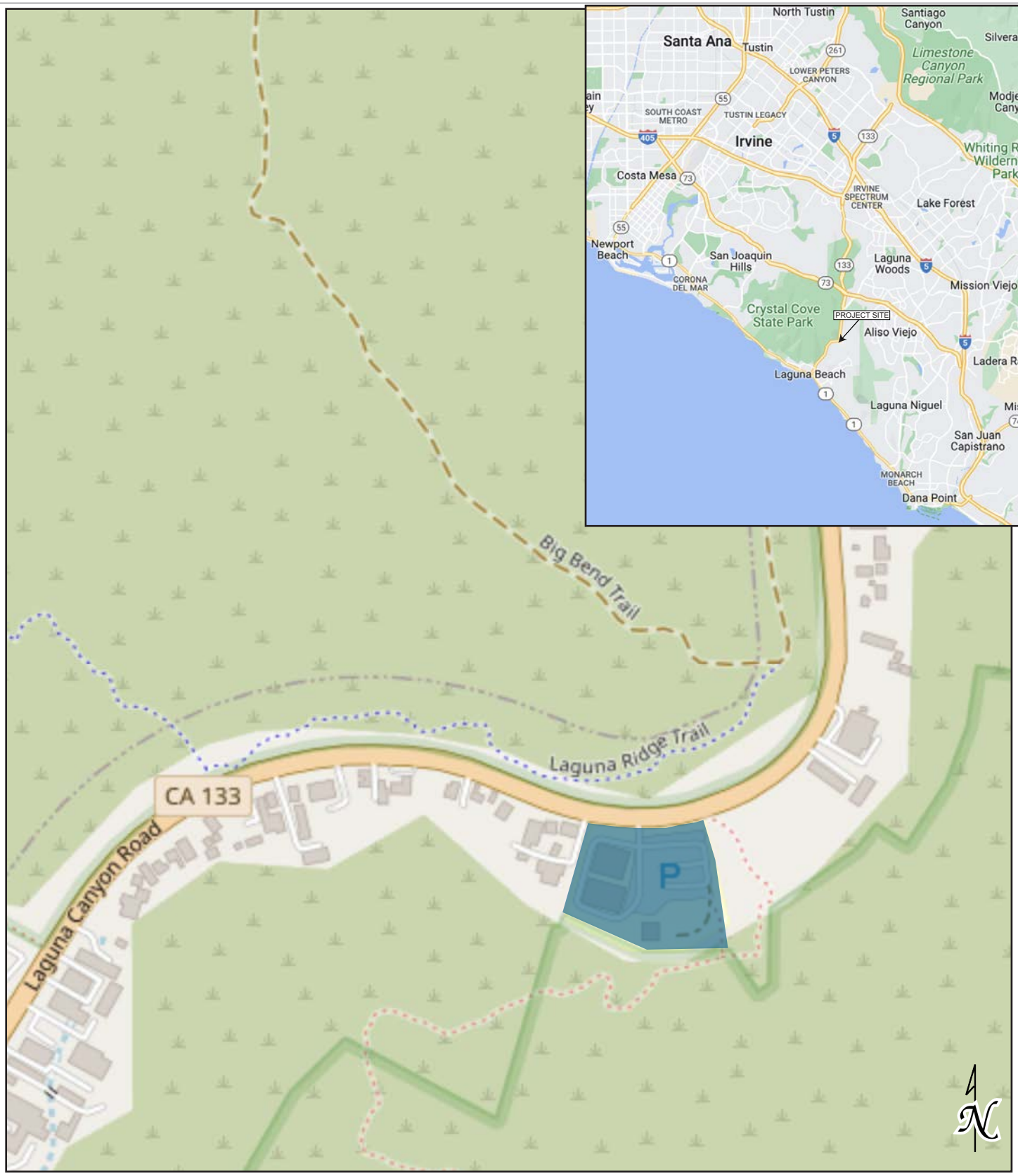
The project would include up to 9,100 cubic yards (CY) of soil export.

The length of time anticipated for construction of the project is approximately 21 months. The project would be operational in late spring/early summer 2025.

Permits and Approvals

The project would require the following permits and approvals:

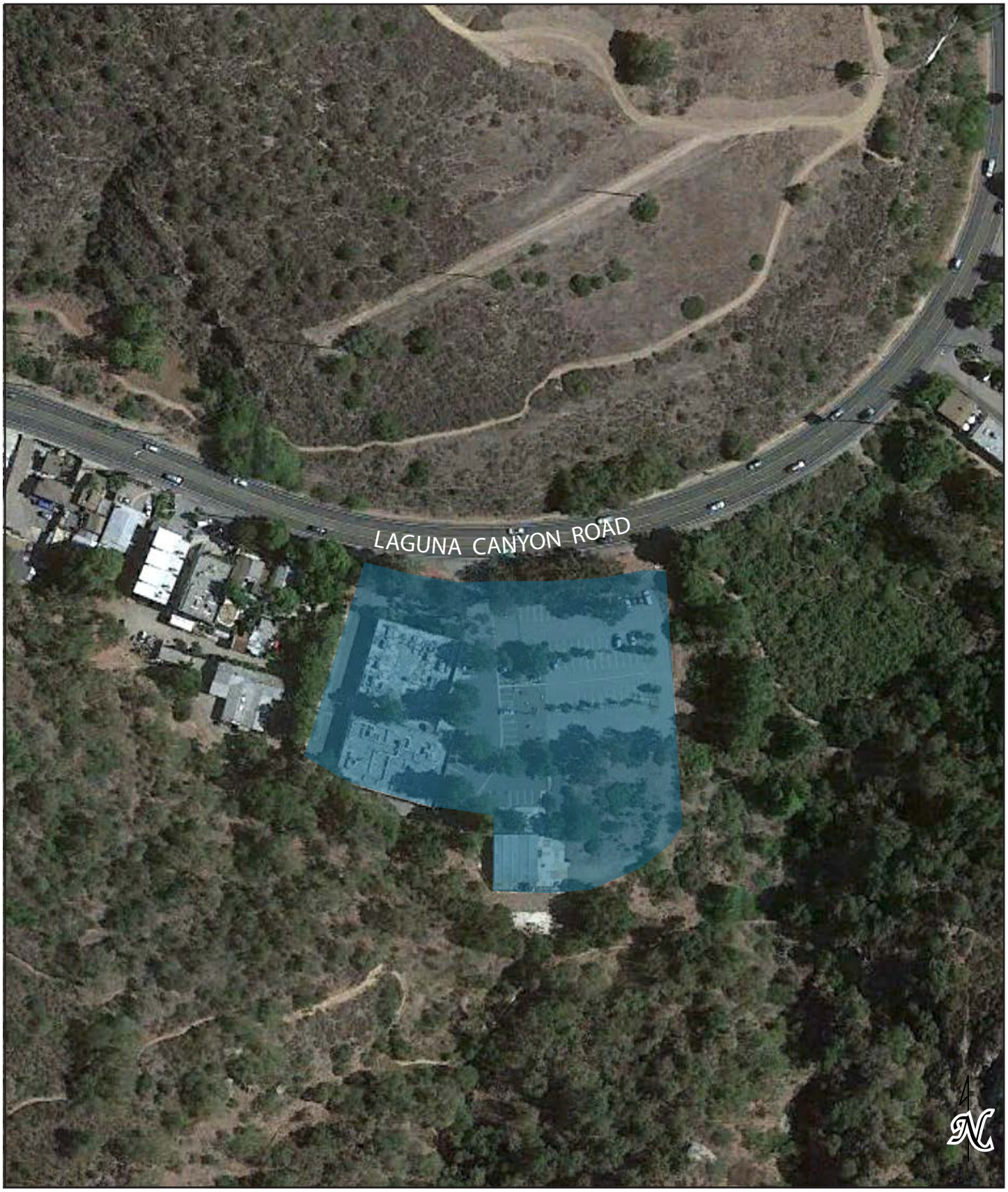
- Demolition Permit
- Building Permit
- Conditional Use Permit
- Design Review
- Tree Removal Permit
- Signage Permit
- Coastal Development Permit
- Lot Line Adjustment



Project Site

Source: OpenStreetMaps, September 2022.

Figure 1
Regional Location Map



Project Site
Source: Google Earth, September 2022.

Figure 2
Project Site Boundary

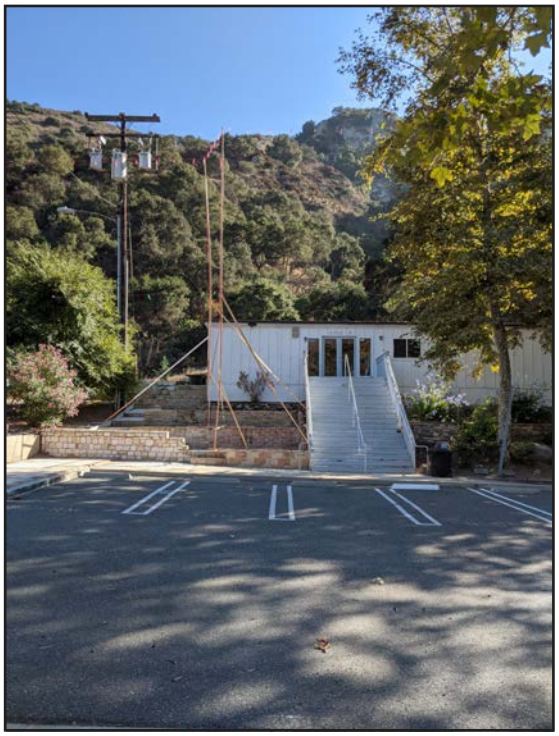
View 1: Views of Buildings A and B.

View 2: View of Parking Area Looking North.

View 3: View of Parking Area Looking South.

View 4: Views of Building C and B.

Figure 3
Views of the Project Site



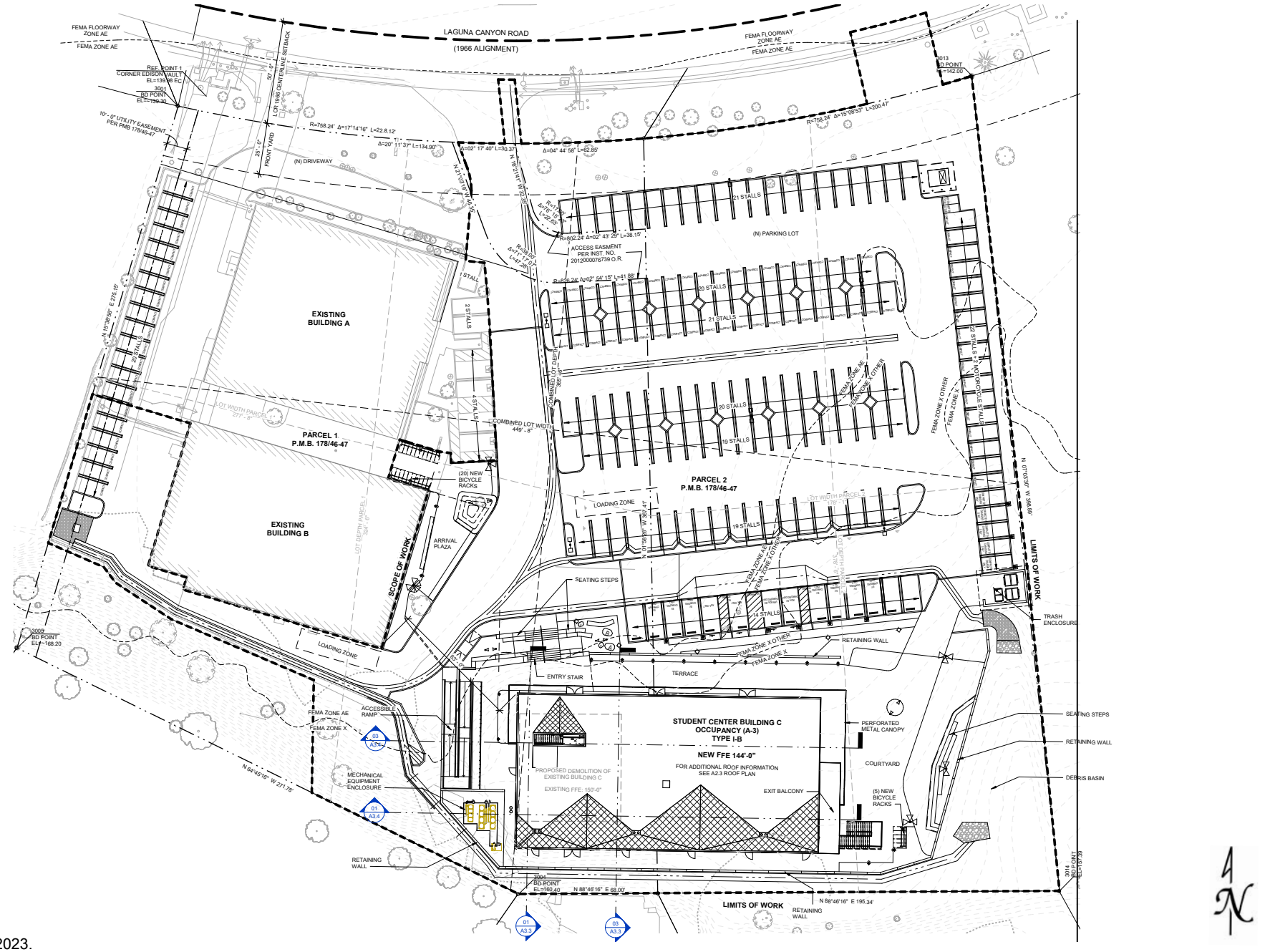
View 5: View of Building C.

View 6: View of Building C Looking East.

View 7: View of Building C Looking South.

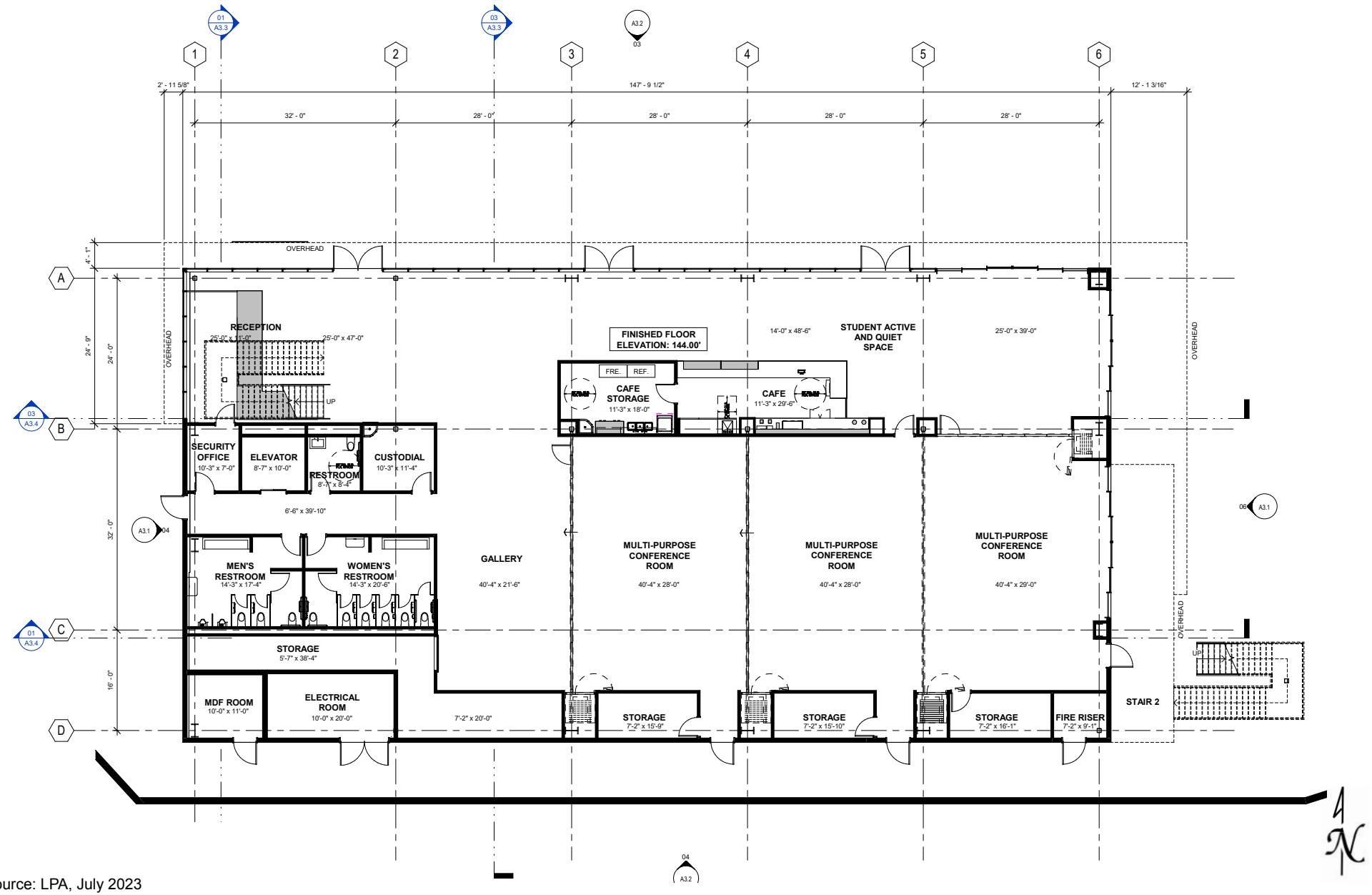
View 8: View Looking East from Building C.

Figure 4
Views of the Project Site



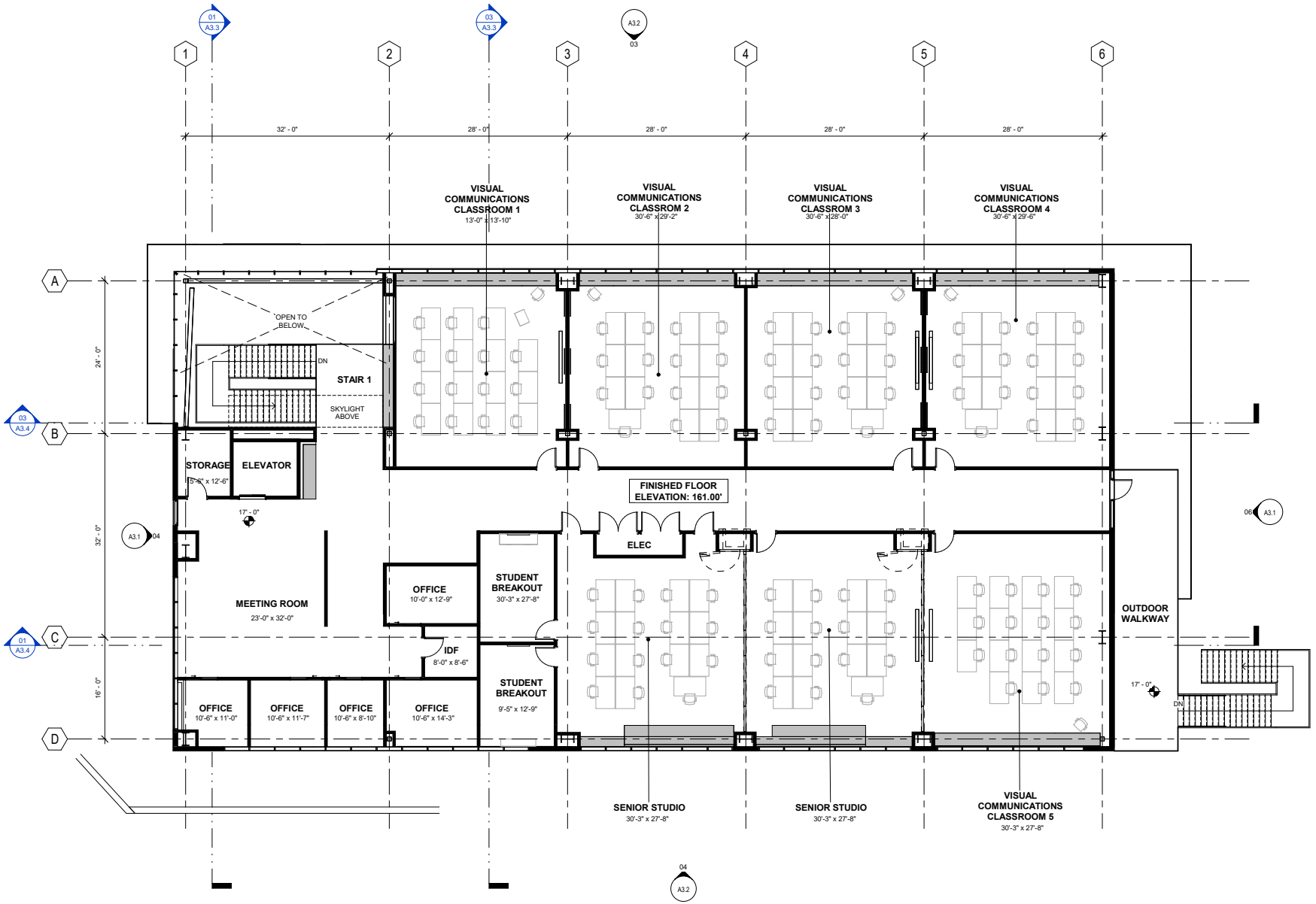
Source: LPA, July 2023.

Figure 5
Project Site Plan



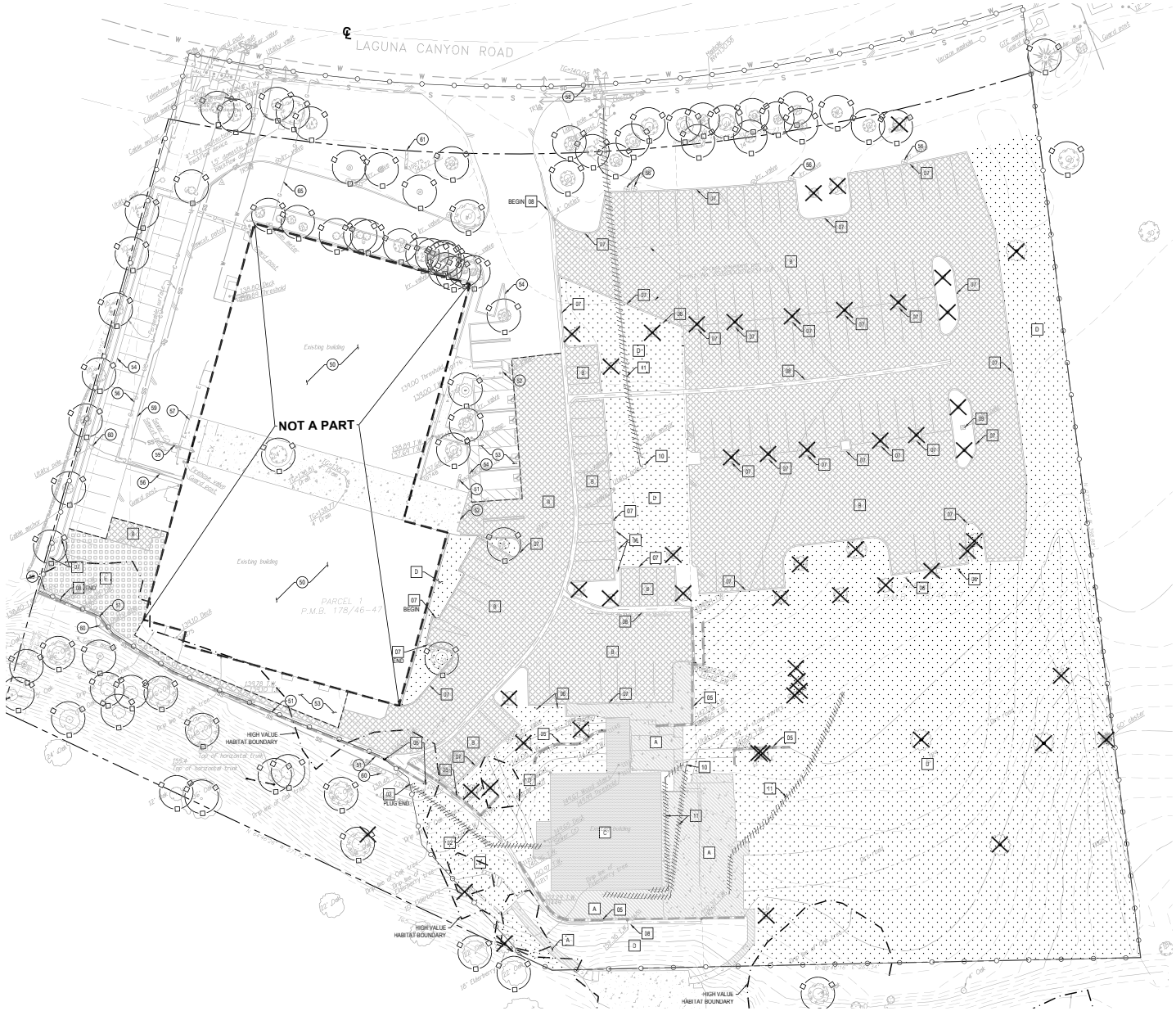
Source: LPA, July 2023

Figure 6
1st Floor Plan



Source: LPA, July 2023.

Figure 7
2nd Floor Plan



DEMOLITION LEGEND

LABEL	DESCRIPTION
A	REMOVE (E) CONCRETE PAVEMENT/FLATWORK.
B	REMOVE (E) AC PAVEMENT.
C	REMOVE (E) BUILDING STRUCTURE AND ATTACHED EXTERIOR STAIRS.
D	REMOVE (E) LANDSCAPING AND ASSOCIATED IRRIGATION SYSTEMS WHERE APPLICABLE. SEE LANDSCAPE AND IRRIGATION PLANS FOR IMPROVEMENTS.
E	REMOVE (E) TURF BLOCK PAVERS. SEE LANDSCAPE MATERIALS PLAN AND PAVING PLAN FOR IMPROVEMENTS.
	REMOVE (E) TREE. SEE SHEETS L7.03, L7.04, & L7.05 FOR TREE PROTECTION AND TREE REMOVAL PLANS.
	(E) TREE TO REMAIN AND BE PROTECTED. SEE SHEETS L7.03, L7.04, & L7.05 FOR TREE PROTECTION AND TREE REMOVAL PLANS.
	SAWCUT (E) PAVEMENT AS NEEDED.
	APPROXIMATE LIMIT OF WORK.
////////////	REMOVE (E) UTILITY.

DEMOLITION KEYNOTES

KEY NOTE	DESCRIPTION
01	REMOVE (E) STORM DRAIN PIPE AND APPURTENANCES. SEE DRAINAGE PLAN FOR IMPROVEMENTS.
02	REMOVE (E) SANITARY SEWER PIPE AND APPURTENANCES. SEE UTILITY PLAN FOR IMPROVEMENTS.
03	REMOVE (E) WATER PIPE AND APPURTENANCES. SEE UTILITY PLAN FOR IMPROVEMENTS.
04	REMOVE (E) IRRIGATION WATER LINE AND APPURTENANCES. SEE IRRIGATION PLANS FOR IMPROVEMENTS.
05	REMOVE (E) RETAINING WALL AND FOOTING.
06	REMOVE (E) SIGN AND FOOTING.
07	REMOVE (E) CURB/CURB & GUTTER.
08	REMOVE (E) V-GUTTER.
09	REMOVE (E) LIGHT STANDARD AND FOOTING. SEE ELECTRICAL PLANS FOR IMPROVEMENTS.
10	REMOVE (E) LIGHT FIXTURE AND ASSOCIATED CONDUIT. SEE ELECTRICAL PLANS FOR REMOVAL OF (E) SCE POWER POLE AND ASSOCIATED POWER LINES.
11	COORDINATE REMOVAL OF OVERHEAD/UNDERGROUND POWER AND COMMUNICATIONS LINES WITH ELECTRICAL PLANS AND UTILITY CONSULTANT PLANS.

PROTECTION LEGEND

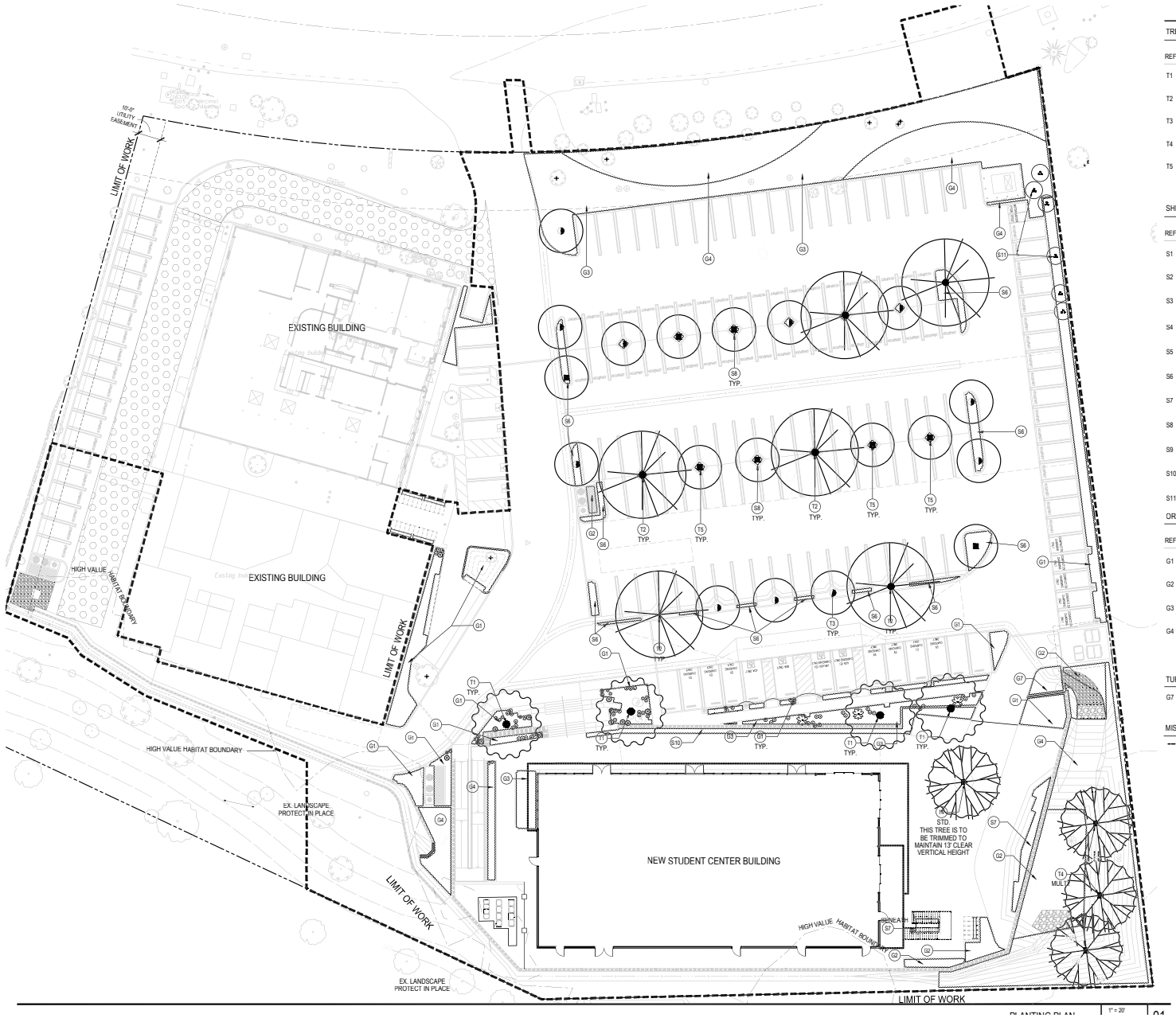
LABEL	DESCRIPTION
	CONTRACTOR TO INSTALL CONSTRUCTION FENCE AT PROJECT PERIMETER TO PROTECT HIGH VALUE HABITAT AREA OUTSIDE THE LIMIT OF WORK. FENCE SHOWN ON PLAN IS SCHEMATIC, CONTRACTOR TO USE DISCRETION IN FENCE PLACEMENT.

PROTECTION KEYNOTES

KEY NOTE	DESCRIPTION
50	PROTECT (E) BUILDING, FOUNDATION AND OTHER STRUCTURAL FEATURES AND BUILDING UTILITIES.
51	PROTECT (E) RETAINING WALL.
52	PROTECT (E) CONCRETE PAVEMENT/SIDEWALK.
53	PROTECT (E) AC PAVEMENT.
54	PROTECT (E) CURB AND/OR GUTTER.
55	PROTECT (E) V-GUTTER.
56	PROTECT (E) WATER SERVICE FACILITIES.
57	PROTECT (E) ELECTRICAL FACILITIES.
58	PROTECT (E) STORM DRAIN FACILITIES.
59	PROTECT (E) SANITARY SEWER FACILITIES.
60	PROTECT (E) UTILITY POLE AND CONDUIT.
61	PROTECT (E) MONUMENT AND/OR SIGN POST.
62	PROTECT (E) FENCE.
63	PROTECT (E) IRRIGATION FACILITIES.
64	PROTECT (E) LIGHT STANDARD AND FOOTING. SEE ELECTRICAL PLANS FOR IMPROVEMENTS.
65	PROTECT (E) GAS FACILITIES.

Source: LPA, July 2023.

Figure 8
Demolition Plan



PLANTING LEGEND

TREE LIST (NCN.)- NO COMMON NAME (*)- UNLESS NOTED ON PLAN

REF.	QTY.	SYM.	DESCRIPTION	SIZE/ SPACING	COMMENTS/ DETAIL	WUCOLS	MATURE HEIGHT	MAINTAINED HEIGHT
T1			CERCIS OCCIDENTALIS/ WESTERN REDBUD	36" BOX/ PER PLAN	MULTI. 01/ L7.02	L	20'-40' H x 20'-30' W	40' H x 30' W
T2			QUERCUS AGRIFOLIA/ COAST LIVE OAK	48" BOX/ PER PLAN	STD. 01/ L7.02	M	40'-80' H x 60'-100' W	80' H x 100' W
T3			GEIJERA PARVIFLORA/ AUSTRALIAN WILLOW	36" BOX/ PER PLAN	STD. 01/ L7.02	L	25'-30' H x 20' W	30' H x 20' W
T4			PLATANUS RACEMOSA/ CALIFORNIA SYCAMORE	48" BOX/ PER PLAN	STD. & MULTI. 01/ L7.02	M	30'-80' H x 20'-50' W	80' H x 50' W
T5			LOPHOSTEMON CONFERTUS/ BRISBANE BOX	36" BOX/ PER PLAN	STD. 01/ L7.02	M	30'-40' H x 25' W	40' H x 25' W
			EXISTING TREE/ PLATANUS RACEMOSA/ CALIFORNIA SYCAMORE	PROTECT IN PLACE				

SHRUB LIST

REF.	QTY.	SYM.	DESCRIPTION	SIZE/ SPACING	COMMENTS/ DETAIL	WUCOLS	MATURE HEIGHT	MAINTAINED HEIGHT
S1	AS SHOWN		ACHILLEA X 'MOONSHINE'/ MOONSHINE ACHILLEA	1 GAL/ 12" O.C.	03.09/ L7.02	M	18" H x 24" W	18" H x 24" W
S2	AS SHOWN		AEONIUM URBICUM SAUCER PLANT	5 GAL/ PER PLAN	03.09/ L7.02	L	24" H x 36" W	18" H x 36" W
S3	AS SHOWN		AGAVE ATTENUATA/ FOXTAIL AGAVE	5 GAL/ PER PLAN	03.09/ L7.02	L	4'-5' H x 6'-8' W	5' H x 8' W
S4	AS SHOWN		ALOE STRIATA/ CORAL ALOE	5 GAL/ 18" O.C.	03.09/ L7.02	L	2'-3' H x 1'-2' W	18" H x 2' W
S5	AS SHOWN		CALANDRINIA S. 'SHINING PINK'/ SHINING PINK ROCK PURSLANE	5 GAL/ PER PLAN	03.09/ L7.02	L	8"-12" H x 8"-12" W	12" H x 12" W
S6	AS REQ'D		DIANELLA 'CASSA BLUE'/ CASA BLUE FLAX LILY	5 GAL/ 24" O.C.	03.09/ L7.02	M	1'-2' H x 1'-2' W	18" H x 2' W
S7	AS REQ'D		JUNCUS PATENS 'ELK BLUE' / CALIFORNIA GRAY RUSH	5 GAL/ 24" O.C.	03.09/ L7.02	L	1'-2' H x 1'-2' W	18" H x 2' W
S8	AS REQ'D		LANTANA MONTEVIDENSIS / TRAILING LANTANA	5 GAL/ 36" O.C.	03.09/ L7.02	L	1'-2' H x 3'-5' W	18" H x 5' W
S9	AS REQ'D		LIMONIUM PEREZII / SEA LAVENDER	5 GAL/ 24" O.C.	03.09/ L7.02	L	2'-3' H x 2'-3' W	18" H x 3' W
S10	AS REQ'D		SENECIO MANDRALISCAE/ BLUE CHALK STICKS	1 GAL/ 12" O.C.	03.09/ L7.02	L	1'-3' H x 2'-3' W	12" H x 3' W
S11	AS REQ'D		SAMBUCUS SPP./ ELDERBERRY	15 GAL/ PER PLAN	03.09/ L7.02	M	10'-12' H x 10'-12' W	8' H x 8' W

ORNAMENTAL GRASSES

REF.	QTY.	SYM.	DESCRIPTION	SIZE/ SPACING	COMMENTS/ DETAIL	WUCOLS	MATURE HEIGHT	MAINTAINED HEIGHT
G1	AS REQ'D		CAREX DIVULSA/ EUROPEAN GRAY SEDGE	1 GAL/ 18" O.C.	03.09/ L7.02	L	1'-2' H x 1'-2' W	2' H x 2' W
G2	AS REQ'D		CAREX PANSA/ DUNE SEDGE	1 GAL/ 18" O.C.	03.09/ L7.02	M	6"-8" H x 1'-2' W	8" H x 2' W
G3	AS REQ'D		FESTUCA MAIREI/ ATLAS FESCUE	5 GAL/ 30" O.C.	03.09/ L7.02	L	2'-3' H x 2'-3' W	3' H x 3' W
G4	AS REQ'D		LOMANDRA BREEZE / DWARF MAT RUSH	5 GAL/ 36" O.C.	03.09/ L7.02	L	2'-3' H x 2'-4' W	3' H x 4' W

TURF

G7	AS REQ'D		TURF	SOD		H

MISCELLANEOUS SYMBOLS

----	ROOT BARRIER	08/ L7.02

PLANTING NOTES:

THE CONTRACTOR MUST FAMILIARIZE HIMSELF WITH THE EXISTING IRRIGATION, GRADING AND PLANTING OF THIS PROPERTY AND ON THE ADJACENT PROPERTIES. ANY DAMAGE OR ADJUSTMENTS REQUIRED INCLUDING REPLACING OR RELOCATING IRRIGATION LINES, HEADS, VALVES, WIRES OR ANY UTILITY THAT OCCURS ON THE PARCEL DUE TO THE GRADING AND CONSTRUCTION OF THIS PROJECT IS THE SOLE RESPONSIBILITY OF THE CONTRACTOR AND SHALL BE PERFORMED AT NO ADDITIONAL COST TO THE OWNER. THE OWNER'S REP. MUST REVIEW ANY REQUIRED MODIFICATIONS TO THESE AREAS PRIOR TO COMMENCING WORK. THE CONTRACTOR MUST NOTIFY THE OWNER'S AUTHORIZED REP. OF THESE CONDITIONS OR ANY DISCREPANCIES PRIOR TO COMMENCING WORK. TYP. ENTIRE SITE.

Source: LPA, July 2023.

Figure 9
Planting Plan

10. Other Public Agencies Whose Approval Is Required:

No other approvals by outside public agencies are required.

11. Have California Native American Tribes Traditionally and Culturally Affiliated with the Project Area Requested Consultation Pursuant to Public Resources Code Section 21080.3.1:

AB 52 notification letters were sent to tribal representatives for the Gabrieleno Band of Mission Indians – Kizh Nation, Gabrielino Tongva Indians of California Tribal Council, Juaneno Band of Mission Indians Acjachemen Nation – Belardes, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrielino-Tongva Tribe Juaneno Band of Mission Indians Acjachemen Nation – Romerio, Gabrieleno/Tongva Nation, Juaneno Band of Mission Indians Acjachemen Nation, and Soboba Band of Luiseno Indians. No requests for consultation were received.

II. INITIAL STUDY CHECKLIST

B. ENVIRONMENTAL FACTORS POTENTIALLY AFFECTED

The environmental factors that would be potentially affected by this project and are mitigated to a less than significant impact are indicated below.

☐ Aesthetics	☐ Agriculture and Forestry Resources	☐ Air Quality
☒ Biological Resources	☒ Cultural Resources	☐ Energy
☐ Geology/Soils	☐ Greenhouse Gas Emissions	☐ Hazards & Hazardous Materials
☐ Hydrology/Water Quality	☐ Land Use/Planning	☐ Mineral Resources
☐ Noise	☐ Population/Housing	☐ Public Services
☐ Recreation	☐ Transportation/Traffic	☐ Tribal Cultural Resources
☐ Utilities/Service Systems	☐ Wildfire	☐ Mandatory Findings of Significance

C. DETERMINATION

On the basis of this initial evaluation:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☒ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because of the incorporated mitigation measures and revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☐ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

Anthony Viera	July 31, 2023
Signature	Date
Anthony Viera	Principal Planner

D. EVALUATION OF ENVIRONMENTAL IMPACTS

1) A brief explanation is required for all answers except "No Impact" answers that are adequately supported by the information sources cited. A "No Impact" answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A "No Impact" answer should be explained where it is based on project-specific factors as well as general standards.

2) All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect, and construction as well as operational impacts.

3) A "Less Than Significant Impact" applies when the proposed project would not result in a substantial and adverse change in the environment. This impact level does not require mitigation measures.

4) "Potentially Significant Impact" is appropriate if there is substantial evidence that an effect is significant. If there are one or more "Potentially Significant Impact" entries when the determination is made, an EIR is required.

5) "Potentially Significant Unless Mitigation Incorporated" applies where the incorporation of mitigation measures has reduced an effect from "Potentially Significant Impact" to a "Less Than Significant Impact." The initial study must describe the mitigation measures and briefly explain how they reduce the effect to a less than significant level.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
1. AESTHETICS. Except as provided in Public Resources Code Section 21099 would the project:				
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcrops, and historic buildings within a state scenic highway?	☐	☐	☐	☒
c) In non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	☐	☐	☒	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?	☐	☐	☒	☐

Regulatory Setting

Regulations exist at state and local levels that guide development and influence the physical form and aesthetic character of the City. These include:

- California Scenic Highway Program
- Laguna Beach General Plan Landscape and Scenic Highways Element
- Laguna Beach Landscape and Scenic Highways Resource Document
- Laguna Beach Municipal Code

Environmental Setting

Scenic Vistas and Scenic Resources

The Laguna Beach Landscape and Scenic Highways Resource Document (LSHRD), which was adopted along with the Landscape and Scenic Highways Element, provides guidelines for the preservation and enhancement of the City's landscape and scenic streets. These documents outline a vision and overview of landscape issues; including goals, policies, and implementing action items for topics that include Neighborhood Character, View Management, Scenic Highways, Streetscape/Parks, Heritage Trees, Fire Safety, Landform Stability, and Design and Maintenance.[1] Scenic resources in the City consist predominantly of the San Joaquin Hills that surround the City and the Pacific Ocean to the west. Public

[1] Laguna Beach Landscape and Scenic Highways Resource Document, November 2018. Page 1.

views of these resources are primarily available from Coast Highway, Laguna Canyon Road, other local roads, and public areas such as parks, beaches, and trails.[2]

Scenic corridors are defined as the land adjacent to a scenic highway, outside of the right-of-way that is being viewed from the road. The LSHRD and Landscape and Scenic Highways Element do not specify any designated scenic vistas.

State Scenic Highways

The Landscape and Scenic Highways Element defines scenic highways and corridors within the City. Scenic highways are defined as roadways located in an area of outstanding natural beauty and that provide exceptional views of natural landscapes and attractive man-made development.

Coast Highway, Laguna Canyon Road, and El Toro Road are three arterial roads within and adjacent to Laguna Beach that meet the City's scenic highways designation guidelines as defined by the Landscape and Scenic Highways Element. Orange County considers Coast Highway, Laguna Canyon Road, and El Toro Road as Viewscape Corridors in the County's Scenic Highway Plan. Caltrans considers Coast Highway eligible as a State Scenic Highway in their Scenic Highway Program, but it is not a designated State Scenic Highway and there are no State Scenic Highways in the City.

Visual Character

The City consists of natural open space areas such as beaches, canyons, and hillsides; commercial development; residential development; and public open spaces such as parks and community gardens. Open space areas are vegetated with native plants. Laguna Canyon, with its year-round water source, supports arroyo willow, California sycamore, and coast live oaks, creating areas of shady forest within the coastal sage scrub setting.

The project site is shown as neighborhood landscape area 4, Laguna Canyon, on the Neighborhood Landscape Areas map in the City's Landscape and Scenic Highways Element. The project site area is located as Zone 3: Laguna Canyon Road in the Scenic Highways Map in the LSHRD. According to the LSHRD, the project area is designated as Zone 3—Big Bend to Canyon Acres, in LSHRD Figure SH-1. Zone 3 is characterized as having steep canyon walls that enclose a mixture of light industrial, office, educational, and residential uses, bordered by the Laguna Wilderness Park. Zone 3 Guidelines include the following:

1. Utilize the tree and shrub planting palette of the LCAD as a model for landscape improvements in Laguna Canyon.

2. Improve the appearance of this area through the placement of trees and screening in parking areas, the relocation of trash and storage areas, landscaped parkways, and street trees.

3. Provide continuous pedestrian pathways along both sides of the road.

Zone 3 Guidelines recommend the use of Coast Live Oak as street trees and California Sycamore and California Pepper as accent trees.

[2] Laguna Beach General Plan, Land Use Element, Scenic Highway Plan, December 7, 2011. Page 5-2.

Light and Glare

The City is developed with established existing sources of light and glare, such as streetlights and parking lights, walkway lights, lighted recreational facilities, and light emitted from residential and nonresidential buildings. Laguna Beach has adopted ordinances to reduce artificial lighting and glare from buildings and outdoor areas.

The project site is developed with existing school uses. Laguna Canyon Road has existing street lighting typical for the City.

Checklist Discussion

a) Would the project have a substantial adverse effect on a scenic vista?

Less than Significant Impact. Impacts to scenic vistas occur when a project is of enough height and massing to obscure designated scenic vistas. Although the City's General Plan does not include any designated scenic vistas, the Landscape and Scenic Highways Element does define scenic highways and corridors. According to the City's Landscape and Scenic Highways Element, Laguna Canyon Road and its unique canyon environment creates a dramatic scenic corridor and entrance to the City. The LSHRD divides the scenic highways into zones. Laguna Canyon Road is further divided into five zones. The project site area is located as Zone 3: Laguna Canyon Road in the Scenic Highways Map in the LSHRD. Steep canyon walls enclose the Zone 3 portion of Laguna Canyon Road and views are limited.

The project would demolish the existing Building C and asphalt parking lot and construct a two-story Student Center, a new parking lot, and other associated improvements. The Student Center would be 34 feet, 6 inches high and located at the southeastern corner of the site, in the approximate location of the existing Building C and in an area farthest from Laguna Canyon Road.

The Student Center is separated visually from Laguna Canyon Road by mature trees between the roadway edge and the existing parking area. Many of these trees would remain and would not be removed. There would be no changes to or obstruction of views of canyon hills from the new Student Center due to the distance of the roadway to the Student Center and the less than 35-foot building height of the Student Center.

The project would include parking lot changes, including tree removal, new lighting, and new landscaping. None of these components would be large enough to obstruct views of the canyon hills. Therefore, none of the project components, would substantially obstruct views of the canyon hills. **Impacts would be less than significant**.

b) Would the project substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State scenic highway?

No Impact. According to the City's Landscape and Scenic Highways Element, Laguna Canyon Road meets the City's scenic highways designation guidelines. However, Laguna Canyon Road is not designated as a state scenic highway. **Therefore, the project would have no impact on designated state scenic highways.** See a) for a discussion of project impacts to scenic resources, including City scenic corridors.

c) Would the project, in non-urbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced

from publicly accessible vantage point). If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?

Less than Significant Impact. An impact would occur if the project substantially degraded the existing visual character or quality of public views of the site and its surroundings or conflicts with applicable zoning and other regulations governing scenic quality. The project site is within Zone 3 (as defined in the LSHRD) and is characterized as a mixture of light industrial, office, and residential uses. As stated in the LSHRD, the area has a predominately industrial character with a significant amount of visible parking, as well as exposed service yards and storage areas and the area is developed with a mixture of light industrial, office, and residential uses. Per the LSHRD, the frequency and random locations of vehicular access points and the amount of paved surface dedicated to motor vehicles is a significant factor in creating the poor visual image of this zone at eye level.

The project would demolish the existing Building C and asphalt parking lot and construct a two-story Student Center, a new parking lot, and other associated improvements. The project would be constructed on a site previously developed with LCAD uses. The Student Center exterior building materials would include a metal panel system and perforated metal screening, both patinaed copper. Windows would include laminated IGU glazing. Landscaping improvements would include planting of drought resistant trees, shrubs, and ornamental grasses. New lighting would be installed on the Student Center and new parking lot.

The project would replace an aging building set back from the street with a new building constructed of materials that would blend into the surrounding natural landscape. Building height, massing, and materials would be consistent with the City's Zoning Code and goals and regulations related to visual quality.

Landscape improvements on the site would be maintained at proper heights and dimensions consistent with City codes for landscaping and shrubbery and consistent with the surrounding natural, native landscape in the canyon. Lighting improvements on the site would be consistent with City lighting standards. Therefore, the project components would not substantially degrade the existing visual character or quality of public views of the site and its surroundings or conflict with any applicable zoning or other regulations governing scenic quality**. Impacts would be less than significant**.

d) Would the project create a new source of substantial light or glare which would adversely affect day or nighttime views in the area?

Less than Significant Impact. Impacts from light and glare would occur if the project created a new source of substantial light or glare adversely affecting day or nighttime views in the area. The project would be constructed on a site previously developed with LCAD uses and which includes site and building lighting. The Student Center exterior building materials would include a metal panel system and perforated metal screening, both patinaed copper. These materials would not be highly reflective. Windows would include laminated IGU glazing and would not be highly reflective.

New lighting would be installed on the Student Center and new parking lot. These lighting improvements on the site would be selected for their ability to safely light the site with no off-site overspill of light. All lighting would be consistent with City lighting standards including the Good Neighbor Outdoor Lighting Ordinance and would not introduce a new source of substantial light. **Therefore, the project would have a less than significant impact on light and glare.**

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
2. AGRICULTURE AND FORESTRY RESOURCES. Would the project:				
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to nonagricultural use?	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☒
c) Conflict with existing zoning for, or cause rezoning of, forestland (as defined in Public Resources Code Section 12220(g)), timberland (as defined by Public Resources Code Section 4526), or timberland zoned Timberland Production (as defined by Government Code Section 51104(g))?	☐	☐	☐	☒
d) Result in the loss of forestland or conversion of forestland to non-forest use?	☐	☐	☐	☒
e) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland to nonagricultural use or conversion of forestland to non-forest use?	☐	☐	☐	☒

Regulatory Setting

The Department of Conservation, the Division of Land Resource Protection (DLRP) serves as the state's leader in conserving California's agricultural lands. The Department of Conservation's Farmland Mapping and Monitoring Program (FMMP) produces maps and statistical data used for analyzing impacts on California's agricultural resources.

The DLRP also collects data on Williamson Act contracts, which are formed between a county or city and a landowner for the purpose of restricting specific parcels of land to agricultural or related open space use. Private land within locally designated agricultural preserve areas is eligible for enrollment under a contract. The minimum term for contracts is ten years.

Environmental Setting

The City of Laguna Beach is an urban environment designated for residential, commercial, and manufacturing use and is essentially built out. There is no land within the City of Laguna Beach designated as farmland, forest, or timber production nor are there any existing agricultural, farmland, forest, or timber production uses. Pursuant to the Farmland Mapping and Monitoring Program, the City is

designated as Urban and Built-Up Land.[3] The project site is designated as Industrial in the General Plan and zoned as M-1A, Light Industrial. The project site is not under a Williamson Act contract.

Checklist Discussion

a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?

No Impact. The project would result in a significant impact if it would convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland) to urbanized or developed uses. The State of California's Farmland Mapping and Monitoring Program does not identify any lands in the City or on the project site as "Prime Farmland, Unique Farmland, Farmland of Statewide Importance, or Farmland of Local Importance." Therefore, the project would not convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use as there is no land designated as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance in the City or project site. **Therefore, no impact would occur.**

b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?

No Impact. The project would result in a significant impact if it would conflict existing forest use or timber production zoning or with forest use or timber production uses. The project site is zoned as M-1A, Light Industrial and the site is not under a Williamson Act contract. **Therefore, no impact would occur to Williamson Act contracts.**

c) Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?

No Impact. The project would result in a significant impact if it would conflict existing agricultural zoning or with a Williamson Act contract. The City of Laguna Beach does not have any land that is designated or zoned for forest use or timber production. **Therefore, no impact would occur to forestland or timberland.**

d) **Result in the loss of forest land or conversion of forest land to non-forest use?**

No Impact. The project would result in a significant impact if it would result in the loss of an existing forestland or conversion of forestland to non-forestland uses. The City of Laguna Beach does not have any land that is designated or zoned for forest use or timber production. **Therefore, no impact would occur.**

e) **Conflict with existing zoning for, or cause rezoning of, forest land (as defined in Public Resources Code section 12220(g)), timberland (as defined by Public Resources Code section 4526), or timberland zoned Timberland Production (as defined by Government Code section 51104(g))?**

No Impact. The project would not result in changes in the existing environment with the potential to convert any Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to a non-agricultural use or convert forestland to a non-forest use as there is no farmland or forestland in the City**. Therefore, no impact would occur.**

[3] California Department of Conservation, California Important Farmland Finder. Accessed at DLRP Important Farmland Finder (ca.gov).

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
3. AIR QUALITY. Would the project:				
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is nonattainment under an applicable federal or state ambient air quality standard?	☐	☐	☒	☐
c) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐
d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?	☐	☐	☒	☐

Regulatory Setting

Regulations exist at federal, state, and local levels with regard to air quality and include:

- Federal Clean Air Act
- California Clean Air Act
- State Implementation Plan
- California Energy Code
- Regional Air Quality Strategy
- South Coast Air Quality Management District Rules and Regulations

Environmental Setting

Both the U.S. Environmental Protection Agency (USEPA) and the California Air Resources Board (CARB) have established ambient air quality standards for common pollutants. Ambient air quality standards are set to protect public health and are levels of pollutants which represent safe levels that avoid specific adverse health effects. The ambient air quality standards cover what are called "criteria" pollutants because the health and other effects of each pollutant are described in criteria documents. The major criteria pollutants are ozone, carbon monoxide, nitrogen dioxide, and particulate matter. Both federal and state ambient air quality standards apply, as established by the U.S. Environmental Protection Agency (USEPA) and state air quality agencies (CALEPA for California). California air quality standards are generally more stringent than federal standards.

The City of Laguna is within the South Coast Air Basin (basin). In Orange County, the South Coast Air Quality Management District (SCAQMD) is the agency responsible for protecting public health and welfare through the administration of federal and state air quality laws and policies. This regional agency regulates air quality through its permit authority over most types of stationary emission sources and through its planning and review process.

Attainment Designations

Specific geographic areas that do not meet federal air quality standards (National Ambient Air Quality Standards [NAASQS]) or state air quality standards (California Ambient Air Quality Standards [CAAQS]) for a particular air quality pollutant are in "nonattainment" areas for the pollutant. The current federal and state attainment status for the basin is provided in **Table 1, Federal and State Air Quality Designations in the South Coast Air Basin**.

Table 1
South Coast Air Basin Attainment Status

Pollutant	Standard[1]	Averaging Time	Designation[2]	Attainment Date[3]
1-Hour Ozone	NAAQS	1979 1-Hour (0.12 ppm)	Nonattainment (Extreme)	2/6/2023 (not attained)[4]
	CAAQS	1-Hour (0.09 ppm)	Nonattainment	N/A
8-Hour Ozone[5]	NAAQS	1997 8-Hour (0.08 ppm)	Nonattainment (Extreme)	6/15/2024
	NAAQS	2008 8-Hour (0.075 ppm)	Nonattainment (Extreme)	7/20/2032
	NAAQS	2015 8-Hour (0.070 ppm)	Nonattainment (Extreme)	8/3/2038
	CAAQS	8-Hour (0.070 ppm)	Nonattainment	Beyond 2032
CO	NAAQS	1-Hour (35 ppm)	Attainment (Maintenance)	6/11/2007 (attained)
	CAAQS	8-Hour (9 ppm)	Attainment	6/11/2007 (attained)
NO_2[6]	NAAQS	1-Hour (0.1 ppm)	Unclassifiable/Attainment	N/A (attained)
	NAAQS	Annual (0.053 ppm)	Attainment (Maintenance)	9/22/1998 (attained)
	CAAQS	1-hour (0.18 ppm) Annual (0.030 ppm)	Attainment	-
SO_2[7]	NAAQS	1-Hour (75 ppb)	Designations Pending (expect Uncl./Attainment)	N/A (attained)
	NAAQS	24-Hour (0.14 ppm) Annual (0.03 ppm)	Unclassifiable/Attainment	3/19/1979 (attained)
PM10	NAAQS	1987 24-Hour (150 µg/m^3)	Attainment (Maintenance)[8]	7/26/2013 (attained)
	CAAQS	24-Hour (50 µg/m^3) Annual (20 µg/m^3)	Nonattainment	N/A
PM2.5[9]	NAAQS	2006 24-Hour (35 µg/m^3)	Nonattainment (Serious)	12/31/2019
	NAAQS	1997 Annual (15.0 µg/m^3)	Attainment	8/24/2016
	NAAQS	2021 Annual (12.0 µg/m^3)	Nonattainment (Serious)	12/31/2025

Table 1
South Coast Air Basin Attainment Status

	CAAQS	Annual (12.0 µg/m^3)	Nonattainment	N/A
Lead	NAAQS	3-Months Rolling (0.15 µg/m^3)	Nonattainment (Partial)[10]	12/31/2015

Notes:
Source: http://www.aqmd.gov/docs/default-source/clean-air-plans/air-quality-management-plans/naaqs-caaqs-feb2016.pdf
[1] NAAQS = National Ambient Air Quality Standards, CAAQS = California Ambient Air Quality Standards
[2] U.S. EPA often only declares Nonattainment areas; everywhere else is listed as Unclassifiable/Attainment or Unclassifiable.
[3] A design value below the NAAQS for data through the full year or smog season prior to the attainment date is typically required for attainment demonstration.
[4] 1-hour O3 standard (0.12 ppm) was revoked, effective June 15, 2005 ; however, the Basin has not attained this standard based on 2008-2010 data and is still subject to anti-backsliding requirements.
[-*5] 1997 8-hour O3 standard (0.08 ppm) was reduced (0.075 ppm), effective May 27, 2008; the revoked 1997 O3 standard is still subject to anti-backsliding requirements.
[6] New NO2 1-hour standard, effective August 2, 2010; attainment designations January 20, 2012; annual NO2 standard retained.
[7] The 1971 annual and 24-hour SO2 standards were revoked, effective August 23, 2010; however, these 1971 standards will remain in effect until one year after U.S. EPA promulgates area designations for the 2010 SO2 1-hour standard. Area designations are still pending, with Basin expected to be designated Unclassifiable /Attainment.
[8] Annual PM10 standard was revoked, effective December 18, 2006; 24-hour PM10 NAAQS deadline was 12/31/2006; SCAQMD request for attainment redesignation and PM10 maintenance plan was approved by U.S. EPA on June 26, 2013, effective July 26, 2013.
[9] Attainment deadline for the 2006 24-Hour PM2.5 NAAQS (designation effective December 14, 2009) is December 31, 2019 (end of the 10th calendar year after effective date of designations for Serious nonattainment areas). Annual PM2.5 standard was revised on January 15, 2013, effective March 18, 2013, from 15 to 12 µg/m3. Designations effective April 15, 2015, so Serious area attainment deadline is December 31, 2025.
[10] Partial Nonattainment designation – Los Angeles County portion of Basin only for near-source monitors. Expect redesignation to attainment based on current monitoring data.

Air Quality Management Plan

Every three (3) years the SCAQMD prepares a new AQMP, updating the previous plan and having a 20-year horizon. The 2022 AQMP was adopted December 2, 2022, by SCAQMD. The 2022 AQMP was then approved and adopted by CARB on January 26, 2023.

The 2022 AQMP builds upon measures already in place from previous AQMPs. It also includes a variety of additional strategies such as regulation, accelerated deployment of available cleaner technologies (e.g., zero emissions technologies, when cost-effective and feasible, and low NOx technologies in other applications), best management practices, co-benefits from existing programs (e.g., climate and energy efficiency), incentives, and other CAA measures to achieve the 2015 8-hour ozone standard. The 2022 AQMP includes both stationary and mobile source strategies to ensure that rapidly approaching attainment deadlines are met, that public health is protected to the maximum extent feasible, and that the region is not faced with burdensome sanctions if the Plan is not approved or if the NAAQS are not met on time.

Sensitive Receptors

CARB and the Office of Environmental Health Hazard Assessment (OEHHA) have identified the following groups of individuals as the most likely to be affected by air pollution: the elderly over 65, children under 14, infants (including in utero in the third trimester of pregnancy), and persons with cardiovascular and chronic respiratory diseases such as asthma, emphysema, and bronchitis. Some land uses are considered

more sensitive to air pollution than others due to the types of population groups or activities involved and are referred to as sensitive receptors.

For purposes of CEQA, the SCAQMD considers a sensitive receptor to be a location where a sensitive individual could remain for 24 hours, such as residences, hospitals, or convalescent facilities.[4] Commercial and industrial facilities are not included in the definition because employees do not typically remain on-site for 24 hours.

The closest sensitive receptors to the project site include: the existing single-family residential uses associated with the artist studio located at 2795 Laguna Canyon Road, approximately 20 feet west of the project site boundary; the single-family residential use located at 2775 Laguna Canyon Road, approximately 75 feet west of the project site boundary; the multi-family residential uses located at 2745 Laguna Canyon Road, approximately 180 feet west of the project boundary, the single-family residential use located at 2735 Laguna Canyon Road, approximately 225 feet west of the project site boundary; the single-family residential uses located at 2999 Laguna Canyon Road, approximately 590 feet northeast of the project site boundary, and the residential uses located east of Laguna Canyon Road, north and south of Castle Rock Road approximately 0.21 miles (1,098 feet) northeast of the Project Site.

The project site is within the Industrial General Plan land use designation. The industrial section of the City is confined to Laguna Canyon, where approximately 65 acres of land is zoned for light industrial and limited commercial activities. This category refers to the industrial or manufacturing base of the City and allows a mixture of light and heavy industrial uses as defined in the Municipal Code. Residential uses are prohibited, except for "artists-in-residence" activities.

Checklist Discussion

a) Conflict with or obstruct implementation of the applicable air quality plan?

Less Than Significant Impact. The California Environmental Quality Act (CEQA) requires a discussion of any inconsistencies between a proposed project and applicable General Plans and Regional Plans (CEQA Guidelines Section 15125). The regional plan that applies to the proposed project includes the SCAQMD Air Quality Management Plan (AQMP). Therefore, this section discusses any potential inconsistencies of the proposed project with the AQMP.

The purpose of this discussion is to set forth the issues regarding consistency with the assumptions and objectives of the AQMP and discuss whether the proposed project would interfere with the region's ability to comply with Federal and State air quality standards. If the decision-makers determine that the proposed project is inconsistent, the lead agency may consider project modifications or inclusion of mitigation to eliminate the inconsistency.

The SCAQMD CEQA Handbook states that "New or amended General Plan Elements (including land use zoning and density amendments), Specific Plans, and significant projects must be analyzed for consistency with the AQMP." Strict consistency with all aspects of the plan is usually not required. A proposed project should be considered to be consistent with the AQMP if it furthers one or more policies and does not

[4] Source: SCAQMD 2008. Final Localized Significance Threshold Methodology (revised).

obstruct other policies. The SCAQMD CEQA Handbook identifies two key indicators of consistency:

1. Whether the project will result in an increase in the frequency or severity of existing air quality violations or cause or contribute to new violations, or delay timely attainment of air quality standards or the interim emission reductions specified in the AQMP.

2. Whether the project will exceed the assumptions in the AQMP in 2022 or increments based on the year of project buildout and phase.

Both criteria are evaluated in the following sections.

Criteria 1 – Increase in the Frequency or Severity of Violations

Based on the air quality modeling analysis (see b and c below), short-term construction impacts would not result in significant impacts based on the SCAQMD regional and local thresholds of significance. This analysis also found that long-term operations impacts would not result in significant impacts based on the SCAQMD local and regional thresholds of significance.

Therefore, the proposed project is not projected to contribute to the exceedance of any air pollutant concentration standards and is found to be consistent with the AQMP for the first criterion.

Criteria 2 – Exceed Assumptions in the AQMP?

Consistency with the AQMP assumptions is determined by performing an analysis of the proposed project with the assumptions in the AQMP. The emphasis of this criterion is to ensure that the analyses conducted for the proposed project are based on the same forecasts as the AQMP. The 2020-2045 Regional Transportation/Sustainable Communities Strategy prepared by SCAG (2020) includes chapters on: the challenges in a changing region, creating a plan for our future, and the road to greater mobility and sustainable growth. These chapters currently respond directly to federal and state requirements placed on SCAG. Local governments are required to use these as the basis of their plans for purposes of consistency with applicable regional plans under CEQA. For this project, the City's General Plan defines the assumptions that are represented in the AQMP.

The project site is designated as Industrial in the City's General Plan and zoned as M-1A (Light Industrial). Although educational uses are not specifically described in the General Plan designation, industrial uses in the City are generally light in nature, in keeping with the scale and intensity of development elsewhere in the community. Therefore, the project would be consistent with the Industrial General Plan land use designation, is not anticipated to exceed the AQMP assumptions for the project site, and is found to be consistent with the AQMP for the second criterion.

Based on the above, the proposed project would not result in an inconsistency with the SCAQMD AQMP. **Therefore, impacts would be less than significant.**

b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard?

Less Than Significant Impact. The SCAQMD has developed significance thresholds for regulated pollutants, as summarized in Table 2, SCAQMD Air Quality Significance Thresholds. The SCAQMD's CEQA Air Quality Significance Thresholds (April 2019) indicate that any projects in the SCAB with daily emissions

that exceed any of the indicated thresholds should be considered as having an individually and cumulatively significant air quality impact.

It should be noted that the SCAQMD provides a threshold for emissions of lead, however for purposes of this analysis no lead emissions are calculated as there are no substantive sources of lead emissions.

Table 2
SCAQMD Air Quality Significance Thresholds

Mass Daily Thresholds [a]		
Pollutant	**Construction**	**Operation**
NO_x	100 pounds/day	55 pounds/day
VOC[b]	75 pounds/day	55 pounds/day
PM_{10}	150 pounds/day	150 pounds/day
$PM_{2.5}$	55 pounds/day	55 pounds/day
SO_x	150 pounds/day	150 pounds/day
CO	550 pounds/day	550 pounds/day
Lead	3 pounds/day	3 pounds/day
Toxic Air Contaminants and Odor Thresholds		
Toxic Air Contaminants (including carcinogens and non-carcinogens)	Maximum Incremental Cancer Risk ≥ 10 in 1 million Cancer Burden > 0.5 excess cancer cases (in areas ≥ 1 in 1 million) Hazard Index ≥ 1.0 (project increment)	
Odor	Project creates an odor nuisance pursuant to SCAQMD Rule 402	
GHG	10,000 MT/yr CO2eq for industrial facilities	
Ambient Air Quality for Criteria Pollutants [c]		
NO_2 1-hour average Annual arithmetic mean	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 0.18 ppm (state) 0.03 ppm (state) and 0.0534 ppm (federal)	
PM_{10} 24-hour average Annual average	10.4 µg/m^3 (construction)[d] & 2.5 µg/m^3 (operation) 1.0 µg/m^3	
$PM_{2.5}$ 24-hour average	10.4 µg/m^3 (construction)[d] & 2.5 µg/m^3 (operation)	
Sulfate 24-hour average	25 µg/m^3 (state)	
CO 1-hour average 8-hour average	SCAQMD is in attainment; project is significant if it causes or contributes to an exceedance of the following attainment standards: 20 ppm (state) and 35 ppm (federal) 9.0 ppm (state/federal)	

Notes: ppm = parts per million by volume; µg/m^3 = micrograms per cubic meter
a Source: SCAQMD CEQA Handbook (SCAQMD, 1993).
b The definition of VOC includes ROG compounds and additional organic compounds not included in the definition of ROG. However, for the purposes of this evaluation, VOC and ROG will be considered synonymous.
c Ambient air quality thresholds for criteria pollutants based on SCAQMD Rule 1303, table A-2 unless otherwise stated.
d Ambient air quality threshold based on SCAQMD Rule 403.
Source: SCAQMD CEQA Handbook (SCAQMD, 1993), SCAQMD Air Quality Significance Thresholds, revised April 2019.

Additionally, the air quality modeling program (discussed below) does not calculate any emissions of lead from typical construction or operational activities.

Short-Term (Construction) Emissions

Emissions are estimated using the CalEEMod (Version 2022.1) software, which is a statewide land use emissions computer model designed to provide a uniform platform for government agencies, land use planners, and environmental professionals to quantify potential criteria pollutant emissions from a variety of land use projects. CalEEMod was developed in collaboration with the air districts of California. Regional data (e.g., emission factors, trip lengths, meteorology, source inventory, etc.) have been provided by the various California air districts to account for local requirements and conditions. The model is an accurate and comprehensive tool for quantifying air quality impacts from land use projects throughout California and is recommended by the SCAQMD.[5]

Daily regional emissions during construction are forecasted by assuming a conservative estimate of construction activities (i.e., assuming all construction occurs at the earliest feasible date) and applying the mobile source and fugitive dust emissions factors. The input values used in this analysis were adjusted to be project-specific for the construction schedule and the equipment used was based on CalEEMod defaults. The CalEEMod program uses the EMFAC2021 computer program to calculate the emission rates specific for Orange County for construction-related employee vehicle trips and the OFFROAD2017 computer program to calculate emission rates for heavy truck operations. EMFAC2021and OFFROAD2017 are computer programs generated by CARB that calculates composite emission rates for vehicles. Emission rates are reported by the program in grams per trip and grams per mile or grams per running hour. Daily truck trips and CalEEMod default trip length data were used to assess roadway emissions from truck exhaust. The maximum daily emissions are estimated values for the worst-case day and do not represent the emissions that would occur for every day of project construction. The maximum daily emissions are compared to the SCAQMD daily regional numeric indicators. Detailed construction equipment lists, construction scheduling, and emission calculations are available in the CalEEMod Output provided in **Appendix A** of this document.

Construction activities associated with the project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Construction related emissions are expected from the following construction activities:

- Demolition
- Site Preparation
- Grading
- Building Construction
- Paving
- Architectural Coating

Construction activities are expected to start no sooner than July 2023, take approximately 21 months and construction completion and occupancy is anticipated in late spring/early summer 2025. The construction schedule utilized in the analysis represents a "worst-case" analysis scenario even if construction was to occur any time after the respective dates since emission factors for construction decrease as time passes and the analysis year increases due to emission regulations becoming more stringent.[6] The construction

5 South Coast Air Quality Management District, California Emissions Estimator Model.

6 As shown in the California Emissions Estimator Model (CalEEMod) User's Guide Version 2020.4.0, Section 4.3 "OFFROAD Equipment" as the analysis year increases, emission factors for the same equipment pieces decrease due to the natural turnover of older equipment being replaced by newer less polluting equipment and new regulatory requirements.

activities for the project are anticipated to include: demolition of the existing 3,080 square foot (SF) light industrial building and approximately 46,750 SF of existing parking area together with approximately 2,000 SF of concrete paving (479.18 tons of demolition total), minimal site preparation (to remove some rocks and vegetation), grading, construction of an approximately 21,977 design college building with approximately 18,785 SF of irrigated landscaping, paving of a 187-space parking lot, and application of architectural coatings. The irrigated landscape area is 18,785 SF and the active construction area footprint is approximately 3.2 acres. The project would export approximately 9,100 CY of material.

Dust is typically a major concern during demolition, site preparation and rough grading activities. Because such emissions are not amenable to collection and discharge through a controlled source, they are called "fugitive emissions." Fugitive dust emissions rates vary as a function of many parameters (soil silt, soil moisture, wind speed, area disturbed, number of vehicles, depth of disturbance or excavation, etc.). CalEEMod was utilized to calculate fugitive dust emissions resulting from this phase of activity. The project would be required to comply with existing SCAQMD rules for the reduction of fugitive dust emissions. SCAQMD Rule 403 establishes these procedures. Compliance with this rule is achieved through application of standard best management practices in construction and operation activities, such as application of water or chemical stabilizers to disturbed soils, managing haul road dust by application of water, covering haul vehicles, restricting vehicle speeds on unpaved roads to 15 mph, sweeping loose dirt from paved site access roadways, cessation of construction activity when winds exceed 25 mph and establishing a permanent, stabilizing ground cover on finished sites. In addition, projects that disturb 50 acres or more of soil or move 5,000 cubic yards of materials per day are required to submit a Fugitive Dust Control Plan or a Large Operation Notification Form to SCAQMD. Based on the size of the project area footprint (approximately 3.2 acres) a Fugitive Dust Control Plan or Large Operation Notification would not be required.

SCAQMD's Rule 403 minimum requirements require that the best available dust control measures are applied for all grading operations and include the application of water or other soil stabilizers in sufficient quantity to prevent the generation of visible dust plumes. Compliance with Rule 403 would require the use of water trucks during all phases where earth moving operations would occur and is incorporated into the emissions modeling for the project.

Construction emissions for construction worker vehicles traveling to and from the project site, as well as vendor trips (construction materials delivered to the project site) were estimated based on CalEEMod. SCAQMD Rules that are currently applicable during construction activity for this project include but are not limited to: Rule 1113 (Architectural Coatings) and Rule 403 (Fugitive Dust). Best Available Control Measures (BACMs) are considered standard regulatory requirements. As such, credit for Rule 403 and Rule 1113 have been taken.

The estimated maximum daily construction emissions are summarized in **Table 3, Construction-Related Regional Pollutant Emissions**. Detailed construction model outputs are presented in **Appendix A** to this document.

Table 3
Construction-Related Regional Pollutant Emissions

Activity	Pollutant Emissions (pounds/day)					
	ROG	**NOx**	**CO**	**SO_2**	**PM10**	**PM2.5**
Maximum Daily Emissions[1,2]	6.61	27.7	24.6	0.04	3.34	1.92
SCAQMD Thresholds	75	100	550	150	150	55
Exceeds Thresholds?	**No**	**No**	**No**	**No**	**No**	**No**

[1]Includes both on-site and off-site emissions. On-site emissions from equipment operated on-site that is not operated on public roads. Demolition, site preparation and grading/excavation PM-10 and PM-2.5 emissions include compliance with SCAQMD Rule 403.

[2]Construction., paving, and painting phases may overlap, and this has been accounted for in the maximum daily emissions.

*Source: CalEEMod Version 2022.1. Output, available in **Appendix A**.*

As shown in **Table 3, Construction-Related Regional Pollutant Emissions**, the maximum emissions resulting from the project construction would not exceed criteria pollutant thresholds established by the SCAQMD for emissions of any criteria pollutant. Thus, a less than significant impact would occur for project-related construction-source emissions. No mitigation measures are required.

Long-Term (Operational) Emissions

Emissions were calculated for the project. Operational activities associated with the project would result in emissions of VOCs, NO_X, SO_X, CO, PM_{10}, and $PM_{2.5}$. Emissions were also calculated for the removal of the existing college use (the light industrial portion of the college being demolished). Operational emissions would be expected from the following primary sources:

- Area Source Emissions
- Energy Source Emissions
- Mobile Source Emissions

Area Source Emissions

Architectural Coatings

Over a period of time the buildings that are part of this project would be subject to emissions resulting from the evaporation of solvents contained in paints, varnishes, primers, and other surface coatings as part of project maintenance.

Consumer Products

Consumer products include, but are not limited to detergents, cleaning compounds, polishes, personal care products, and lawn and garden products. Many of these products contain organic compounds which when released in the atmosphere can react to form ozone and other photochemically reactive pollutants.

Landscape Maintenance Equipment

Landscape maintenance equipment would generate emissions from fuel combustion and evaporation of unburned fuel. Equipment in this category would include lawnmowers, shredders/grinders, blowers, trimmers, chain saws, and hedge trimmers used to maintain the landscaping of the project.

Energy Source Emissions

Combustion Emissions Associated with Natural Gas and Electricity

Electricity and natural gas are used by almost every project. Criteria pollutant emissions are emitted through the generation of electricity and consumption of natural gas. However, because electrical generating facilities for the project area are located either outside the region (state) or offset through the use of pollution credits (RECLAIM) for generation within the SCAB, criteria pollutant emissions from offsite generation of electricity are generally excluded from the evaluation of significance and only natural gas use is considered.

Mobile Source Emissions

Vehicles

Project mobile source air quality impacts are dependent on both overall daily vehicle trip generation and the effect of the project on peak hour traffic volumes and traffic operations in the vicinity of the project. The project-related operational air quality impacts are derived primarily from vehicle trips generated by the project. The daily trips and trip generation rates used in the CalEEMod modeling calculations for both the existing light industrial building and the proposed design college building were obtained from the project-specific Traffic Impact Assessment (TIA).[7] The TIA showed that the existing use (being removed) would generate 22 roundtrips per day and the proposed project would generate 160 roundtrips per day, for a total net trips of 138 roundtrips per day.

Fugitive Dust Related to Vehicular Travel

Vehicles traveling on paved roads would be a source of fugitive emissions due to the generation of road dust inclusive of tire wear particulates.

Operational Emissions Summary

The potential operations-related air emissions have been analyzed below for the criteria pollutants and cumulative impacts. The worst-case summer or winter criteria pollutant emissions created from the project's long-term operations have been calculated and are shown below in **Table 4, Regional Operational Pollutant Emissions.** This table also shows the reduction in emissions from the removal of the existing light industrial college building.

[7] Linscott, Law & Greenspan Engineers (2022). Traffic Impact Assessment for the Proposed LCAD Building C Replacement Project. May 4.

Table 4
Regional Operational Pollutant Emissions

Operational Activities	Pollutant Emissions (pounds/day)					
	VOC	**NOx**	**CO**	**SOx**	**PM_{10}**	**$PM_{2.5}$**
Maximum Daily Project Emissions	1.30	0.91	7.74	0.02	0.68	0.15
- Minus the emissions from existing light industrial use	-0.19	-0.14	-0.95	-<0.005	-0.09	-0.02
Total Net Emissions	**1.11**	**0.77**	**6.79**	**0.015**	**0.59**	**0.13**
SCAQMD Regional Threshold	55	55	550	150	150	55
Threshold Exceeded?	**NO**	**NO**	**NO**	**NO**	**NO**	**NO**

*Source: CalEEMod Version 2022.1; the higher of either summer or winter emissions for the project and the lower of either summer or winter emissions for the existing use (being removed). CalEEMod Output is available in **Appendix A**.*

The results from **Table 4, Regional Operational Pollutant Emissions,** show that even before the emissions from the light industrial use (being removed) are subtracted, none of the SCAQMD regional emissions thresholds would be exceeded. The total net emissions do not exceed any SCAQMD regional emissions thresholds. Therefore, a less than significant regional air quality impact would occur from operation of the project. No mitigation measures are required.

Cumulative Air Quality Impacts

There are a number of cumulative projects in the project area that have not yet been built or are currently under construction. Since the timing or sequencing of the cumulative projects is unknown, any quantitative analysis to ascertain daily construction emissions that assumes multiple, concurrent construction projects would be speculative. Further, cumulative projects include local development as well as general growth within the project area. However, as with most developments, the greatest source of emissions is from mobile sources, which travel well out of the local area. Therefore, from an air quality standpoint, the cumulative analysis would extend beyond any local projects and when wind patterns are considered would cover an even larger area. The SCAQMD recommends using two different methodologies: (1) that project-specific air quality impacts be used to determine the potential cumulative impacts to regional air quality;[8] and (2) that a project's consistency with the current AQMP be used to determine its potential cumulative impacts.

The project area is out of attainment for ozone, PM_{10}, and $PM_{2.5}$. Construction and operation of cumulative projects would further degrade the local air quality, as well as the air quality of the South Coast Air Basin. The greatest cumulative impact on the quality of regional air cell would be the incremental addition of

[8] South Coast Air Quality Management District, Potential Control Strategies to Address Cumulative Impacts from Air Pollution White Paper, 1993, http://www.aqmd.gov/home/regulations/ceqa/air-quality-analysis-handbook.

pollutants mainly from increased traffic volumes from residential, commercial, and industrial development and the use of heavy equipment and trucks associated with the construction of these projects. Air quality would be temporarily degraded during construction activities that occur separately or simultaneously. A significant impact may occur if a project would add a cumulatively considerable contribution of a federal or state non-attainment pollutant. However, in accordance with the SCAQMD methodology, projects that do not exceed the SCAQMD criteria or can be mitigated to less than criteria levels are not significant and do not add to the overall cumulative impact.

Project operations would generate emissions of NO_x, ROG, CO, PM_{10}, and $PM_{2.5}$, which would not exceed the SCAQMD regional thresholds and would not be expected to result in ground level concentrations that exceed the NAAQS or CAAQS. **Therefore, the project would not result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal or state ambient air quality standard and impacts would be less than significant.**

c) Expose sensitive receptors to substantial pollutant concentrations?

Less Than Significant Impact.

Short-Term (Construction) Localized Emissions

The SCAQMD has established that impacts to air quality are significant if there is a potential to contribute or cause localized exceedances of the federal and/or state ambient air quality standards (NAAQS/CAAQS). Collectively, these are referred to as localized significance thresholds (LSTs).

The significance of localized emissions impacts depends on whether ambient levels in the vicinity of any given project are above or below State standards. In the case of CO and NO_2, if ambient levels are below the standards, a project is considered to have a significant impact if project emissions result in an exceedance of one or more of these standards. If ambient levels already exceed a state or federal standard, then project emissions are considered significant if they increase ambient concentrations by a measurable amount. This would apply to PM_{10} and $PM_{2.5}$; both of which are non-attainment pollutants.

The SCAQMD established LSTs in response to the SCAQMD Governing Board's Environmental Justice Initiative I-4. LSTs represent the maximum emissions from a project that would not cause or contribute to an exceedance of the most stringent applicable federal or state ambient air quality standard at the nearest residence or sensitive receptor. The SCAQMD states that lead agencies can use the LSTs as another indicator of significance in its air quality impact analyses.

To address the issue of localized significance, the SCAQMD adopted LSTs that show whether a project would cause or contribute to localized air quality impacts and thereby cause or contribute to potential localized adverse health effects. The analysis makes use of methodology included in the SCAQMD Final Localized Significance Threshold Methodology (LST Methodology). SCAQMD's Methodology clearly states that "off-site mobile emissions from the project should NOT be included in the emissions compared to LSTs."[9] Therefore, for purposes of the construction LST analysis, only emissions included in the CalEEMod "on-site" emissions outputs were considered. The CalEEMod output in **Appendix A** of this document

[9] South Coast Air Quality Management District, Final Localized Significance Thresholds Methodology, 2003 (Revised July 2008).

shows the equipment used for this analysis.

The local air quality emissions from construction were analyzed using the SCAQMD's Mass Rate Localized Significant Threshold Look-up Tables and the methodology described in LST Methodology prepared by SCAQMD (revised July 2008). The Look-up Tables were developed for 1, 2 and 5-acre sites by the SCAQMD in order to readily determine if the daily emissions of CO, NO_x, PM_{10}, and $PM_{2.5}$ from the project could result in a significant impact to the local air quality. The emission thresholds were calculated based on the Central Orange County Coastal source receptor area (SRA) 20 and a disturbance value of two acres per day (to be conservative, as the construction footprint is approximately 3.2 acres).

According to LST Methodology, any receptor located closer than 25 meters (82 feet) shall be based on the 25-meter thresholds. The Look-Up Tables provide thresholds for receptors located at 25, 50, 100, 200, and 500 meters. The nearest sensitive receptors to the project site include: the existing single-family residential uses associated with the artist studio located at 2795 Laguna Canyon Road, approximately 20 feet west of the project site boundary; the single-family residential use located at 2775 Laguna Canyon Road, approximately 75 feet west of the project site boundary; the multi-family residential uses located at 2745 Laguna Canyon Road, approximately 180 feet west of the project boundary, the single-family residential use located at 2735 Laguna Canyon Road, approximately 225 feet west of the project site boundary; the single-family residential uses located at 2999 Laguna Canyon Road, approximately 590 feet northeast of the project site boundary, and the residential uses located east of Laguna Canyon Road, north and south of Castle Rock Road approximately 0.21 miles (1,098 feet) northeast of the Project Site; therefore, the SCAQMD Look-up Tables for 25 meters was used. Other air quality sensitive land uses located further from the project site and would experience lower impacts. **Table 5, Local Construction Emissions at the Nearest Receptors** shows the on-site emissions from the CalEEMod model for the different construction phases and the LST emissions thresholds.

The data provided in **Table 5, Local Construction Emissions at the Nearest Receptors**, shows that none of the analyzed criteria pollutants would exceed the local emissions thresholds at the nearest sensitive receptors. **Therefore, a less than significant local air quality impact would occur from construction of the project.** No mitigation measures are required.

Construction-Related Toxic Air Contaminants (TACs)

With respect to TACs, the greatest potential for TAC emissions resulting from construction of the project would involve diesel particulate emissions associated with trucks and heavy equipment. Based on SCAQMD guidance, health effects from TACs are usually described in terms of individual cancer risk, which is the likelihood that a person exposed to TACs over a 70-year lifetime will contract cancer. Project construction activity would not result in long-term substantial sources of TAC emissions (i.e., 30 or 70 years) and would not generate ongoing construction TAC emissions. Given the temporary and short-term construction schedule (approximately 21 months), the project would not result in a long-term (i.e., lifetime or 30-year) exposure as a result of project construction. Furthermore, as shown above, construction-based particulate matter (PM) emissions (including diesel exhaust emissions) do not exceed any local or regional thresholds.

Table 5
Local Construction Emissions at the Nearest Receptors

Activity	On-Site Pollutant Emissions (pounds/day)			
	NO_x	CO	PM_{10}	$PM_{2.5}$
Demolition	27.3	23.5	1.37	1.13
Site Preparation	14.1	13.1	2.34	1.47
Grading	20.0	19.7	2.78	1.76
Building Construction	11.8	13.2	0.55	0.51
Paving	6.52	8.84	0.29	0.26
Architectural Coating	0.88	1.14	0.03	0.03
SCAQMD Thresholds[a]	**131**	**962**	**7**	**5**
Exceeds Threshold?	**No**	**No**	**No**	**No**

[a] *The nearest sensitive receptors to the project include: the existing single-family residential uses associated with the artist studio located at 2795 Laguna Canyon Road, approximately 20 feet west of the project site boundary; the single-family residential use located at 2775 Laguna Canyon Road, approximately 75 feet west of the project site boundary; the multi-family residential uses located at 2745 Laguna Canyon Road, approximately 180 feet west of the project boundary, the single-family residential use located at 2735 Laguna Canyon Road, approximately 225 feet west of the project site boundary; the single-family residential uses located at 2999 Laguna Canyon Road, approximately 590 feet northeast of the project site boundary, and the residential uses located east of Laguna Canyon Road, north and south of Castle Rock Road approximately 0.21 miles (1,098 feet) northeast of the Project Site; therefore, the 25 meter threshold was used.*

Source: Calculated from CalEEMod and SCAQMD's Mass Rate Look-up Tables for 2 acres at a distance of 25 m in SRA 20 (Central Orange County Coastal).

In addition, the construction activities associated with the project would be similar to other development projects in the City and would be subject to the regulations and laws relating to toxic air pollutants at the regional, State, and Federal level that would protect sensitive receptors from substantial concentrations of these emissions. The project would be consistent with applicable AQMP requirements for control strategies intended to reduce emissions from construction equipment and activities. The project would comply with the CARB Air Toxics Control Measure that limits diesel powered equipment and vehicle idling to no more than five (5) minutes at a location, and the CARB In-Use Off-Road Diesel Vehicle Regulation; compliance with these would minimize emissions of TACs during construction. The project would also comply with the requirements of SCAQMD Rule 1403 if asbestos is found during the demolition activities.

Long-Term (Operational) Localized Emissions

Project-related air emissions from on-site sources such as architectural coatings, landscaping equipment, onsite usage of natural gas appliances as well as the operation of vehicles on-site may have the potential to exceed the state and federal air quality standards in the project vicinity, even though these pollutant emissions may not be significant enough to create a regional impact to the Air Basin. According to SCAQMD LST methodology, LSTs would apply to the operational phase of a project, if the project includes stationary sources, or attracts mobile sources (such as heavy-duty trucks) that may spend long periods queuing and idling at the site; such as industrial warehouse/transfer facilities. The project involves the replacement of an existing vacant building with a larger, more modern design college building together with improvements to the parking area, and would not involve the construction of stationary sources or attract queuing form heavy duty vehicles. Therefore, due the lack of on-site/stationary source emissions, no long-term localized significance threshold analysis is warranted.

CO Hot Spots

CO is the pollutant of major concern along roadways because the most notable source of CO is motor vehicles. For this reason, CO concentrations are usually indicative of the local air quality generated by a roadway network and are used as an indicator of potential local air quality impacts. Local air quality impacts can be assessed by comparing future without and with project CO levels to the State and Federal CO standards which were presented above.

To determine if the proposed project could cause emission levels in excess of the CO standards discussed above, a sensitivity analysis is typically conducted to determine the potential for CO "hot spots" at a number of intersections in the general project vicinity. Because of reduced speeds and vehicle queuing, "hot spots" potentially can occur at high traffic volume intersections with a Level of Service E or worse.

The analysis prepared for CO attainment in the South Coast Air Basin by the SCAQMD can be used to assist in evaluating the potential for CO exceedances in the South Coast Air Basin. CO attainment was thoroughly analyzed as part of the SCAQMD's 2003 Air Quality Management Plan (2003 AQMP) and the 1992 Federal Attainment Plan for Carbon Monoxide (1992 CO Plan). As discussed in the 1992 CO Plan, peak carbon monoxide concentrations in the South Coast Air Basin are due to unusual meteorological and topographical conditions, and not due to the impact of particular intersections. Considering the region's unique meteorological conditions and the increasingly stringent CO emissions standards, CO modeling was performed as part of 1992 CO Plan and subsequent plan updates and air quality management plans. In the 1992 CO Plan, a CO hot spot analysis was conducted for four busy intersections in Los Angeles at the peak morning and afternoon time periods. The intersections evaluated included: South Long Beach Boulevard and Imperial Highway (Lynwood); Wilshire Boulevard and Veteran Avenue (Westwood); Sunset Boulevard and Highland Avenue (Hollywood); and La Cienega Boulevard and Century Boulevard (Inglewood). These analyses did not predict a violation of CO standards. The busiest intersection evaluated was that at Wilshire Boulevard and Veteran Avenue, which has a daily traffic volume of approximately 100,000 vehicles per day. The Los Angeles County Metropolitan Transportation Authority evaluated the Level of Service in the vicinity of the Wilshire Boulevard/Veteran Avenue intersection and found it to be Level of Service E during the morning peak hour and Level of Service F during the afternoon peak hour.

The project proposes the replacement of an existing vacant building with a larger, more modern, design college building together with improvements to the parking area. The TIA showed that the project would generate a net total of 138 daily traffic trips. Therefore, as the project is not anticipated to generate a significant number of trips, the traffic volume would fall far short of 100,000 vehicles per day. No CO "hot spot" modeling was performed, and no significant long-term air quality impact is anticipated to local air quality with the on-going use of the proposed project.

Therefore, as shown above, the project would not expose sensitive receptors to substantial pollutant concentrations. **Impacts are less than significant.**

d) Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people?

Less Than Significant Impact.

Short-Term (Construction) Emissions

Construction activities could result in minor amounts of odor compounds associated with diesel heavy equipment exhaust and architectural coatings. These compounds would be emitted in various amounts at various locations during construction and potentially affect nearby sensitive receptors. However, odors are highest near the source and would quickly dissipate away from the source. Such odors are temporary and generally occur at magnitudes that would not affect a substantial number of people. Therefore, impacts related to construction-generated odors would be **less than significant**.

Long-Term (Operational) Emissions

As the project involves the replacement of an existing vacant building with a larger, more modern, design college building together with improvements to the parking area, no long-term operational objectionable odors are anticipated. Therefore, potential impacts associated with objectionable odors would be less than significant and no mitigation is required. **Therefore, impacts related to odors generated from the operation of the project would be less than significant**.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
4. BIOLOGICAL RESOURCES. Would the project:				
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☒	☐	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations, or by the California Department of Fish and Wildlife or US Fish and Wildlife Service?	☐	☒	☐	☐
c) Have a substantial adverse effect on state or federally protected wetlands a (including, but not limited to marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☒
Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☒	☐
e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☒	☐	☐
f) Conflict with the provisions of an adopted habitat conservation plan, natural community conservation plan, or other approved local, regional, or state habitat conservation plan?	☐	☒	☐	☐

Information in this section is incorporated from the *Biological Technical Report for Big Bend Property Laguna College of Art and Design*, prepared by VCS Environmental June 2021. Additionally, some information in this section is incorporated from the *Revised – Request for Alternative Methods and Materials of Construction Report for the Laguna College of Art and Design, North Campus New Student Center Project*, prepared by Dudek, May 4, 2022. The *Biological Technical Report for Big Bend Property Laguna College of Art and Design* and the *Revised – Request for Alternative Methods and Materials of Construction Report for the Laguna College of Art and Design, North Campus New Student Center Project* are provided in **Appendices B and F**.

Regulatory Setting

Regulations exist at federal, state, and local levels with regard to biological resources and include:

- Federal Clean Water Act, Section 401, 404, and 408
- Federal Endangered Species Act
- Federal Migratory Bird Treaty Act
- California Endangered Species Act
- California Fish and Game Code 1600, Sections 3503, 3503.5, 3513, and 4150
- California Endangered Species Act
- Porter-Cologne Water Quality Control Act and Waste Discharge Requirements
- City of Laguna Beach Local Coastal Program
- City of Laguna Beach General Plan
- City of Laguna Beach Zoning Code—Chapter 12.06 Tree Removal Permit Process and 12.08 Preservation of Heritage Trees
- City of Laguna Beach Fire Department – Landscape/Fuel Modification Guidelines and Maintenance Program

Environmental Setting

The majority of the approximately 3.6-acre project site is disturbed/developed including the parking lot, associated ornamental vegetation, and buildings. Planted and landscaped vegetation including eucalyptus trees occur along Laguna Canyon Road Right-Of-Way (ROW). There are biological resources of value located in the coast live oak woodland habitat on the southern boundary of the project site, and within the biological resources report study area, primarily along the southern, southeastern, and northeastern boundaries.

The project site is surrounded by urbanized areas to the west of Laguna Canyon Road, south of Laguna Canyon Road and Laguna Coast Wilderness Park, and north of Aliso and Wood Canyons Wilderness Park. The site is located immediately adjacent to Big Bend Restoration site to the east; the parcel to the south is an undeveloped, naturally vegetated steep mountainside with numerous large native oak tree species and walking trails that are managed by Orange County (OC) Parks.

The study area supports ten vegetation communities/land cover types including coast live oak woodland, disturbed coyote brush scrub, mulefat thickets, disturbed annual grassland, California sycamore woodland, mixed scrub, Coastal sage scrub, disturbed/developed, ornamental trees, coyote brush scrub, and Eucalyptus woodland.

The topography throughout the project site is generally flat, however, a steep north facing mountainside (with an approximately 45% slope) is located south of the project site and study area. The elevations vary from approximately 143 feet above mean sea level (MSL) at street grade (Laguna Canyon Road) to roughly 165 feet above mean sea level (MSL) at the southernmost portion of the project site.

No special status plant or wildlife species were observed within the study area during the October 2021 survey. Cooper's hawk, a Sensitive - Watch List Species, was observed during the focused surveys.

Additionally, there was no evidence of wetland or non-wetland jurisdictional waters of the U.S. or waters of the State present within the project footprint.

The project site is located within the City of Laguna Beach Local Coastal Program (LCP) area. Policies under the LCP determine whether an area is considered environmentally sensitive in order to identify and maintain habitat areas in their natural state as necessary for the preservation of species. The City's LCP contains biological value maps indicating the value of habitats throughout the city's open space areas. Habitats are ranked as "low", "moderate", "high", and "very high value" based on the integrity and extent, faunal use, and presence of endangered, rare, or locally unique biota." During the general biological survey, the Coast live oak woodland habitat that occurs within the southern portion of the project site would be considered "high value habitat" due to its characteristics.

Checklist Discussion

a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less than Significant Impact with Mitigation. A significant impact may occur if a project were to have a substantial adverse effect on any species identified or designated as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the State or federal regulatory agencies cited.

Special Status Plants

Based on the lack of detection of any special-status plants during the focused plant survey, the project is not expected to impact any special-status plant species. Coast live oak woodland within the project disturbance area is considered high value habitat; however, Coast live oaks are not special-status plant species. Based on the habitat found onsite, no direct impacts are expected to occur as a result of project implementation and no mitigation is recommended. The remaining species reported from the project vicinity are not expected to occur on the project site. **Therefore, impacts would be less than significant and no mitigation would be required.**

Special Status Wildlife

No sensitive wildlife species were observed within the study area during the biological survey or CAGN focused surveys. However, four species have a low to moderate or moderate potential to occur within the study area. **With the inclusion of Mitigation Measures BIO-2, and BIO-5 and BIO-6 impacts to these species would be considered less than significant.**

California gnatcatcher

The project footprint is not located within designated critical habitat for the California gnatcatcher; however, some portions within the study area are suitable for the species. There are larger areas of suitable habitat to the north of Highway 133 – Laguna Canyon Road. The proposed impact area/Limit of Disturbance is not expected to result in the direct impact to any California gnatcatcher and the loss of habitat is marginal since there is virtually no suitable habitat within the project footprint. Impacts would be limited to indirect effects during construction. Other effects could include increases in noise, human activity, and trash from the expansion of the education facility. These impacts could affect nearby birds and wildlife, but since California gnatcatcher were not found in the vicinity, they are unlikely to affect this species. **Impacts to California gnatcatcher would be less than significant.**

Other Sensitive Wildlife Species

Other sensitive species including the Cooper's hawk and Southern California rufous-crowned sparrow are considered to have moderate to high potential to occur on the Study Area. **With the inclusion of BIO-4 and BIO-5, and implementation of standard BMPs, potential impacts to these special status wildlife species would be considered less than significant.**

The remaining species are not expected to occur on the project footprint or study area due to the lack of suitable habitat. **There would be no impact on these species and no mitigation would be required.**

Nesting Birds, Other Raptor Species / Foraging Habitat

The project footprint and study area have the potential to support various avian species and raptor nests due to the presence of shrubs, ground cover, coast live oak, sycamore trees, eucalyptus, and other ornamental trees on-site. Bird nests and eggs are protected under Fish and Wildlife Code Section 3503. Since removal of vegetation could result in impacts to raptor species, including sensitive species, and other songbirds during the nesting season, recommended measures include a pre-construction nesting bird survey and biological monitoring as needed to avoid impacts to nesting birds. These mitigation measures BIO-4 and BIO-5. **With the implementation of Mitigation Measures BIO-4 and BIO-5, impacts to nesting birds would be less than significant.**

Bat Foraging Habitat

The potential for bat roosting is low-moderate within the project footprint, while the existing vegetation onsite may represent suitable foraging habitat. The study area and adjacent cliffs represent suitable foraging and potentially roosting habitat for some bat species; however, no impacts are anticipated to occur outside of the Limit of Disturbance. Additionally, any indirect impact on foraging habitat would be less than significant given the availability of habitat remaining in the region. Mitigation Measure BIO-6 would be required to reduce impacts. **With implementation of this Mitigation Measures BIO-7, impacts to bat species would be considered less than significant.**

b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?

Less Than Significant Impact with Mitigation. A significant impact may occur if riparian habitat or any other sensitive natural community identified locally, regionally, or by the State and federal regulatory agencies cited were to be adversely modified without adequate mitigation.

There is no riparian habitat on the project site. The project site does not fall within any USFWS-designated Critical Habitat.

Vegetation Communities

Potential impacts to vegetation communities/land cover types due to implementation of the project includes improvements within the Limit of Disturbance totaling approximately 3.20* acres, which includes type habitats as shown below in **Table 6, Potential Impacts to Vegetation Communities/Land Cover.**

Table 6
Potential Impacts to Vegetation Communities/Land Cover

Vegetation Community/Land Cover Type	Acreages		
	Total Impacts within ROW Improvements	Total Impacts within Project Site	Total Impacts within Project Footprint.
Coast Live Oak Woodland	—	0.19	0.19
Disturbed Coyote Brush Scrub	—	0.45	0.45
Disturbed Annual Grassland -	—	0.03	0.03
Disturbed/Developed	0.03	1.51	1.54
Eucalyptus spp	<0.11	0.13	0.14
Mixed Scrub	-	0.07	0.07
Ornamental Trees	0.01	0.24	0.25
Total	**0.04**	**2.64***	**2.68***

*Note: Sum is 0.01 acre larger due to rounding.

Direct impacts to disturbed/developed, ornamental trees, disturbed annual grassland, vegetation/land cover types are considered less than significant because these habitats/land covers are comprised mostly of non-native vegetation, are common in the surrounding vicinity, and do not represent California Natural Diversity Database (CNDDB) or California Department of Fish and Wildlife (CDFW) sensitive plant communities.

Direct or indirect impacts to sensitive habitat would occur to 0.19 acres of Coast live oak woodland/High Value habitat within the Limit of Disturbance. This impact area is comprised primarily of mature coast live oaks and elderberry trees, which are located within the Environmentally Sensitive Habitat Areas (ESHA) and subject to the City Local Coastal Plan (LCP). Project implementation would be considered potentially significant due to this community's vulnerability in the state. This habitat is dominated by native tree species and provides suitable habitat for wildlife.

Mitigation as detailed in MM-BIO-1a and BIO-1b would compensate for impacts to this sensitive habitat. **Therefore, impacts to LCP resources, including the coast live oak woodland would be considered less than significant with mitigation.**

Disturbed coyote shrub scrub, Eucalyptus spp., ornamental trees, and mixed scrub could be utilized by some sensitive wildlife species. Direct impacts to these vegetation communities/land cover with implementation of MM-BIO-2, BIO-3, would reduce impacts to less than significant levels. **Therefore, impacts to vegetation communities/land cover would be considered less than significant with mitigation.**

Indirect impacts to plant communities can result in secondary consequences. Development/excavation activities within the project site could result in indirect impacts to the vegetation communities

surrounding the directly impacted areas. Examples of indirect temporary impacts to plant communities include the effects of fugitive dust created by construction activities and the spread of invasive species. With development, "edges" of vegetation communities may be exposed and more susceptible to invasion by invasive species (introduced by planted landscaping, seed dispersal from cars, people, and/or pets, and/or wind). Construction-related erosion, runoff, sedimentation, soil compaction, and alteration of drainage patterns that may affect plants by altering site conditions so that the location in which they are growing becomes unfavorable are prohibited by federal and state laws; compliance with the requirements under these federal and state laws would reduce the potential for significant indirect impacts to below significance and no mitigation measures are required.

c) Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?

No Impact. A significant impact may occur if state or federally protected wetlands are modified or removed without adequate mitigation.

No permanent or temporary impacts would occur to jurisdictional waters during project activities. The drainage feature near the project site is located offsite and outside of the project's limit of disturbance. No jurisdictional drainages occur within the project site. Therefore, no impacts to jurisdictional waters are anticipated during project activities.

d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?

Less Than Significant Impact. A significant impact may occur if a project would interfere or remove access to a migratory wildlife corridor or impede the use of native wildlife nursery sites.

The study area may serve a function in local wildlife dispersal and foraging; however, due to the disturbed nature of the project site where direct impacts may occur, the loss of foraging habitat and/or effect on local wildlife movement would be less than significant. Additionally, the Big Bend Restoration site adjacent to the project and the High Value Habitat south provide a higher quality corridor and would likely be preferred by wildlife species moving through the area. No long-term or significant effects to wildlife movement are anticipated due to project implementation. **Therefore, impacts would be less than significant.**

e) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance (e.g., oak trees or California walnut woodlands)?

Less Than Significant Impact with Mitigation. A project-related significant adverse effect could occur if a project is inconsistent with local regulations pertaining to biological resources.

The project would not conflict with any General Plan policies of the Open Space Conservation Element (see General Plan Consistency Table, Appendix H of this document).

Implementation of the proposed project has the potential to directly and/or indirectly impact trees that may qualify as public trees under the City tree removal policy, which establishes a procedure for the

removal of qualifying trees if certain requirements are met. However, there are no protected Heritage Trees on the project site or within the limits of disturbance. It is anticipated that all the trees within the impact area may be impacted, but impacts would be limited through supervision of and consultation with the arborist. This includes the Eucalyptus trees within the ROW, and trees within the High Value Habitat (Coast live oak woodland). If impacts are required to trees subject to the City's tree removal policy, then a permit and/or coordination with the City of Laguna Beach would be required for impacts to the trees. **Implementation of Mitigation Measures BIO-1a, BIO-1b, BIO-2, and BIO-3 would reduce this impact to less than significant with mitigation.**

High Value Habitat on the Southwestern Side of the Project Footprint

Per the arborist report and vegetation impacts figure, it is anticipated that two (2) Coastal Live Oak trees (#87 and #88) may be impacted by the proposed project through removal or root loss, but this may be a minimal impact as coordinated with the arborist. Also, per the arborist report, the tree protection zone overlaps with the Limit of Disturbance/ construction encroachment, but efforts would be made to preserve all Coastal Live Oak trees. Avoidance may be possible during construction, however, if avoidance is not possible, trees would be replaced onsite as detailed in BIO-3.

Three (3) elderberry trees located within this area: trees #126, #127, and #144 are less than substantial trees with poor form and are planned for removal. Per the arborist recommendations, if removal of some of those trees is not necessary, these trees may be pruned according to ISA standard, in coordination with the arborist. Coastal Live Oak tree #88 has a hazardous, far-reaching limb that rests on the power pole and an elderberry growing adjacent to its trunk. This hazardous limb would be removed, and the tree and elderberry pruned prior to construction activities. Removal of this elderberry (#144) may benefit the Coastal Live Oak (#88), therefore, if this is determined to be the case in consultation with the Arborist during the pruning, no mitigation for the removal of elderberry #144 would be required because it would benefit Coastal Live Oak #88.

High Value Habitat area on the southeastern side of the Project Footprint

One (1) Coastal Live Oak tree, #86 may be impacted by the proposed project. This tree would be pruned and protected. If needed, contingency planting at a ratio of 3:1 would be proposed as mitigation in coordination with the arborist and consistent with BIO-3.

f) Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?

Less Than Significant Impact with Mitigation. A significant impact may occur if a project is inconsistent with resource policies of any Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

The project site is located within the City of Laguna Beach Local Coastal Program (LCP)area. Policies under the LCP determine whether an area is considered environmentally sensitive in order to identify and maintain habitat areas in their natural state as necessary for the preservation of species. The City's LCP contains biological value maps indicating the value of habitats throughout the city's open space areas. Habitats are ranked as "low", "moderate", "high", and "very high value" based on the integrity and extent, faunal use, and presence of endangered, rare, or locally unique biota." During the general biological

survey, the Coast live oak woodland habitat that occurs within the southern portion of the project site would be considered "high value habitat" due to its characteristics.

Direct or indirect impacts to sensitive habitat would occur to 0.13 acres of Coast live oak woodland/High Value habitat within the Limit of Disturbance. This impact area is comprised primarily of mature coast live oaks and elderberry trees, which are located within the Environmentally Sensitive Habitat Areas (ESHA) and subject to the City's LCP. Project implementation would be considered potentially significant due to this community is vulnerable in the state. This habitat is dominated by native tree species and provides suitable habitat for wildlife.

Mitigation as detailed in MM-BIO-1a and BIO-1b would compensate for impacts to this sensitive habitat. **Therefore, impacts to provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan would be considered less than significant with mitigation.**

Mitigation Measures

MM-BIO-1a: The project applicant shall provide compensatory mitigation for impacts to City LCP resources, including impacts to coast live oak woodland "High Value Habitat" Impacts are proposed to be mitigated through replacement/creation of habitat at a minimum 3:1 ratio. Removal of any individual trees shall be mitigated consistent with the 2022 Arborist Report and, if necessary, the City permit identified in BIO-3 and BIO-5. Creation may be conducted within the project site through incorporation into the landscape plan, or through a City-approved mitigation program.

MM-BIO-1b: Removal of non-native / invasive vegetation is recommended to be conducted within the "High Value Habitat", on the project footprint and study area. Nonnative invasive vegetation would be completely cleared, while other vegetation would be reduced by up to 50 percent within the FMZ's. A qualified botanist and arborist would establish exclusion areas to avoid any sensitive areas/plant species and minimize clearance of native plant species.

MM-BIO-2: The biological monitor shall be onsite during initial ground disturbance/vegetation removal activities to implement avoidance/minimization measures to protect sensitive resources onsite. The qualified biologist shall identify and explain the protection methods during the Employer Education Program. These methods could include, but are not limited to, stopping work in the area where the animal is encountered until it has moved on its own outside of the site or moving individuals outside of the site to adjacent appropriate habitat.

MM-BIO-3: If eucalyptus, oak, elderberry, or other trees need to be removed, a tree permit and coordination with the City might be required. Mitigation ratios and replacement planting of any removed trees shall be done consistent with the 2022 Arborist Report. Removal of any large trees may require a City permit. Any impacts to covered trees shall be mitigated based on the health and quality of the tree and as required under the City permit. The tree report identifies tree pruning, health care, protection and removal needs within the project footprint. Any native trees removed shall be replaced at a minimum ratio of 3:1 onsite.

MM-BIO-4: Removal of trees shall be accomplished in a manner that avoids impacts to avian species, including sensitive species as well as raptor nests. Vegetation removal activities shall be conducted outside the nesting season (September 1 to February 14 for songbirds; September 1 to January 14 for raptors) to avoid potential impacts to nesting birds. If removal of any portion of this vegetation community must be performed during the nesting season, the mitigation measure in MM BIO-6 shall be implemented.

MM BIO-5: Any construction activities including ground disturbance and/or vegetation removal that occur during the nesting season (February 15 to August 31 for songbirds; January 15 to August 31 for raptors) shall require that all suitable habitat be thoroughly surveyed for the presence of nesting birds by a qualified biologist before commencement of clearing. If no nesting birds are found, no further action is required. If active nests are found during the pre-construction surveys, no construction or tree removal activities shall take place within at least 500 feet of an active listed species or raptor nest, 300 feet of other sensitive bird nests (nonlisted), and 100 feet of most common songbird nests. The buffer may be modified and/or other recommendations proposed as determined appropriate by the biological monitor to minimize impacts.

The onsite biologist would review and verify compliance with these nesting boundaries and would verify the nesting effort has finished. Work can resume within the buffer area when no other active nests are found. Alternatively, a qualified biologist may determine that certain work can be permitted within the buffer areas and would develop a monitoring plan to prevent any impacts while the nest continues to be active (eggs, chicks, etc.). If vegetation clearing is not initiated within 72 hours of a negative survey during the nesting season, the nesting survey must be repeated to confirm the absence of nesting birds.

MM-BIO-6: Prior to construction, all trees suitable for bats within the study area shall be surveyed for the presence of bat roosts by a qualified bat biologist. Initial surveys are recommended to be conducted between one year to six months prior to the initiation of vegetation removal and ground disturbing activities, ideally during the maternity season (typically March 1 to August 31), to allow time to prepare avoidance, relocation, and/or exclusion plans if needed. Surveys may entail direct inspection of the trees or nighttime surveys. If active bat roosts are present, a qualified bat biologist shall determine the species of bats present and the type of roost (i.e., day roost, night roost, maternity roost). If the biologist determines that the roosting bats are not a special-status species and the roost is not being used as a maternity roost, then the bats may be evicted from the roost by a qualified bat biologist.

If special-status bat species or a maternity roost of any bat species is present, but no direct removal of active roosts would occur, a qualified bat biologist shall determine appropriate avoidance measures, which may include implementation of a construction-free buffer around the active roost until maternity activities are complete.

If special-status bat species or a maternity roost of any bat species is present and direct removal of habitat (roost location) would occur, then a qualified bat biologist shall develop a plan to avoid, relocate and/or exclude the bats. Removal of the roost shall only occur when the plan has been completed and only when bats are not present in the roost.

The plan shall detail the methods of excluding bats from the roost and the plans for a replacement roost in the vicinity of the project site. The plan shall include: (1) a description of the species targeted for mitigation; (2) a description of the existing roost or roost sites; (3) methods to be used to exclude the bats if necessary; (4) methods to be used to secure the existing roost site to prevent its reuse prior to removal; (5) the location for a replacement roost structure; (6) design details for the construction of the replacement roost; (7) monitoring protocols for assessing replacement roost use; and (8) a schedule for excluding bats, demolishing of the existing roost, and construction of the replacement roost. Pre-construction surveys shall be conducted by a qualified bat biologist no more than two weeks prior to the initiation of vegetation removal and ground disturbing activities. If no active roosts are present, then trees shall be removed within two weeks following the survey.

All construction activity in the vicinity of an active roost shall be limited to daylight hours.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
5. CULTURAL RESOURCES. Would the project:				
a) Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5?	☐	☐	☒	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5?	☐	☒	☐	☐
c) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐

The following analysis in this section is based on the *Archaeological and Tribal Cultural Resources Sensitivity Assessment for the Laguna College of Art and Design Project, Laguna Beach, Orange County, California* that was prepared by SWCA, dated January 2023. The *Archaeological and Tribal Cultural Resources Sensitivity Assessment for the Laguna College of Art and Design Project, Laguna Beach, Orange County, California* is available in **Appendix C** of this document.

Regulatory Setting

Regulations exist at federal, state, and local levels with regard to cultural resources and include:

- National Historic Preservation
- National Register of Historic Places
- Federal Native American Graves Protection and Repatriation Act
- California Register of Historic Resources
- CEQA Guidelines Section 15064.5
- California Native American Graves Protection and Repatriation Act
- California Health and Safety Code Section 7050.5
- California Public Resources Code Section 5097
- California Government Code Section 6254
- Assembly Bill 52
- Senate Bill 18
- Orange County General Plan Resources Element
- Laguna Beach Open Space and Conservation Element

Environmental Setting

This project site is in Laguna Canyon of the San Joaquin Hills in the southern section of the Peninsular Ranges Geomorphic Province. The project site is situated on the eastern slope of the canyon and the southern portion of the project site is characterized by a steep, west-facing slope. Laguna Canyon Road is a two-lane asphalt road bordering the project area to the north. The project site is situated approximately 140 to 160 feet above mean sea level. Vegetation in the project site and surrounding area is dominated

by mature native coast live oak trees. The Laguna Coast Wilderness Park is located to the northwest of the project area and the Aliso and Wood Canyons Wilderness Park to the southeast.

There are three buildings on the site. These buildings are shown in **Figures 3 and 4, Views of the Project Site**. Buildings A and B, constructed in 1966, are stucco buildings used for instruction. Building C consists of five connected modular buildings constructed in 1970, and was permitted by the State of California Department of Housing and Community Development. Building C is vacant and unsafe for occupancy. None of the buildings, nor the site, are listed on the *Laguna Beach Historic Register*. *Historic Overview*

Post-contact history for the state of California is generally divided into three periods: the Spanish period (1769–1822), Mexican period (1822–1848), and the American period (1848–present). Although Spanish, Russian, and British explorers visited the area for brief periods between 1529 and 1769, the Spanish period in California begins with the establishment in 1769 of a settlement at San Diego and the founding of Mission San Diego de Alcalá, the first of 21 missions constructed between 1769 and 1823. Independence from Spain in 1821 marks the beginning of the Mexican period, and the signing of the Treaty of Guadalupe Hidalgo in 1848, ending the Mexican American War, signals the beginning of the American period, when California became a territory of the United States.

Archival Research

The project site is located within the San Joaquin Hills in Southern Orange County, a low mountain range within the Peninsular Ranges. The project site was not located within a Spanish rancho but borders the land that was once Rancho San Joaquin and is approximately 1 mile west of the boundary of Rancho San Niguel. The oldest maps available which depict the project site and nearby vicinity are two hand-drawn diseños depicting these Ranchos. The older map depicts Rancho San Joaquin and dates to 1841 while the diseño map of Rancho San Niguel was created by J.R. Hardenburgh in 1872 (Figure 4 and Figure 5). Diseños were typically made as part of the original petition of the land and were not drawn to scale but instead rely on approximate relationships to natural features that are represented pictographically, rather than explicitly in a coordinate system.

Both diseños depict “Cañada de Laguna,” or Laguna Canyon, which is located on the western edge of Rancho San Joaquin (on the right side of the map) and the eastern edge of Rancho San Niguel (on the left side of the map). Both maps also depict the “Camina de San Juan,” the Trail of San Juan located north of the project site. This trail travels roughly northwest-southeast and eventually reaches Mission San Juan Capistrano, which is depicted on the Diseño of Rancho San Niguel and is located approximately 7.4 miles east of the project. Rancho San Niguel’s map includes “Sitio de Neuil” in the center as well as “Loma Rio del Neuil.” The word Neuil may be a misspelling of the rancho name, Niguel, which was taken from a Native American word niguil and was reportedly the name of a rancheria under the jurisdiction of Mission San Juan Capistrano (Robinson 1954:11). Both maps depict hills and rivers throughout the ranchos. The canyons depicted on both maps are shown with water and springs. There are few developments depicted within either rancho on these maps.

Topographic maps were available for the project site and surrounding vicinity dating from 1896 to the mid-twentieth century. The 1896 topographic map depicts the project site and surrounding area as undeveloped land. Laguna Canyon Road appears to have been present by this time, although there is also a water feature mapped running through Laguna Canyon. The nearby cities, such as Laguna Beach, Laguna Hills, and Aliso Viejo were not present. By 1901, Laguna Canyon Road appears to have been improved and there are several buildings mapped throughout the canyon; additionally, the town of Laguna Beach was

beginning to take shape by this time. Topographic maps from 1902 through 1947 do not depict any significant changes to the project site or the immediate vicinity. The topographic map from 1949 shows that Laguna Beach had greatly expanded by this time and there were many more developments within Laguna Canyon itself; the communities to the northeast of the project site were still not developed by this time. Topographic maps from between 1964 and 1967 show that the project site had begun to be developed during this time. The communities in the vicinity of the project site continued to expand during this time as well. Topographic maps from the remainder of the twentieth century do not depict any significant changes to the project site, while surrounding communities continued to develop to their current extent.

Historical aerial photographs were available for the project site from 1931 to present day. The 1931 aerial photograph depicts Laguna Canyon Road as an improved road with very few developments along its borders. The developments that do exist appear to be primarily agricultural in nature. Much like today, all developments appear to be along the southeastern side of Laguna Canyon Road, likely as a result of the terrain throughout the canyon. By 1939, there were many more developments along Laguna Canyon Road including developments directly to the west of the project site. These developments appear to be small structures. The 1939 aerial photograph also depicts the development of Laguna Beach at this time; it consisted of a small town that did not extend past Temple Hills Drive. In 1939, the project site appears to be vacant, relatively flat land. The aerial photograph from 1952 shows numerous small developments to the north of the project site. Within the project site itself, a graded U-shaped road is present and one small structure had been built within the southern portion of the project site at the base of the hills, roughly in the same location as the extant Building C. In 1960, the road and structure within the project site are still present and the northern portion of the project site appears to have possibly been graded. By 1979, the parking lot and Building A and B are present within the project site. The parking lot appears to be significantly smaller in 1979 than what it is currently. The aerial photograph from 1992 shows that the existing southern building had been demolished. By 2007, the project site had been developed to its current extent.

Records Search

A California Historical Resources Information System (CHRIS) search through the South Central Coastal Information System (SCCIC), a Sacred Lands File (SLF) search through the Native American Heritage Commission (NAHC), archival research, and an intensive pedestrian survey were used to evaluate the presence or likelihood of archaeological resources and tribal cultural resources within the project site.

SWCA received the results of the records search from the SCCIC on November 14, 2022. The results indicate that 36 cultural resource studies have been conducted in and within 0.8 km (0.5 mile) of the project site. Two of these studies directly intersected the project site. The remaining 34 studies consist of 23 archaeological field studies, five literature reviews, one archaeological field study and excavation report, two built environment studies, one archaeological and built environment study, one archaeological review, and one management review.

Sacred Lands File Search

On October 18, 2022, SWCA requested a search of the SLF from the NAHC. SWCA received the results of the SLF search on November 17, 2022. The NAHC's SLF results letter indicated positive findings and stated that the Juaneño Band of Mission Indians Acjachemen Nation – Belardes should be contacted for additional information. The letter noted that the SLF and CHRIS are not exhaustive inventories of

resources that may be present in any given area, and that tribes may uniquely possess information on the presence of an archaeological resource. The NAHC also provided a tribal consultation list for Orange County, which includes the names and contact information of 22 tribes who are traditionally affiliated with the area and have requested consultation.

Field Survey

Field survey and site assessments were completed on November 29, 2022. Survey was conducted by SWCA archaeologist Olivia Romansik. Developed portions of the project site consisted of parking lots, planters, roads, and buildings. In the non-developed areas of the project site vegetation consists of grasses, oak, buckwheat, chaparral, and prickly pear cactus. Visibility across the project site ranged from poor to good (>10% to 85%). Modern refuse was noted throughout the project site, particularly along Laguna Canyon Road. No cultural resources were identified as a result of the field survey.

Archaeological Resources

The records search identified 11 previously recorded resources within a 0.8-km (0.5-mile) radius of the project site, including one that borders the project site (P-30-177656) to the north. The bordering resource consists of the Laguna Canyon historic district composed of three distinct areas of pre-1940 cottages. The remaining 10 cultural resources consist of five prehistoric sites and five historic structures.

Historically, the project site was in an area between two Spanish-era ranchos. Historical and topographic maps from the later nineteenth century indicate that the project site and the multiple canyons throughout the San Joaquin Hills would have been sources of fresh water. The presence of fresh water sources as well as the known presence of multiple prehistoric sites in the general vicinity of the project site suggest that the overall sensitivity for Native American affiliated prehistoric or historic archaeological resources is high. Based on these considerations, SWCA considers the greater region of the project site to have moderate to high sensitivity for prehistoric or historic Native American archaeological resources. The project site is composed of soils from the Miocene formation, which are likely too old to contain subsurface deposits; however, surficial deposits are still possible.

The project site was initially developed in the 1960s and was fully developed by the early 2000s. Although the developed portions of the project site likely have a lower possibility of supporting surficial deposits, the project site and vicinity have not seen numerous phases of development and do contain areas, specifically in the southern portion of the project site, that have not been developed. Although development within the project site may have impacted surficial deposits of Native American affiliated archaeological resources, it is possible that such remains can exist below paved surfaces even in developed urban settings. While the CHRIS records search results did not identify any Native American affiliated archaeological resources within the project site, most of the project site was not inspected for archaeological resources before being developed. Considering these factors SWCA considers the sensitivity for prehistoric and historic Native American affiliated archaeological resources to be moderate to high within the project site.

The project site was not developed during the early twentieth century and therefore the likelihood of encountering historic period remains such as trash pits, privies, foundations, or structures is low. For this reason, SWCA finds the project site has a low sensitivity for containing historic period (non–Native American) archaeological resources.

Tribal Cultural Resources

The CHRIS and SLF searches were positive for tribal cultural resources or potential tribal cultural resources within the project site or a 0.8-km (0.5-mile) radius. SWCA conducted supplemental background research focusing on Native American land uses and settlement patterns in the region and the effects of urban development, which began within the project site in the mid-twentieth century. The project site is located on the border of what was traditionally Gabrielino territory to the north and Juaneño territory to the south. The project site is situated between several Native American sites, the nearest of which are the Acjachemen villages of Paplenga (approximately 1.7 miles southwest near the present-day location of Laguna Hills) and Llekupe (approximately 2.1 miles southeast of the project site). Additionally, based on personal communicate with descendants of the Acjachemen peoples, a locale known as "Tom-ok'" was present in Laguna Canyon.

Soils within the project site are made up of the Miocene formation, which dates to 23 to 5.3 million years ago and due to its age is not likely to contain subsurface archaeological deposits. Although subsurface deposits are unlikely within the project site, there is a potential for surficial deposits to exist within the project site. The area that has been previously developed is unlikely to contain surficial deposits; however, there are areas of the project site that have not been previously developed, particularly in the southern section of the site, and are within the limits of disturbance for the proposed project. These areas would have a generally higher sensitivity for encountering tribal cultural resources than the developed portions of the project site.

The project site is also located in an area that was situated between two Spanish-era Ranchos and approximately 7.3 miles east of Mission San Juan Capistrano. Several villages are also noted southeast of the project site in the vicinity of Mission San Juan Capistrano where, during the Spanish period, Native American peoples were forcibly moved to Mission San Juan Capistrano. Additionally, the project site and surrounding areas include natural features such as fresh water sources and proximity to the ocean, which would have provided numerous resources to Native American peoples. For these reasons, SWCA finds the project site to have a low sensitivity for containing historic period (non–Native American) archaeological resources.

Checklist Discussion

a. Cause a substantial adverse change in the significance of a historical resource pursuant to State CEQA Guidelines §15064.5?

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to State CEQA Guidelines §15064.5?

***Less Than Significant Impact with Mitigation*.** Section 15064.5 of the State CEQA Guidelines defines an historical resources as: 1) a resource listed in or determined to be eligible by the State Historical Resources Commission, for listing in the California Register of Historical Resources; 2) a resource listed in a local register of historical resources or identified as significant in an historical resource survey meeting certain state guidelines; or 3) an object, building, structure, site, area, place, record or manuscript which a lead agency determines to be significant in the architectural, engineering, scientific, economic, agricultural, educational, social, political, military, or cultural annals of California, provided that the lead agency's determination is supported by substantial evidence in light of the whole record. A project-related

significant adverse effect would occur if the project were to adversely affect a historical resource meeting one of the above definitions.

Section 15064.5 of the State CEQA Guidelines defines significant archaeological resources as resources which meet the criteria for historical resources, as discussed above, or resources which constitute unique archaeological resources. A project-related significant adverse effect could occur if the project were to affect archaeological resources which fall under either of these categories. Archaeological sites (such as are most often recommended eligible under Criterion 4 of the California Register, which is the potential for a resource to contribute information important to the study of history or prehistory. This is also known as the potential for a given resource to answer specific research questions (or its inherent "data or information potential"). In addition to meeting the Criteria for Evaluation, a property must have integrity. "Integrity is the ability of a property to convey its significance," (U.S. Department of the Interior 2002:44). For properties eligible under Criterion 4, less attention is given to their overall condition, than if they were being considered under Criteria 1, 2, or 3. Archeological sites, in particular, do not exist today exactly as they were formed as there are always cultural and natural processes that alter the deposited materials and their spatial relationships. For properties eligible under Criterion 4, integrity is based upon the property's potential to yield specific data that addresses important research questions.

Historical Structures

Generally, properties eligible for listing in the National Register are at least 50 years old. The California Office of Historic Preservation generally recommends an evaluation of buildings and structures older than 45 years of age by professionals meeting the Secretary of the Interior Standards Professional Qualifications for Architectural History and Archeology. There are three buildings on the site. Buildings A and B, constructed in 1966, are stucco buildings used for instruction. No changes are proposed to Buildings A and B. Building C consists of five connected modular buildings constructed in 1970, with constructed permitted by the State of California Department of Housing and Community Development. Building C is not a distinctive building type or style that could be considered significant. Building C is currently vacant and not safe for occupancy. None of the buildings, nor the site, are listed on the *Laguna Beach Historic Register*. **Therefore, impacts to historic resources would be less than significant**.

Archaeological Resources

As described above, the project site was not developed during the early twentieth century and therefore the likelihood of encountering historic period remains such as trash pits, privies, foundations, or structures is low. For this reason, SWCA finds the project site has a low sensitivity for containing historic period (non–Native American) archaeological resources.

However, sensitivity for prehistoric and historic Native American affiliated archaeological resources within the project site are moderate to high. Given the potential for encountering resources, this would be significant impact and mitigation measures are required. **With implementation of MM CUL-1 through -3, impacts would be less than significant**.

c. Disturb any human remains, including those interred outside of dedicated cemeteries?

***Less Than Significant Impact with Mitigation*.** A significant adverse effect may occur if grading or excavation activities associated with a project were to disturb previously interred human remains. No known human remains have been documented within the project site or the immediate vicinity. While

the project site is unlikely to contain human remains, should human remains be encountered unexpectedly during grading or construction activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. Pursuant to PCR Section 5097, if human remains of Native American origin are discovered during project construction, compliance with State laws, which fall within the jurisdiction of the Native American Heritage Commission, relating to the disposition of Native American burials would be required (refer to MM-CULT-4, which has been included to further reduce impacts). **Considering the low potential for any human remains to be located on the project site and that compliance with regulatory standards described above would ensure appropriate treatment of any human remains unexpectedly encountered during grading activities, the project's impact on human remains would be less than significant**.

Mitigation Measures

MM-CULT-1 **Retain Qualified Archaeologist**: Prior to any ground-disturbing activities on the project site, the project applicant shall retain a qualified archaeologist. A qualified archaeologist is defined as one who meets the Secretary of the Interior's Professional Qualifications Standards for archaeology.

MM-CULT-2 **Worker Environmental Awareness Training.** Prior to the commencement of ground-disturbing activities, the qualified archaeologist shall provide a briefing to construction crews to provide information on archaeological monitoring procedures, regulatory requirements for the protection of archaeological resources, and procedures to follow should unanticipated discoveries of archaeological resources be made during construction. Workers will be provided contact information and protocols to follow in the event these discoveries are made. Additionally, workers will be shown examples of the types of resources that would require notification, as well as the state and federal penalties for not following said notification.

MM-CULT-3 **Monitor for Archaeological Resources.** A qualified archaeologist shall monitor ground disturbing activities for the project for all intact, native (i.e.., not previously disturbed) soils. The monitor shall have the authority to temporarily halt or redirect construction activities in soils that are likely to contain potentially significant archaeological resources, as determined by the qualified archaeologist. The monitor shall complete a daily log documenting construction activities and observations. If potentially significant archaeological resources are exposed during construction, work in the immediate vicinity of the find (within 8 m [25 feet]) shall stop until a qualified archaeologist can evaluate the significance of the find. Construction activities may continue in other areas in coordination with the qualified archaeologist. If the discovery is determined by the qualified archaeologist to constitute a "historical resource" pursuant to CEQA Guidelines Section 15064.5(a) or a "unique archaeological resource" pursuant to PRC 21083.2(g), the qualified archaeologist shall coordinate with the project proponent, the City of Laguna Beach, and any consulting Native American Tribes (should the find be of Native American origin) to develop a formal treatment plan that would reduce impacts to the resource(s). The treatment plan established for the resource(s) shall be in accordance with CEQA Guidelines Section 15064.5(f) for historical resources and PRC Sections 21083.2(b) for unique archaeological resources. Preservation in place (i.e., avoidance) is the preferred manner of treatment and if it is determined avoidance is not feasible, treatment may

include archaeological data recovery (i.e., excavation, laboratory processing and analysis) to remove the resource(s) and reduce potential impacts to less than significant.

Upon completion of archaeological monitoring, the qualified archaeologist shall prepare a technical report documenting the methods and results the monitoring, including treatment of archaeological materials, results of artifact processing, analysis, and research, and evaluation of the resource(s) for the CRHR (if any). The format and content of the report should follow the California Office of Historic Preservation's Archaeological Resource Management Reports (ARMR): Recommended Contents and Format. Any archaeological resources identified will be documented on appropriate California Department of Parks and Recreation 523-Series Forms. The report will be prepared under the supervision of a qualified archaeologist and submitted to the project applicant. The final draft of the report will be submitted to the SCCIC.

If historic-period archaeological materials are identified and collected for laboratory analysis, they shall be curated at a public, non-profit research institution that will ensure their long-term preservation and allow access to interested scholars. Should no such institutions accept the materials, they will be donated to an educational institution or historical society. If material of Native American origin is identified and collected, the final treatment of items shall be determined in coordination between the City and any consulting tribes.

MM-CULT-4 **Inadvertent Discovery of Human Remains**: If human remains are encountered unexpectedly during implementation of the project, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to PRC Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission (NAHC). The NAHC shall then identify the person(s) thought to be the Most Likely Descendent (MLD). The MLD may, with the permission of the landowner, or his or her authorized representative, inspect the site of the discovery of the Native American remains and may recommend to the owner or the person responsible for the excavation work means for treating or disposing, with appropriate dignity, the human remains and any associated grave goods. The MLD shall complete their inspection and make their recommendation within 48 hours of being granted access by the landowner to inspect the discovery. The recommendation may include the scientific removal and nondestructive analysis of human remains and items associated with Native American burials. Upon the discovery of the Native American remains, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this mitigation measure, with the MLD regarding their recommendations, if applicable, taking into account the possibility of multiple human remains. The landowner shall discuss and confer with the descendants all reasonable options regarding the descendants' preferences for treatment.

If the NAHC is unable to identify a MLD, or the MLD identified fails to make a recommendation, or the landowner rejects the recommendation of the MLD and the

mediation provided for in subdivision (k) of Section 5097.94, if invoked, fails to provide measures acceptable to the landowner, the landowner or his or her authorized representative shall inter the human remains and items associated with Native American human remains with appropriate dignity on the facility property in a location not subject to further and future subsurface disturbance.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
6. ENERGY. Would the project:				
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	☐	☐	☒	☐
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?	☐	☐	☒	☐

Energy calculations were preformed using CalEEMod output data, which is provided in **Appendix A**. *Construction and Operation Transportation Energy Worksheet* data is provided in **Appendix D**.

Regulatory Setting

Regulations exist at federal, state, and regional levels with regard to energy and include:

- Federal Corporate Average Fuel Economy (CAFE) Standards
- Federal Energy Independence and Security Act
- California Building Energy Efficiency Standards (Title 24, Part 6)
- California Green Building Standards (Title 24, Part 11)
- California's Renewable Portfolio Standard
- Senate Bill 350
- Senate Bill 100
- Assembly Bill 32 (California Global Warming Solutions Act of 2006) and Senate Bill 32
- Assembly Bill 1493 (Pavley I)
- Executive Order S-1-07 (California Low Carbon Fuel Standard)
- California Air Resources Board:
- Advanced Clean Car Regulation
- Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling
- Regulation to Reduce Emissions of Diesel Particulate Matter, Oxides of Nitrogen, and other Criteria Pollutants from In-Use Heavy-Duty Diesel-Fueled Vehicles
- Sustainable Communities Strategy (SB 375)
- Assembly Bill 758
- Senate Bill 1389
- California Environmental Quality Act

Environmental Setting

Electricity

Electricity is provided to the central portion of the City, where the project site is located, by Southern California Edison (SCE). SCE provides electric power to more than 15 million persons, within a service area

encompassing approximately 50,000 square miles.[10] SCE generates electricity from natural gas, hydro, nuclear, solar, and fuel sources. SCE also sources energy and local grid support from third parties such as cogeneration, biomass, small hydro, wind, geothermal, solar plants, and California Department of Water Resources.

In 2020, California used 272,576 gigawatt-hours (GWh) of electricity, of which 33 percent was from renewable resources.[11] **Table 7, Electricity Consumption in the SCE Service Area for 2020**, shows the portion of the 2020 electricity consumption consumed within SCE's service area.

Table 7
Electricity Consumption in the SCE Service Area for 2020

Agriculture and Water Pump	Commercial Building	Commercial Other	Industry	Mining and Construction	Residential	Streetlight	Total Usage (GWh)
3,112	28,800	4,449	12,450	1,822	32,475	426	83,534
Source: California Energy Commission, Electricity Consumption by Entity, https://ecdms.energy.ca.gov/elecbyutil.aspx. Accessed February 2023.							

Natural Gas

Natural gas is provided to the City by Southern California Gas (SoCalGas). SoCalGas serves approximately 21.6 million customers in more than 500 communities encompassing approximately 20,000 square miles throughout Central and Southern California, from the City of Visalia to the Mexican border.[12] SoCalGas receives gas supplies from several sedimentary basins in the western United States and Canada, including supply basins located in New Mexico (San Juan Basin), West Texas (Permian Basin), the Rocky Mountains, and Western Canada as well as local California supplies.[13]

California consumed approximately 12,332 million U.S. therms (MMthm) of natural gas in 2020.[14] **Table 8, Natural Gas Consumption in the SoCalGas Service Area for 2020**, shows the portion of the 2020 natural gas consumption consume within SoCalGas' territory.

10 Southern California Edison, Who We Are, https://www.sce.com/about-us/who-we-are. Accessed February 2023.

11 California Energy Commission, 2020 Total System Electric Generation, https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2020-total-system-electric-generation/2020. Accessed October 2022.

12 Southern California Gas Company, Company Profile Website, accessed: July 13, 2020.

13 California Gas and Electric Utilities, 2022 California Gas Report, page 135.

14 California Energy Commission, Natural Gas Consumption by Entity, https://ecdms.energy.ca.gov/gasbyutil.aspx. Accessed October 2022.

Table 8
Natural Gas Consumption in the SoCalGas Service Area for 2020

Agriculture and Water Pump	Commercial Building	Commercial Other	Industry	Mining and Construction	Residential	Total Usage (MMthm)
74	802	88	1,616	226	2,426	5,231

Source: California Energy Commission, Natural Gas Consumption by Entity, https://ecdms.energy.ca.gov/gasbyutil.aspx. Accessed February 2023.

Transportation Energy

Petroleum fuels are primarily consumed by on-road and off-road equipment in addition to some industrial processes. In 2019, approximately 39 percent of the State's energy consumption was used for transportation activities.[15] Californians presently consume over 19 billion gallons of motor vehicle fuels per year. Though California's population and economy are expected to grow, gasoline demand is projected to decline from roughly 15.6 billion gallons in 2017 to between 12.1 billion and 12.6 billion gallons in 2030, or a reduction of more than 19 percent. This decline comes in response to both increasing vehicle electrification and higher fuel economy for new gasoline vehicles.[16]

California is one of the top producers of petroleum in the nation with drilling operations occurring throughout the State. A network of crude oil pipelines connects production areas to oil refineries in the Los Angeles area, the San Francisco Bay area, and the Central Valley. California oil refineries also process Alaskan and foreign crude oil received at ports in Los Angeles, Long Beach, and the San Francisco Bay area. California requires all motorists use California Reformulated Gasoline, which is sourced almost exclusively from in-state refineries. Gasoline, which is used by light-duty cars, pickup trucks, and sport utility vehicles, is the most used transportation fuel in California with 15.4 billion gallons sold in 2019. Diesel, which is used primarily by heavy duty-trucks, delivery vehicles, buses, trains, ships, boats and barges, farm equipment, and heavy-duty construction and military vehicles, is the second most used fuel in California with 1.8 billion gallons sold in 2019.[17]

Checklist Discussion

a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?

Less Than Significant Impact. A significant impact may occur if a project were to consume energy resources in a wasteful, inefficient, or unnecessary way during construction or operation. In order to determine if the project would result in a potentially significant environmental impact due to the wasteful,

[15] California Energy Commission, Transportation Energy Demand Forecast, 2018-2030. Page 1. Note that due to atypical fuel consumption during 2020 as a result of the Covid-19 pandemic, 2019 data were utilized on for this analysis.

[16] California Energy Commission, Transportation Energy Demand Forecast, 2018-2030. Page 85. Note that due to atypical fuel consumption during 2020 as a result of the Covid-19 pandemic, 2019 data were utilized on for this analysis.

[17] California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2019. Diesel is adjusted to account for retail (49%) and non-retail (51%) diesel sales. Note that due to atypical fuel consumption during 2020 as a result of the Covid-19 pandemic, 2019 sales data were utilized on for this analysis.

inefficient, or unnecessary consumption of energy resources during the construction or operation of the project, an analysis of the project's energy use for all stages of the project has been provided. Section 15126.2(b) of the CEQA Guidelines refers to Appendix F of the CEQA Guidelines as guidance for the information to be provided in the analysis. Appendix F provides the following factors that a lead agency may consider in the discussion of energy use:

1. The project's energy requirements and its energy use efficiencies by amount and fuel type for each stage of the project including construction, operation, maintenance, and/or removal (If appropriate, the energy intensiveness of materials may be discussed);

2. The effects of the project on local and regional energy supplies and on requirements for additional capacity;

3. The effects of the project on peak and base period demands for electricity and other forms of energy;

4. The degree to which the project complies with existing energy standards;

5. The effects of the project on energy resources; and

6. The project's projected transportation energy use requirements and its overall use of efficient transportation alternatives.

In accordance with the considerations above, the following analysis evaluates the potential energy impacts of the project with a particular emphasis on whether the project would result in the inefficient, wasteful, or unnecessary consumption of energy. The energy analysis does not include a full life cycle analysis of energy usage that would occur over the production/transport of materials used during project construction or operation, or the end of life for the materials and processes that would occur as an indirect result of the project (i.e., "the energy intensiveness of materials"). Estimating the energy usage associated with these processes would be too speculative for meaningful consideration, would require analysis beyond the current state-of-the-art in impact assessment, and may lead to a false or misleading level of precision in reporting. Manufacture and transport of materials related to project construction and operation are expected to be regulated under regulatory energy efficiency requirements. Therefore, it is assumed that energy usage related to construction and operational materials would be consistent with current regulatory requirements regarding energy usage.

Construction

Construction activities, including the construction of new buildings and facilities, typically do not involve the consumption of natural gas. In addition, construction of the project would not require electricity to power most construction equipment as the majority of construction equipment during demolition and grading would be gas- or diesel-powered. Additionally, it is anticipated that most of the electric-powered construction equipment would be hand tools (e.g., power drills, table saws, compressors) and lighting, which would result in minimal electricity usage during construction activities.

However, during project construction, energy would be consumed in the form of petroleum-based fuels used to power off-road construction vehicles and equipment on the project site, construction worker travel to and from the project site, and vehicles used to deliver materials to the site. As taken from the

CalEEMod modeling prepared for the project (see **Appendix A**), diesel-powered construction equipment (such as off-road equipment and hauling and vendor trucks) would result in approximately 606.13 metric tons of carbon dioxide ($MTCO_2$) while gasoline-powered construction equipment (such as worker automobiles) would result in approximately 32.9 $MTCO_2$.[18] According to CO_2 emission factors for transportation fuels published by the U.S. Energy Information Administration, burning one gallon of diesel fuel generates approximately 22.4 pounds of CO_2 and burning one gallon of gasoline produces approximately 19.6 pounds of CO_2.[19] Based on the U.S. Energy Information Administration fuel consumption factors, and the project's estimated "total CO_2" emissions presented in the CalEEMod output sheets, it is estimated that the project's construction activities would consume a total of approximately 60,356 gallons of diesel fuel and approximately 3,701 gallons of gasoline. According to fuel sales data from the California Energy Commission, fuel consumption in Orange County was approximately 1.16 billion gallons of gasoline and 91 million gallons of diesel fuel in 2021 (the most recent year of reported data).[20] Accordingly, the project's transportation-energy consumption during construction would represent a negligible portion of annual gasoline and diesel consumption within Orange County.

Energy use during construction would be temporary in nature, and construction equipment used would be typical of similar-sized construction projects in the region. In addition, the project would utilize construction contractors who demonstrate compliance with applicable CARB regulations that restrict the idling of heavy-duty diesel motor vehicles and govern the accelerated retrofitting, repowering, or replacement of heavy-duty diesel on- and off-road equipment. Construction activities would utilize fuel-efficient equipment consistent with state and federal regulations and would comply with state measures to reduce the inefficient, wasteful, or unnecessary consumption of energy. In addition, per applicable regulatory requirements, the project would comply with construction waste management practices to divert construction and demolition debris. These practices would result in efficient use of transportation-energy necessary to construct the project. Furthermore, in the interest of cost efficiency, construction contractors would not utilize fuel in a manner that is wasteful or unnecessary. As such, the project would not involve the inefficient, wasteful, and unnecessary use of energy during construction. **Therefore, impacts during construction would be less than significant and no mitigation measures would be required.**

Operation

Transportation-Energy

Transportation-related energy in the form of gasoline and diesel fuel would also be consumed during project operations related to water usage, solid waste disposal, and vehicle trips to and from the project site by students and visitors. According to the project's CalEEMod modeling (see **Appendix A** of this document), the project would result in 851,850 annual VMT. According to CARB's On-Road Emissions Factor (EMFAC) model, in Orange County, diesel-powered vehicles will account for 4.23 percent of all on-

[18] See Construction Transportation Energy Worksheet included as **Appendix D** to this document.

[19] U.S. Energy Information Administration, Environment Carbon Dioxide Emissions Coefficients, February 2, 2016.

[20] California Energy Commission, California Retail Fuel Outlet Annual Reporting (CEC-A15) Results, 2021. Diesel is adjusted to account for retail (50.3%) and non-retail (49.7%) diesel sales.

road VMT and will have an average fuel efficiency weighted for percentage of miles traveled of 14 miles per gallon (mpg) in 2025 (the project's operational year), while gasoline-powered vehicles will account for 89.05 percent of on-road VMT with a fuel efficiency of 27 mpg; electric-powered vehicles, natural-gas-powered vehicles, and plug-in hybrid vehicles will account for the remaining on-road VMT.[21] Accordingly, using the same percentages of VMT and average fuel economy projected by EMFAC, operation of the project would consume approximately 2,854 gallons of diesel fuel and 28,095 gallons of gasoline per year.[22] According to CARB's EMFAC model, on-road vehicles in Orange County will consume 136 million gallons of diesel and 1.11 billion gallons of gasoline in 2025 (i.e., the project's buildout year).[23] Accordingly, fuel consumption by students and visitors during operation of the project would represent a negligible portion of fuel consumed in the County.

The project's users would utilize vehicles that comply with CAFE fuel economy standards and the Pavley standards, which are designed to result in more efficient use of transportation fuels. Additionally, as detailed in response to Checklist Question II.17(a), the project would not conflict with circulation system plans.

Electricity and Natural Gas

During operation of the project, electricity and natural gas would be consumed for multiple purposes, including, but not limited to, HVAC, refrigeration, water heating, lighting, and the use of electronics, equipment, and appliances. According to the CalEEMod outputs (see **Appendix A**), the project would have an electrical demand of 311,049 kilowatt-hours per year (kWh/yr), or 0.31 GWh, and a natural gas demand of 1,094,738 cubic-feet (cf) per year, or 108 cf per day.[24] Electricity would be provided to the project site by SCE, which projects that its total sales in 2025 fiscal year (the project's operational year) will be 100,907 GWh.[25] Natural gas would be provided to the project site by SoCalGas, which projects that natural gas consumption within SoCalGas' planning area will be approximately 2,280 million cf per day in 2025.[26] As

[21] California Air Resources Board, EMFAC2021 on-road vehicle emissions factor model, EMFAC2021 (Modeling input: Orange County; Fleet Aggregate; Annual; 2025). The modeling input values are considered generally representative of conditions for the region and representative of the majority of vehicles associated with project related VMT. See EMFAC Operational Transportation Energy Worksheet in **Appendix D** of this document.

[22] Calculated as follows for diesel: 4.69 percent of total 851,850 VMT = 39,952 diesel VMT / 14 diesel mpg = 2,854 gallons of diesel. Calculated as follows for gasoline: 89.05 percent of total 851,850 VMT = 758,572 gasoline VMT / 27 gasoline mpg = 28,095 gallons of gasoline.

[23] California Air Resources Board, EMFAC2021 on-road vehicle emissions factor model, EMFAC2021 (Modeling input: Orange County; Fleet Aggregate; Annual; 2025). The modeling input values are considered generally representative of conditions for the region and representative of the majority of vehicles associated with project related VMT. See EMFAC Operational Transportation Energy Worksheet in **Appendix D** of this document.

[24] Note that the CalEEMod outputs present the project's operational natural gas demand as 38,335 kilo-British thermal units (kBTU) per year. 1 kBTU = 1.026 cubic feet; 38,335 kBTU per year x 1.026 = 39,332 cf per year; 39,332 cf per year / 365 days per year = 108 cf per day.

[25] California Energy Commission, California Energy Demand 2019-2030 Baseline Forecast –LSE and BA Tables Mid Demand Case, Form 1.1c: Electricity Deliveries to End Users by Agency (GWh), Corrected February 2020, TN No. 232307, Docketed March 4, 2020.

[26] California Gas and Electric Utilities, 2022 California Gas Report, page 185.

such, the project's electrical and natural gas demands would represent exceedingly small percentages of projected supplies and consumptions for SCE and SoCalGas, respectively.

The project would be required to comply with all standards set in California Building Code (CBC) Title 24, which would minimize the wasteful, inefficient, or unnecessary consumption of energy resources during operation. California's Green Building Standards Code (CALGreen; Title 24, Part 11) requires implementation of energy efficient light fixtures and building materials into the design of new construction projects. Furthermore, the 2019 Building Energy Efficiency Standards of the California Energy Code (CBC Title 24, Part 6) requires newly constructed buildings to meet energy performance standards set by the Energy Commission. These standards are specifically crafted for new buildings to result in energy efficient performance so that the buildings do not result in wasteful, inefficient, or unnecessary consumption of energy. The standards are updated every three years and each iteration is more energy efficient than the previous standards. Furthermore, the project would continue to reduce its use of nonrenewable energy resources as the electricity generated by renewable resources provided by SCE continues to increase to comply with State requirements through Senate Bill 100 (SB 100), which requires electricity providers to increase procurement from eligible renewable energy resources to 60 percent by 2030 and 100 percent by 2045.

Summary

Based on the above, the project would not involve the inefficient, wasteful, and unnecessary use of energy during operation. **Therefore, impacts would be less than significant**.

Mitigation Measures

None required.

b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency?

Less Than Significant Impact. A significant impact may occur if a project were to conflict with a state or local plan for renewable energy or energy efficiency.

State regulations for energy efficiency are contained within California's Building Energy Efficiency Standards and CALGreen, both of which are set forth in CCR Title 24. California's Building Energy Efficiency Standards were established in 1978 and serve to enhance and regulate California's building standards. These standards include regulations for residential and non-residential buildings constructed in California to reduce energy demand and consumption. The Building Energy Efficiency Standards are updated every 3 years to incorporate and consider new energy efficiency technologies and methodologies. CALGreen institutes mandatory minimum environmental performance standards for all ground-up, new construction of commercial, low-rise residential, and state-owned buildings, as well as schools and hospitals. The new 2022 standards became effect on January 1, 2023. As these standards and regulations are mandatory, the project would be required to meet Building Energy Efficiency Standards and CALGreen standards to reduce energy demand and increase energy efficiency.

Locally, the project would be subject to the policies set forth in SCAG's RTP/SCS (Connect SoCal) at the regional level, and the City's General Plan Land Use Element and the Laguna Beach Climate Protection Action Plan (CPAP) at the City level. The RTP/SCS is a regional growth-management strategy that targets per-capita GHG reduction from passenger vehicles and light-duty trucks in the Southern California region

pursuant to Senate Bill (SB) 375. With regard to individual developments, such as the project, the strategies and policies set forth in Connect SoCal include improved energy efficiency. Connect SoCal's goal is to actively encourage and create incentives for energy efficiency, where possible. Additionally, the City's General Plan Land Use Element contains Policy 1.2, which supports design strategies and construction standards that maximize the use of alternative energy sources and passive solar architecture in buildings. The actions associated with Policy 1.2 include requiring low-emission vehicles and equipment for developers/contractors, and ensuring that development projects implement sustainable landscaping strategies such as low or ultra-low water use plants. The City of Laguna Beach adopted the CPAP in 2009. The goal of the plan was to reduce GHG emissions seven percent below 1990 levels by 2012. The CPAP is geared towards City government action, such as City outreach to local businesses and residents to encourage sustainable practices, the adoption of local guidance and policies to reduce energy and water use, and the adoption of practices to reduce GHG emissions in government operations. Therefore, the CPAP is limited in its application to the proposed project. However, the intent of the CPAP is to ensure development is designed and constructed in a manner which results in a reduction of energy consumption.

The project would be developed on an infill site within an existing urbanized area and would include bicycle parking. Furthermore, the number of daily vehicle trips generated by the project is well below the threshold required by the City of Laguna Beach to perform a vehicle miles traveled analysis. Therefore, as detailed in Section II.8, Greenhouse Gas Emissions, the project would not conflict with the applicable objectives of the 2020-2045 RTP/SCS. In addition, the project would include sustainability features consistent with Title 24 energy conservation standards and would include energy efficient lighting and HVAC, low water use plantings, and drip irrigation. As previously discussed, the Project would follow applicable energy standards and regulations during construction and would be built and operated in accordance with all applicable Building Energy Efficiency Standards and CALGreen standards in effect at the time of construction. The project's sustainability features and compliance with CALGreen would increase energy efficiency within the buildings, which would align with General Plan Policy 1.2 and the CPAP goals and recommendations.

Based on the above, the Project would implement features and systems designed to reduce the consumption of energy and has been located consistent with policies designed to reduce VMT. Therefore, the Project would not conflict with or obstruct a state or local plan for renewable energy or energy efficiency. **Therefore, impacts would be less than significant**.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
7. GEOLOGY AND SOILS. Would the project:				
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:				
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning map, issued by the State Geologist for the area or based on other substantial evidence of a known fault?	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐
iv) Landslides?	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?	☐	☐	☒	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☒
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☒	☐

Information in this section is incorporated from the *Preliminary Geotechnical Investigation, Proposed North Campus Student Center, 2825 Laguna Canyon Road, Laguna Beach, California*, prepared by Geofirm, July 1, 2021. The *Preliminary Geotechnical Investigation* is provided in **Appendix E**.

Regulatory Setting

Regulations exist at state and local levels with regard to geology and soils and include:

- California Alquist-Priolo Earthquake Fault Zoning Act
- California Seismic Hazards Mapping Act
- California Building Code
- Laguna Beach Building Code
- Laguna Beach General Plan Safety Element
- Laguna Beach Local Hazard Mitigation Plan (LHMP)

Environmental Setting

General Site Conditions

The project site is located within the "Big Bend" area of Laguna Canyon. The central and northern portions occupy relatively flat terrain within the floor of Laguna Canyon, while the southern portion of the property contains a minor slope and elevated pad area with relief on the order of 14 feet. The natural hillside terrain offsite on the south ascends to a distal ridgeline as high as 755 feet above the site to an elevation of 905 feet above mean sea level (MSL). The slope is incised by two major north-south trending tributary canyons, the Southeast and South Canyon Watersheds. Past phases of rough and precise earthwork grading were conducted on portions of the adjacent site to improve parking areas and surface drainage conditions. Grading resulted in the placement of approximately 3- to 6-feet of engineered fill across the site.

Faulting and Seismicity

Laguna Beach does not currently have any Alquist-Priolo Special Study Zones. Seismic shaking is of particular concern for the City due to the proximity to active faults that can generate significant earthquakes. The Laguna Beach LHMP identifies a 1% to 25% probability of a magnitude 6.7 or greater event to occur along numerous faults within southern California in the next 30 years. The highest probability (25%) is projected for the San Andreas fault, located approximately 52 miles from the City. While the closest fault (Newport Inglewood) is approximately 2 miles from the City and estimated to have a 1% probability Seismic shaking is of particular concern for the City of Laguna Beach due to the proximity to active faults that can generate significant earthquakes. The Laguna Beach LHMP identifies a 1% to 25% probability of a magnitude 6.7 or greater event to occur along numerous faults within southern California in the next 30 years. The highest probability (25%) is projected for the San Andreas fault, located approximately 52 miles from the City. While the closest fault (Newport Inglewood) is approximately 2 miles from the City and estimated to have a 1% probability.

The closest mapped ancient fault consists of the Laguna Canyon fault, approximately 1,100 feet southwest of the site, which controls much of the geologic structure of Laguna Canyon. The closest active fault is the San Joaquin Hills Blind Thrust, approximately 3.2 miles away. Risk from seismic rockfalls on the site is considered low.

Liquefaction

Multiple Laguna Beach areas are at risk of liquefaction, primarily the beaches and the canyon areas. The soils in these areas are sandy or loose sediment washed down the canyons by floods and creeks, and such material is prone to liquefaction. According to the LHMP, specific risk areas are where the Pacific Coast Highway crosses below Emerald Canyon and the roads and properties of Laguna, Bluebird, and Aliso Canyons.

The project site is subject to liquefaction and may experience vertical seismic settlements from liquefaction on the order of 4 to 6 inches.

Landsliding and Mudflows

Parts of Laguna Beach are at risk of landslides. These areas are generally located at the bottom of canyons and along the canyon slopes. According to studies of landslide susceptibility in Orange County, areas facing high or very high risk of sliding under normal conditions include the slopes on either side of Laguna, Bluebird, and Aliso canyons; the area north of the Temple Hill neighborhood; and many of the coastal bluffs. Additional areas face a high risk of landslides in the event of an earthquake, including the hills above Irvine Cove, Boat Canyon, and the Skyline Drive neighborhood.

The site is underlain by bedrock assigned to the Vaqueros Formation of Miocene age. The Topanga Formation outcrops locally within the adjacent natural slopes south and east of the site. Regional maps depict the presence of an ancient landslide within the slope to the west of the site; however, no evidence for its presence was observed during geologic field mapping for the project and its location is not expected to impact the site.

Paleontological Resources

The project site is situated within the Miocene formation, which is characterized by sandstone, shale, siltstone, and conglomerate. The Miocene formation is made up of marine sedimentary rocks and dates to 23 to 5.3 million years ago. Soils within the site consist of Capistrano sandy loam throughout the majority of the site and Cieneba–Rock Outcrop complex along the southern portion of the project site.

As stated in Orange County's General Plan, Resources Element, the City has the potential and sensitivity for paleontological resources.[27]

Checklist Discussion

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving?

i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? Refer to Division of Mines and Geology Special Publication 42.

ii. Strong seismic ground shaking?

Less Than Significant Impact. Impacts could occur if the project, directly or indirectly, exacerbated risks of loss, injury, or death due to the rupture of a known earthquake fault or strong seismic ground shaking. Laguna Beach does not currently have any Alquist-Priolo Special Study Zones and the site is not located in an Alquist-Priolo Special Study Zone.

The project site is located in the seismically active Southern California region and strong seismic ground shaking as a result of earthquakes along several local and regional faults is likely to occur during the design

[27] Orange County General Plan, Resources Element, Figure VI-9.

life of the project. However, the risk from strong seismic shaking on the site is no greater than other areas of Southern California. A Preliminary Geotechnical Investigation was prepared for the site and project that includes project-specific recommendations that would be incorporated to reduce risk of loss, injury, and death from seismic events. Additionally, as required by state and local building regulations, the City would review the building plans for compliance with the City Building Code and the California Building Code seismic standards related to seismic safety. **Therefore, impacts would be less than significant.**

iii. Seismic-related ground failure, including liquefaction?

Less than Significant Impact. Impacts could occur if the project exacerbated risks of loss, injury, or death due to strong seismic ground shaking resulting in seismic-related ground failure or liquefaction of poorly consolidated and saturated soils. The Seismic Hazard Zones Map for the Laguna Beach Quadrangle identifies the site and all of the Laguna Canyon drainage as within a zone of required investigation for liquefaction. Investigations conducted for the Preliminary Geotechnical Investigation found that the project site is subject to liquefaction and may experience vertical seismic settlements from liquefaction on the order of 4 to 6 inches. According to the Preliminary Geotechnical Investigation, the potential for shallow ground cracking to occur during an earthquake is a possibility at any site, but does not pose a significant hazard to site development. Due to the potential for liquefaction settlement, a Site Class F is recommended for design of the building, along with other recommendations included in the Preliminary Geotechnical Investigation. Additionally, as required by state and local building regulations, the City would review the building plans for compliance with the City Building Code and the California Building Code seismic standards related to seismic safety. **Therefore, impacts would be less than significant**.

iv. Landslides?

Less than Significant Impact. Impacts could occur if the project exacerbated risks of loss, injury, or death due to strong seismic ground shaking resulting in landsliding. According to the Preliminary Geotechnical Investigation, rock/block falls may occur within the adjacent natural slope and impact the site during an earthquake. However, given the nature of the sandstone blocks near the slope, it is likely that they would be broken down into smaller and smaller fragments on their descent to the base of the slope during a rock fall event, and potential impacts to the project due to this form of seismically induced surficial slope instability is considered low. **Impacts would be less than significant.**

b) Result in substantial soil erosion or the loss of topsoil?

Less than Significant Impact. The project would result in a significant impact if it created substantial soil erosion or the loss of topsoil. The site is underlain by bedrock topped with approximately 3- to 6-feet of engineered fill across the site. Ground-disturbing activities associated with project construction may result in the removal of some topsoil during construction. The project includes an Erosion Control Plan that includes erosion control Best Management Practices (BMPs), Sediment Control BMPs, and other construction-related non-stormwater management control BMPs. Therefore, construction BMPs would be implemented to avoid or minimize soil erosion associated with ground-disturbing activities. **As such, impacts would be less than significant.**

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse?

Less than Significant Impact. Impacts would occur if the project was located on a geologic unit or soil that is unstable, or that would become unstable from the project, and potentially result in on- or off-site landslide, lateral spreading, subsidence, liquefaction, or collapse. According to the Preliminary Geotechnical Investigation, the site is underlain by bedrock assigned to the Vaqueros Formation of Miocene age. The Topanga Formation outcrops locally within the adjacent natural slopes south and east of the site. Regional maps depict the presence of an ancient landslide within the slope to the west of the site; however, no evidence for its presence was observed during geologic field mapping and its location is not expected to impact the site. Therefore, the site is not located on a geologic unit of soil that is unstable. Additionally, proper engineering and adherence to required building standards, such as the UBC and CBC would be implemented. **Therefore, impacts would be less than significant**.

d) Be located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property?

Less than Significant Impact. Impacts would occur if the project was located on expansive soil, as defined in Table 18 1 B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property. According to the Preliminary Geotechnical Investigation, the site has low expansion potential. Therefore, the site is not subject to expansive soils. Additionally, proper engineering and adherence to required building standards such as the UBC and CBC, would be implemented. **Therefore, impacts would be less than significant**.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?

No Impact. The project site is located within the City and served by existing sewer infrastructure. No septic tanks would be required or installed. **No impact would occur.**

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?

Less than Significant Impact. A significant impact may occur if a project directly or indirectly destroys a unique paleontological resource or site or unique geologic feature. Paleontological resources are the fossilized remains, imprints, or traces of past life preserved in the geologic record. This can include bones, teeth, soft tissues, shells, plant material, microscopic organisms, footprints, trackways, and burrows. Fossils are the only record of the natural history of life on this planet.

Despite the frequency of sedimentary rock in the geologic record, and the number of organisms that have lived throughout the planet's history, only a very small number of remains have been preserved in the fossil record. Fossils are important scientific resources, allowing the study of:

- The evolutionary history of extinct organisms, including their lifestyle, interrelationships, distribution, speciation, extinction, and relation to modern groups.
- The taphonomic agents responsible for fossil preservation, including biases in the fossil record.
- Ancient environments, in which these organisms lived, and the distribution and change in these

environments and their organisms through time.

- The temporal relationships of rock deposits from one area to another, and the timing of geologic events.

A Vertebrate Paleontology Records Check was conducted by the Los Angeles County Natural History Museum for paleontological resources on the project site and vicinity. The research did not find any recorded paleontological resources within the project site boundaries. The research did find that there are localities of resources nearby from the same sedimentary deposits occurring at depth in the project area.[28] **Table 9, Paleontology Records Search**, shows fossil localities identified in the local and regional area.

Table 9
Paleontology Records Search

Locality Number	Location	Formation	Taxa	Depth
LACM IP 7848	Laguna Canyon, Joaquin Hills; about 2.5 miles north of Laguna Beach	Vaqueros Formation	Invertebrates (uncatalogued)	Surface
LACM IP 22002	Head of canyon leading east from Niguel Road at farm 1 1/2 miles from Laguna Canyon	Unknown Formation (Miocene)	Invertebrates (uncatalogued)	Unknown
LACM VP 7249	Ridge between Temple Hill and Wood Canyon, south side of wash on cliff face	Topanga Formation	Marine mammals (Dugongidae)	Unknown
LACM VP 4007	In the head of Rim Rock Canyon south of Temple Hill Drive & west of Top of the World on Temple Hill	Topanga Formation	Marine mammal (Desmostylus)	Unknown
LACM IP 21977, 21978	Ridge between Wood Canyon and Laguna Canyon, 0.4 miles northeast of Alta Laguna Park	Unknown Formation (Miocene; massive sandstone)	Invertebrate beds of gastropods (Turitella) and sea urchins (Echini)	Surface
LACM IP 21976	Ridge between Wood Canyon and Laguna Canyon, 0.5 miles northeast of Alta Laguna Park	Unknown Formation (Miocene)	Invertebrate beds of gastropods (Turitella)	Surface
Correspondence from Alyssa Bell, Ph.D., Natural History Museum of Los Angeles County, December 11, 2022. Refer to Appendix C to this document.				

According to the Orange County Resources Element, the project site is located in the San Joaquin Hills District, which is considered a sensitive paleontological area.[29] The project would require excavations up to approximately 15 feet for removal of undocumented fill and development of the Student Center and associated site improvements. Deeper excavations could uncover significant fossil vertebrate remains.

[28] Correspondence from Alyssa Bell, Ph.D., Natural History Museum of Los Angeles County, December 11, 2022. Refer to Appendix C to this document.

[29] Orange County, General Plan, Resources Element, Adopted December 17, 1993. Figure VI-9.

The project would be required to comply with the City of Laguna Beach Open Space Conservation Element's Site Protection policies regarding designation of a paleontologist and notification, assessment, and removal or protection of paleontological resources that may be encountered during excavation.[30] Found deposits would be treated in accordance with federal, State, and local guidelines, including those set forth in California Public Resources Code Section 21083.2. Therefore, the project would not directly or indirectly destroy a unique paleontological resource or site or unique geologic feature. **As such, impacts would be less than significant.**

Mitigation Measures

None required.

[30] City of Laguna Beach, General Plan, Open Space Conservation Element, Adopted December 17, 1993. Page 58a.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
8. GREENHOUSE GAS EMISSIONS. Would the project:				
a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	☐	☐	☒	☐
b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?	☐	☐	☒	☐

Regulatory Setting

Regulations exist at federal, state, regional, and local levels with regard to GHGs and include:

- Federal Clean Air Act
- Light Duty Vehicle Greenhouse Gas Emissions Standards and Corporate Average Fuel Economy Standards
- California Code of Regulations, Title 24, Part 6
- California Green Building Standards Code
- Executive Order S-3-05
- Assembly Bill 32 – Global Warming Solution Act of 2006
- Senate Bill 375
- Senate Bill 743
- Senate Bill 97
- Executive Order B-30-15
- Senate Bill 32 and Assembly Bill 197
- Assembly Bill 1493 – Vehicular Emissions of Greenhouse Gases
- Assembly Bill 341
- Executive Order S-01-07
- Senate Bill 350
- Senate Bill 100
- California Air Resources Board: Scoping Plan
- Laguna Beach Land Use Element
- Laguna Beach Climate Protection Action Plan

Environmental Setting

Global temperatures are moderated by naturally occurring atmospheric gases. These gases are commonly referred to as greenhouse gases (GHGs) because they function like a greenhouse, allowing solar radiation (sunlight) into the Earth's atmosphere but prevent heat from escaping, thus warming the Earth's atmosphere. GHGs, as defined under California's Assembly Bill (AB) 32, include carbon dioxide (CO2), methane (CH4), nitrous oxide (N2O), hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF6). GHGs are emitted by natural processes and human (anthropogenic) activities. Anthropogenic GHG emissions are primarily associated with (1) the burning of fossil fuels during

motorized transport, electricity generation, natural gas consumption, industrial activity, manufacturing, and other activities; (2) deforestation; (3) agricultural activity; and (4) solid waste decomposition. GHG emissions from human activities are the most significant driver of observed climate change since the mid-20th century.[31] Global climate change refers to changes in average climatic conditions over the entire Earth, including temperature, wind patterns, precipitation, and storms.

Local Regulations

City of Laguna Beach Climate Protection Action Plan (CPAP)

The City of Laguna Beach adopted the Laguna Beach CPAP in 2009. The goal of the plan was to reduce GHG emissions seven percent below 1990 levels by 2012. The plan provides recommendations for achieving the GHG emissions reduction, including increasing energy efficiency, increasing the use of public transit and active transportation, and providing public outreach and education. The CPAP is geared towards City government action, such as City outreach to local businesses and residents to encourage sustainable practices, the adoption of local guidance and policies to reduce energy and water use, and the adoption of practices to reduce GHG emissions in government operations. The CPAP contains a chapter on reducing GHG emissions from government operations, which includes GHG emissions reduction measures like providing natural and day lighting, increased reliance on natural ventilation, installation of solar panels in government buildings, use of fuel-efficient vehicles, installation of water-efficient appliances, and planting drought-tolerant landscaping.

General Plan

The Land Use Element of the General Plan includes the goal to "Create a community that is sustainable, resilient, and regenerative," which intends to guide the City towards a more sustainable future through a reduction in GHG emissions and conservation of natural resources.[32] To achieve this goal, the Land Use Element includes the following policies and actions related to GHG emissions:

Policy 1.1 Reduce greenhouse gas (GHG) emissions 80% below 1990 levels by 2050.

Action 1.1.1 Protect natural assets and open-space areas to maintain their role as "carbon sinks."

Action 1.1.2 Revise and update the Transportation, Circulation, and Growth Management Element and continue to encourage and promote the use of mass transit and other high-occupancy vehicles, bicycling walking, and telecommuting as a means to reduce the City's greatest local contributor to global warming.

[31] *United Nations Intergovernmental Panel on Climate Change, Climate Change 2013: The Physical Science Basis, Working Group I Contribution to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change, 2013.*

[32] General Plan Land Use Element. http://www.lagunabeachcity.net/civicax/filebank/blobdload.aspx?BlobID=8066. Accessed January 2023.

Action 1.1.3 Create a Sustainability/Conservation Element with policies that promote energy and resource efficiency, water efficiency, conservation, recycling, and the protection of ground and surface waters.

Action 1.1.4 Support technology and business practices that enable people to reduce vehicle miles traveled from home to work. These include the use of home office and technology such as wireless communication and video conferencing.

Action 1.1.5 Support State and/or Federal action to implement vehicle emission standards that would reduce greenhouse gas emissions.

Action 1.1.6 Evaluate and consider eliminating or significantly reducing the cost of parking permits for fuel-efficient or alternative-fuel vehicles.

Action 1.1.7 Make fuel efficiency and clean air important criteria in the acquisition of all city vehicles, including fire engines, buses, trucks, etc., and for non-specialty uses consider instituting a policy of purchasing only highly fuel-efficient or alternative-fuel vehicles.

Action 1.1.8 Continue to offer incentives to businesses that encourage employees to use buses, bikes, and carpools (or vanpools) to commute to work. Facilitate telecommuting and/or allow employees to work extended hours for fewer days per week.

Action 1.1.9 Maintain the existing free trolley/bus service and pursue extension throughout the year.

Action 1.1.10 Coordinate with surrounding cities and governmental agencies to maximize the use of public transportation including buses and metro line.

Action 1.1.11 Work with the Laguna Beach Unified School District and private schools to promote the use of clean bus or trolley transportation and discourage the use of private vehicles for trips to and from school.

Action 1.1.12 Provide public education and information about options for reducing greenhouse gas emissions.

Action 1.1.13 Encourage preservation of historic structures and adaptive reuse of buildings.

Action 1.1.14 Establish a City climate-friendly purchasing procedure.

Action 1.1.15 Evaluate establishing lighting and "dark sky" ordinances.

Policy 1.2 Support design strategies and construction standards that maximize use of alternative energy sources and passive solar architecture in buildings.

Action 1.2.1 Modify building codes and design guidelines to permit, encourage, and/or require integration of passive solar design, green roofs, active solar, and other renewable energy sources and/or provide incentives for development projects that meet or exceed silver LEED certification or better (or equivalent standards, if developed by the State).

Action 1.2.2 Revise or eliminate zoning and development standards that act as a barrier to use of renewable energy systems (except for standards required to assure protection of coastal resources.

Action 1.2.3 Construct and renovate public facilities to demonstrate green building practices and renewable energy systems.

Action 1.2.4 Establish incentives to encourage installation of renewable energy systems by homeowners and businesses including, but not limited to, the installation of energy-rated appliances, programmable thermostats, solar-electric and solar-thermal systems, cool roofs and roofing materials, and sustainable landscaping.

Action 1.2.5 Require, where feasible, all new buildings to be designed and oriented to take maximum advantage of the sun and wind for natural heating and cooling.

Action 1.2.6 Require developers and contractors to take action to minimize greenhouse gas emissions by using low-emission vehicles and equipment.

Action 1.2.7 Ensure that all development projects and major remodels implement sustainable landscaping strategies such as use of low or ultra-low water use plants and non-invasive plants.

Action 1.2.8 Evaluate establishing an air conditioning "carbon offset" fee for all permits.

Policy 1.3 Support planning and design solutions that reduce water consumption and implement water conservation practices.

Action 1.3.1 Continue to equip all city restrooms with low-flow toilets.

Action 1.3.2 Encourage or require the use of xeriscape in new construction and major remodels.

Action 1.3.3 Review existing ordinances to allow/encourage water reuse in public and private construction and remodels.

Checklist Discussion

a) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?

Less Than Significant Impact. A project may have a significant impact if project-related emissions would exceed federal, State, or regional standards or thresholds.

The project is anticipated to generate GHG emissions from area sources, energy usage, mobile sources, waste, water/wastewater, and construction equipment. The project also includes the removal of an existing vacant light industrial building. The following provides the methodology used to calculate the project related GHG emissions and the project impacts.

CalEEMod Version 2022.1 was used to calculate the GHG emissions from the project. The CalEEMod Annual Outputs for year 2025 for the proposed project and Year 2023 for the Existing Uses being removed

are available in **Appendix A** of this document. Each source of GHG emissions is described in greater detail below.

Area Sources

Area sources include emissions from consumer products, landscape equipment and architectural coatings. No changes were made to the default area source emissions.

Energy Usage

Energy usage includes emissions from the generation of electricity and natural gas used on-site. No changes were made to the default energy usage parameters.

Mobile Sources

Mobile sources include emissions from the additional vehicle miles generated from the project. The emissions from the vehicle trips associated with the project have been analyzed in the manner described above in the Air Quality Section.

Emissions of GHGs associated with mobile sources from operation of the project are based on the average daily trip generation rate, trip distance, the GHG emission factors for the mobile sources, and the GWP values for the GHGs emitted. The types of vehicles that would visit the project site include all vehicle types including automobiles, light-duty trucks, delivery trucks, and waste haul trucks. Modeling for the project was conducted using the vehicle fleet mix for the Orange County portion of the South Coast Air Basin as provided in EMFAC2021 and CalEEMod.

Waste

Waste includes the GHG emissions generated from the processing of waste from the project as well as the GHG emissions from the waste once it is interred into a landfill. AB 341 required that 75 percent of waste be diverted from landfills by 2020. To be conservative, no changes were made to the default waste parameters and no reductions were taken.

Water/Wastewater

Water includes the water used for the interior of the building as well as for landscaping and is based on the GHG emissions associated with the energy associated with supplying and treating water and wastewater. California Green Building Standards require a 20 percent reduction in indoor water usage. To be conservative, no changes were made to the default water usage parameters and no reductions were taken.

Construction

The construction-related GHG emissions were also included in the analysis and were based on a 30-year amortization rate as recommended in the SCAQMD GHG Working Group meeting on November 19, 2009. The construction related GHG emissions were calculated by CalEEMod.

The GHG emissions have been calculated based on the parameters as described above. A summary of the results is shown below in **Table 10, Project-Related GHG Emissions,** and the CalEEMod Model runs for the

project and the Existing Use are provided in **Appendix A** of this document. **Table 10, Project-Related GHG Emissions,** shows that the project's total net emissions would be 375.5 $MTCO_2e$ per year.

Table 10
Project-Related GHG Emissions

Emissions Source	Estimated Project Generated CO_2e Emissions (Metric Tons per Year)
Maximum Annual Project Operations	413
Construction Emissions	21.3
Project Subtotal	**434.3**
- Minus Emissions from the removal of the Existing Light Industrial Building	-58.8
Total Net GHG Emissions	**375.5**

*Calculation sheets are provided in **Appendix A** of this document.*
Source: CalEEMod Version 2022.1 for Opening Year 2025 for the project and Year 2023 for Existing.

According to the thresholds of significance established above, a cumulative global climate change impact would occur if the GHG emissions created from the on-going operations of the proposed project would exceed the SCAQMD threshold of 3,000 MTCO2e per year for all land uses. Therefore, as emissions do not exceed 3,000 MTCO2e per year, operation of the proposed project would not create a significant cumulative impact to global climate change.

Therefore, the project would not generate significant greenhouse gas emissions and impacts would be less than significant.

b) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?

Less Than Significant Impact.

A significant air quality impact may occur if a project is not consistent with the AB32 Scoping Plan or other applicable plans designed to reduce greenhouse gas emissions such as a Climate Action Plan, or would in some way represent a substantial hindrance to employing the policies or obtaining the goals of such a plan.

The project would not have the potential to conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of GHGs. The project's consistency with applicable plans is discussed below.

CARB Scoping Plan Consistency

In November 2017, CARB released the 2017 Scoping Plan. This Scoping Plan incorporates, coordinates, and leverages many existing and ongoing efforts and identifies new policies and actions to accomplish the State's climate goals, and includes a description of a suite of specific actions to meet the State's 2030 GHG limit. In addition, Chapter 4 provides a broader description of the many actions and proposals being explored across the sectors, including the natural resources sector, to achieve the State's mid and long-term climate goals.

Guided by legislative direction, the actions identified in the 2017 Scoping Plan reduce overall GHG emissions in California and deliver policy signals that will continue to drive investment and certainty in a low carbon economy. The 2017 Scoping Plan builds upon the successful framework established by the Initial Scoping Plan and First Update, while identifying new, technologically feasible, and cost-effective strategies to ensure that California meets its GHG reduction targets in a way that promotes and rewards innovation, continues to foster economic growth, and delivers improvements to the environment and public health, including in disadvantaged communities. The Plan includes policies to require direct GHG reductions at some of the State's largest stationary sources and mobile sources. These policies include the use of lower GHG fuels, efficiency regulations, and the Cap-and Trade Program, which constrains and reduces emissions at covered sources.

As the latest, 2022 Scoping Plan builds upon previous versions. project consistency with applicable strategies of the 2008, 2017, and 2022 Plan are assessed in **Table 11, Consistency with CARB Scoping Plan Policies and Measures.** As discussed below, any future development that could occur due to land use and zoning changes proposed by the project is consistent with the applicable strategies of the CARB Scoping Plan.

CARB adopted the 2022 Scoping Plan for Achieving Carbon Neutrality on November 16, 2022. The 2022 Scoping Plan lays out the sector-by-sector roadmap for California, the world's fifth largest economy, to achieve carbon neutrality by 2045 or earlier, outlining a technologically feasible, cost-effective, and equity-focused path to achieve the state's climate target. The Plan addresses recent legislation and direction from Governor Newsom and extends and expands upon earlier plans with a target of reducing anthropogenic emissions to 85 percent below 1990 levels by 2045. The plan also takes the unprecedented step of adding carbon neutrality as a science-based guide and touchstone for California's climate work.

Table 11
Consistency with CARB Scoping Plan Policies and Measures

2008 Scoping Plan Measures to Reduce Greenhouse Gas Emissions	Project Compliance with Measure
California Light-Duty Vehicle Greenhouse Gas Standards – Implement adopted standards and planned second phase of the program. Align zero-emission vehicle, alternative and renewable fuel, and vehicle technology programs with long-term climate change goals.	Consistent. These are CARB enforced standards; vehicles that access the project site (that are required to comply with the standards) would comply with the strategy.
Energy Efficiency – Maximize energy efficiency building and appliance standards; pursue additional efficiency including new technologies, policy, and implementation mechanisms. Pursue comparable	Consistent. Any future development projects would be required to comply with the current Title 24 standards.

Table 11
Consistency with CARB Scoping Plan Policies and Measures

investment in energy efficiency from all retail providers of electricity in California.	
Low Carbon Fuel Standard – Develop and adopt the Low Carbon Fuel Standard.	Consistent. These are CARB enforced standards; vehicles that access the project site (that are required to comply with the standards) would comply with the strategy.
Vehicle Efficiency Measures – Implement light-duty vehicle efficiency measures.	Consistent. These are CARB enforced standards; vehicles that access the project site (that are required to comply with the standards) would comply with the strategy.
Medium/Heavy-Duty Vehicles – Adopt medium and heavy-duty vehicle efficiency measures.	Consistent. These are CARB enforced standards; vehicles that access the project site (that are required to comply with the standards) would comply with the strategy.
Green Building Strategy – Expand the use of green building practices to reduce the carbon footprint of California's new and existing inventory of buildings.	Consistent. The California Green Building Standards Code (proposed Part 11, Title 24) was adopted as part of the California Building Standards Code in the CCR. Part 11 establishes voluntary standards, which are mandatory in the 2022 edition of the Code, on planning and design for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. The project is subject to these mandatory standards.
High Global Warming Potential Gases – Adopt measures to reduce high global warming potential gases.	Consistent. CARB identified five measures that reduce HFC emissions from vehicular and commercial refrigeration systems vehicles that access the project site (that are required to comply with the standards) would comply with the strategy.
Recycling and Waste – Reduce methane emissions at landfills. Increase waste diversion, composting, and commercial recycling. Move toward zero-waste.	Consistent. The state is currently developing a regulation to reduce methane emissions from municipal solid waste landfills. The project is required to comply with City programs and regulations related to solid waste, which comply with the 75 percent reduction required by 2020 per AB 341.
Water – Continue efficiency programs and use cleaner energy sources to move and treat water.	Consistent. The project is required to comply with all applicable City ordinances and CAL Green requirements.
2017 Scoping Plan Recommended Actions to Reduce Greenhouse Gas Emissions	**Project Compliance with Recommended Actions**
Implement Mobile Source Strategy: Further increase GHG stringency on all light-duty vehicles beyond existing Advanced Clean Car regulations.	Consistent. These are CARB enforced standards; vehicles that access the project site (that are required to comply with the standards) would comply with the strategy.
Implement Mobile Source Strategy: At least 1.5 million zero emission and plug-in hybrid light-duty electric vehicles by 2025 and at least 4.2 million zero emission and plug-in hybrid light-duty electric vehicles by 2030.	Consistent. These are CARB enforced standards; vehicles that access the project site (that are required to comply with the standards) would comply with the strategy.

Table 11
Consistency with CARB Scoping Plan Policies and Measures

Implement Mobile Source Strategy: Innovative Clean Transit: Transition to a suite of to-be-determined innovative clean transit options. Assumed 20 percent of new urban buses purchased beginning in 2018 will be zero emission buses with the penetration of zero-emission technology ramped up to 100 percent of new sales in 2030. Also, new natural gas buses, starting in 2018, and diesel buses, starting in 2020, meet the optional heavy-duty low-NOX standard.	Consistent. These are CARB enforced standards; vehicles that access the project site (that are required to comply with the standards) would comply with the strategy.
Implement Mobile Source Strategy: Last Mile Delivery: New regulation that would result in the use of low NO_X or cleaner engines and the deployment of increasing numbers of zero-emission trucks primarily for class 3-7 last mile delivery trucks in California. This measure assumes ZEVs comprise 2.5 percent of new Class 3–7 truck sales in local fleets starting in 2020, increasing to 10 percent in 2025 and remaining flat through 2030.	Consistent. These are CARB enforced standards; vehicles that access the project site (that are required to comply with the standards) would comply with the strategy.
Implement SB 350 by 2030: Establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a cumulative doubling of statewide energy efficiency savings in electricity and natural gas end uses by 2030.	Consistent. The project is required to comply with the current Title 24 standards.
By 2019, develop regulations and programs to support organic waste landfill reduction goals in the SLCP and SB 1383.	Consistent. The project is required to comply with City programs and regulations related to solid waste, which comply with the 75 percent reduction required by 2020 per AB 341.
2022 Scoping Plan Priority Key Actions and Recommendations	**Project Compliance with Recommended Actions**
100 percent of light-duty vehicle sales are ZEVs by 2035.	Not Applicable. This action is in regard to vehicle sales, with an aim to have 100 percent of light-duty vehicle sales be ZEVs by 2035. The proposed project is an expansion/improvement to an existing college and would not interfere with such policymaking.
VMT per capita reduced 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.	No Conflict. The Project would not result in an unmitigated impact to VMT. Therefore, the Project would not interfere with the goals of reducing VMT per capita by 25 percent by 2030 and by 30 percent by 2045.
All electric appliances in new construction beginning 2026 (residential) and 2029 (commercial).	No Conflict. The California Green Building Standards Code (proposed Part 11, Title 24) was adopted as part of the California Building Standards Code in the CCR. Part 11 establishes voluntary standards, that are mandatory in the 2019 edition of the Code, on planning and design for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. In addition, the 2022 edition of the Code will take effect

Table 11
Consistency with CARB Scoping Plan Policies and Measures

	January 1, 2023. The project will be subject to these mandatory standards.
For existing residential buildings, 80 percent of appliance sales are electric by 2030 and 100 percent of appliance sales are electric by 2035 (appliances replaced at end of life). For existing commercial buildings, 80 percent of appliance sales are electric by 2030 and 100 percent of appliance sales are electric by 2045 (appliances replaced at end of life).	Not Applicable. This action is in regard to appliance sales and the proposed project is an expansion/improvement to an existing college and would not interfere with such policymaking. Furthermore, although this action is not necessarily applicable on a project-specific basis, the proposed project is subject to the California Green Building Standards Code (proposed Part 11, Title 24) which was adopted as part of the California Building Standards Code in the CCR. Part 11 establishes voluntary standards, that are mandatory in the 2022 edition of the Code, on planning and design for sustainable site development, energy efficiency (in excess of the California Energy Code requirements), water conservation, material conservation, and internal air contaminants. The project will be subject to these mandatory standards.
Source: CARB Scoping Plan (2008, 2017, 2022)	

The 2022 Scoping Plan included the following Key Actions and Recommendations:

- 100 percent of light-duty vehicle sales are ZEVs by 2035.
- VMT per capita reduced 25 percent below 2019 levels by 2030 and 30 percent below 2019 levels by 2045.
- All electric appliances in new construction beginning 2026 (residential) and 2029 (commercial).
- For existing residential buildings, 80 percent of appliance sales are electric by 2030 and 100 percent of appliance sales are electric by 2035 (appliances replaced at end of life). For existing commercial buildings, 80 percent of appliance sales are electric by 2030 and 100 percent of appliance sales are electric by 2045 (appliances replaced at end of life)

Through regulation, the Project will not conflict with any of these Key Actions and Recommendations and is consistent with the applicable goals/policies of the 2022 CARB Scoping Plan.

Executive Orders S-03-05 and B-30-15

Although the emissions levels of the future development in 2050 cannot be reliably quantified, statewide efforts are underway to facilitate the State's achievement of that goal and it is reasonable to expect the emissions profile of the proposed uses would only decline as the regulatory initiatives identified by CARB in the First Update are implemented, and other technological innovations occur. As such, given the reasonably anticipated decline in emissions once fully constructed and operational, the future development is consistent with the Executive Order's horizon-year goal.

Many of the emission reduction strategies recommended by CARB would serve to reduce the project's emissions level to the extent applicable by law and help lay the foundation "…for establishing a broad framework for continued emission reductions beyond 2020, on the path to 80 percent below 1990 levels by 2050," as called for in CARB's First Update to the AB 32 Scoping Plan. As such, the project's emissions trajectory is expected to follow a declining trend, consistent with the 2030 and 2050 targets and Executive Order S-3-05 and B-30-15.

SCAG's RTP/SCS

SCAG's Regional Council approved and fully adopted the Connect SoCal (2020–2045 Regional Transportation Plan/Sustainable Communities Strategy) and the addendum to the Connect SoCal Program Environmental Impact Report in September 2020. Connect SoCal is a long-range visioning plan that builds upon and expands land use and transportation strategies established over several planning cycles to increase mobility options and achieve a more sustainable growth pattern. Connect SoCal is supported by a combination of transportation and land use strategies that help the region achieve state greenhouse gas emission reduction goals and federal Clean Air Act requirements, preserve open space areas, improve public health and roadway safety, support our vital goods movement industry, and utilize resources more efficiently. By integrating the Forecasted Development Pattern with a suite of financially constrained transportation investments, Connect SoCal can reach the regional target of reducing greenhouse gases, or GHGs, from autos and light-duty trucks by 8 percent per capita by 2020, and 19 percent by 2035 (compared to 2005 levels).

The project, involves the replacement of an existing design college light industrial building with a larger, more modern design college building together with improvements to the parking area, would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area. Furthermore, the number of daily vehicle trips generated by the project is well below the threshold required by the City of Laguna Beach to perform a vehicle miles traveled analysis. Therefore, the project would not conflict with the applicable objectives of the 2020-2045 RTP/SCS.

Therefore, the project would not conflict with any applicable plan, policy or regulation of an agency adopted for the purpose of reducing the emissions of greenhouse gases. Impacts would be less than significant.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
9. HAZARDS AND HAZARDOUS MATERIALS. Would the project:				
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐
b) Create a significant hazard to the public or the environment through reasonable foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☐	☒	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☐	☒	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within 2 miles or a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	☐	☐	☐	☒
f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires?	☐	☐	☒	☐

Some information in this section is incorporated from the *Revised – Request for Alternative Methods and Materials of Construction Report for the Laguna College of Art and Design, North Campus New Student Center Project*, prepared by Dudek, May 4, 2022. The *Revised – Request for Alternative Methods and Materials of Construction Report for the Laguna College of Art and Design, North Campus New Student Center Project* is provided in **Appendix F.**

Regulatory Setting

Regulations exist at federal, state, and local levels with regard to hazards and hazardous materials and include:

- Comprehensive Environmental Response, Compensation, and Liability Act
- Resources Conservation and Recovery Act
- Hazardous Materials Transportation Act
- Federal Aviation Regulations Part 77
- California Code of Regulations
- Hazardous Materials Release Response Plans and inventory Act
- Emergency Response to Hazardous Materials Incidents
- California Government Code Section 65962.5
- Emergency Response to Hazardous Materials Incidents
- Orange County and Orange County Fire Authority Local Hazard Mitigation Plan
- Laguna Beach Zoning Code
- Laguna Beach General Plan Safety Element
- Laguna Beach Local Hazard Mitigation Plan (LHMP)
- City of Laguna Beach Wildfire Egress Study

Environmental Setting

Hazardous Materials

Hazardous materials encompass a wide range of substances, some of which are naturally occurring and some of which are man-made. Examples of hazardous materials include pesticides, herbicides, petroleum products, metals (e.g., lead, mercury, arsenic), asbestos, and chemical compounds used in manufacturing. Hazardous materials are used for a variety of purposes, including service industries, various small businesses, medical uses, schools, and households. Many chemicals used in household cleaning, construction, dry cleaning, film processing, landscaping, and automotive maintenance and repair are considered hazardous. Small-quantity hazardous waste generators include facilities such as automotive repair, dry cleaners, and medical offices. Hazardous materials could pose a substantial present or future hazard to human health or the environment when improperly handled, disposed, or otherwise managed.

Other Hazards

According to CAL FIRE, the project site is located in a Very High Fire Hazard Severity Zone of local responsibility.

Checklist Discussion

a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?

Less Than Significant Impact. A significant impact would occur if a project involved use or disposal of hazardous materials as part of its routine operations and would have the potential to generate toxic or otherwise hazardous emissions that could adversely affect sensitive receptors.

Construction of the project would involve the temporary transport, use, and disposal of potentially hazardous materials. These materials include paints, adhesives, surface coatings, cleaning agents, fuels, and oils that are typically associated with development of any development project. These materials would be used temporarily during construction and all potentially hazardous materials associated with construction activities would be used and stored in accordance with manufacturers' instructions and

handled in compliance with applicable standards and regulations. Any use of potentially hazardous materials utilized during construction of the project would comply with all local, State, and federal regulations regarding the handling of potentially hazardous materials and risk of spills would cease after construction is completed. The transport, use, and storage of hazardous materials during the construction of the project would be conducted in accordance with all applicable state and federal laws, such as the Hazardous Materials Transportation Act, Resource Conservation and Recovery Act, California Hazardous Material Management Act, and CCR Title 2. Construction activities would be contained on the project site and, thus, any emissions from the use of such materials would be minimal and localized to the project site. Therefore, construction of the project would not expose persons or the environment to a substantial risk resulting from the release of hazardous materials or exposure to health hazards in excess of regulatory standards.

Operation of the project would not involve the routine use, transport, or disposal of hazardous materials. The project includes the development of educational and parking uses. This type of use does not involve the routine use of hazardous materials. Instead, the operation of the project has limited hazardous materials that are similar to any other urban development such as cleaning solvents, paints, and pesticides for landscaping. As a result, the project generally would not produce significant amounts of hazardous waste, use or transport hazardous waste beyond those materials typically used in an urban development.

Therefore, the project would not create a significant hazard to the public or environment through the routine transport, use, or disposal of hazardous materials into the environment during construction or operation. **Impacts would be less than significant**.

b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?

Less Than Significant Impact. A significant impact would occur if the project created a significant hazard to the public or environment through exposure to reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

The project includes demolition of Building C and the existing asphalt parking lot and construction of a two-story, approximately 21,977 square foot Student Center. The Student Center would include a gallery, multi-purpose conference rooms, café/lounge, and lobby on the 1st floor. Visual communication classrooms and offices would be located on the 2nd floor. The project would not involve the use or manufacture of hazardous materials. Therefore, the project would not create a significant hazard to the public or the environment with regard to the handling, use, storage, release, or emissions of hazardous materials, including in proximity to schools. **Accordingly, impacts related to hazardous materials would be less than significant**.

c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?

Less Than Significant Impact. A significant adverse effect would occur if a project site were located within one-quarter mile of an existing or proposed school site and is projected to release toxic emissions which pose a health hazard beyond regulatory thresholds.

The project site is located on the Laguna College of Art and Design, an existing school site. However, the project is the construction and operation of a Student Center and parking lot uses and no uses are

proposed that would emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste. **Therefore, impacts would be less than significant**.

d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?

No Impact. Impacts would occur if the project were located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5.

Recognized environmental conditions (RECs) is the presence or likely presence or any hazardous substances or petroleum products in, on, or at the property due to release to the environment; under conditions indicative of a release to the environment; or under conditions that pose a material threat of a future release to the environment.

Regulatory databases such as those required by California Government Code Section 65962.5 were reviewed for the project site and properties within the standard search radii. The records search included federal, State, and tribal environmental record sources, and supplemental and local sources. The project site was not identified in the regulatory database reports. A recent review of such databases shows that there are no known hazardous sites associated with the project site as according to California DTSC EnviroStor database,[33] SWRCB's GeoTracker database,[34] and DTSC's current "Cortese" list.[35] In conclusion, there are no RECs, controlled RECs, or historical RECs on the project site. **Therefore, no impact would occur.**

e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard or excessive noise for people residing or working in the project area?

No Impact. John Wayne International Airport is located approximately 9 miles from the project. **Therefore, there would be no impact.**

f) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan.

As stated in the General Plan's Safety Element, as part of the City's preparedness initiatives, an Evacuation Analysis has been prepared that identifies the routes used for evacuation purposes. As identified in the General Plan's Safety Element the project site is located on a Critical Evacuation Roadway, Laguna Canyon

[33] California Department of Toxic Substances Control, EnviroStor, http://www.envirostor.dtsc.ca.gov/public/. Accessed: September 2022.

[34] State Water Resources Control Board, GeoTracker, website: http://geotracker.waterboards.ca.gov. Accessed: September 2022.

[35] California Department of Toxic Substances Control, Hazardous Waste and Substances Site List (Cortese), website: http://www.envirostor.dtsc.ca.gov/public/mandated_reports.asp. Accessed: September 2022.

Road.[36] Also, as indicated in the City's Wildfire Egress Study, which was prepared to examine anticipated traffic conditions and evacuation times associated with various rates of evacuation responses and alternative management strategies that could be used in response to them for the Emergency Management Zones (EMZs) within the City of Laguna Beach, Laguna Canyon Road is designated as an evacuation route.[37]

The project includes demolition of Building C and the existing asphalt parking lot and construction of a two-story, approximately 21,977 square foot Student Center. The Student Center would include a gallery, multi-purpose conference rooms, café/lounge, and lobby on the 1st floor. Visual communication classrooms and offices would be located on the 2nd floor. Other project components include the installation of landscaping, pedestrian pathways, site lighting, driveway improvements, and connection to offsite utilities (sewer, domestic water, electrical, telecommunications) in the right-of-way on Laguna Canyon Road.

No change in attendance in classes at the campus or increase in attendance of events would occur that would impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan. Although construction activities have the potential to temporarily impact traffic and vehicle speeds on Laguna Canyon Road, these impacts would be temporary and access to Laguna Canyon Road would not be blocked by project construction.

Operation of the project would not require the development of additional streets or introduce new features that would interfere with or obstruct an adopted emergency response plan. Additionally, as discussed further in Section 17, Transportation, operation of the project would not result in a significant increase in daily trips to the site and the project site fronts Laguna Canyon Road, which has sufficient capacity to provide access to and from the project site. **Therefore, impacts would be less than significant**.

g) Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?

Less Than Significant Impact. A significant impact would occur if the project would expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

As stated in the General Plan's Safety Element and defined by the California Department of Forestry and Fire Protection (CAL FIRE), all the canyon and hillside areas in Laguna Beach and some coastal terrace areas are classified within the VHFHSZ, which is the highest wildfire risk classification designated by CAL FIRE. Therefore, the project site is located in a Very High Fire Hazard Severity Zone (VHFHSZ).

The project would include an on-site Fuel Modification Zone (FMZ) would include a minimum 10-foot and up to 20-foot setback irrigated zone around all sides of the building, an irrigated zone ranging in width from approximately 60 feet along the eastern side of the building to 195 feet within the northern parking lot area, and a vegetation thinning zone within the small area considered a high habitat area along the rear of the proposed structure and in the southwest corner of the project site. The project would incorporate a combination of permanently irrigated fire resistive, ornamental landscape within the

[36] Laguna Beach General Plan, Safety Element, October 2021. Figure S-1A through -8.
[37] City of Laguna Beach, Wildfire Egress Study, July 2021. Figure 11-1.

property boundaries and a fuel modification reduction treatment that follows the City's Laguna Beach Fuel Modification Guidelines.

The existing Student Center would be demolished and replaced with a new code compliant, ignition resistive, fully-sprinklered two-story steel moment framed College Student Center conforming to and exceeding the current ignition resistant fire and building codes (Chapter 7A of the 2019 California Building Code, or then current edition) included in the City's most recent code adoption. The proposed Student Center would be constructed with a code compliant, ignition resistive, Type I-B, fully sprinklered, two-story building. Type I-B buildings are designed to hold fire in or keep fire out for an extended period of time and built with noncombustible materials; the buildings walls, columns, floors, and roofs are constructed with concrete and/or steel materials. All rooms of the Student Center and attached mechanical room would be fitted with an upgraded Ordinary Hazard Group 2 automatic interior fire sprinkler system conforming to National Fire Protection Association (NFPA) 13 commercial building requirements and NFPA 25 maintenance requirements.

The project site is currently developed with existing school uses and would not construct new development on an undeveloped site in a VHFHSZ. No change in attendance in classes or increase in attendance of events is proposed. **Therefore, impacts would be less than significant**.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
10. HYDROLOGY AND WATER QUALITY. Would the project:				
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	☐	☐	☒	☐
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	☐	☐	☒	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:				
i) result in substantial erosion or siltation on- or off-site?	☐	☐	☒	☐
ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site?	☐	☐	☒	☐
iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐
iv) impede or redirect flood flows?	☐	☐	☒	☐
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	☐	☐	☒	☐
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	☐	☐	☒	☐

Information in this section is incorporated from the *Hydrologic and Floodplain Engineering Services Draft Report, North Campus Student Center,* prepared by Rivertech Inc., August 6, 2021, and the B*ig Bend Property – Laguna College Art and Design Biological Technical Report*, prepared by VCS Environmental, June 2020. The *Hydrologic and Floodplain Engineering Services Draft Report, North Campus Student Center* is provided in **Appendix G**. The *Big Bend Property – Laguna College Art and Design Biological Technical Report* is provided in **Appendix B**.

Regulatory Setting

Regulations exist at federal, state, regional, and local levels with regard to hydrology and water quality and include:

- Clean Water Act/National Pollutant Discharge Elimination System Requirements
- National Flood Insurance Program
- NPDES Construction General Permit
- NPDES Groundwater Permit
- NPDES Municipal Permit
- Porter-Cologne Water Quality Control Act
- San Diego Regional Water Quality Control Board Water Quality Control Plan
- Laguna Beach General Plan Safety Element
- Laguna Beach Jurisdictional Runoff Management Program
- Laguna Beach Local Hazard Mitigation Plan (LHMP)

Laguna Beach Municipal Code **Environmental Setting**

Groundwater

The City is located within the San Juan Basin. Natural recharge to the San Juan Basin includes streambed infiltration in San Juan Creek, Horno Creek, Oso Creek, and Arroyo Trabuco, subsurface inflows along boundaries at the head of the tributaries upstream and other minor subsurface inflows from other boundaries, precipitation and applied water, and flow from fractures and springs. The California State Water Resources Control Board (SWRCB) has determined that the San Juan Creek watershed is not a groundwater basin but is rather a surface and underground flowing stream. Therefore, it is subject to SWRCB jurisdiction and its processes with respect to the appropriation and use of waters within the watershed.[38]

Surface Water

Laguna Canyon Creek is located to the north of the project site.[39] Two riverine features are mapped within/adjacent to the project site boundary on the USFWS's National Wetland Inventory (NWI). These features were delineated in the field and it was determined that they are not present in the project footprint.[40]

Flooding

The Federal Emergency Management Agency (FEMA) is mandated by the National Flood Insurance Act of 1968 and the Flood Disaster Protection Act of 1973 to evaluate flood hazards and provide Flood Insurance Rate Maps (FIRMs) for local and regional planners to promote sound land use and floodplain development. Further, the Flood Disaster Protection Act requires owners of all structures in identified Special Flood Hazard Areas to purchase and maintain flood insurance as a condition of receiving Federal or federally related financial assistance, such as mortgage loans from federally insured lending institutions. The National Flood Insurance Reform Act of 1994 further strengthened the National Flood Insurance Program (NFIP) by providing a grant program for State and community flood mitigation projects. The act also established a system (Community Rating System - CRS) for crediting communities that

[38] South Coast Water District 2020 Urban Water Management Plan, June 2021. Page 6-15.

[39] Rivertech Inc Hydrologic and Floodplain Engineering Services Draft Report, North Campus Student Center, August 6, 2021.

[40] Big Bend Property – Laguna College Art and Design Biological Technical Report, prepared by VCS Environmental, June 2020

implement measures to protect the natural and beneficial functions of their floodplains, as well as managing the erosion hazard.

The proposed development is partially located in the designated floodway, which at this location runs longitudinally towards the western property boundary.[41] The majority of the northern portions of the project site occur within the 100-year FEMA floodplain (Zone AE and X); however, the proposed building footprint occurs above the 100-year FEMA floodplain boundary.[42]

Checklist Discussion

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or ground water quality?

Less Than Significant Impact. A significant impact may occur if a project discharges water which does not meet the quality standards of agencies which regulate surface water quality and water discharge into storm water drainage systems. Significant impacts may also occur if a project does not comply with all applicable regulations related to surface water quality as governed by the SWRCB. These regulations include compliance with the Standard Urban Storm Water Mitigation Plan (SUSMP) requirements to reduce potential water quality impacts.

Construction

The project would demolish parking lot and walkway pavement, some turf near Buildings A and B, and demolish Building C (no changes are proposed to Buildings A and B). Construction activities associated with the project have the potential to degrade surface water quality through the exposure of surface runoff (primarily rainfall) to exposed soils, dust, and other debris, as well as from runoff from construction equipment. As stormwater flows over a construction site, it can pick up sediment, debris, and chemicals, and transport them to receiving water bodies. Additionally, the project would require earthmoving and grading during construction, which would create the potential for pollutants from equipment onsite.

The project would be required to obtain a Construction General Permit for stormwater and to comply with LBMC Chapter 22.17, Construction Project Erosion and Sediment Control Maintenance Requirements. The LBMC requires that all construction projects implement erosion controls and BMPs, monitor and evaluate their performance after each rainstorm event, and revise and repair sediment control systems as needed. In addition, LBMC Chapter 16.01, Water Quality Control, requires project plan and BMP review prior to the issuance of construction permits and may impose additional BMPs or other requirements to ensure that the project would not adversely impact water quality.

The project includes an Erosion Control Plan, which includes Best Management Practices (BMPs) for use during construction. Accordingly, the construction contractor for the project would be required to implement BMPs that would meet or exceed federal, state, and local mandated guidelines for storm water treatment to control erosion and to protect the quality of surface water runoff during the construction period. BMPs utilized could include, without limitation, disposing of waste in accordance with all

[41] Rivertech Inc Hydrologic and Floodplain Engineering Services Draft Report, North Campus Student Center, August 6, 2021.

[42] Big Bend Property – Laguna College Art and Design Biological Technical Report, prepared by VCS Environmental, June 2020. Federal Emergency Management Agency, Flood Insurance Rate Map, City of Laguna Beach, California, FEMA Map Number 06059C0409J, effective March 21, 2019.

applicable laws and regulations; cleaning up leaks, drips, and spills immediately; conducting street sweeping during construction activities; limiting the amount of soil exposed at any given time; covering trucks; keeping construction equipment in good working order; and installing sediment filters during construction activities.

In addition, construction activities would be subject to the requirements of the San Diego Regional Water Quality Control Board (SDRWQCB) Order No. R9-2013-0001, National Pollutant Discharge Elimination System (NPDES) No. CAS0109266, as amended by Order No. R9-2015-0001 and R9-2015-0100, effective November 18, 2015, Waste Discharge Requirements for Municipal Separate Storm Sewer System (MS4) Discharges within the San Diego Region (the "MS4 Permit"), which controls the quality of runoff entering municipal storm drains in the San Diego Region. The MS4 Permit enforces implementation of BMPs, including, but not limited to, approval of an Erosion and Sediment Control Plan (ESCP) for all construction activities within their jurisdiction.[43]

Operation

The project includes installation of storm drainage, pervious pavers, and a modular wetland. The project is subject to the provisions of the City's Low Impact Development (LID), which is designed to mitigate the impacts of increases in runoff and stormwater pollution as close to the source as possible. LID comprises a set of site design approaches and BMPs that promote the use of natural systems for infiltration, evapotranspiration, and use of stormwater. The City would review the site plans for compliance with the LID Ordinance, which requires the project to incorporate LID standards and practices to encourage the beneficial use of rainwater and urban runoff; reduce stormwater runoff, promote rainwater harvesting; and provide increased groundwater recharge. Incorporation of these features would ensure that there is no increase in stormwater runoff from the site.

Therefore, the project would not violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality during construction or operation. **As such, impacts would be less than significant**.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?

Less Than Significant Impact. Impacts could occur if a project includes deep excavations resulting in the potential to interfere with groundwater movement, included withdrawal of groundwater, or paving of existing permeable surfaces important to groundwater recharge.

According to the 2020 Urban Water Management Plan (UWMP), water supply in the area is provided by the Laguna Beach County Water District, which sources approximately 41 percent of its water from imported water provided by the Metropolitan Water District of Southern California (MWD) and 41 percent from groundwater.[44]

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[43] California Regional Water Quality Control Board – San Diego Region, National Pollutant Discharge Elimination System Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems Draining the Watersheds within the San Diego Region, Order No. R9-2013-0001, No. CAS0109266, as amended by Order No. R9-2015-0001 and R9-2015-0100, effective November 18, 2015.

[44] Laguna Beach County Water District, 2020 Urban Water Management Plan, June 2021. Page ES-5.

The project site would not include deep excavations and the project site is predominately developed with impervious surfaces and buildings. The project would use a municipal water supply and does not propose the use of any wells or other means of extracting groundwater. The City imports most of its potable water supply from sources outside the Basin. According to the 2020 UWMP, SCWD expects to be able to provide reliable water supplies for an average year, single dry year, and multiple dry years for its existing and planned supplies. As discussed further in Section 19, Utilities and Service Systems, SCWD would have sufficient water supply to provide for the project's water use. Therefore, the project would not impede groundwater infiltration at the project site and project water use would not result in significant depletion of groundwater supplies. **Therefore, this impact would be less than significant**.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

i. Result in substantial erosion or siltation on- or off-site;

ii. Substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or off-site;

iii. Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or;

iv. Impede or redirect flood flows?

Less Than Significant Impact. A significant impact may occur if a project results in a substantial alteration of drainage patterns that would result in a substantial increase in erosion or siltation during construction or operation of the project, increase in runoff on- and off-site, or redirect floodflows.

Construction

The proposed project improvements are limited to the removal of existing Building C structure and installation of a new campus student center structure and associated grading and structural measures, most of which is located outside of the floodplain in Zone X, and very minimally in the floodplain fringe (i.e., Zone AE) but outside of the regulatory floodway. Grading is not planned in the regulatory floodway and the proposed structure is on the floodplain fringe and outside of the floodway.[45] There is a single drainage, which travels through the City-owned undeveloped parcels to the south and southeast of the project site. This feature runs adjacent to the project footprint but is located offsite. Therefore, construction would not have the potential to alter this drainage.[46]

During construction of the project, a temporary alteration of the existing on-site drainage pattern may occur from site preparation and grading for construction. However, construction associated with the project would be subject to the requirements of SDRWQCB Order No. R9-2013-0001, National Pollutant Discharge Elimination System (NPDES) No. CAS0109266, as amended by Order No. R9-2015-0001 and R9-2015-0100, effective November 18, 2015, San Diego Region MS4 Permit, which controls the quality of

[45] Rivertech Inc Hydrologic and Floodplain Engineering Services Draft Report, North Campus Student Center, August 6, 2021.

[46] Big Bend Property – Laguna College Art and Design Biological Technical Report, prepared by VCS Environmental, June 2020. Federal Emergency Management Agency, Flood Insurance Rate Map, City of Laguna Beach, California.

runoff entering municipal storm drains in the County. The MS4 Permit enforces implementation of BMPs, including, but not limited to, approval of an ESCP for all construction activities within their jurisdiction.[47] ESCPs are required to include the elements of a SWPPP. Accordingly, the construction contractor for the project would be required to implement BMPs that would meet or exceed local, State, and federal mandated guidelines for stormwater treatment to control erosion and to protect the quality of surface water runoff during the construction period. BMPs utilized could include, without limitation: disposing of waste in accordance with all applicable laws and regulations; cleaning up leaks, drips, and spills immediately; conducting street sweeping during construction activities; limiting the amount of soil exposed at any given time; covering trucks; keeping construction equipment in good working order; and installing sediment filters during construction activities. These BMPs would control and contain stormwater and runoff on the site and runoff would not leave the site. Therefore, the BMPs would prevent flooding on- and off-site.

Operation

The proposed Student Center is to be built at grade, with minimal grading, on the fringe of the effective (existing) floodplain designated as Zone AE, of Laguna Canyon Creek. The obstructions to the flow would be caused by the north face of a proposed Student Center, which has a maximum width of approximately 77 feet, normal to the direction of flow. The proposed Student Center is not a new encroachment to the floodplain but rather the replacement of existing Building C. The total longitudinal length (i.e., in the direction of flow) of the proposed structure is approximately 150 feet but would be outside of the floodplain.[48]

Additionally, modeling of local peak flows draining to the site from the adjacent hillside areas showed that the post-project scenario yields equivalent or lower water-surface elevations throughout the study reach and there would be no net increase in base flood elevations (BFEs) on adjacent properties.[49]

The project includes installation of storm drainage, pervious pavers, and a modular wetland. As discussed above, the project is subject to the provisions of the City's Low Impact Development (LID), which is designed to mitigate the impacts of increases in runoff and stormwater pollution as close to the source as possible. The City would review the site plans for compliance with the LID Ordinance, which requires the project to incorporate LID standards and practices to reduce stormwater runoff.

Accordingly, impacts during construction and operation would be less than significant.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?

Less than Significant Impact. A significant impact may occur if a project site is sufficiently close to the ocean or other water body to be potentially at risk of the effects of seismically induced tidal phenomena

[47] California Regional Water Quality Control Board – San Diego Region, National Pollutant Discharge Elimination System Permit and Waste Discharge Requirements for Discharges from the Municipal Separate Storm Sewer Systems Draining the Watersheds within the San Diego Region, Order No. R9-2013-0001, No. CAS0109266, as amended by Order No. R9-2015-0001 and R9-2015-0100, effective November 18, 2015.

[48] Rivertech Inc Hydrologic and Floodplain Engineering Services Draft Report, North Campus Student Center, August 6, 2021.

[49] Rivertech Inc Hydrologic and Floodplain Engineering Services Draft Report, North Campus Student Center, August 6, 2021.

(seiche and tsunami) or if the project site is located adjacent to a hillside area with soil characteristics that would indicate potential susceptibility to mudslides or mudflows.

The project site is located inland and is not located near the Pacific Ocean or near any bodies of water than could create tsunami or seiche. Portions of the project site are within Zones AE and X, which is a designation for areas determined to have a minimal flood hazard.[50] The area where Building C would be constructed is outside any FEMA-designated flood zones. **Accordingly, impacts would be less than significant**.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?

Less Than Significant Impact. Impacts could occur if a project is not consistent with water quality control plans or sustainable groundwater management plans.

Water quality control plans applicable to the project include the SDRWQCB *Water Quality Control Plan, for the San Diego Basin* (Basin Plan) and the City's *Jurisdictional Runoff Management Program* (Management Plan). Adopted by SDRWQCB, the Basin Plan designates beneficial uses for surface and groundwaters, sets narrative and numerical objectives that must be attained or maintained to protect the designated beneficial uses and conform to the State's anti-degradation policy, and describes implementation programs to protect all waters in the Santa Ana Region. In addition, the Basin Plan incorporates (by reference) all applicable State and Regional Board plans and policies and other pertinent water quality policies and regulations. The Management Plan was developed by the City of Laguna Beach Water Quality Department to help meet water quality regulations. The Management Plan identifies and describes the various watersheds in the City, summarizes the water quality conditions of the City's waters, identifies known sources of pollutants, describes the governing regulations for water quality, describes the BMPs that are being implemented by the City, discusses existing Total Maximum Daily Loads (TMDL).[51]

Implementation Plans and Watershed Management Plans

Construction and operation of the project would involve activities that have the potential to conflict with the water quality goals in the Basin Plan and Management Plan through the spread of contaminants into surface or groundwater supplies. As described above, the project would not include any deep excavations resulting in the potential to interfere with groundwater movement, included withdrawal of groundwater, or paving of existing permeable surfaces important to groundwater recharge.

Construction of the project would prevent the spread of contaminants into surface water through adherence to applicable regulations and BMPs for the handling and storing of hazardous materials, and the requirements of the MS4 Permit, including implementation of an ESCP for the prevention of erosion and spread of polluted runoff. These regulations and practices effectively control the potential stormwater pollution to surface water during construction. Furthermore, the proposed residential use does not represent the type of use that would have the ability to adversely affect water quality. Anticipated and potential pollutants generated by operation of the project would be addressed through

50 Federal Emergency Management Agency, Flood Insurance Rate Map, City of Laguna Beach, California, FEMA Map Number 06059C0409J, December 3, 2009.

51 Total Maximum Daily Load (TMDL) is a regulatory term referring to the maximum amount of a pollutant that a body of water can receive per day while still meeting water quality standards.

the implementation of approved LID BMPs. While the development of the Student Center would increase the use of on-site hazardous materials (i.e., those typically used on residentially zoned properties such as cleaning, maintenance, and landscaping supplies), compliance with all applicable existing regulations at the project site regarding the handling, storage, and potentially required cleanup of hazardous materials would prevent the project from affecting or expanding any potential areas of contamination, increasing the level of contamination, or causing regulatory water quality standards at an existing production well to be violated.

Regarding groundwater management plans, on September 16, 2014, the State of California signed into law the Sustainable Groundwater Management Act (SGMA). Comprised of three bills, AB 1739, SB 1168, and SB 1319, the SGMA provides a framework for long-term sustainable groundwater management across California and requires governments and water agencies of high and medium priority basins to halt overdraft and bring groundwater basins into balanced levels of pumping and recharge. Under the roadmap laid out by the legislation, local, and regional authorities in medium and high priority groundwater basins have formed Groundwater Sustainability Agencies (GSAs) that will oversee the preparation and implementation of a local Groundwater Sustainability Plan (GSP). Local stakeholders have until 2022 (in critically over drafted basins until 2020) to develop, prepare, and begin implementation of Groundwater Sustainability Plans. GSAs will have until 2042 (2040 in critically over drafted basins) to achieve groundwater sustainability.

The project site overlies the San Juan Basin. The project would receive its water from the SCWD. Both the SCWP and the California Department of Water Resources have programs in place to monitor wells to prevent overdrafting. The San Juan Groundwater Basin manager adopted the concept of "adaptive management" of the Basin to vary pumping from year to year based on actual basin conditions derived from monitoring efforts, with the groundwater management implication that during dry periods groundwater pumping would be lower than in wet periods. SCWD also addresses water supply needs through preparation of an UWMP, which projects future water use demands and identifies water supplies to meet these demands and is updated every five years.

As described in detail in Section 19. Utilities and Service Systems, the project's water demand would be within the projections of the UWMP and the project would be required to implement water saving features to reduce the amount of water used by the project in accordance with water conservation measures, including Title 20 and 24 of the California Administrative Code**.** Additionally, the project would not have the potential to impact the amount of groundwater recharge as the project site does not currently provide recharge for the groundwater basin.

Accordingly, based on the above, the project would not conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan. **Impacts would be less than significant**.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
11. LAND USE AND PLANNING. Would the project**:**				
a) Physically divide an established community?	☐	☐	☐	☒
b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐

A land use consistency discussion with *Applicable Goals, Policies and Actions of the General Plan* is provided in **Appendix H**.

Regulatory Setting

Regulations exist at state and local levels with regard to land use and include:

- California Planning and Zoning Law, Government Code Sections 65000 et seq.
- Southern California Association of Governments Connect SoCal Plan
- City of Laguna Beach General Plan
- City of Laguna Beach Zoning Ordinance

Environmental Setting

The City is comprised of a total land area of 5,658 acres, or 8.84 square miles. The City, located in the southern portion of Orange County, is bounded by the Pacific Ocean on the southwest, Crystal Cove State Park and the City of Newport Beach on the northwest, Laguna Woods on the northeast, Aliso Viejo and Laguna Niguel on the east, and Dana Point on the southeast. The project site is surrounded by urbanized areas to the west of Laguna Canyon Road, south of Laguna Canyon Road and Laguna Coast Wilderness Park, and north of Aliso and Wood Canyons Wilderness Park. The project site is located immediately adjacent to Big Bend Restoration site to the east; the parcel to the south is an undeveloped, naturally vegetated steep mountainside with numerous large native oak tree species and walking trails that are managed by Orange County (OC) Parks. A public walking trail is located along a portion of the south edge of the site, extending along the eastern edge to Laguna Canyon Road.

The project site is designated as Industrial in the City's General Plan and zoned as M-1A (Light Industrial).

Checklist Discussion

a) Physically divide an established community?

No Impact. Projects with the potential to divide a community include highways, railways, and large building or infrastructure projects that change the street grid. The project would demolish Building C and the existing asphalt parking lot and construct a two-story, approximately 21,977 square foot Student Center. The Student Center would include a gallery, multi-purpose conference rooms, café/lounge, and lobby on

the 1st floor. Visual communication classrooms and offices would be located on the 2nd floor. The project would be constructed on the site of the existing LCAD North Campus and would not include any highways, railways, large buildings, or infrastructure that would change the street grid or physically divide an established community. As such, the project would not physically divide an established community. **No impact would occur.**

b) Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?

Less Than Significant Impact. A significant impact may occur if a project is inconsistent with the General Plan or zoning designations currently applicable to the project site and would cause adverse environmental effects, which the General Plan and zoning ordinance are designed to avoid or mitigate.

Applicable Land Use Policies and Regulations

At the regional level, development within the project site is subject to the following:

- SCAG's 2020-2045 Regional Transportation Plan/Sustainable Communities Strategy

At the City level, development within the project site is subject to the following:

- Laguna Beach General Plan; and
- Laguna Beach Zoning Code (Laguna Beach Municipal Code Titles 16, 21, 22, and 25);

An overview of each of these plans and regulations is provided below. However, not every policy or goal of these plans is intended to mitigate or avoid environmental impacts. Where a policy is not intended to mitigate or avoid an environmental impact, consistency with that policy may not be relevant to an environmental impact analysis.

Consistency with Regional Plans

Southern California Association of Governments/Regional Transportation Plan

On September 3, 2020, the SCAG Regional Council adopted the 2020-2045 RTP/SCS, also known as Connect SoCal. The 2020-2045 RTP/SCS presents a long-term transportation vision through the year 2045 for the six-county region of Imperial, Los Angeles, Orange, Riverside, San Bernardino, and Ventura counties. The 2020-2045 RTP/SCS contains baseline socioeconomic projections that are used as the basis for SCAG's transportation planning, and the provision of services by other regional agencies. SCAG's overarching strategy for achieving its goals is integrating land use and transportation.

SCAG policies are directed towards the development of regional land use patterns that contribute to reductions in vehicle miles and improvements to the transportation system. Rooted in past RTP/SCS plans, Connect SoCal's "Core Vision" centers on maintaining and better managing the region's transportation network, expanding mobility choices by co-locating housing, jobs, and transit, and increasing investment in transit and complete streets. The plans "Key Connections" augment the "Core Vision" to address challenges related to the intensification of core planning strategies and increasingly aggressive greenhouse gas reduction goals, and include but are not limited to, Housing Supportive Infrastructure, Go Zones, and Shared Mobility.

Connect SoCal intends to create benefits for the SCAG region by achieving regional goals for sustainability, transportation equity, improved public health and safety, and enhancement of the regions' overall quality of life. These benefits include but are not limited to a five percent reduction in vehicle miles traveled (VMT) per capita and vehicle hours traveled by nine percent, increase in work-related transit trips by two percent, create more than 264,500 new jobs, reduce greenfield development by 29 percent, and, building off of the 2019-2040 RTP/SCS, increase the share of new regional household growth occurring in High Quality Transit Area's by six percent and the share of new job growth in High Quality Transit Areas by 15 percent.

The project, which would construct an approximately 21,977 square foot Student Center and associated site improvements, would be developed within an existing urbanized area that provides an established network of roads and freeways that provide local and regional access to the area. The project would provide on-site services to the students of LCAD including a gallery, multi-purpose conference rooms, café/lounge, lobby, and visual communication classrooms and offices.

The project would generate 160 daily trips, with 40 trips (40 inbound, 0 outbound) during the AM peak hour and 9 trips (0 inbound, 9 outbound) during the PM peak hour. Comparing the trips generated by the proposed project with the traffic generation potential of the existing Building C, the project would generate 138 greater daily trips, 37 greater AM peak hour trips and 6 greater PM peak hour trip than the current land use in Building C. A qualitative assessment of the addition of 37 AM peak hour trips and 6 PM peak hour trip, when assigned to the project driveway and Laguna Canyon Road (SR-133), would result in no significant impact to the surrounding transportation system, particularly given that the 37 net AM peak hour trips are inbound trips that would experience minimal delay accessing the site. Therefore, the project would not conflict with the applicable objectives of the 2019-2040 RTP/SCS.

Consistency with Local Plans

Laguna Beach General Plan

The City's General Plan is a document consisting of nine elements, including, Historic Resources Element, Housing Element, Human Needs Element, Land Use Element, Landscape and Scenic Highways Element, Noise Element, Open Space Conservation Element, Safety Element, and Transportation, Circulation, and Growth Management Element.

The project site is within the Industrial General Plan land use designation. The industrial section of the City is confined to Laguna Canyon, where approximately 65 acres of land is zoned for light industrial and limited commercial activities. This category refers to the industrial or manufacturing base of the City and allows a mixture of light and heavy industrial uses as defined in the Municipal Code. Residential uses are prohibited, except for "artists-in-residence" activities. Although educational uses are not specifically described in the General Plan designation, industrial uses in the City are generally light in nature, in keeping with the scale and intensity of development elsewhere in the community. Therefore, the project would be consistent with the Industrial General Plan land use designation.

General Plan policies applicable to the project include goals and policies related to sustainability, protection of natural resources and open space, preserving visual character and quality, and protecting life and property from natural hazards. The project would include sustainability features consistent with Title 24 energy conservation standards and would include energy efficient lighting and HVAC, low water use plantings, and drip irrigation. The project would not impact any wetlands or riparian habit and would

incorporate mitigation measures to project sensitive habitat, special status plants. and wildlife and would not have a significant impact on natural resources. The project would be consistent with the City's Zoning Code and goals and regulations related to visual quality and scenic resources by incorporating City design guidelines and complying with height restrictions.

Lastly, the project includes an Alternate Material, Design or Method of Construction (AM&M) analysis to provide specific information about the available on- and offsite FMZs, as well as an evaluation of the site's fire environment and risk and alternative means of fire protection. The project would conduct the appropriate fire fuel modification practices and would be in conformance with LBMC Chapter 15.01, California Fire Code, which adopts the 2019 California Fire Code and establishes provisions for fire safety related to construction, maintenance and design of buildings and land use. Please se**e Appendix H** for a full analysis of the project's consistency with General Plan goals and policies.

Laguna Beach Zoning Code

All on-site development activity is subject to the Zoning Code. The Zoning Code includes development standards for the various districts in the City. The project site is currently zoned M-1A, Light Industrial.

The M-1A zone permits a maximum building height of 36 feet when measured from the finished or natural grade.[52] The project has been designed with a maximum height of 34 feet, 6 inches and, therefore, complies with the zone height limitations.

The City Code parking requirement for 2825 Laguna Canyon Road with the proposed LCAD at Big Bend Building C Replacement Project is based on the application of City code requirements contained within City of Laguna Beach Municipal Code (Title 25 Zoning, Chapter 25.52, Parking Requirements, Section 25.52.012, Parking Spaces Required) and the findings associated with the Conditional Use Permit 10-24, approved by the Planning Commission on July 14, 2010. Direct application of City parking ratios and/or appropriate CUP findings to 2825 Laguna Canyon Road site, with the proposed project, results in a total parking requirement of 201 parking spaces. A Parking Demand analysis was prepared for the project which found that using data provided by the Survey Data Shared Parking methodology for the LCAD Big Bend Campus, with the proposed LCAD Building C Replacement Project, resulted in a total peak parking demand of 187 parking spaces. The project would supply 187 parking spaces. Therefore, parking supply would be adequate to accommodate all of the existing and proposed uses at the LCAD Big Bend Campus. [53]

The project would require approval of the building by the Planning Commission, Design Review, Conditional Use Permit, Coastal Development Permit, Sign Permit, Lot Line Adjustment, Building Permit, and a Grading Permit. Based on the analysis above, the project would be substantially consistent with applicable goals, policies, and objectives in local and regional plans that govern development on the project site. Therefore, the project would not conflict with applicable land use plans adopted for the purpose of avoiding or mitigating an environmental effect. **As such, impacts would be less than significant**.

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[52] LBMC Section 25.32.005.

[53] Linscott, Law & Greenspan. *Parking Demand Analysis for 2825 Laguna Canyon Road Proposed LCAD at Big Bend Building C Replacement Laguna Beach, California*. May 4, 2002.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
12. MINERAL RESOURCES. Would the project:				
a) Result in the loss of availability of a known mineral resource that would be a value to the region and the residents of the state?	☐	☐	☐	☒
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	☐	☐	☐	☒

Regulatory Setting

Regulations and responsible agencies exist at the state level with regard to mineral resources and include:

- Surface Mining and Reclamation Act of 1975
- Division of Oil, Gas, and Geothermal Resources
- Division of Mines and Geology

Environmental Setting

The project site is developed and has not been historically used for mineral extraction. There are no ongoing mineral extraction activities in the area.[54]

Checklist Discussion

a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?

No Impact. An impact would occur if the project resulted in the loss of a known mineral resource valuable to the region. No portion of the project site is delineated as a mineral resource or mineral resource recovery site. There are no active mines or mineral resource extraction occurring on the site or project vicinity and the project site is currently developed with land uses that are not related to mining or mineral extraction. **No impact would occur.**

b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?

No Impact. An impact would occur if the project resulted in the loss of a local important mineral resource or mineral recovery site delineated in a local or other land use plan. No portion of the project site is

[54] Division of Mine Reclamation, California Department of Conservation. Accessed at Mines Online (ca.gov).

delineated as a local mineral resource recovery site in the General Plan or at the state level. **No impact would occur.**

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
13. NOISE. Would the project result in:				
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐
b) Generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐
c) For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public use airport, expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☒

Regulatory Setting

Various private and public agencies have established noise guidelines and standards to protect citizens from potential hearing damage and other adverse physiological and social effects associated with noise. Federal, state, regional, and local guidelines include the following:

- Federal Transit Administration and Federal Railroad Administration Standards
- Federal Aviation Administration Standards
- California Noise Control Act
- California Code of Regulations
- Laguna Beach General Plan
- Laguna Beach Municipal Code

Noise Fundamentals

Sound is described in terms of amplitude (i.e., loudness) and frequency (i.e., pitch). The standard unit of sound amplitude measurement is the decibel (dB). The dB scale is a logarithmic scale that describes the physical intensity of the pressure vibrations that make up any sound. The pitch of the sound is related to the frequency of the pressure vibration. Since the human ear is not equally sensitive to a given sound level at all frequencies, a special frequency-dependent rating scale has been devised to relate noise to human sensitivity. The A-weighted dB scale (dBA) provides this compensation by emphasizing frequencies in a manner approximating the sensitivity of the human ear.

Noise, on the other hand, is typically defined as unwanted sound audible at such a level that the sound becomes an undesirable by-product of society's normal day-to-day activities. Sound becomes unwanted when it interferes with normal activities, causes actual physical harm, or results in adverse health effects. The effects of noise on people can be placed into four general categories:

- Subjective effects (e.g., dissatisfaction, annoyance);
- Interference effects (e.g., communication, sleep, and learning interference);
- Physiological effects (e.g., startle response); and
- Physical effects (e.g., hearing loss).

The definition of noise as unwanted sound implies that it has an adverse effect, or causes a substantial annoyance, to people and their environment. However, not every unwanted audible sound interferes with normal activities, causes harm, or has adverse health effects. For unwanted audible sound (i.e., noise) to be considered adverse, it must occur with sufficient frequency and at such a level that these adverse impacts are reasonably likely to occur.

Vibration Fundamentals

Vibration can result from a source (e.g., train operations, motor vehicles, machinery equipment, etc.) causing the adjacent ground to move and creating vibration waves that propagate through the soil to the foundations of nearby buildings. This effect is referred to as groundborne vibration. The peak particle velocity (PPV) or the root mean square (RMS) velocity is usually used to describe vibration levels. PPV is defined as the maximum instantaneous peak of the vibration level, while RMS is defined as the square root of the average of the squared amplitude of the vibration level. PPV is typically used for evaluating potential building damage, while RMS velocity in decibels (VdB) is typically more suitable for evaluating human response.

Environmental Setting

Noise in Laguna Beach comes from transportation sources, including highways, arterials, and roadways and non-transportation sources, such as commercial/industrial activities, construction equipment and various community activities. The noise environment in Laguna Beach is dominated by vehicular traffic including vehicular generated noise along Highway 133 and primary and secondary arterials. In addition, a number of other sources contribute to the total noise environment. These noise sources include construction activities, power tools and gardening equipment, loudspeakers, auto repair, radios, children playing and dogs barking.

The State of California defines sensitive receptors as those land uses that require serenity or are otherwise adversely affected by noise events or conditions. Schools, libraries, churches, hospitals, single and multiple-family residential, including transient lodging, motels and hotel uses make up the majority of these areas. Land uses that are considered relatively insensitive to noise include business, commercial, and professional developments. Land uses that are typically not affected by noise include: industrial, manufacturing, utilities, agriculture, natural open space, undeveloped land, parking lots, warehousing, liquid and solid waste facilities, salvage yards, and transit terminals.

Existing Noise Level Measurements

To assess the existing noise level environment, three (3) short-term, 15-minute noise level measurements were taken at sensitive receiver locations in the project study area. The receiver locations were selected to describe and document the existing noise environment within the project study area. The 15-Minute Noise Measurement Datasheet (see **Appendix I** of this Initial Study) provides the location of the project site and the noise level measurement locations. Noise level measurements were collected on November 15, 2022.

Measurement Procedure and Criteria

Noise monitoring was performed with a Larson Davis Model Soundtrack LxT Class 1 sound level meter. The noise meter was programmed in "slow" mode to record the sound pressure level at one second intervals for in A-weighted form. The sound level meter and microphone were mounted approximately five feet above the ground and equipped with a windscreen during all measurements. The sound level meter was calibrated before monitoring using a Larson Davis CAL250 calibrator. The noise level measurement equipment meets American National Standards Institute (ANSI) specifications for sound level meters (S1.4-1983 identified in Chapter 19.68.020.AA).

Noise Measurement Locations

The short-term noise level measurements were positioned as close to the nearest sensitive receiver locations as possible to assess the existing ambient noise levels surrounding the project site. Both Caltrans and the FTA recognize that it is not reasonable to collect noise level measurements that can fully represent any part of a private yard, patio, deck, or balcony normally used for human activity when estimating impacts for new development projects. This is demonstrated in the Caltrans general site location guidelines which indicate that, sites must be free of noise contamination by sources other than sources of interest and avoid sites located near sources such as barking dogs, lawnmowers, pool pumps, and air conditioners unless it is the express intent of the analyst to measure these sources. Further, FTA guidance states, it is not necessary nor recommended that existing noise exposure be determined by measuring at every noise-sensitive location in the project area. Rather, the recommended approach is to characterize the noise environment for clusters of sites based on measurements or estimates at representative locations in the community.

Based on recommendations of Caltrans and the FTA, it is not necessary to collect measurements at each individual building or residence, because each receiver measurement represents a group of buildings that share acoustical equivalence. In other words, the area represented by the receiver shares similar shielding, terrain, and geometric relationship to the reference noise source. Receivers represent a location of noise sensitive areas and are used to estimate the future noise level impacts. Collecting reference ambient noise level measurements at the nearby sensitive receiver locations allows for a comparison of the before- and after-project noise levels and is necessary to assess potential noise impacts due to the project's contribution to the ambient noise levels.

As shown on **Figure 10, Noise Measurement Location Map**, the noise measurements were taken near the closest sensitive uses to: the existing single-family residential uses associated with the artist studio located at 2795 Laguna Canyon Road, approximately 20 feet west of the project site boundary (NM3); the single-family residential use located at 2775 Laguna Canyon Road, approximately 75 feet west of the project site boundary (NM3); the multi-family residential uses located at 2745 Laguna Canyon Road, approximately 180 feet west of the project boundary (NM3), the single-family residential use located at 2735 Laguna Canyon Road, approximately 225 feet west of the project site boundary (NM3); the single-family residential uses located at 2999 Laguna Canyon Road, approximately 590 feet northeast of the project site boundary (NM1), and the Kingdom Hall of Jehovah's Witnesses, located at 3 Castle Rock Road (NM2).

The project site is within the Industrial General Plan land use designation. The industrial section of the City is confined to Laguna Canyon, where approximately 65 acres of land is zoned for light industrial and limited commercial activities. This category refers to the industrial or manufacturing base of the City and allows a mixture of light and heavy industrial uses as defined in the Municipal Code. Residential uses are

prohibited, except for "artists-in-residence" activities. Therefore, the intermingled residential uses are already exposed to light industrial/commercial-type noise sources and noise levels.

Noise Measurement Results

Table 12, Existing Ambient Noise Levels, provides a summary of the ambient noise data. Ambient average noise levels were measured between 43.2 and 66.5 dBA Leq. **Appendix I** of this Initial Study includes photos, field sheet, and measured noise data. The dominant noise sources were from vehicles traveling along the adjacent roadways, aircraft, residential noise, and commercial/pedestrian-related noise.

Table 12
Existing Ambient Noise Levels

Noise Measurement Location	Location	Primary Noise Sources	Noise Levels [a]		
			L_{eq}	L_{max}	L_{min}
NM1	Adjacent to the residential uses located east of Laguna Canyons Road, south of Castle Rock Road.	Main noise sources are from vehicular traffic traveling along Laguna Canyon Road. The buildings reflect & refract much of the sound. Other noise sources include bird song, residential ambiance, wind chimes, water features in gardens, pedestrians, hikers walking along trails, crickets, the occasional low altitude aircraft (both fixed wing propeller), jet aircraft & the occasional helicopter passing overhead.	66.5	76.8	55.7
NM2	In the parking lot of the Kingdom Hall of Jehovah's Witnesses located at 3 Castle Rock Road, Laguna Beach.		43.2	52.3	39.8
NM3	On the Laguna College Campus, in the parking lot, by the hiking trail.		54.0	66.6	49.3

[a] See **Figure 10** for noise measurement locations. Each noise measurement was performed over a 15-minute duration. Noise measurements performed on November 15, 2022.

Ambient noise data details are available in **Appendix I** of this Initial Study.

NM# = Noise Location

= Project Site

Source: Google Earth, August 2021.

N

Figure 10
Noise Monitoring Locations

Regulatory Setting

State of California

California Code of Regulations (CCR) Title 24 Section 1207.4 requires that within residences the interior noise levels attributable to exterior noise sources not exceed a CNEL of 45 dBA in any habitable room with windows closed. CALGreen, Standard 5.507.4, requires that all non-residential buildings with property lines within sound levels regularly exceeding 65 dBA L_{eq} verify the interior noise levels within occupied nonresidential space do not exceed 50 dBA L_{eq}.

City of Laguna Beach Noise Element

The goals, policies, and implementation actions contained in the Noise Element of the Laguna Beach General Plan (2005) focus on establishing regulations and applying criteria for acceptable noise levels for different land uses in order to minimize the negative impacts of noise, especially at sensitive receiver locations. In support of these goals and policies, the Noise Element contains a land use and noise compatibility matrix that determines the normally acceptable, conditionally acceptable, normally unacceptable, and clearly unacceptable noise levels for various land uses to guide planning decisions. The 'normally acceptable' noise level for a single-family home is 50-60 dBA CNEL and a 'conditionally acceptable' noise level is 60-70 dBA CNEL.[55]

City of Laguna Beach Standards

Chapter 7.25, Noise, of the Laguna Beach Municipal Code (LBMC) establishes a series of regulations and standards to prevent excessive noise that may jeopardize the health, welfare or safety of the citizens or degrade their quality of life. Specifically, LBMC Section 7.25.040(A), Exterior Noise Standards, establishes exterior noise standards categorized by five noise zones in the City. The noise standards for these zones differ between daytime (7:00 a.m. to 10:00 p.m.) and nighttime (10:00 p.m. to 7:00 a.m.) hours. The daytime exterior noise standard for residential land uses is 60 dBA L_{eq} and the nighttime exterior noise standard is 50 dBA L_{eq}.

According to Section 7.25.040(B), it is unlawful for any person at any location within the City to create noise which causes the noise level when measured on any other property to: 1) exceed the noise standard for the applicable zone for any 15-minute period, or 2) a maximum instantaneous (single instance) noise level equal to the noise standard plus 20 dBA for any period of time.

As listed in LBMC Section 7.25.050(B), Exemptions, any mechanical device, apparatus, or equipment uses, related to, or connected with emergency machinery, vehicle, work or warning alarm or bell is exempt from noise regulations and standards provided that the sounding of any bell or alarm on any building or motor vehicle is terminated within 15 minutes of its activation.

[55] Normally Acceptable: Specified land use is satisfactory, based upon the assumption that any buildings involved are of normal conventional construction without any special noise insulation requirements. Conditionally Acceptable: New construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features included in the design. Conventional construction, but with closed windows and fresh air supply systems or air conditioning would normally suffice. Source: General Plan Noise Element. http://www.lagunabeachcity.net/civicax/filebank/blobdload.aspx?BlobID=2686. Accessed January 2023.

LBMC Section 7.25.050(E) exempts noise sources associated with construction, repair, remodeling, demolition or grading of any real property from compliance with the noise level limits contained in the LBMC. This section indicates that such noise-generating activities are subject to the provisions of LBMC Section 7.25.080, Construction Activity Noise Regulations.

Furthermore, LBMC Section 7.25.080, Construction Activity Noise Regulations, prohibits the operation of any tool or equipment used for construction activities or any other related building activity between the hours of 6:00 p.m. and 7:30 a.m. on weekdays, whereas such construction activities are prohibited entirely on weekends and federal holidays.

LBMC Section 7.25.130, Heating, venting, pool/spa, and air conditioning—Special Provisions, includes specific noise standards for regulating heating, venting and air conditions (HVAC), and pool/spa equipment in or adjacent to residential areas. According to Section 7.25.130(a), permits for HVAC, and pool/spa equipment in or adjacent to residential areas are issued only after the installation contractor signs an acknowledgment that the installation would meet the noise limits established in LBMC Section 7.25.040.

Checklist Discussion

a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?

Less Than Significant Impact. A significant impact may occur if the project would generate excess noise that would cause the ambient noise environment at the project site to fail to comply with noise level standards set forth in the City of Laguna Beach General Plan Noise Element (Noise Element) and the City of Laguna Beach ("Noise Ordinance") (Chapter 7.25). Implementation of the project would result in an increase in ambient noise levels during both construction and operations, as discussed in detail below.

Construction Noise

Short-term noise impacts could occur during construction activities from either the noise impacts created from the transport of workers and movement of construction materials to and from the project site, or from the noise generated onsite during demolition, site preparation, grading, and building, paving, and painting activities.

Construction noise levels would vary significantly based upon the size and topographical features of the active construction zone, duration of the workday, and types of equipment employed, as indicated in **Table 13, Typical Construction Equipment Noise Levels**.

Table 13
Typical Construction Equipment Noise Levels

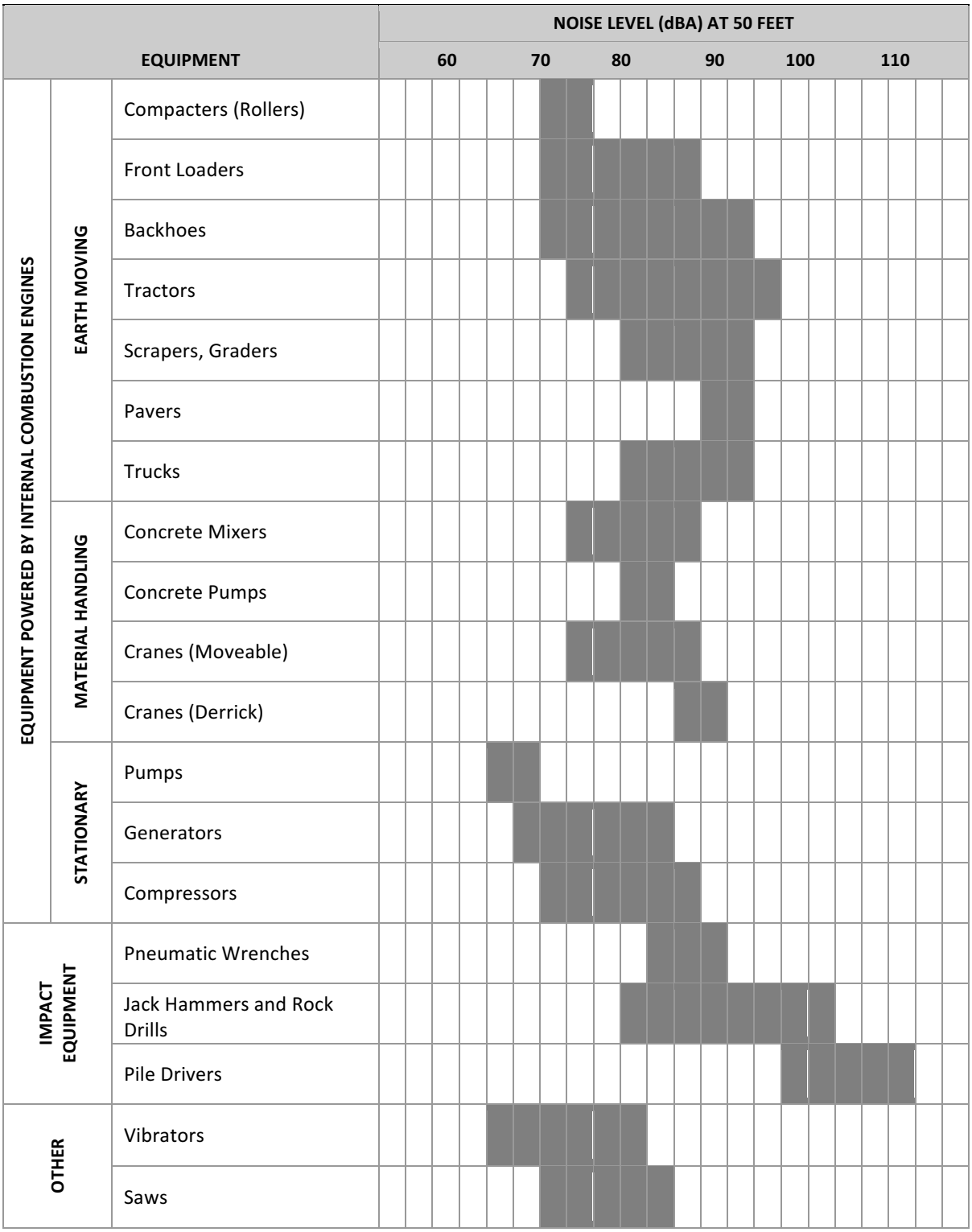

Table 13
Typical Construction Equipment Noise Levels

Source: United States Environmental Protection Agency, 1971, "Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances," NTID 300-1.

To provide a point of reference, a typical construction day with an eight-hour duration would generate 84 dBA CNEL at a distance of 50 feet[56] from the noise source, on average.

As stated above, LBMC Section 7.25.050(E) exempts noise sources associated with construction, repair, remodeling, demolition or grading of any real property from compliance with the noise level limits contained in the LBMC, as long as the construction does not occur between the hours of 6:00 p.m. and 7:30 a.m. on weekdays, weekends, and federal holidays.

As the construction of the project would not occur between the hours of 6:00 p.m. and 7:30 a.m., or on weekdays, weekends, and federal holidays, the impacts associated with construction noise would not exceed any noise standards and are anticipated to be less than significant.

The closest sensitive receptor that could be impacted by construction noise is located to the east of the project site (NM3), at the residential portion of the live/work artist-in-residence at 2795 Laguna Canyon Road approximately 20 feet from the site. The next closest receptors are: the single-family residential use located at 2775 Laguna Canyon Road, approximately 75 feet west of the project site boundary (NM3); the multi-family residential uses located at 2745 Laguna Canyon Road, approximately 180 feet west of the project boundary (NM3), the single-family residential use located at 2735 Laguna Canyon Road, approximately 225 feet west of the project site boundary (NM3). Other residential receptors are located at 2999 Laguna Canyon Road, approximately 590 feet northeast of the project site boundary (NM1), east of Laguna Canyon Road, north and south of Castle Rock Road approximately 0.21 miles (1,098 feet) northeast of the project site (NM1). The Kingdom Hall of Jehovah's Witnesses church, located at 3 Castle Rock Road, Laguna Beach (NM2), is located even further away, approximately 0.3 miles (1,580 feet) from the project site.

The existing college buildings A and B are located in-between the closest receptors to the west and the majority of the demolition/construction work to be performed on-site, and would act as a noise barrier and reduce construction noise levels by at least 5 dBA. At a distance of approximately 250 feet,[57] construction noise levels at the closest receptor located 20 feet west of the site would be approximately 70 dBA. With the attenuation afforded by the intervening structures, the noise level would be reduced to approximately 65 dBA. As shown by ambient noise levels reported in **Table 13** above, this noise level would be similar to the maximum ambient noise level of 66.6 dBA L_{max} at the closest receptor; however, the noise level would exceed the average ambient noise level of 54.0 dBA L_{eq}. The noise levels at the closest sensitive receptor to the northeast, located at 2999 Laguna Canyon Road, would be approximately

[56] Source: City of Perris General Plan, Noise Element, Appendix C: Technical Noise Area Definitions, page 69

[57] Distance from the approximate center of the construction site activity to the façade of the closest sensitive receptor.

60 dBA (without any reduction in noise level for intervening structures or topography), which is less than the ambient noise level of 66.5 dBA Leq. Therefore, construction noise at this location would be inaudible. As stated above, construction noise is exempt via the LBMC, and no impacts are anticipated. However, to ensure that construction noise levels are reduced to the extent feasible at the closest receptor locations to the west of the project site, Best Management practices (BMPS) are recommended. These industry-wide best BMPs for construction in urban or otherwise noise-sensitive areas, would be incorporated to attenuate construction noise levels to the closest residential receptors.

- The project contractor shall use power construction equipment with state-of-the-art noise shielding and muffling devices.

- A temporary noise control barrier/sound curtain shall be installed on the western property line of the construction site closest to the adjacent residential uses located to the west of the Project Site. The noise control barrier shall be engineered to block the line-of-sight from the residential uses to the construction activity and reduce construction-related noise levels at the adjacent residential structures with a goal of a reduction of 10 dBA.[58] The supporting structure shall be engineered and erected according to applicable codes. The temporary barrier shall remain in place until paving is complete, all windows have been installed, and all activities on the project site are complete.

- Construction activities shall be scheduled so as to avoid operating several pieces of equipment simultaneously, which causes high noise levels.

Operational Noise

This impact discussion analyzes the potential for a substantial permanent increase in ambient noise levels in the project vicinity associated with operation of the proposed project, including impacts related to offsite vehicular noise and exposure of neighboring land uses to onsite noise.

On-Site Noise

As the project involves the replacement of an existing design college light industrial building with a larger, more modern design college building together with improvements to the parking area, operational noise levels would be similar to those currently experienced on the project site. As shown by the ambient noise level reading taken at NM3, ambient noise levels on-site are 54.0 dBA L_{eq}. Furthermore, the typical noise sources associated with the proposed improved college building uses (heating, venting, and air conditioning) are regulated by LBMC Section 7.25.130. Therefore, with compliance with LBMC 7.25.130, the on-site operational noise from the proposed LCAC North Campus Student Center Project is considered to be less than significant.

[58] 2000. FHWA Highway Noise Barrier Design Handbook. Page 26. Table 3, Approximate Sound Transmission Loss Values for Common Materials. Per Table 3, 0.5-inch-thick plywood has a transmission loss of 20 dBA.

Traffic Noise

In order for a new noise source to be audible, there would need to be a 3 dBA or greater CNEL noise increase. The traffic volume on any given roadway would need to double in order for a 3 dBA increase in ambient noise to occur. According to the TIA, the project would increase peak hour volumes by a maximum of 37 vehicles during AM peak hour and 6 vehicles during PM peak hour. As this volume is not anticipated to generate a doubling of traffic volumes on any roadways within the project vicinity, the noise impact from project-related traffic is considered to be less than significant.

Therefore, the project would not cause the generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies. **Impacts are less than significant.**

b) Generation of excessive groundborne vibration or groundborne noise levels?

Less Than Significant Impact. A significant impact may occur if a project were to generate excessive vibration during construction or operation.

Construction activities can produce vibration that may be felt by adjacent uses. The construction of the proposed project would not require the use of equipment such as pile drivers, which are known to generate substantial construction vibration levels. The highest degree of groundborne vibration would be generated during the paving phase due to the use of a vibratory roller. Based on the Federal Transit Administration (FTA) data, vibration velocities from vibratory roller operations are estimated to be approximately 0.210 inch-per-second PPV at 25 feet from the source of activity.[59] As such, structures located greater than 26 feet from vibratory operations would not experience groundborne vibration above the Caltrans significance thresholds (i.e., 0.2 inch-per-second PPV for structures and 0.2 inch-per-second PPV for human annoyance). As the nearest off-site structures are at least 30 feet from any location within the project boundary where a vibratory roller may be used, the Caltrans significance thresholds would not be exceeded. Therefore, impacts would be less than significant in this regard. Such compliance would reduce noise groundborne vibration and noise levels associated with construction activities. Impacts would be **less than significant.**

As the project is a design college, it is not considered to be a significant source of operational vibration. No additional analysis is warranted or required. **Therefore, the project would not cause excessive groundborne vibration or groundborne noise levels and impacts are less than significant.**

c) For a project located within the vicinity of a private airstrip or an airport land use plan, or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project expose people residing or working in the project area to excessive noise levels?

[59] Federal Transit Administration, *Transit Noise and Vibration Impact Assessment Manual*, September 2018.

No Impact. A significant impact would occur if the project were located in the vicinity of a private airstrip or an airport land use plan and would expose people residing or working in the project area to excessive noise levels.

John Wayne Airport is located approximately 9.35 miles northwest of the project site. According to the Orange County ALUC Land Use Plan for the John Wayne Airport, the site is not located within the airport's noise contours.[60] Although the project site would potentially be subject to occasional aircraft overflight noise, such occurrences would be intermittent and temporary. In addition, there are no private airstrips in the vicinity of the project site. Therefore, the project would not expose people working in the project area to excessive noise levels associated with airports or airstrips and the project would not exacerbate existing noise conditions related to airports or airstrips. **No impact would occur. There would be no impact related to exposure to excessive noise from air traffic-related sources**.

Mitigation Measures

None required.

[60] Orange County Airport Land Use Commission. 2008. Land Use Plan for the John Wayne Airport. https://files.ocair.com/media/2021-02/JWA_AELUP-April-17-2008.pdf?VersionId=cB0byJjdad9OuY5im7Oaj5aWaT1FS.vD. Accessed January 2023.

	Potentially Significant Impact	Less Than Significant Impact with the Incorporated Mitigation	Less Than Significant Impact	No Impact
14. POPULATION AND HOUSING. Would the project:				
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☒	☐
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒

Regulatory Setting

Regulations and plans exist at state, regional, and local levels related to populations and housing and include:

- Southern California Association of Governments (SCAG) Connect SoCal
- City of Laguna Beach General Plan

Environmental Setting

Laguna Beach was founded on June 29, 1927. The City occupies 8.84 square miles and has an estimated population of 22,795.[61] The City has 13,007 housing units.[62]

Checklist Discussion

a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?

Less Than Significant Impact. The project would create an impact if it resulted in substantial unplanned population growth. The proposed project would not include housing and, therefore, would not directly contribute to population growth within the City. The project would construct a two-story, approximately 21,977 square foot Student Center for LCAD student use. The Student Center would include a gallery, multi-purpose conference rooms, café/lounge, and lobby on the 1st floor. Visual communication classrooms and offices would be located on the 2nd floor. The project does not propose any expansion of

[61] United State Census. Quick Facts, Laguna Beach, California. Accessed at https://www.census.gov/quickfacts/fact/table/lagunabeachcitycalifornia/PST045221.

[62] SCAG. 2019 Local Profiles. Accessed at https://scag.ca.gov/sites/main/files/file-attachments/lagunabeach_localprofile.pdf?1606012709

student enrollment at LCAD, class attendance on the project site would remain the same, and would not result in a substantial increase in staff on the site. **Therefore, impacts would be less than significant**.

b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?

No Impact. An impact would occur if the project resulted in the displacement of substantial numbers of people. Because no existing housing is located on the project site, the proposed project would not displace existing housing or people and would not necessitate the construction of replacement housing elsewhere. **No impact would occur.**

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
15. PUBLIC SERVICES. Would the project result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:				
a) Fire protection?	☐	☐	☒	☐
b) Police protection?	☐	☐	☒	☐
c) Schools?	☐	☐	☒	☐
d) Parks?	☐	☐	☒	☐
e) Other public facilities?	☐	☐	☒	☐

Regulatory Setting

Regulations and policies exist the state and local level with regard to public services and include:

- California Mutual Aid Plan
- Senate Bill 50
- Wildfire Mitigation and Fire Safety Report
- Laguna Beach Local Hazard Mitigation Plan
- Laguna Beach Municipal Code
- Laguna Beach General Plan Open Space Conservation Element
- Laguna Beach General Plan Safety Element

Environmental Setting

Fire Protection

The LBFD provides fire protection to the City and is comprised of four (4) stations. The LBFD provides for the public's safety by deploying and staffing a variety of emergency response vehicles and covers emergency medical services, rescue, forestry, and health hazardous material and emergency operations.[63]

Police Protection

The Laguna Beach Police Department (LBPD) provides law enforcement services to residents and businesses in the City. The LBPD is located at 505 Forest Avenue and provides field services and patrol. The services provided include the following: crime prevention; traffic and congestion control; safety management; and emergency response.[64]

[63] City of Laguna Beach, Fire Department, https://www.lagunabeachcity.net/government/departments/fire. Accessed October 2022.

[64] City of Laguna Beach, Police Department, https://www.lagunabeachcity.net/government/departments/police. Accessed October 2022.

Schools

Schools in the City are under the Laguna Beach Unified School District (LBUSD). The City has two (2) elementary schools, one (1) middle school, and one (1) high school.[65] The Leroy F. Greene School Facilities Act of 1998 (Senate Bill 50) sets a maximum level of fees a developer may be required to pay to mitigate a project's impacts on school facilities authorized school districts to assess all new development a fee to offset impacts proposed projects might have on the school facilities. Whenever possible, school districts have requested that developers provide full impact mitigation on development. The establishment of special tax districts, full cost recovery agreements or the provision of relocatable classrooms in lieu of fees are just a few examples of such mitigation measures.

Parks

The City has ten (10) parks and a variety of recreation opportunities. Parks include the Alta Laguna Park, Bluebird Park, Crescent Bay Park, Heisler Park, Laguna Beach Dog Park, Lang Park, Main Beach Park, Moulton Meadows Park (and Dog Plan Area), Riddle Field Park, and Village Green Park. The City has a senior center, the Laguna Beach Community & Susi Q Senior Center[66] and direct access to the Laguna Greenbelt, which is an approximately 10,000-acre open space area within Orange County.[67]

Other Public Facilities

The City has one public library located 363 Glenneyre Street than is operated by Orange County. The library has space for children and teens, including homework help. Additionally, the library includes materials in both English and Spanish, public computers for online research, eBooks, audiobooks, magazines, newspapers, and music. [68]

Checklist Discussion

a) Fire Protection?

Less Than Significant Impact. A significant impact may occur if a project creates the need for new or physically altered fire facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable response times or other performance objective.

The nearest fire station to the project site is Fire Station No. 1, located at 501 Forest Avenue, approximately 1.7 miles southwest of the project site.

The project would include demolition of Building C and the existing asphalt parking lot and construction of a two-story, approximately 21,977 square foot Student Center. No residential uses increasing population residing on the site are proposed.

The project site is adjacent to City-owned open space areas. The parcel to the south is an undeveloped, naturally vegetated steep mountainside with numerous large native oak tree species (*Quercus spp.)* and walking trails that are managed by OC Parks. The parcel to the east is undeveloped and naturally vegetated

[65] Laguna Beach Unified School District, https://www.lbusd.org/. Accessed October 2022.

[66] City of Laguna Beach, Recreation Division, https://www.lagunabeachcity.net/government/departments/parks-recreation/parks-and-open-space. Accessed October 2022.

[67] City of Laguna Beach, General Plan, Open Space Conservation Element, Adopted December 17, 1993. Page 8.

[68] Orange County Public Libraries, https://www.ocpl.org/libraries/laguna-beach. Accessed October 2022.

with small non-native trees and shrubs that are managed by the conservancy. These City parcels are designated as 'Open Space Preserve Areas' and 'High Value Habitat' lands. Additionally, the project site is considered to be within a wildland urban interface (WUI) area and a Very High Fire Hazard Severity Zone (VHFHSZ) as statutorily designated by the Laguna Beach Fire Department (LBFD) and CAL FIRE.

This designation requires the project to conform to the 195-foot Fuel Modification Zone (FMZ) as detailed in the City's Landscape/Fuel Modification Guidelines and Maintenance Program. Because the City-owned parcels are designated as 'Open Space Preserve Areas' and 'High Value Habitat' lands, the project applicant would not be allowed off-site to complete a full 195 feet FMZ and fuel modification activities are constrained to 20 feet of on-site FMZ on the southern side of the building, approximately up to 195-feet of on-site FMZ on the west side of the building (which includes the existing LCAD Student buildings), approximately up to 60-feet of on-site FMZ on the east side of the building, and approximately up to 195-feet of on-site FMZ on the north side of the building within the existing parking lot area. Based on the reduced FMZs, the proposed LCAD North Campus Student Center Building C would be hardened, which would not only mitigate for the lack of a full FMZ but would allow for the temporary sheltering of students and faculty if it is deemed not safe to evacuate onto Laguna Canyon Road.

As identified in Chapter 15.01 of the LBMC, the City has adopted the 2019 California Fire Code, which contains regulations related to construction, maintenance, and design of buildings and land uses. The project would replace a non-code compliant building with a new code-compliant, ignition resistive, Type 1-B fully sprinklered steel framed building. The applicant has prepared an Alternate Material, Design or Method of Construction (AM&M) analysis[69] to provide specific information about the available on- and offsite FMZs), as well as an evaluation of the site's fire environment and risk and alternative means of fire protection. Specifically, the project would provide:

- New Type I-B, Fully Fire Sprinklered two-story steel moment framed college student center;
- All landscaping meets Setback Irrigated Zone A, Irrigated Zone B, and thinning Zone C criteria;
- All windows for the proposed Student Center would be dual-pane, dual tempered windows, including sliding glass doors (code exceeding) Hazard Group 2 Fire Sprinkler System;
- A wall-mounted exterior fire sprinkler system shall be installed along the south, east and west sides of the structure (sides exposed to native vegetation). The entire exterior fire sprinkler system would be designed to NFPA 13, Sections 11.3.2 (including both subsections 11.3.2.1 and 11.3.2.2 requirements;
- Installation of a wet-standpipe system; one FDC located in the southeast corner of the structure on the first floor and another FDC outlet located on the second floor at the top of the eastern staircase;
- All egress doors would be self-closing doors (except entrance door and sliding glass doors);
- External vents would be baffled or fitted with ember resistive mesh.
- Code required Fire Alarm System pursuant with NFPA 72, including code exceeding smoke detectors in each office room, all hallways, and on both floors.

The project would conduct fuel modification activities and construct a new code compliant building on the site. Additionally, the project would not increase full-time population on the site, nor substantially

[69] Dudek, Revised – Request for Alternative Methods and Materials of Construction Report for the Laguna College of Art and Design, North Campus New Student Center Project, May 4, 2022.

increase development on the site to the extent that new or physically altered City of Laguna Beach fire facilities would be required to maintain acceptable response times or other performance objective. **Therefore, impacts to fire protection services would be less than significant**.

b) Police Protection?

Less Than Significant Impact. A significant impact may occur if a project creates the need for new or physically altered police facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objective.

The project site would be served by the LBPD. The station is located at 505 Forest Avenue, approximately 1.8 miles southwest of the project site. The Field Services Division patrols the City in three geographic areas; the project site is within Patrol Beat 1.[70]

The project would include demolition of Building C and the existing asphalt parking lot and construction of a two-story, approximately 21,977 square foot Student Center. No residential uses increasing population residing on the site are proposed. As discussed in Section 14, Population and Housing, the project would not significantly increase population in the City and therefore would not cause substantially delayed response times, degraded service ratios or necessitate construction of new police facilities. **Therefore, impacts to police protection services would be less than significant.**

c) Schools?

Less Than Significant Impact. A significant impact may occur if a proposed project includes substantial employment or population growth, which could generate demand for school facilities that exceeds the capacity of the school district(s) responsible for serving the project site.

The project would include demolition of Building C and the existing asphalt parking lot and construction of a two-story, approximately 21,977 square foot Student Center on a private school site. The new Student Center would not substantially increase employment at LCAD and no residential uses are proposed that would increase on-site population generating students that would attend LBUSD. Therefore, the project would not result in substantial adverse physical impacts associated with the provision of new or physically altered school facilities. **Impacts related to schools would be less than significant**.

d) Parks?

Less Than Significant Impact. A significant impact to parks may occur if implementation of a project includes a new or physically altered park or creates the need for a new or physically altered park, the construction of which could cause substantial adverse physical impacts.

The project site is located immediately adjacent to Big Bend Restoration site to the east; the parcel to the south is an undeveloped, naturally vegetated steep mountainside with numerous large native oak tree species and walking trails that are managed by Orange County (OC) Parks. A public walking trail is located along a portion of the south edge of the site, extending along the easter edge to Laguna Canyon Road. It is possible that some students using the proposed Student Center would also use the public walking trail or public open space. However, any increase in use would not likely be substantial and it would be very unlikely that use by LCAD students would create the need for any physical alternations to the walkways or open space areas. As discussed in Section 14, Population and Housing, the project would not

[70] City of Laguna Beach, Laguna Beach Police Department, 2017-2018 Biennial Report. Page 11.

significantly increase population in the City and therefore would not substantially impact parks. **Therefore, impacts would be less than significant.**

e) Other public facilities?

Less Than Significant Impact. A significant impact may occur if a project generates a demand for other public facilities (such as libraries) that exceeds the capacity available.

The project proposes the construction of an approximately 21,977 square foot Student Center on a private school site. The new Student Center would not substantially increase employment at LCAD and no residential uses are proposed that would increase on-site population that would increase demand on library services. **Therefore, impacts from the project on City libraries would be less than significant**.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
16. RECREATION. Would the project:				
a) Increase the use of existing neighborhood and regional parks or other recreational facilities, such that substantial physical deterioration of the facility would occur or be accelerated?	☐	☐	☒	☐
b) Include recreational facilities or require the construction or expansion of recreational facilities, which might have an adverse physical effect on the environment?	☐	☐	☒	☐

Environmental Setting

The City has ten (10) parks and a variety of recreation opportunities. Parks include the Alta Laguna Park, Bluebird Park, Crescent Bay Park, Heisler Park, Laguna Beach Dog Park, Lang Park, Main Beach Park, Moulton Meadows Park (and Dog Plan Area), Riddle Field Park, and Village Green Park. The City has a senior center, the Laguna Beach Community & Susi Q Senior Center[71] and direct access to the Laguna Greenbelt, which is approximately 10,000-acre open space area within Orange County.[72]

Checklist Discussion

a) Would the project Increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?

b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?

Less Than Significant Impact. A significant impact may occur if a project would increase demand for park or recreational facilities creating a physical deterioration of the park facilities, include recreational facilities, or require the expansion of existing recreational facilities.

As discussed previously, the project would not include any housing that would increase population in the City, and therefore, demand for park facilities. The project does not propose an increase in student population or staffing on site. The project would construct a Student Center primarily for use by students at LCAD and does not propose uses to serve the general City population. Because the project does not substantially increase the number of residents, the project would not create unanticipated demand on

[71] City of Laguna Beach, Recreation Division, https://www.lagunabeachcity.net/government/departments/parks-recreation/parks-and-open-space. Accessed October 2022.

[72] City of Laguna Beach, General Plan, Open Space Conservation Element, Adopted December 17, 1993. Page 8.

City parks or cause substantial deterioration of existing parks such that new park facilities would be needed. **Therefore, impacts would be less than significant**.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
17. TRANSPORTATION. Would the project:				
a) Conflict with a program plan, ordinance or policy addressing the circulation system, including transit roadway, bicycle, and pedestrian facilities?	☐	☐	☒	☐
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3, subdivision (b)?	☐	☐	☒	☐
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	☐	☐	☒	☐
d) Result in inadequate emergency access?	☐	☐	☒	☐

Information in this section is incorporated from the *Traffic Impact Assessment for the Proposed LCAD Building C Replacement Project, Laguna Beach, California Laguna Beach, California*, prepared by Linscott, Law, & Greenspan, May 4, 2022. The *Traffic Impact Assessment for the Proposed LCAD Building C Replacement Project* is provided in **Appendix J**.

Regulatory Setting

Regulations and policies exist at the state, regional, and local levels as follows:

- Senate Bill 743
- SCAG Connect SoCal
- City of Laguna Beach General Plan

Environmental Setting

Laguna Canyon Road is a two-lane roadway with striped shoulders on both the north- and south-bound directions and a striped median center turn lane. The project site is accessed by a single driveway that allows both ingress and egress. Vehicles traveling south on Laguna Canyon Road access the site by turning left using the striped median center turn lane. Vehicles traveling north on Laguna Canyon Road turn right directly into the site and there is no right turn lane into the site.

Checklist Discussion

a) Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?

Less Than Significant Impact. The project would create a significant impact if it conflicted with policies and plans governing roadways, transit, bicycle, and pedestrian facilities on Laguna Canyon Road. The project would not alter the width or operation of Laguna Canyon Road or alter access to the site. As part

of the project plan review and approval process, the City would review all project driveway plans for consistency with the City's adopted codes for driveway widths and access. The project would not alter any pedestrian or bicycle facilities on Laguna Canyon Road.

The project would require connection to offsite utilities (sewer, domestic water, electrical, telecommunications) in the right-of-way on Laguna Canyon Road. However, this work would be temporary in nature, would be conducted in compliance with City regulations for traffic control for work within City rights-of-way, and Laguna Canyon Road would be returned to its existing configuration upon completion of the work.

Construction of the project would generate traffic. Construction-related vehicles would travel to, and access, the project site via Laguna Canyon Road. Construction traffic would be temporary, and the movement of construction equipment would be limited to the project site for most of the construction period and vehicular access to Laguna Canyon Road would be maintained throughout the construction period. Therefore, construction traffic would not substantially interfere with the City's circulation system.

Operation of the project would generate a slight increase in traffic to the site. As described below under b), this increase would be under the number of average daily trips screening threshold used by Orange County to determine that a project would result in less than significant impacts. **Therefore, impacts would be less than significant**.

b) Conflict or be inconsistent with CEQA Guidelines Section 15064.3, subdivision (b)?

Less Than Significant Impact. The project would result in a significant impact if it conflicted with CEQA Guidelines Section 15064.3(b), which identifies appropriate criteria for evaluating transportation impacts. CEQA Guidelines Section 15064.3(b) identifies appropriate criteria for evaluating transportation impacts. It states that land use projects with vehicle miles traveled (VMT) exceeding an applicable threshold of significance may indicate a significant impact, and that projects that decrease VMT compared to existing conditions should be presumed to have a less than significant transportation impact.

The City does not have adopted traffic impact guidelines or separate VMT analysis guidelines, but as allowed by CEQA Guidelines Section 15064.7(c) uses the County of Orange Guidelines for Evaluating Vehicle Miles Traveled under CEQA (County Guidelines). The County Guidelines establish screening criteria for land use projects that would not exceed an applicable threshold of significance. One of the screening criteria is for small projects. The County Guidelines establish a screening criterion of 500 average daily trips based on the substantial evidence that this traffic volume correlates to greenhouse gas emissions below the typical emissions threshold of 3,000 MT CO2e equivalent.

The project would generate 160 daily trips, with 40 trips (40 inbound, 0 outbound) during the AM peak hour and 9 trips (0 inbound, 9 outbound) during the PM peak hour. The traffic generation forecast was derived from an average of the weekday (Tuesday through Thursday) class attendance during the AM and PM peak periods for the Fall/Spring semester class schedule (three days). Comparing the trips generated by the proposed project with the traffic generation potential of the existing Building C, the project would generate 138 greater daily trips, 37 greater AM peak hour trips and 6 greater PM peak hour trip than the current entitled land use in Building C. A qualitative assessment of the addition of 37 AM peak hour trips and 6 PM peak hour trip, when assigned to the project driveway and Laguna Canyon Road (SR-133), would result in no significant impact to the surrounding transportation system, particularly given that the 37 net

AM peak hour trips are inbound trips that would experience minimal delay accessing the site. **Therefore, impacts would be less than significant**.

c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?

Less Than Significant Impact. The project could result in a significant impact if it would increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible use (e.g., farm equipment). The project would not construct any roadway features with sharp curves or any new intersections. The project would not include the operation of any equipment that would be incompatible with motor vehicles. The project would result in typical types of traffic associated with the existing school uses on the site. **Accordingly, impacts would be less than significant**.

d) Result in inadequate emergency access?

Less Than Significant Impact. The project could result in inadequate emergency access if the site plan did not provide adequate emergency ingress and egress or generated such an increase in traffic that emergency vehicles would be hindered from providing services in the area.

The project would not interfere with emergency access because if would not alter the width or operation of Laguna Canyon Road or alter access to the site. Additionally, the project would not increase traffic in the area to the extent that it would hinder emergency vehicle access in the area. All new development in the City is required to comply with existing fire codes and ordinances regarding emergency access, such as widths, surfaces, vertical clearance, brush clearance, and allowable grades. **Therefore, impacts would be less than significant**.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
18. TRIBAL CULTURAL RESOURCES. Consultation with a California Native American tribe that has requested such consultation may assist a lead agency in determining whether the project may adversely affect tribal cultural resources, and if so, how such effects may be avoided or mitigated. Whether or not consultation has been requested, would the project cause a substantial adverse change in a site, feature, place, cultural landscape, sacred place, or object, with cultural value to a California Native American tribe, which is any of the following:				
a. Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:				
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	☐	☐	☒	☐
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	☐	☐	☒	☐

Regulatory Setting

Assembly Bill 52 (AB 52, Gatto. Native Americans: California Environmental Quality Act) and CEQA Public Resources Code Section 21080.31, subdivisions (b), (d)), requires a lead agency to consult with any California Native American tribe that requests consultation and is traditionally and culturally affiliated with the geographic area of a proposed project.

California Government Code Section 65352.3 (adopted pursuant to the requirements of Senate Bill (SB) 18) requires local governments to contact, refer plans to, and consult with tribal organizations prior to adopting or amending a general or specific plan, or to designate open space that includes Native American Cultural Places. The tribal organizations eligible to consult have traditional lands in a local government's jurisdiction, and are identified, upon request, by the Native American Heritage Commission (NAHC). As noted in the California Office of Planning and Research's Tribal Consultation Guidelines (2005), "the intent of SB 18 is to provide California Native American tribes an opportunity to participate in local land use decisions at an early planning stage, for the purpose of protecting, or mitigating impacts to cultural places."

Environmental Setting

Ethnographic Overview

The project site is located in an area historically occupied by the Gabrielino (Tongva) and Juaneño/Luiseño (Acjachemen). The Gabrielino occupied the northern half of Orange County, Los Angeles County, and portions of San Bernardino and Riverside County. The Juaneño occupied the southern half of Orange County, and portions of Riverside and San Diego County. The project site is in the border area between the Gabrielino and the Juaneño. Surrounding Native groups included the Luiseño to the south, the Cahuilla and Serrano to the east, and the Chumash and Tatataviam/Alliklik to the north.

Native American Settlements and Sites in the Project Vicinity

The project site is located within the San Joaquin Hills in the southern extent of the Peninsular Ranges. The project site is situated between several Native American sites, the nearest of which are the Acjachemen villages of Paplenga (approximately 1.7 miles southwest near the present-day location of Laguna Hills) and Llekupe (approximately 2.1 miles southeast of the project site). O'Neil and Evans do not show either of these village sites but do indicate that a locale known as "Tom-ok'" was present in Laguna Canyon based on personal communicate with descendants of the Acjachemen peoples. It is unclear if the site was a village site or instead just a known location for the Acjachemen peoples. O'Neil and Evans (1980:3) indicate that numerous Acjachemen village sites were located approximately 7 miles southeast of the project site near the location of Mission San Juan Capistrano.

Sacred Lands File Search

On October 18, 2022, SWCA requested a search of the SLF from the NAHC. SWCA received the results of the SLF search on November 17, 2022. The NAHC's SLF results letter indicated positive findings and stated that the Juaneño Band of Mission Indians Acjachemen Nation – Belardes should be contacted for additional information. The letter noted that the SLF and CHRIS are not exhaustive inventories of resources that may be present in any given area, and that tribes may uniquely possess information on the presence of an archaeological resource. The NAHC also provided a tribal consultation list for Orange County, which includes the names and contact information of 22 tribes who are traditionally affiliated with the area and have requested consultation.

Tribal Cultural Resources

The CHRIS and SLF searches were positive for tribal cultural resources or potential tribal cultural resources within the project site or a 0.8-km (0.5-mile) radius. SWCA conducted supplemental background research focusing on Native American land uses and settlement patterns in the region and the effects of urban development, which began within the project site in the mid-twentieth century. The project site is located on the border of what was traditionally Gabrielino territory to the north and Juaneño territory to the south. The project site is situated between several Native American sites, the nearest of which are the Acjachemen villages of Paplenga (approximately 1.7 miles southwest near the present-day location of Laguna Hills) and Llekupe (approximately 2.1 miles southeast of the project site). Additionally, based on personal communicate with descendants of the Acjachemen peoples, a locale known as "Tom-ok'" was present in Laguna Canyon.

Soils within the project site are made up of the Miocene formation, which dates to 23 to 5.3 million years ago and due to its age is not likely to contain subsurface archaeological deposits. Although subsurface deposits are unlikely within the project site, there is a potential for surficial deposits to exist within the project site. The area that has been previously developed is unlikely to contain surficial deposits; however, there are areas of the project site that have not been previously developed, particularly in the southern section of the site, and are within the limits of disturbance for the proposed project. These areas would have a generally higher sensitivity for encountering tribal cultural resources than the developed portions of the project site.

Tribal Consultation

As the lead agency under CEQA, the City is responsible for Native American consultation pursuant to AB 52. The City maintains a list of 11 Native American tribes and tribal representatives who have requested consultation for local projects. The City sent AB 52 notification letters on January 23, 2023 to tribal representatives for the Gabrieleno Band of Mission Indians – Kizh Nation, Gabrielino Tongva Indians of California Tribal Council, Juaneno Band of Mission Indians Acjachemen Nation – Belardes, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrielino-Tongva Tribe Juaneno Band of Mission Indians Acjachemen Nation – Romerio, Gabrieleno/Tongva Nation, Juaneno Band of Mission Indians Acjachemen Nation, and Soboba Band of Luiseno Indians. No requests for consultation were received.

Checklist Discussion

a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1 (k)?

b) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

Less Than Significant Impact. AB 52, signed into law on September 25, 2014, requires lead agencies to evaluate a project's potential to impact Tribal Cultural Resources (TCR) and establishes a formal notification and, if requested, consultation process for California Native American Tribes as part of CEQA. TCR may include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American Tribe that are eligible for inclusion in the California Register or included in a local register of historical resources. AB 52 also gives lead agencies the discretion to determine, supported by substantial evidence, whether a resource qualifies as a TCR. Consultation is required upon request by a California Native American tribe that has previously requested that the City provide it with notice of such projects, and that is traditionally and culturally affiliated with the geographic area of a project.

The City maintains a list of 11 Native American tribes and tribal representatives who have requested consultation for local projects. AB 52 notification letters were sent to tribal representatives for the Gabrieleno Band of Mission Indians – Kizh Nation, Gabrielino Tongva Indians of California Tribal Council, Juaneno Band of Mission Indians Acjachemen Nation – Belardes, Gabrieleno/Tongva San Gabriel Band of Mission Indians, Gabrielino-Tongva Tribe Juaneno Band of Mission Indians Acjachemen Nation – Romerio, Gabrieleno/Tongva Nation, Juaneno Band of Mission Indians Acjachemen Nation, and Soboba Band of Luiseno Indians. No requests for consultation were received.

Mitigation Measures

None Required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
19. UTILITIES AND SERVICE SYSTEMS. Would the project:				
a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?	☐	☐	☒	☐
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	☐	☐	☒	☐
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	☐	☐	☒	☐
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	☐	☐	☒	☐

Regulatory Setting

- 2020 Urban Water Management Plan
- Assembly Bill 939
- California Code of Regulations Title 20
- California Code of Regulations Title 24
- South Coast Water District Sewer System Management Plan
- County of Orange Waste & Recycling Strategic Plan
- Laguna Beach Municipal Code

Environmental Setting

Water

The project site is served for water supply by the Laguna Beach County Water District (LBCWD) The LBCWD provides water services to 25,000 people within a 8.5 square mile area of Southern Orange County, including portions of the city of Laguna Beach, a portion of Crystal Cove State Park, and the unincorporated community of Emerald Bay. LBCWD's 8,450 service connections service mostly residential

water users. The District sells about 4,500 acre feet of water annually.[73] Water delivered to customers in the LBCWD is a blend of groundwater pumped from the Orange County Groundwater Basin and purchased, imported water from MWD.[74]

LBCWD is responsible for ensuring that water demand within the City is met and that State and federal water quality standards are achieved. According to the LBCWD 2020 Urban Water Management Plan, LBCWD can provide adequate water supply to meet demand. [75]

Wastewater

The City operates a sanitary sewer system that consists of 85.71 miles of gravity sewers, 9.44 miles of force mains, and 25 lift stations. The City is also a member agency of South Orange County Wastewater Authority (SOCWA), which operates the Coastal Treatment Plant (CTP) in Laguna Beach that provides anaerobic digestion for wastewater. The City's wastewater collection system collects and conveys four (4) million gallons per day (mgd) of wastewater from residences and businesses to two treatment plants via a 140-mile system of pipelines, which includes 13 lift stations, approximately 3 miles of force mains, and 3,749 manholes (MHs).[76] The CTP has a permitted capacity of 6.70 mgd, with an average daily capacity of 2.9 mgd.[77]

Solid Waste

The City's Public Works Department supplies residents, businesses, and institutions with waste carts for recyclables and green waste through their contract with the private waste hauler, Waste Management. Waste Management services include trash pickup, recycling, bulky item pickup, organic waste recycling, green waste collection, and holiday tree recycling.[78] The California Integrated Waste Management Act of 1989 (Assembly Bill [AB] 939), as amended, was enacted to reduce, recycle, and reuse solid waste generated in the State. AB 939 requires city and county jurisdictions to divert 50 percent of the total waste stream from landfill disposal. AB 939 also requires each city and county to promote source reduction, recycling, and safe disposal or transformation. Furthermore, California cities and counties are required to submit annual reports to the California Department of Resources Recycling and Recovery (CalRecycle) to update their progress toward the AB 939 goals.

Electric Power Facilities

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[73] Laguna Beach County Water District. Website: https://www.lbcwd.org/about-us/about-our-district. Accessed February 2023.

[74] Laguna Beach County Water District. 2020 Urban Water Management Plan, June 2021. Page ES-5. https://www.lbcwd.org/home/showpublisheddocument/1277/637601348098870000. Accessed February 2023.

[75] Laguna Beach County Water District. 2020 Urban Water Management Plan, June 2021. Table ES-3 and 7-2. https://www.lbcwd.org/home/showpublisheddocument/1277/637601348098870000. Accessed February 2023.

[76] South Coast Water District Sewer System Management Plan, July 2009, Revised September 2019. Page iv.

[77] South Orange County Wastewater Agency, Coastal Treatment Plant, https://www.socwa.com/infrastructure/coastal-treatment-plant/. Accessed October 2022.

[78] City of Laguna Beach, Public Works, https://www.lagunabeachcity.net/government/departments/public-works/recycling-waste-and-compost. Accessed October 2022.

Electricity is provided to the central portion of the City, where the project site is located, by Southern California Edison (SCE). SCE provides electric power to more than 15 million persons, within a service area encompassing approximately 50,000 square miles.[79] SCE generates electricity from natural gas, hydro, nuclear, solar, and fuel sources. SCE also sources energy and local grid support from third parties such as cogeneration, biomass, small hydro, wind, geothermal, solar plants, and California Department of Water Resources.

In 2020, California used 272,576 gigawatt-hours (GWh) of electricity, of which 33 percent was from renewable resources.[80] **Table 14, Electricity Consumption in the SCE Service Area for 2020**, shows the portion of the 2020 electricity consumption consumed within SCE's service area.

Table 14
Electricity Consumption in the SCE Service Area for 2020

Agriculture and Water Pump	Commercial Building	Commercial Other	Industry	Mining and Construction	Residential	Streetlight	Total Usage (GWh)
3,112	28,800	4,449	12,450	1,822	32,475	426	83,534
Source: California Energy Commission, Electricity Consumption by Entity, https://ecdms.energy.ca.gov/elecbyutil.aspx. Accessed February 2023.							

Natural Gas Facilities

Natural gas is provided to the City by Southern California Gas (SoCalGas). SoCalGas serves approximately 21.6 million customers in more than 500 communities encompassing approximately 20,000 square miles throughout Central and Southern California, from the City of Visalia to the Mexican border.[81] SoCalGas receives gas supplies from several sedimentary basins in the western United States and Canada, including supply basins located in New Mexico (San Juan Basin), West Texas (Permian Basin), the Rocky Mountains, and Western Canada as well as local California supplies.[82]

California consumed approximately 12,332 million U.S. therms (MMthm) of natural gas in 2020.[83] **Table 15, Natural Gas Consumption in the SoCalGas Service Area for 2020**, shows the portion of the 2020 natural gas consumption consume within SoCalGas' territory.

[79] Southern California Edison, Who We Are, https://www.sce.com/about-us/who-we-are. Accessed February 2023.

[80] California Energy Commission, 2020 Total System Electric Generation, https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2020-total-system-electric-generation/2020. Accessed October 2022.

[81] Southern California Gas Company, Company Profile Website, accessed: July 13, 2020.

[82] California Gas and Electric Utilities, 2022 California Gas Report, page 135.

[83] California Energy Commission, Natural Gas Consumption by Entity, https://ecdms.energy.ca.gov/gasbyutil.aspx. Accessed October 2022.

Table 15
Natural Gas Consumption in the SoCalGas Service Area for 2020

Agriculture and Water Pump	Commercial Building	Commercial Other	Industry	Mining and Construction	Residential	Total Usage (MMthm)
74	802	88	1,616	226	2,426	5,231

Source: California Energy Commission, Natural Gas Consumption by Entity, https://ecdms.energy.ca.gov/gasbyutil.aspx. Accessed February 2023.

Checklist Discussion

a) Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects?

Less Than Significant Impact.

Water Facilities

As detailed below in response to Section 19(b), sufficient water supplies would be available to serve the project. Furthermore, the demand and installation of new water supply lines and fire hydrants are evaluated and managed by SCWD and LBFD, respectively, under their own independent environmental analysis. The project site, although currently developed, would require construction of new, on-site water distribution lines to serve the new Student Center. Impacts associated with the installation of water distribution lines would primarily involve trenching in order to place the water distribution lines below surface and would be limited to on-site water distribution, and minor off-site work associated with connections to the public main. Prior to ground disturbance, project contractors would coordinate with the SCWD to identify the locations and depth of all lines. Furthermore, SCWD would be notified in advance of proposed ground disturbance activities to avoid water lines and disruption of water service and including offsite connection to existing water lines. Therefore, the construction of new water facilities would not result in significant environmental effects. **Accordingly, impacts would be less than significant**.

Wastewater Facilities

As detailed below in response to Section 19(c), the project's wastewater would be treated by the CTP, which has adequate capacity to serve the project. Accordingly, it is not anticipated that the project, which is comprised of a single-family residential use, would require the construction of new wastewater treatment facilities. During construction of the project, workers would utilize portable restrooms, which would not contribute to wastewater flows to the wastewater system. Therefore, wastewater generation from project construction activities is not anticipated to cause any increase in wastewater flows. The project would require construction of new on-site wastewater infrastructure to serve the new Student Center. Impacts associated with wastewater infrastructure would primarily be confined to trenching for miscellaneous utility lines and connections to public infrastructure. Installation of wastewater infrastructure would be limited to on-site wastewater distribution, and minor off-site work associated with connections to the public main. Although no upgrades to the public main are anticipated, connection to offsite utilities (sewer, domestic water, electrical, telecommunications) in the right-of-way on Laguna Canyon Road would be required. All off-site work would be performed in consultation and under the approval of SCWD. Therefore, the construction of new wastewater facilities would not result in significant environmental effects. **Accordingly, impacts would be less than significant**.

Stormwater Drainage Facilities

Refer to Section 10c(iii), Hydrology and Water Quality, above for a discussion of stormwater drainage facilities. As discussed there, BMPs would be required to control stormwater runoff and runoff would drain to the stormwater system on Coast Highway. Stormwater runoff from the project site would not exceed the capacity of the existing or planned stormwater drainage systems and would not be expected to require the construction of new facilities. Therefore, the construction of new stormwater drainage facilities would not result in significant environmental effects. **Accordingly, impacts would be less than significant**.

Electric Power Facilities

The SCE would supply the project from the existing electrical system. However, the project would require the installation of new on-site electrical distribution facilities and connection to the off-site electrical system. All electrical facility installation and connection to the existing system would be done in coordination and under the approval of the SCE. Electricity demand during construction would vary throughout the construction period based on the construction activities being performed, and would cease upon completion of construction. When not in use, electric equipment would be powered off so as to avoid unnecessary energy consumption. Accordingly, it is not expected that the temporary demand for electricity during construction would require new electric power facilities.

The project includes a 21,977 square foot Student Center and associated site and parking improvement. During operation the electricity for these uses would represent an insignificant percentage of the SCE's projected annual sales. Furthermore, as discussed in response to Section 6(a), Energy, the incorporation of the Title 24 energy conservation standards into the project would ensure that the project would not result in the inefficient, unnecessary, or wasteful consumption of energy, including electricity. As such, it is anticipated that SCE's existing and planned electricity capacity and electricity supplies would be sufficient to support the project's electricity demand. Based on the above, the construction of new on-site electric power distribution facilities would not result in significant environmental effects and the expansion of off-site electric power sources would not be required. **Accordingly, impacts would be less than significant.**

Natural Gas Facilities

SoCalGas would supply the project from the existing natural gas facilities. However, the project would require construction of new on-site gas distribution lines to serve the new Student Center and connection to the existing off-site natural gas facilities. The project would connect to existing natural gas facilities in coordination with and under the supervision of SoCalGas. Construction activities typically do not involve the consumption of natural gas. Accordingly, there would be no demand generated by construction and no new natural gas facilities would be required.

During operation, natural gas service would be provided in accordance with the SoCalGas's policies and extension rules on file with the California Public Utilities Commission (CPUC) at the time contractual agreements are made. The project would be responsible for paying connection costs to connect its on-site service meters to existing infrastructure. SoCalGas undertakes expansion and/or modification of the natural gas infrastructure to serve future growth within its service area as part of the normal process of providing service. There would be no disruption of service to other consumers during the installation of these improvements.

As detailed in response to Section 6(a), Energy, the estimated natural gas demand of the project during operation would represent an insignificant percentage of the forecasted consumption of natural gas in SoCalGas' planning area. Furthermore, as discussed in response to Section 6(a), Energy, the incorporation of the Title 24 energy conservation standards into the project would ensure that the project would not result in the inefficient, unnecessary, or wasteful consumption of energy, including natural gas. As such, it is expected that SoCalGas' existing and planned natural gas capacity and supplies would be sufficient to serve the project's demand. Based on the above, the construction of new on-site electric power facilities would not result in significant environmental effects and the expansion of off-site natural gas sources would not be required. **Accordingly, impacts would be less than significant**.

Telecommunication Facilities

Construction-related activities, including grading and excavation, could encroach on telecommunication facilities. However, before construction begins, the project applicant would be required to coordinate with applicable regulatory agencies and telecommunication providers to locate telecommunication facilities. Therefore, the location of new telecommunication facilities would not result in significant environmental effects. Furthermore, telecommunication services are provided by private companies, the selection of which is at the discretion of the applicant on an ongoing basis. Accordingly, project impacts to telecommunication facilities would be **less than significant**.

Therefore, the project would not require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunication facilities, the construction or relocation of which could cause significant environmental effects. **Impacts would be less than significant**.

b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?

Less Than Significant Impact. A significant impact would occur if the project were to increase water consumption to such a degree that new water sources would need to be identified, or that existing resources would be consumed at a pace greater than planned for by purveyors, distributors, and service providers.

The Metropolitan Water District of Southern California and Municipal Water District of Orange County's 2020 UWMPs conclude that they can meet full-service demands of their member agencies starting 2025 through 2045 during normal years, a single-dry year, and multiple-dry years. Consequently, the SCWD is projected to meet full-service demands through 2045 for the same scenarios.[84] The SCWD's 2020 UWMP total gross water demand projection for 2045 is approximately 7,070 af/y.[85] According to CalEEMod[86] results, the project would demand an estimated 1,618,975 gallons (or 4.97 AF) of water per year. This increase is within the forecasted increase in water demand for SCWD.

The project would comply with the California's Green Building Standards Code, which would require implementation of water saving features to reduce the amount of water used by the project, including, high efficiency toilet and urinals and low flow faucets. All fixtures would be required to meet applicable flush volumes and flow rates. In addition, the project would be prohibited from using single pass cooling systems. Compliance with these requirements and water conservation measures, including Title 20 and 24 of the California Administrative Code, would further reduce the above projected water demand.

Consideration of existing sources of supply is expected to assure adequate water supplies for the service area through at least 2045. Any shortfall in SCWD controlled supplies (e.g., groundwater, recycled, conservation, or aqueduct) is offset with MWD purchases to rise to the level of demand.[87] Therefore, the amount of new annual demand from the project would be insignificant relative to available supplies through 2045, projected growth in SCWD. Moreover, the addition of approximately 22,000 square feet of private school uses would be consistent with Citywide growth, and thereby accounted for in the 2020 UWMP. As such, the project's estimated water demand would be within overall SCWD projections and would not require new water supply entitlements and/or require the expansion of existing or construction of new water facilities beyond those already considered in the 2020 UWMP.

Therefore, based on the above, sufficient water supplies would be available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years. **Accordingly, impacts related to water supply would be less than significant**.

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84 South Coast Water District 2020 Urban Water Management Plan, June 2021. Page 7-1.

85 South Coast Water District 2020 Urban Water Management Plan, June 2021. Page 4-7.

86 CalEEMod is a statewide emissions computer model and comprehensive tool for quantifying emissions associated with both construction and operations from a variety of land use projects, including project water demand.

87 South Coast Water District 2020 Urban Water Management Plan, June 2021.

c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has adequate capacity to serve the project's projected demand in addition to the provider's existing commitments?

Less Than Significant Impact. A significant impact would occur if the project would increase wastewater generation to such a degree that the capacity of facilities currently serving the project site would be exceeded.

Under contract with the City, SOCWA provides the project area with the conveyance, treatment, and disposal of wastewater. The project would require construction of on-site wastewater infrastructure to serve the new Student Center. The project site's wastewater would be conveyed to the CTP. Recent data on the CTP website indicates that on average 2.9 mgd of wastewater enters the CTP on a daily basis. The plant was designed to accommodate both dry and wet weather days with a maximum daily flow of 6.7 mgd.[88] Accordingly, there is a remaining capacity of 3.8 mgd, or 57 percent of the total.

The type and amount of wastewater that would be generated by the project would be typical for a private college and small café use. Conservatively assuming that wastewater generation would be approximately 100 percent of water demand (approximately 1,618,975 gallons per year as calculated by CalEEMod[89]), the project would generate approximately 1,618,975 gallons of wastewater per year, or 4,436 gallons per day. This amount would represent approximately 0.1 percent of the remaining daily capacity at the CTP. Therefore, the CTP has adequate capacity to serve the project's demand in addition to its existing commitments and the project would not require the construction of new or expanded wastewater treatment facilities. Furthermore, as with the projections of water demand detailed above, the estimated wastewater generation is a conservative estimate as the rates do not account for water conservation features that would reduce the amount of the project's water usage and, therefore, resulting conveyance into the wastewater distribution and treatment system**. Accordingly, impacts related to wastewater treatment capacity would be less than significant**.

d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?

Less Than Significant Impact. A significant impact would occur if the project were to increase solid waste generation to a degree that existing and projected landfill capacity would be insufficient to accommodate the additional solid waste.

Waste disposal sites (i.e., landfills) are operated by the City and County as well as by private companies. In addition, transfer stations temporarily store debris until larger haul trucks are available to transport the materials directly to the landfills. Landfill availability is limited by several factors, including: (1) restrictions to accepting waste generated only within a particular landfill's jurisdiction and/or watershed boundary, (2) tonnage permit limitations, (3) types of waste, and (4) operational constraints. Planning to serve long-term disposal needs is constantly being conducted at the regional level (e.g., siting new landfills within the County and transporting waste outside the region).

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[88] South Orange County Wastewater Agency, Coastal Treatment Plant, https://www.socwa.com/infrastructure/coastal-treatment-plant/. Accessed October 2022.

[89] See Appendix A to this document.

Waste generated from the project site would be taken to Sunset Environmental Transfer Station, where recyclables are separated from the solid waste. Materials leaving transfer stations could be transported to three active landfills within Orange County: Olinda Alpha Landfill, Frank R. Bowerman Landfill, and Prima Deshecha Landfill.[90] These landfills accept residential, commercial, and construction waste. Olinda Alpha Landfill is permitted to receive 8,000 tons of waste per day and has a remaining capacity of 17,500,000 cubic yards.[91] Frank R. Bowerman Landfill is permitted to receive 11,500 tons of waste per day and has a remaining capacity of 205,000,000 cubic yards.[92] Prima Deshecha Landfill is permitted to receive 4,000 tons of waste per day and has a remaining capacity of 134,300,000 cubic yards.[93]

Construction of the project would generate construction waste, including waste from demolition of the building, parking, and other paved areas. Construction of the project is estimated to generate a total of approximately 17 tons of solid waste.[94] This forecasted solid waste generation is a conservative estimate as it assumes no reductions in solid waste generation would occur due to recycling. As required by LBMC 7.19, projects shall reuse, recycle, or divert a minimum of fifty percent of construction and demolition debris. Moreover, the *County of Orange Waste & Recycling Strategic Plan* concludes that there is capacity of 212 million tons available throughout the County for the disposal of waste and by 2031 the disposal system is projected to have 156 million tons of remaining capacity.[95] Therefore, the project-generated construction waste of 17 tons would represent a very small percentage of the inert waste disposal capacity in the region.

During operation, the project would generate solid waste that is typical of a private school and small café use and would be consistent with all federal, State, and local statutes and regulations regarding proper disposal. According to CalEEMod, the project would generate about 28.6 tons of solid waste per year (0.08 tons per day).[96] As discussed below in response to Section 19(e), AB 939 was enacted to reduce, recycle, and reuse solid waste generated in the State to the maximum extent feasible. Specifically, AB 939 required cities and counties to identify an implementation schedule to divert 50 percent of the total waste stream from landfill disposal. AB 939 also required each city and county to promote source reduction, recycling, and safe disposal or transformation. All solid waste-generating activities within the City, including the project, would continue to be subject to the requirements set forth in AB 939.

Therefore, it is assumed that the project would divert 50 percent of its solid waste generated, thereby diverting this waste from landfills and have adequate areas for collection and removal of recyclable materials. Nonetheless, it is conservatively assumed that all 0.08 tons per day of the project's solid waste would be disposed of at regional landfills. The Olinda Alpha, Frank R. Bowerman, and Prima Deshecha Landfills' combined permitted daily intake of 23,500 tons per day would have capacity to accept the daily

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90 Orange County Waste & Recycling, Active Landfills, https://www.oclandfills.com/landfills/active-landfills. Accessed October 2022.

91 California Department of Resources Recycling and Recovery, SWIS Facility, Olinda Alpha Landfill, https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2757?siteID=2093. Accessed October 2022.

92 California Department of Resources Recycling and Recovery, SWIS Facility, Frank R. Bowerman Sanitary Landfill, https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2767?siteID=2103. Accessed October 2022.

93 California Department of Resources Recycling and Recovery, SWIS Facility, Prima Deshecha Landfill, https://www2.calrecycle.ca.gov/SolidWaste/SiteActivity/Details/2750?siteID=2085. Accessed October 2022.

94 A construction waste generation rate of 4.38 pounds per square foot was used. 7,584 square feet of residential construction multiplied by 4.38 pounds is 33,218 pounds (17 tons). Source: USEPA Report No. EPA A530-98-010, Characterization of Building Related Construction and Debris in the United States, Table 3, July 1998.

95 County of Orange Waste & Recycling Strategic Plan, November 22, 2016, page 9.

96 See Construction Transportation Energy Worksheet included as Appendix A to this document.

operational waste generated by the project under the existing permitted amount. Therefore, the project would not generate solid waste in excess of State and local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals. **Accordingly, impacts related to solid waste and solid waste reduction goals would be less than significant**.

e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?

Less Than Significant Impact. A significant impact may occur if the project would generate solid waste that was not disposed of in accordance with applicable regulations.

The project would generate construction and operation waste. As required by LBMC 7.19, the project would reuse, recycle, or divert a minimum of fifty percent of construction and demolition debris. During operation, the project would comply with federal, State, and local statues and regulations related to solid waste, such as AB 939 and the City's recycling programs. The AB 939 requirement to reduce the solid waste stream in landfills by 50 percent means that half of the project's total solid waste generated must be recycled rather than disposed of in a landfill. The project would be required to comply with AB 939 requirements and approximately 50 percent of the project's waste would be diverted for reuse or recycling; the remaining solid waste generated during operation would be disposed of in landfills. Therefore, the project would not substantially increase solid waste generation in the City or the amount disposed into the landfills. **Impacts would be less than significant**.

Mitigation Measures

None required.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
20. WILDFIRE: If located in or near state responsibility areas or lands classified as very high fire hazard severity zones, would the project:				
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	☐	☐	☒	☐
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	☐	☐	☒	☐
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	☐	☐	☒	☐

Some information in this section is incorporated from the *Revised – Request for Alternative Methods and Materials of Construction Report for the Laguna College of Art and Design, North Campus New Student Center Project*, prepared by Dudek, May 4, 2022. The *Revised – Request for Alternative Methods and Materials of Construction Report for the Laguna College of Art and Design, North Campus New Student Center Project* is provided in **Appendix F**.

Regulatory Setting

- Laguna Beach Safety Element
- Laguna Beach Local Hazard Mitigation Plan
- Laguna Beach Wildfire Mitigation and Fire Safety Report
- Laguna Beach Municipal Code

Environmental Setting

The City is surrounded by natural, undeveloped hillsides and all the canyon and hillside areas in the City and some coastal terrace areas are classified within the VHFHSZ, which is the highest wildfire risk classification designated by Cal FIRE. Nearly 90 percent of the City is classified VHFHSZ. The Laguna Beach Local Hazard Mitigation Plan (LHMP) identifies these hazard zones in relation to developed areas of the City and the location of critical facilities and infrastructure. In addition, the LBFD conducts strategic

planning on a regular basis to ensure fire response capabilities and personnel can adequately address current service needs throughout the City and identifies potential issues to be addressed by the LBFD.[97]

The project site is located within a wildland urban interface (WUI) area and a Very High Fire Hazard Severity Zone (VHFHSZ) as statutorily designated by the Laguna Beach Fire Department (LBFD) and CAL FIRE.

Checklist Discussion

a) Substantially impair an adopted emergency response plan or emergency evacuation plan?

Less Than Significant Impact. A significant impact may occur if a project were to interfere with roadway operations used in conjunction with an emergency response plan or emergency evacuation plan or would generate traffic congestion that would interfere with the execution of such a plan.

Many of the major roadways within the City are susceptible to natural hazards and could become blocked in the event of an emergency. As described in the Laguna Beach Wildfire Egress Study, City officials have divided the City into Emergency Management Zones (EMZs), which helps the City communicate evacuation orders to the public. Additionally, as part of the City's preparedness initiatives, an Evacuation Analysis has been prepared that identifies the routes used for evacuation purposes.

As identified in the General Plan's Safety Element the project site is located on a Critical Evacuation Roadway, Laguna Canyon Road.[98] Also, as indicated in the City's Wildfire Egress Study, which was prepared to examine anticipated traffic conditions and evacuation times associated with various rates of evacuation responses and alternative management strategies that could be used in response to them for the Emergency Management Zones (EMZs) within the City, Laguna Canyon Road is designated as an evacuation route.[99]

The project does not propose any new roads or infrastructure that have the potential to interfere with or obstruct an adopted emergency response plan or impede fire or police access to the site. Construction staging and activities would be temporary in nature and are not anticipated to substantially impede traffic on Laguna Canyon Road. Additionally, the project would not result an increase in population on the site that would generate traffic, impede evacuation routes, or hinder emergency vehicle access in the area. All new development in the City is required to comply with existing fire codes and ordinances regarding emergency access, such as widths, surfaces, vertical clearance, brush clearance, and allowable grades. Therefore, the project would not impede or conflict with any adopted emergency response or evacuation plans. **Impacts on emergency response or evacuation plans would be less than significant.**

[97] Laguna Beach General Plan, Safety Element, October 19, 2021. Page 11.
[98] Laguna Beach General Plan, Safety Element, October 2021. Figure S-1A through -8.
[99] City of Laguna Beach, Wildfire Egress Study, July 2021. Figure 11-1.

b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?

Less Than Significant Impact. A significant impact may occur if a project were to exacerbate wildfire risks and thereby expose people to pollutant concentrations from a wildfire or place them in the path of an uncontrolled spread of wildfire.

The project would include demolition of Building C and the existing asphalt parking lot and construction of a two-story, approximately 21,977 square foot Student Center. No residential uses increasing population residing on the site are proposed.

The project site is generally level, although surrounded by the hillsides of Laguna Canyon. The project site is adjacent to City-owned open space areas. The parcel to the south is an undeveloped, naturally vegetated steep mountainside with numerous large native oak tree species (*Quercus spp.)* and walking trails that are managed by OC Parks. The parcel to the east is undeveloped and naturally vegetated with small non-native trees and shrubs that are managed by the conservancy. These City parcels are designated as 'Open Space Preserve Areas' and 'High Value Habitat' lands. Additionally, the project site is within a wildland urban interface (WUI) area and a Very High Fire Hazard Severity Zone (VHFHSZ) as statutorily designated by the Laguna Beach Fire Department (LBFD) and CAL FIRE.

This VHFHSZ designation requires the project conform to the 195-foot Fuel Modification Zone (FMZ) as detailed in the City's Landscape/Fuel Modification Guidelines and Maintenance Program. Because the City-owned parcels are designated as 'Open Space Preserve Areas' and 'High Value Habitat' lands, the project applicant would not be allowed off-site to complete a full 195 feet FMZ and fuel modification activities are constrained to 20 feet of on-site FMZ on the southern side of the building, approximately up to 195-feet of on-site FMZ on the west side of the building (which includes the existing LCAD Student buildings), approximately up to 60-feet of on-site FMZ on the east side of the building, and approximately up to 195-feet of on-site FMZ on the north side of the building within the existing parking lot area. Based on the reduced FMZs, the proposed LCAD North Campus Student Center Building C would be hardened, which would not only mitigate for the lack of a full FMZ but would allow for the temporary sheltering of students and faculty if it is deemed not safe to evacuate onto Laguna Canyon Road.

As identified in Chapter 15.01 of the LBMC, the City has adopted the 2019 California Fire Code, which contains regulations related to construction, maintenance, and design of buildings and land uses. The project would replace a non-code compliant building with a new code-compliant, ignition resistive, Type 1-B fully sprinklered steel framed building. The applicant has prepared an Alternate Material, Design or Method of Construction (AM&M) analysis[100] to provide specific information about the available on- and offsite FMZs), as well as an evaluation of the site's fire environment and risk and alternative means of fire protection. Specifically, the project would provide:

- New Type I-B, Fully Fire Sprinklered two-story steel moment framed college student center;
- All landscaping meets Setback Irrigated Zone A, Irrigated Zone B, and thinning Zone C criteria;
- All windows for the proposed Student Center would be dual-pane, dual tempered windows, including sliding glass doors (code exceeding) Hazard Group 2 Fire Sprinkler System;

[100] Dudek, Revised – Request for Alternative Methods and Materials of Construction Report for the Laguna College of Art and Design, North Campus New Student Center Project, May 4, 2022.

- A wall-mounted exterior fire sprinkler system shall be installed along the south, east and west sides of the structure (sides exposed to native vegetation). The entire exterior fire sprinkler system would be designed to NFPA 13, Sections 11.3.2 (including both subsections 11.3.2.1 and 11.3.2.2 requirements;
- Installation of a wet-standpipe system; one FDC located in the southeast corner of the structure on the first floor and another FDC outlet located on the second floor at the top of the eastern staircase;
- All egress doors would be self-closing doors (except entrance door and sliding glass doors);
- External vents would be baffled or fitted with ember resistive mesh.
- Code required Fire Alarm System pursuant with NFPA 72, including code exceeding smoke detectors in each office room, all hallways, and on both floors.

The project would conduct fuel modification activities and construct a new code compliant building on the site. Additionally, the project would not increase full-time population on the site, nor substantially increase development on the site to the extent that risks from wildfire would be exacerbated. Therefore, the project would not exacerbate the risk of wildfire, nor the potential to expose people to pollutant concentrations from a wildfire or place them in the path of an uncontrolled spread of wildfire. **Impacts would be less than significant**.

c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?

Less Than Significant Impact. A significant impact may occur if a project would require the installation or maintenance of associated infrastructure that may exacerbate fire risks or that may result in temporary or ongoing impacts to the environment.

The project includes demolition of Building C and the existing asphalt parking lot and construction of a two-story, approximately 21,977 square foot Student Center. Site improvements would include exterior spaces to support student collaboration including patios, turf areas, landscaping, and other similar improvements. Other project components include the installation of landscaping, pedestrian pathways, site lighting, driveway improvements, and connection to offsite utilities (sewer, domestic water, electrical, telecommunications) in the right-of-way on Laguna Canyon Road. The project would include stormwater detention features such as debris basins and/or other appropriate features, including stormwater detention system located below the parking lot.

The project would conduct fuel modification activities as required by its VHFHSZ designation. As described previously, although the VHFHSZ designation requires the project to conform to the 195-foot FMZ as detailed in the City's Landscape/Fuel Modification Guidelines and Maintenance Program, because the City-owned parcels are designated as 'Open Space Preserve Areas' and 'High Value Habitat' lands, the project applicant would not be allowed off-site to complete a full 195 feet FMZ and fuel modification activities are constrained. No fuel breaks would be installed other than the FMZ activities. No roads or emergency water sources would be installed or maintained.

Installation of any required power lines or other utilities would be done in a manner consistent with other construction projects typical of urban development requiring connection to the existing utility grid and infrastructure and in accordance with applicable City building codes and utility provider policies and would not exacerbate fire risk. Compliance with all building code, developmental regulations, and utility

providers requirements and policies would ensure that the project would not exacerbate fire risks. **Impacts would be less than significant**.

d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?

Less Than Significant Impact. A significant impact may occur if a project were to expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope stability, or drainage changes.

The project site is relatively flat. According to the FEMA Flood Insurance Rate Map, portions of the project site are within Zones AE and X, which is a designation for areas determined to have a minimal flood hazard.[101] The area where Building C would be constructed is outside any FEMA-designated flood zones. No natural drainages would be altered or changed.

Therefore, downslope flooding resulting from runoff, post-fire slope instability, or drainage changes are unlikely to occur at the site. **Impacts would be less than significant**.

Mitigation Measures

None required.

[101] Federal Emergency Management Agency, Flood Insurance Rate Map, City of Laguna Beach, California, FEMA Map Number 06059C0438K, October 2020.

	Potentially Significant Impact	Less Than Significant Impact with Mitigation Incorporated	Less Than Significant Impact	No Impact
21. MANDATORY FINDINGS OF SIGNIFICANCE. Would the project:				
a) Have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number, or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☐	☒	☐	☐
b) Have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☐	☒	☐	☐
c) Have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	☐	☐	☒	☐

Checklist Discussion

a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number, or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?

Less Than Significant Impact with Mitigation. A significant impact may occur if a project would substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory.

The project could result in impacts to four species that have a low to moderate or moderate potential to occur within the study area. The project could result in direct or indirect impacts to 0.13 acres of Coast live oak woodland/High Value habitat within the Limit of Disturbance. There is the potential that nesting birds could occur on-site or near the project site and construction activities for the project could impact vegetation that could be used for nesting. Lastly, implementation of the proposed project has the potential to directly and/or indirectly impact trees that may qualify as public trees under the City of Laguna Beach Tree Removal Policy. **Implementation of MM-BOI-1 through MM-BIO-6 would ensure that the project would not substantially degrade the quality of the environment, substantially reduce the**

habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, nor substantially reduce the number or restrict the range of a rare or endangered plant or animal species.

To avoid impacts to unknown cultural resources or human remains that could be present on the project site, the proposed project would be required to comply with MM-CUL-1 through MM-CUL-4. **Implementation of MM CUL-1 to CUL-4 would ensure that the project would not eliminate important examples of major periods of California history or prehistory.**

b) Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)?

Less Than Significant Impact with Mitigation. A cumulative impact may be significant if a project's incremental effect, though individually limited, is cumulatively considerable. Cumulatively considerable means that the incremental effects of an individual project are significant when viewed in connection with the effects of past projects, the effects of other current projects and the effects of probable future projects. Cumulative impacts can occur as a result of the interactions of environmental change from multiple projects that could affect the environment, such as traffic, noise, and air quality. The City has ongoing development projects and capital improvement projects that could be occurring concurrently in the vicinity of the project when the project is under construction. The following analysis evaluates the potential for the project to contribute considerably to significant cumulative impacts.

Implementation of the project would have no impact or a less than significant impact on aesthetic resources, agriculture and forestry resources, air quality, energy, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use/planning, mineral resources, housing and population, public services, recreation, transportation, utility/service systems, and wildfire. **Because either no potential impacts would occur or less than significant impacts would occur, the project contribution to cumulative impacts to these issue areas would not be considered considerable and potential cumulative impacts would be less than significant**.

Biological Resources

Construction activities for the project would have the potential to adversely impact special status species, nesting birds, and trees. The project would implement MM-BIO-1 through MM-BIO-4, which would reduce construction impacts to biological resources to a less than significant level. Cumulative development projects in the City would be required to comply with state and federal laws that provide for the protection of biological resources and where needed, would need to implement measures to minimize impacts to biological resources. Compliance with local, state, and federal laws would reduce the potential impacts to less than significant. **Therefore, the project, considered with the related projects, would not contribute considerably to cumulative impacts and potential cumulative impacts to biological resources would be less than significant**.

Cultural Resources

The context for assessing cumulative impacts to local archaeological and paleontological resources is to determine whether the project would result in a loss of these resources that could diminish or eliminate

important information relevant to the history of the project area. The project would be required to comply with MM-CUL-1 through MM-CUL-3, which would eliminate any potential loss of important archaeological or paleontological information that may be buried under the project site. With regard to the potential discovery of human remains during construction, the project would be required to comply with Mitigation Measure CUL-4, which requires grading and construction activities to cease pursuant to State Health and Safety Code Section 7050.5 until the County Coroner has made the necessary findings as to the origin and disposition pursuant to Section 5097.98 of the California Public Resources Code. Therefore, the project would not contribute considerably to a cumulative loss of important archaeological or paleontological resources, and/or disturbed human remains. Related cumulative projects in the City would be evaluated for potential impacts to cultural resources and would be required to implement measures to reduce impacts to cultural resources. **Therefore, the project, considered with the related cumulative projects, would not result in significant cumulative impacts to cultural resources**.

c) Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?

Less Than Significant Impact. A significant impact may occur if a project has the potential to result in significant impacts, as discussed in the preceding sections. Based on the preceding environmental analysis, the project would not have significant environmental effects on human beings, either directly or indirectly. **Thus, impacts to humans would be less than significant**.

Mitigation Measures

Refer to MM-BIO-1 through MM-BIO-6.

Refer to MM-CULT-1 through MM-CULT-4.