



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 467-4201
www.wildlife.ca.gov

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



Governor's Office of Planning & Research

November 20, 2019

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Wendy Jung, Senior Planner
City of Laguna Beach
505 Forest Avenue
Laguna Beach, CA, 92651

STATE CLEARINGHOUSE

Subject: Comments on the Negative Declaration for the Downtown Specific Plan Update (LCP 19-4482 and ZOA 19-4483), Laguna Beach, CA (SCH# 2019109065)

Dear Ms. Jung:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Negative Declaration and the updated Downtown Specific Plan (DSP) for the City of Laguna Beach (City). The DSP is a regulatory and policy document that serves to guide growth, design, and development standards in downtown Laguna Beach and to preserve and enhance the character of the Downtown. The DSP does not include proposals for development. Future development projects would require individual environmental review under federal, State, and City guidelines. Therefore, the draft Negative Declaration finds that the update to the DSP would not result in any direct effects to the environment or biological resources.

CDFW is California's Trustee Agency for fish and wildlife resources and holds those resources in trust by statute for all the people of the State. (Fish & G. Code, §§ 711.7, subd. (a) & 1802; Pub. Resources Code, § 21070; California Environmental Quality Act [CEQA] Guidelines § 15386, subd. (a).) CDFW, in its trustee capacity, has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species. (*Id.*, § 1802.) Similarly, for purposes of CEQA, CDFW is charged by law to provide, as available, biological expertise during public agency environmental review efforts, focusing specifically on projects and related activities that have the potential to adversely affect fish and wildlife resources.

CDFW offers the following comments and recommendations to assist the City in developing DSP guidelines for future landscaping and development in the Downtown to avoid significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources.

Comments

1. The DSP Area consists primarily of urban development, but limited portions of the planning area are adjacent to natural areas and native habitat, such as those areas designated as public park/open space, as well as the Village Entrance north of City Hall. The Village Entrance primarily consists of parking spaces. However, a project is currently in construction to develop this area for pedestrian use with protected pathways and new landscaping.

We recommend that the DSP include a policy stating that landscaping near open space areas does not include exotic plant species that may be invasive to native habitats. Exotic plant species not to be used include those species on the California Invasive Plant Council's (Cal-IPC) Invasive Plant Inventory. A copy of the complete list can be

obtained from the Cal-IPC website at <http://www.cal-ipc.org>. In addition, landscaping adjacent to open space areas should not use plants that require intensive irrigation, fertilizers, or pesticides. In addition, planting materials should be free of insectivorous pests, particularly Argentine ants (*Iridomyrmex humil*) and fire ants (*Solenopsis invicta*), and any planting stock should first be inspected by a qualified pest inspector to ensure it is free of pest species that could invade natural areas. Infested stock should not be allowed on the project site and should be quarantined, treated, or disposed of according to best management principles by qualified experts in a manner that precludes invasions into natural habitats.

2. The *Polyphagous* and *Kuroshio* shot hole borers (ISHBs) are invasive ambrosia beetles that introduce fungi and other pathogens into host trees. The adult female (1.8-2.5 mm long) tunnels galleries into the cambium of a wide variety of host trees, where it lays its eggs and propagates the *Fusarium* fungi species for the express purpose of feeding its young. These fungi cause *Fusarium* dieback disease, which interrupts the transport of water and nutrients in at least 58 reproductive host tree species (both ornamental and native), with impacts to other host tree species as well. With documented occurrences throughout Orange County, including multiple recorded occurrences of *polyphagous* shot hole borers in Aliso and Woods Canyon Park, and one within the City, the spread of invasive shot hole borers (ISHBs) could have significant impacts in local ecosystems. In addition, invasive shot hole borers could infect a number of native and ornamental tree species within the City. If unchecked, an infestation could result in a significant cost to the City on the form of removing and replacing dead and infested ornamental plantings. Therefore, with regard to ISHBs, we recommend the DSP include Best Management Practices (BMPs) to prevent further spread of these beetles, such as:
 - i. Inspection of nursery materials prior to use in landscaping, to ensure that infested plants are not installed;
 - ii. Routine inspection of established landscaping trees for signs of ISHB infestation. Vulnerable host trees include species of maple, sycamore, ficus, oak, willow, cottonwood, wisteria, and others;
 - iii. Education of City workers and landscapers regarding ISHBs and their spread and how to deal with infected trees by a) reporting sign of ISHB infestation, including sugary exudate ("weeping") on trunks or branches and ISHB entry/exit-holes (about the size of the tip of a ballpoint pen), to the Department and UCR's Eskalen Lab, b) equipment disinfection, c) pruning infected limbs in infested areas where project activities may occur, d) avoidance and minimization of transport of potential host tree materials; e) chipping potential host materials to less than 1 inch and solarization, prior to delivering to a landfill, f) chipping potential host materials to less than 1 inch, and solarization, prior to composting on-site, g) burning of potential host tree materials;

Please refer to UCR's Eskalen lab website for more information regarding ISHBs:
<http://eskalenlab.ucr.edu/pshb.html>.

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Page 3 of 3

CDFW appreciates the opportunity to comment on the Negative Declaration for the DSP to assist the City in identifying guidelines and policies to reduce potential project and landscaping impacts on biological resources adjacent to the Downtown area.

Questions regarding this letter or further coordination should be directed to Meredith Osborne, Environmental Scientist at (858) 636-3163 or Meredith.Osborne@wildlife.ca.gov.

Sincerely,



Gail K. Sevens
Environmental Program Manager
South Coast Region

cc: Office of Planning and Research, State Clearinghouse, Sacramento

