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October 11, 2018

Makana Nova, AICP  
Associate Planner  
Community Development Department  
City of Newport Beach  
100 Civic Center Drive  
Newport Beach, CA 92660

**Subject:** Errata/Revisions to the Initial Study/Mitigated Negative Declaration for the Big Canyon Coastal Habitat Restoration and Adaptation Project - Phase 2A

Dear Ms. Nova, AICP:

The IS/MND for the Big Canyon Coastal Habitat Restoration and Adaptation Project – Phase 2A was circulated for public review from September 4, 2018 to October 5, 2018. The City of Newport Beach received four comment letters, one email and one phone message that included a map.

The following provides the corrections and additions to the sections of the Initial Study/Mitigated Negative Declaration. The corrections and additions are organized by page number. Additional text is shown in underline, and deleted text is shown in ~~strike through~~ format.

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Ms. Nova, AICP  
October 11, 2018  
Page 2

## Page 1, IS/MND

The first sentence in the second paragraph on page 1 of Chapter 1, Introduction of the IS/MND is revised as follows:

Phase 2A is considered a separate project from other identified phases (i.e. Phase 1, Phase 2B, and Phase 2C) ~~because where~~ specific grant funding was provided to the project applicant, The Newport Bay Conservancy, to provide a restoration design for the 11.32-acre project site (Phase 2A).

## Page 11, Figure 4, IS/MND

The legend for Figure 4 is modified to accurately identify that the Menzies' Golden Scrub Alliance vegetation community is considered an environmentally sensitive habitat area (ESHA).

Menzies' Golden Scrub Alliance (ESHA)

Page 21, Figure 11, IS/MND

The legend for Figure 11 is modified to accurately identify the intent of the site clearing and grubbing.

### Invasive Plant Removal

Site Clearing and Grubbing (complete removal including root mass of non-natives and PSHB-infested willows)\* – 6.83 acres

Site Selective Tree Removal (within existing riparian vegetation) – 2.41 acres

\* Native vegetation will be avoided to the maximum extent practicable.

## Page 42, IS/MND

The following correction was required to clarify that the vegetation that is currently infested with the Polyphagous Shot Hole Borer (PSHB) is some of the existing willow trees. The second paragraph on page 42 of the IS/MND is revised as follows:

Furthermore, the proposed project includes the removal of the existing Brazilian pepper trees that are approximately 20 to 30 feet in height, non-native and evergreen. ~~Although these tree species could provide a visually pleasing view, these species are infested with PSHB that will eventually destroy the trees.~~ The proposed removal of these non-native evergreen species as well as other exotics and invasive species would alter distant views from Back Bay Drive and limited views from Jamboree Road, as well as distant eastern views from the nearest public viewpoint located approximately 600 feet west of the project site within the western portion of Big Canyon Park. Although these current views would be altered, the proposed vegetation would provide views of native habitat that can be visually pleasing. ~~the presence of PSHB will result in the ultimate destruction of the existing pepper trees and the visually pleasing resource will be naturally affected. Therefore, t~~The proposed restoration of the project site with alkali wet and high meadow communities with



Ms. Nova, AICP  
October 11, 2018  
Page 3

vegetation heights of two to three feet would include more sustainable natural plant species. The final project plantings would continue to provide natural and visually pleasing vegetation as viewed from Back Bay Drive and Jamboree Road. Although the proposed restoration would alter views from Jamboree Road, Back Bay Drive, as well as the public viewpoint west of the project site, views of the project site would remain aesthetically pleasing and impacts to the scenic quality of the project area would be less than significant.

## **Page 28, IS/MND and Appendix C, Page 8**

The following correction addresses the comment made by the California Department of Fish and Wildlife who addressed the need for clarification of vegetation disposal and information provided in third paragraph on page 28 of the IS/MND and page 8 in Appendix C, The Biological Resources Technical Report:

The stream corridor outside of the pepper trees groves is dominated by native willows that exhibited evidence of infestation by the Polyphagous Shot Hole Borer (PSHB) noted during field surveys conducted during Phase 1. The potential infested wood chips from the onsite willow trees would be treated through solarization at locations along the existing trail that are illustrated on Page 6 of the 60% Design Plans in Appendix A. The remaining wood chips as well as the dead and non-native vegetation would be disposed of at the Prima Deshecha Landfill. Subsequent to completing the habitat restoration, tThe proposed project will use long-term pest management techniques in consultation with experts from the University of California Riverside. Such techniques may include heavy pruning of the existing infested mature trees and application of soil amendments and tree injections to improve resilience of existing woody plants. ~~These areas also contain invasive plant species that will be removed selectively and replaced with native plants.~~ To further improve sustainability of the replanted native riparian vegetation, woody species and herbaceous plants that are not highly susceptible to PSHB infestation will be selected. Soil amendments will be also used to reduce salinity levels and improve biological activity in soils. Similarly, the planned re-vegetation after exotic removal along the creek channel will use a mixed palette of native vegetation that includes smaller stem plants that are less desirable to the PSHB. Without these management measures, the existing willow trees and proposed riparian habitat would be likely to be impacted by the PSHB infestation which eventually causes die off of large mature trees that would provide potentially suitable habitat for important wildlife, including, for example, the State and federally Endangered least Bell's vireo (*Vireo bellii pusillus*).

## **Page 126, IS/MND**

At the end of the second paragraph on page 126 of the IS/MND, the following is revised to address the intended hours of operation for the Big Canyon Park with the implementation of the proposed project.

Thus, the construction activities associated with the proposed project would be required to adhere to the applicable permitted hours of operation established under the City of Newport Beach's Noise Ordinance. In addition, the City intends to change the hours of operation for Big Canyon Park to close from "dusk till dawn," which may require a future ordinance.

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## Page 141, IS/MND

The following text has been revised to address the landfilling of the chipped material from the project site. The second paragraph on page 141 of the IS/MND is revised as follows:

Project implementation would result in the need for disposal of vegetative debris from construction and maintenance activities. Solid waste removed from the project site would include dead or nonnative vegetation. Debris would be removed with construction equipment and transported to the landfill by haul trucks at the designated haul routes discussed above in Section 3.4.16, Impacts a) and d). The total estimated vegetation removal is approximately 7,500 cubic yards and the total estimated soil removal is approximately 1,500 cubic yards. It is anticipated that the project's generation of solid waste would be at its greatest during initial construction activities due to the primary removal of non-native habitat vegetation. Thereafter, the project would result in minimal removal of dead vegetation during operational maintenance activities. Chipped material totaling up to approximately 800 cubic yards may be used for top dressing within the replanted area as well as on the trail located along the northern boundary of the project site. A portion of the 800 cubic yards of chip material is anticipated to be infested by the PSHB. Only the potential infested wood chips which are anticipated to come from some of the onsite willow trees would be treated through solarization at locations along the existing trail that are illustrated on Page 6 of the 60% Design Plans in Appendix A. The remaining wood chips that are no infected as well as the dead and non-native vegetation that are also not infected would be disposed of at the Prima Deshecha Landfill. Given the project's scale, it is anticipated that the specified landfill would have the adequate capacity to accommodate the project's waste disposal needs. Therefore, the project would result in a less than significant impact to landfill capacity.

## Page 143, IS/MND

The following is a correction to the cumulative discussion on page 143 of the IS/MND.

**Less than Significant with Mitigation.** The proposed project along with other related projects such as Phases 1, 2B and 2C would result in several potentially significant ~~project level~~ cumulative impacts. Impacts associated with the related projects would be similar to the impacts associated with the proposed project. As a result, the cumulative impacts regarding Biological Resources, Cultural Resources and Noise would be significant. Because the proposed project would result in significant impacts associated with these same issues, the would project level impacts regarding Biological Resources, Cultural Resources and Noise. The project's contribution to cumulative impacts to Biological Resources, Cultural Resources and Noise would be cumulatively considerable, and therefore, could result in significant cumulative impacts.

## Appendix D, Page 7

Appendix D, Phase 1 Cultural Resources / Archeological Research Plan, is modified to reflect the correct date for earliest human occupation. The first sentence of the second paragraph on page 7 as well as the first sentence of the third paragraph of page 7 of Appendix D in the IS/MND is revised as follows:

The prehistory of the region has been summarized within four major horizons or cultural periods:  
Early [~~10,000~~ 13,000 to 8,000 before present (B.P.)], Millingstone (8,000 to 3,000 B.P.), Intermediate

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Ms. Nova, AICP  
October 11, 2018  
Page 5

(3,000 to 1,500 B.P.), and Late Prehistoric (1,500 B.P to A.D. 1769) (Wallace 1955; Warren 1968).

The southern California coast may have been settled as early as ~~10,000~~ 13,000 years ago (~~Jones 1992~~ Waters and Stafford 2007). Evidence of human occupation as early as 13,000 B.P. was found at the southern California Fairpoint Site located on Point Dume in Malibu, which was validated by the national museum, The Smithsonian (Stanford 2007).

## **Appendix D, Page 8**

The first sentence of paragraph five on page 8 of Appendix D, Cultural Resources / Archeological Research Plan is revised as follows:

The proposed project is located at the southern extent of ~~Gabrielino-Kizh-Tongva~~ Kizh territory, near the boundary with the Juaneño–Acjachemen territory to the south.

## **Appendix D, Pages 8 and 9**

Appendix D, Phase 1 Cultural Resources / Archeological Research Plan, is modified to reflect the reference to sources for the mentioned “Ethnographic Setting” on pages 8 through 9 and the reference to Mr. Anthony Salas has been revised as follows:

~~Mr. Anthony Salas~~ Mr. Chairman Andrew Salas, Chairperson of the Gabrieleño Band of Mission Indians – Kizh Nation, provided information on known ethnographic village sin the project vicinity. These include Lukupangna, Lopusuknga, Moyonga (or Moyo), Kengaa, and Kenyaanga (or Kenyaangna), two of which are located near Newport Beach. For reasons of confidentiality, more specific locations are not provided. The Gabrielino-Kizh-Tongva are reported to have been second only to the Chumash in terms of population size and regional influence (Bean and Smith, 1978; Johnston, 1962; McCawley, 1996; Teutimes-Salas et al., 2013).

## **Appendix D, Page 40**

The following sources have been added to the References Cited section on page 40 of Appendix D, Phase 1 Cultural Resources / Archeological Research Plan:

Johnston, Bernice. 1962. California Gabrielino Indians. Southwest Museum Pres, Los Angeles.

McCawley, William. 1996. The First Angelinos, the Gabrielino Indians of Los Angeles. Malki Musuem/Ballena Press, Banning, California.

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Ms. Nova, AICP  
October 11, 2018  
Page 6

Teutimes-Salas, E.A. Salas, C. Swindall-Martinez and G. Stickel 2013 Toypurnia, the Joan of Arc of California. Kizh Tribal Press, San Gabirel

Waters, Michael B. and Thomas W. Stafford Jr. 2007. Redefining the Age of Clovis: Implication for the Peopling of the Americas. Science, Vol. 315, pp. 1122-1126.

If you have any questions regarding the above information, please call me at 714 742 5375.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael E. Houlihan". The signature is fluid and cursive, with the first name "Michael" and last name "Houlihan" clearly distinguishable.

Michael Houlihan, AICP  
Principal Associate