

10.0 CONSISTENCY WITH REGIONAL AND LOCAL PLANS

NEPA requires that the federal lead agency identify possible conflicts between the proposed action and the objectives of state and local land use plans and policies. In addition, potential inconsistencies with local plans should be described, along with actions that the federal agency would take to avoid this inconsistency. Under the provisions of CEQA Guidelines Section 15125(b), an EIR must discuss any inconsistencies between the proposed project and applicable general plans and regional plans.

The SAMP/WSAA Process is a Watershed (landscape-level) approach to preserving and managing sensitive aquatic resources while allowing economic uses to be permitted within the Watershed consistent with the requirements of federal law (CWA Section 404) and state code (FGC Section 1600 *et seq.*). State and federal waters, including wetlands, have been identified in the Watershed, and to the extent feasible, have been avoided. Unavoidable impacts to aquatic resources will be minimized and fully mitigated according to the SAMP Permitting Program/WSAA Process and mitigation framework.

In this section, the SAMP/WSAA Process is evaluated for consistency with the Orange County Central and Coastal Natural Community Conservation Plan (NCCP), the Corps Watershed Management Plan (Corps 2001a,b), SCAG Growth Vision Report (2004), Orange County Transportation Authority Master Plan of Arterial Highways (2005); County of Orange General Plan (2005), and City of Irvine General Plan (1999, 2005, 2006). This section also discusses SAMP/WSAA Process consistency with other municipal general plans of the Watershed.

10.1 NATURAL COMMUNITY CONSERVATION PLAN (NCCP) / HABITAT CONSERVATION PLAN (HCP)

10.1.1 Background

The County's Natural Community Conservation Plan (NCCP) / Habitat Conservation Plan (HCP) is a program designed to provide long-term regional protection of the natural vegetation and wildlife diversity of the region while allowing compatible land use and appropriate development to occur. In April 1996, the Orange County Board of Supervisors adopted the Central-coastal Subregion NCCP/HCP program. The Reserve System identified within the NCCP/HCP preserves approximately 18,500 acres of open space designed to function as a multiple-habitat system. The Reserve System restricts the kinds of permitted uses to protect long-term habitat values. Residential, commercial, and industrial uses are prohibited, as are new active recreational uses outside already-disturbed areas. However, the NCCP/HCP does allow for non-habitat uses that would need to be sited in the Reserve System, such as infrastructure facilities including roads, flood control, sanitary landfills, utilities, and water storage. New recreational facilities would be allowed in locations compatible with habitat protection based on the understanding that recreational use is subordinate to habitat protection within the Reserve. The primary goal of the NCCP/HCP is to protect and manage habitat supporting a broad range of plant and animal populations that are found within the Central and Coastal Subregion. To accomplish this goal, the NCCP/HCP creates a subregional habitat Reserve System and implements a coordinated program to manage biological resources within the habitat preserve. Creating a defined Reserve System provides certainty to the public and affected landowners with respect to the location of future development and open space within the subregion.

10.1.2 Relation to the proposed SAMP/WSAA Process

As described in Section 3.2.2, the NCCP/HCP provides for the regional protection and perpetuation of natural wildlife diversity while allowing compatible land use and appropriate development growth. This approach provides an alternative to "single species" conservation through the formulation of regional, natural community-based, and habitat protection programs. The NCCP/HCP was developed to provide adequate mitigation for impacts to the California gnatcatcher and other Identified Species' habitat. The Department and USFWS developed the NCCP/HCP that provides coverage under Section 10 of FESA and CESA to those who are signatory to the NCCP/HCP. The NCCP Central and Coastal sub-region extends within the Watershed. As under the existing Corps/Department permitting, qualifying applicants within the Watershed seeking coverage under the SAMP/WSAA Process can continue to utilize the NCCP/HCP process for authorizing the take of a listed species, including the federally listed coastal California gnatcatcher. The SAMP's long-term conservation elements include a suite of policies and measures for aquatic resource management. Among these are an adaptive management framework and the requirement/recommendation for buffers. These measures also serve to coordinate the SAMP/WSAA Process with the existing NCCP reserve system. The two plans, one focused on upland species (NCCP) and one focused on riparian resources (SAMP/WSAA Process), are complementary approaches to protecting and enhancing habitats used by listed species.

The NCCP established a habitat reserve system for native habitat. The focus of the NCCP is to protect target sensitive species, such as the coastal California gnatcatcher. Of the 17,125 acres identified as aquatic resource integrity areas, including aquatic resources and their contributing upland areas of influence, 12,408 acres or 72% fall within the boundaries of the NCCP Reserve system. With regard to the Watershed's aquatic resources omitted from coverage under the NCCP, some already lie within the NCCP Reserve (and other open space areas and have been afforded some level of site protection independent of the SAMP/WSAA Process). For instance, 521 acres or 67% of the high and medium integrity riparian habitat (also identified as an aquatic resource integrity area) are located within the NCCP Reserve system. However, the SAMP/WSAA Process would conserve an additional 248 acres of high and medium integrity riparian habitat. Other riparian habitat is located in non-NCCP designated open space areas, including the City of Irvine's Open Space Preserve, and UCI's San Joaquin Freshwater Marsh Preserve.

Consistency Determination: The NCCP and SAMP/WSAA Process have many similar goals and objectives. The SAMP/WSAA Process is expected to strengthen the NCCP by including conditions regarding riparian-oriented species, such as the least Bell's vireo, and providing a process for the conservation, restoration, and rehabilitation of aquatic resource integrity areas located within and adjacent to the NCCP areas. Much of the aquatic resource integrity areas of the Watershed are located within the NCCP area; thus, the two planning processes cover similar areas, but focus on different aspects of the environment (riparian versus upland). The SAMP/WSAA Process also includes prioritization for connecting currently isolated NCCP areas (e.g., linking the northern and southern portions of the Watershed).

There are several federally listed species including (but not limited to) the coastal California gnatcatcher and the least Bell's vireo, and two previously designated critical habitats within the Watershed, including those for the coastal California gnatcatcher and the Riverside fairy shrimp. The Corps has informally consulted with the USFWS to ensure any future impacts to federally listed species, or their critical habitat, are not adverse. With this Draft EIS/EIR, the Corps has initiated formal consultation for the SAMP/WSAA Process in a letter pursuant to Section 7 of the ESA. Therefore, due to the proposed RGP, LOP, and WSAA Process conditions relating to projects within aquatic resource integrity areas, mitigation sites and those affecting listed species, the SAMP/WSAA Process is consistent with the NCCP.

10.2 NEWPORT BAY / WATERSHED MANAGEMENT PLAN

10.2.1 Background

The Committee on Public Works, House of Representatives, adopted a resolution in May 8, 1964, authorizing federal monies for the study of the Santa Ana River Basin and Orange County Streams, California. In addition, specific directive language was provided by Congress within the Conference Report on H.R. 2203, Energy and Water Development Appropriations Act, 1998, (House of Representatives - September 26, 1997), under General Investigations. The conference agreement stated: *"...for the Corps of Engineers to undertake a reconnaissance study for management of the Newport Bay/Watershed in the interest of environmental preservation and restoration, water quality and sediment control, and the avoidance or minimization of undesirable impacts resulting from urbanization and other present and future Watershed activities"*.

The Baseline Conditions Report (F-3 Milestone; Corps 2001a,b) was the first report in a series of deliverables for the Watershed that led to a Feasibility Study, Final Feasibility Report and a Watershed Management Plan. The Baseline Conditions Report summarizes the findings, results, and data collected for the baseline (existing) conditions pertaining to hydrology, hydraulics, sedimentation, groundwater, geology, soils, economics, and the environmental setting of the Watershed. Some of the data presented in this report have been used in the preparation of the baseline sections of this Draft EIS/EIR.

The Corps, in conjunction with the County of Orange, and other stakeholders, conducted the Feasibility Study for the Watershed (F-4 Milestone) that is being used to prepare the comprehensive Watershed Management Plan (hereafter, Plan). The goal of the Feasibility Study was to maintain and/or improve the health of the Watershed. The Feasibility Study addressed restoration opportunities, and identified measures that would strike a balance between the need for economic development and the need to preserve valuable Watershed (and Newport Bay) resources.

The Corps prepared a draft Plan (F-4 Milestone; Corps 2004, Public Draft; Corps 2005b,c). The final plan will be completed and submitted with the Draft Feasibility Report (F-5 Milestone). The Watershed Management Plan is intended to provide a decision-making framework within which specific structural projects, non-structural projects, and local activities will be identified, and BMPs and other relevant information will be included. The Plan will be the overall blueprint for Watershed improvement activities. Measures that are part of the Plan, but fall outside of the Corps mission, can be implemented by other interested local, state, and federal agencies.

10.2.2 Relation to the proposed SAMP/WSAA Process

The Plan will cover topics outside the scope of the proposed permitting and mitigation programs of the SAMP/WSAA Process. The Plan considers (a) the social, economic, and environmental aspects of the Watershed, and (b) the mechanisms required to “incentivize and enable” desired actions. The Plan includes topics such as data management, design of natural and built environments, policy, finance, and communication (Corp, 2004). The proposed SAMP/WSAA Process, developed by the Regulatory Division of the Corps, focuses on a new permitting process and mitigation program for projects requiring Corps authorization for proposed activities in the Watershed. Many local-level concerns related to water resources and current water quality problems, may not be directly addressed by the SAMP/WSAA Process, and thus may be addressed through the parallel process involving the Corps Planning Division and County of Orange.

Both the Plan and the SAMP/WSAA Process have been developed by the Corps of Engineers Los Angeles District and have been designed to complement each other. Most significantly, both documents have been created with the other in mind. Given that the Corps has limits to the level of Watershed management it can require through the regulatory process, both documents provide an outline for how the regulatory process can support a comprehensive resource management process, and how communities and agencies can successfully implement and benefit from broad-based Watershed management efforts.

Additionally, it is anticipated that a Mitigation Coordination Program administrator (proposed as one concept for future management in the Watershed) could compete for and obtain non-regulatory related monies to acquire conservation lands, conduct public education and outreach activities, and/or conduct specific non-mitigation, restoration activities within the aquatic resource integrity areas. Funding sources may include, but are not limited to existing and future grant programs, federal, state, and local watershed restoration funding, bond monies, or conservation fees collected by local land use authorities. Additionally, ecosystem restoration projects determined by the Corps to have federal interest may be eligible for receiving federal monies administered by the Corps. The Corps Newport Bay Watershed Management Plan (2005c) identifies a number of revenue-generation strategies that could be adopted by a Mitigation Coordination Program administrator.

Consistency Determination: Coordination of Participating Applicants at the SAMP/WSAA Process stakeholder meetings, Newport Bay Watershed Management Committee meetings, and internal meetings between staff of the Corps planning and regulatory branches, have ensured compatibility between the two plans. The proposed SAMP/WSAA Process overlaps with the Plan by providing delineation and functional assessment data, restoration planning and site prioritization, and mitigation policies. Many projects identified in the Corps Restoration Plan (Smith and Klimas, 2004) may eventually be implemented through the finance and communication aspects of the Plan. It is expected that implementation of the SAMP/WSAA Process will not constrain or eliminate activities encouraged by the Plan such as future restoration, water quality, or other related projects (Corps, 2005 b,c).

10.3 COUNTY OF ORANGE GENERAL PLAN

Unincorporated Orange County comprises a substantial portion of the Watershed. The Orange County General Plan Land Use Element (LU-3-1) states, “The final portions of the available land within the

County will achieve first generation build-out sometime after the year 2020, varying somewhat by geographic area.” It should be noted that Orange County considers build-out in conceptual terms only, as redevelopment and intensification will continue after all developable land has been used (Corps, 2001).

The Santiago Hills overlook the Watershed from the north and provide the largest remaining block of open space in the Watershed. These hills are largely protected from future development under the NCCP/HCP agreement. The Frank R. Bowerman Landfill is located north of SR-241 in the Bee Canyon area, surrounded by NCCP reserve areas. The estimated closure date of the landfill is 2053. Upon closure, it is anticipated that the landfill site would be converted to a recreational facility. Much of the remaining land to the east and west of the landfill will be incorporated into the Limestone-Whiting Ranch Wilderness Park in the future (Corps, 2001). Thus, few County areas in the Watershed remain available for future development.

10.3.1 Land Use Element

The Land Use Element of the General Plan contains 13 policies, applicable to all geographic areas of unincorporated Orange County were adopted to guide short- and long-term planning and development. Of the thirteen policies, only two are applicable to the environmental topic areas of the SAMP/WSAA Process. These include Policy 8 – Enhancement of the Environment, and Policy 13 – Urban Storm Water Runoff Regulations. Two additional county programs are applicable to the SAMP/WSAA Process and include the Environmental Review Process and the NCCP (see Section 11.1, above). The consistency of the proposed SAMP/WSAA Process with these applicable policies and programs in the County’s General Plan is addressed below.

- **Land Use Element, Policy 8:** Enhancement of the Environment. To guide development so that the quality of the physical environment is enhanced.
- **Land Use Element, Policy 13:** Urban and Storm Water Runoff Regulations. Established for the reduction of water pollution. Updated objectives that respond to water pollution regulations in the Santa Ana RWQCB include:
 - Limit disturbances to natural water bodies and drainage systems; conserve natural areas; protect slopes and channels; and minimize impacts from storm water and urban runoff on the biological integrity of natural drainage systems and water bodies.
 - Look for opportunities that minimize changes in hydrology and pollutant loading; mitigate projected increases in pollutant loads and flows by incorporating structural and non-structural BMPs; ensure that post-development runoff rates and velocities from a site have no significant adverse impact on downstream erosion and stream habitat; seek to minimize the quantity of storm water directed to impermeable surfaces and the MS4s; and maximize the percentage of permeable surfaces to allow more percolation of storm water into the ground.
 - Look for opportunities to preserve wetlands, riparian corridors, and buffer zones and establish reasonable limits on the clearing of vegetation from the project sites.
 - Encourage the use of water quality wetlands, biofiltration swales, watershed-scale retrofits when such measures would be effective and are technically and economically feasible.
 - As appropriate, provide for permanent measures to reduce storm water pollutant loads in storm water conveyed from development sites.

- Establish guidelines for areas particularly susceptible to erosion and sediment loss.
- Establish a Condition of Approval such that permanent water quality treatment BMPs are adequately constructed, operated, and maintained throughout the life of a project.

Consistency Determination: Policy 8 ensures that all land use activities enhance the physical environment while recognizing the need for economic development. This policy also establishes the preservation of those environmental resources that have been identified as high value resources. The SAMP/WSAA Process is consistent with Policy 8 of the Orange County General Plan because the purpose of the SAMP/WSAA Process is to provide for reasonable economic development with the protection and long-term management of sensitive aquatic resources. To the extent feasible, federal waters of the U.S., including wetlands, are avoided and unavoidable impacts to aquatic resources are minimized and fully mitigated under the SAMP/WSAA Process. The SAMP/WSAA Process is consistent with Policy 13 because the SAMP/WSAA Process is a management plan designed to protect aquatic resources and includes LOP and RGP general conditions to minimize impacts to water quality. Authorizations under the SAMP will require certification under CWA Section 401 to ensure water quality standards are maintained. Furthermore, the objectives listed above are consistent with the eight SAMP Tenets, which are guiding principles that achieve the goal of protecting the biological, chemical, and physical integrity of the waters of the U.S. and avoiding impacts to fish and wildlife.

Resource Element

The Resource Element of the County of Orange General Plan (Chapter VI) includes six components with policies that pertain to the management and conservation of resources. Of the six components that make up this Element, three components: Natural Resources, Water Resources, and Open Space are applicable to the SAMP/WSAA Process. The consistency of the proposed SAMP/WSAA Process with the Resource Element's policies in the County's General Plan is addressed below.

- **Resources Element, Goals, Objectives and Policies: Natural Resources Component, Goal 3, Policy 5: Landforms.** To protect the unique variety of significant landforms in Orange County through environmental review procedures and community and corridor planning activities.
- **Resources Element, Goals, Objectives and Policies: Water Resources Component, Goal 1, Policy 5: Water Quality.** To protect water quality through management and enforcement efforts.
- **Resources Element, Goals, Objectives and Policies: Water Resources Component, Goal 1, Policy 6: Intergovernmental Coordination.** To encourage and support a cooperative effort among all agencies towards the resolution of problems and the utilization of opportunities in the planning and management of water resources.

- **Resources Element, Goals, Objectives and Policies: Open Space, Goal 3, Policies.** To encourage the conservation of open space lands, which prevent erosion, siltation, flood, and drought, and to discourage the early conversion of open space to some other land use. To ensure the wise use of County resources by identifying, planning, or assisting in the planning for and assuming management responsibility when appropriate for open space areas used for the managed production of resources including, but not limited to, forest lands, rangeland, agricultural lands, and areas of economic importance for the production of food or fiber; areas required for recharge of groundwater basins; tidelands, beaches, bays, estuaries, marshes, rivers, and streams, which are important for the management of commercial fisheries and for beach sand replenishment; and areas containing mineral deposits.

Consistency Determination: The goals and policies of the Resource Element are directed at ensuring that as urbanization increases an adequate supply of all necessary resources will be available to meet the County's growing needs. Overall, the SAMP/WSAA Process is consistent with the policies indicated in the Resource Element because the policies guide and direct local government decision-making in resource-related matters and also facilitate coordination with regional, state, and federal policies and programs. The Resource Element recognizes the need for economic development, but also establishes guidelines that promote development while providing protection and long-term management of the County's resources. The SAMP/WSAA Process provides similar guidance for future management and protection of aquatic resources in the Watershed.

Specifically, elements of the proposed action that parallel those of the Resource Element include the maintenance and restoration of: diverse and contiguous riparian corridors; hydrologic, water quality, and habitat integrity of riparian habitat; floodplain connection and sediment regimes; and headwater areas. In addition, the SAMP/WSAA Process involves an assessment of the functions and values of aquatic resources in the entire Watershed, and the establishment of a watershed-specific permitting system for issuance of 404 permits and streambed alteration agreements, as well as the identification of aquatic resource integrity areas.

The Safety Element

The Safety Element in the County of Orange General Plan presents policies related to potential and identified hazards and their associated safety considerations along with mitigation and the implications for development. The Natural Hazards component discusses flood and seismic/geologic hazards and is applicable to the SAMP/WSAA Process. The consistency of the proposed SAMP/WSAA Process with the Safety Element policies in the County's General Plan is addressed below.

Chapter IX: Safety Element, Goals, Objectives and Policies: Flood Hazards. The goals and objectives of this section provide a strategy for addressing and mitigating potential flood hazards.

- **Policy 6:** To limit erosion and sediment transport from development areas to bays and harbors.
- **Policy 7:** To permit reasonable movement of sediment to the open ocean for beach sand replenishment through remedial measures.
- **Policy 10:** To monitor and evaluate studies of the uses of non-structural alternatives, including more compatible land use planning adjacent to watercourses for flood control purposes.

- **Policy 12:** To create design criteria, which minimizes or mitigates impacts associated with crossing floodplains by development.

Consistency Determination: The goals and policies of the Safety Element provide a strategy for addressing and mitigating potential flood hazards while allowing development within the unincorporated areas of the County. The proposed project is consistent with these goals and policies because the purpose of the SAMP/WSAA Process is to provide for reasonable economic development and the protection and long term management of sensitive aquatic resources. To the extent feasible, federal waters of the U.S., including wetlands, are avoided and unavoidable impacts are minimized and fully mitigated. For areas outside of aquatic resource integrity areas, the applicable Mitigation Policies and General Conditions, along with applicable BMPs would limit adjacent and downstream impacts. Thus, the SAMP/WSAA Process is consistent with the Safety Element's goals and policies associated with minimizing erosion and sedimentation impacts in proposed development areas in the County of Orange. The SAMP Tenets (Section 2.1.1.3) which guided the Corps and Department in SAMP/WSAA Process development and help meet the objectives of the CWA and FGC include measures such as: 1) maintain and/or restore sediment sources and transport equilibrium; and 2) maintain and/or restore floodplain connection. These processes are important for the long-term sustainability of riparian habitat in the Watershed.

10.4 ORANGE COUNTY TRANSPORTATION AUTHORITY MASTER PLAN OF ARTERIAL HIGHWAYS

The Orange County Master Plan of Arterial Highways (MPAH) (2005) establishes an Orange Countywide roadway network intended to ensure coordinated transportation system development among local jurisdictions in Orange County. The primary purpose of the MPAH is to describe an arterial highway system that effectively serves existing and adopted future land uses in both incorporated and unincorporated areas of Orange County. As the administrator of the MPAH map, OCTA is responsible for maintaining the integrity of the MPAH map through coordination with cities and the County. Consistency with the MPAH is essential to the integrity of a functional, regional highway network. It ensures that each city and the County implement the same base transportation network using similar standards and assumptions. Consistency with the MPAH is also required for local agencies to be eligible for the Orange County Combined Transportation Funding Programs.

To aid in establishing consistency among plans, all jurisdictions are encouraged to use common land use assumptions and travel demand projections. OCTA facilitates the use of these common assumptions through administration of the Orange County Transportation Analysis Model (OCTAM), which was previously maintained by the County of Orange. OCTA established goals and policies to serve as countywide guidelines and provide direction to local agencies for implementing the MPAH. The goals and policies are based on the regional policies found in the County of Orange General Plan Transportation Element. A goal is a general expression of County-wide values and is abstract in nature. A policy is a specific statement that guides decision-making. The following goal and policies from the MPAH are relevant to water and aquatic resources being regulated by the SAMP/WSAA Process or environmental policies in general.

Goal: Provide an Arterial Highway System that Supports Land Use Policies of the County and Cities.

Policies: The MPAH will establish a coordinated arterial highway system that is in balance with the General Plan Land Use Elements of the County and cities. OCTA will monitor local agencies to ensure that the arterial highway system is implemented in a manner that supports the

implementation of adopted overall land use policies and that is consistent with financing capabilities. OCTA will provide guidance for the development of subarea traffic models used by local jurisdictions to determine the quantitative impacts of land use decisions on the circulation system, so as to be consistent with OCTAM.

Consistency Determination: The SAMP/WSAA Process proposes an alternative permitting and mitigation program for the Watershed; as such, it does not preclude any road construction and maintenance activities (see Section 4.6.11). Any proposed roadway project requiring a Corps permit would need to meet the terms and conditions of the SAMP/WSAA Process; any project not meeting the criteria would proceed through the SIP process. Also, the proposed SAMP/WSAA Process's goal of allowing reasonable economic development (which includes roads) while protecting sensitive resources is consistent with the MPAH. The OCTA proposes to allow development of arterial highways that are in balance with the General Plan Land Use Elements of the jurisdictions within the Watershed. Because the SAMP/WSAA Process is consistent with these general plan elements (as described in Section 11.3), the proposed SAMP/WSAA Process would also be considered consistent with the MPAH.

10.5 SOUTHERN CALIFORNIA ASSOCIATION OF GOVERNMENTS

The SCAG region covers more than 38,000 square miles that include the counties of Orange, Los Angeles, Ventura, Riverside, San Bernardino and Imperial. SCAG's Growth Vision Report (June, 2004) presents the comprehensive Growth Vision for the SCAG region and provides an analysis of the Growth Vision scenario. It also discusses the modeled impacts and effects the Growth Vision scenario is likely to have on Southern California.

The SCAG report indicates that although multi-family housing construction has increased in Orange County during the last few years, it still has not kept up with population growth. The increase in construction of townhomes also suggests that there are housing types that are becoming more in demand. While townhomes account for only 18 percent of the region's multi-family units, they accounted for more than 40 percent of the growth in multi-family housing built from 1990 and 2000. The SCAG report found that the gap in unmet demand for greater housing diversity will continue to grow without a regional long-term planning effort. In particular, the housing need for new employees entering the work force and senior housing must be addressed if the region is going to sustain economically viable and healthy communities.

Regarding land supply, the SCAG report states that the region does face a severe limit on the amount of undeveloped land suitable for development. The Coastal Basin of Los Angeles and Orange Counties, along with San Fernando Valley, is home to 77 percent of the region's jobs and 71 percent of its population. Under current general plans, capacity on vacant land accommodates only 238,000 households. This relates to only 29 percent of the SCAG 2030 growth projection for this area could be accommodated through new development on vacant land.

With limited undeveloped land, SCAG found that developed land will become increasingly important in accommodating growth. On a regional basis, infill, or new development in already developed areas, will be the method used to construct nearly half of the new housing. With the Growth Vision alternative, the Riverside and San Bernardino High Desert modeling zones absorb the most greenfield development – new development on vacant land. Ventura and Orange Counties have the least development on vacant land. Furthermore, with the Growth Vision alternative, Orange County absorbs almost half (46 percent) of

its households through infill. High percentages of infill development indicate that a larger proportion of growth is occurring where development has already occurred before, through recycling of older buildings.

In their Growth Vision report, SCAG recognized that open space is integral to the health of communities. In an effort to address this issue, SCAG developed a principle to promote sustainability for future generations. The guidelines associated with the sustainability principle and that are relevant to water and aquatic resources being regulated by the SAMP/WSAA Process or environmental policies in general are presented below:

- Preserve rural, agricultural, recreational, and environmentally sensitive areas;
- Focus development in urban centers and existing cities;
- Develop strategies to accommodate growth that use resources efficiently, eliminate pollution, and significantly reduce waste; and
- Utilize “green” development techniques.

Consistency Determination: As stated throughout this document, the SAMP/WSAA Process is a Watershed (landscape-level) approach to preserving and managing sensitive aquatic resources while allowing economic uses to be permitted within the Watershed consistent with the requirements of federal law (CWA Section 404) and state code (FGC Section 1600 *et seq.*). Economic uses include land development for residential, commercial, industrial, and institutional development necessary to accommodate planned population and economic growth for the region. As the SAMP/WSAA Process is a watershed-specific permitting program to replace existing case-by-case permitting in the Watershed, it does not present a conflict with SCAG’s vision for growth and sustainability principles in the Growth Vision Report. The SAMP/WSAA Process accommodates planned growth while managing and enhancing high integrity aquatic resources and promoting the long-term ecosystem function of the Watershed.

10.6 CITY OF IRVINE GENERAL PLAN

The City of Irvine encompasses 45 square miles and is the largest jurisdiction that lies completely within the Watershed. Approximately 29,156 acres, or 38 percent of the Watershed, is within the City of Irvine. Approximately 60 percent of the City is currently developed.¹ The City of Irvine estimates full build-out by 2040. The northern edge of the City boundary, towards the Santiago Hills, is unincorporated County land and within the City’s Sphere of Influence.

The City of Irvine’s General Plan represents the long-range vision of the City. It is a comprehensive statement of Irvine’s development and preservation policies for all geographic areas of the City and its sphere of influence, and the relationships between social, financial, environmental, and physical characteristics.

The following objectives from the City of Irvine General Plan are relevant to water and aquatic resources being regulated by the SAMP/WSAA Process or environmental policies in general.

¹ It is noted that a large area within the central portion of Irvine is proposed for the Orange County Great Park. The SAMP/WSAA Process is consistent with the Great Park concept because of inter-agency coordination, the planned restoration of riparian corridors through the site (CBA 2003, 2004), and the possible use as a mitigation bank.

- **Objective L-2: Biotic Resources, Policy (b), Resource Areas 6 and 13:** Development as shown on the Land Use Element diagram will be allowed in Marsh Area 6 and Habitat Area 13 in recognition of the dedication of similar resources in the Preservation Areas. Development areas located within Areas 6 and 13 shall not be subject to any preservation, protection, requirements, measures, or mitigations set forth in the Master Environmental Assessment (MEA) for these areas except that riparian/wetland habitat adversely impacted by such development will be mitigated in accordance with procedures established in an open space management and conservation plan.
- **Objective L-2: Biotic Resources, Policy (b), Resource Area 28:** Development as shown on the Land Use Element diagram will be allowed in Buffer Area 28 provided that any significant adverse development impacts on habitat in Riparian/Wetland Area 9 will be mitigated. The final mitigation measures shall be established in an open space management and conservation plan. Such mitigation measures shall be developed with consideration for the type and resilience of the habitat, the specific type and design of development, and the effect of natural and man-made barriers in the area.
- **Objective L-2: Biotic Resources, Policy (d):** Mitigation banks in the San Joaquin Marsh may be created for selected development in the City and its sphere of influence. That portion of the preservation area in San Joaquin Marsh subject to the Habitat Enhancement and Wetlands Program (approximately 85 acres) will be dedicated to the University of California Natural Reserve System in accordance with the program. Portions of the preservation area in San Joaquin Marsh not subject to the above program may be used as a mitigation bank for development impacts in development areas adjacent to the marsh and in other locations throughout the City. Riparian habitat within development areas may be modified subject to applicable state and federal regulatory requirements of the United States Fish and Wildlife Service, Army Corps of Engineers and the California Department of Fish and Game and mitigation for such modification may be accomplished off site within the San Joaquin Marsh.
- **Objective L-2: Biotic Resources, Policy (e):** Maintain significant riparian areas in preservation areas as natural corridors and sources of shelter, water, and food for wildlife, except where required for infrastructure.
- **Objective L-2: Biotic Resources, Policy (g):** Allow the enhancement of habitat areas, particularly riparian habitat, in all preservation areas as mitigation for any development impacts in other areas. Promote agreements between the California Department of Fish and Game and the landowner to accomplish the creation of new habitat in preservation areas consistent with applicable standards and procedures.

Consistency Determination: The SAMP/WSAA Process is consistent with these policies because it proposes no net loss of acreage and functions of waters of the U.S. With implementation of the SAMP/WSAA Process, the goal of the no net loss can be accomplished through avoidance, minimization of impacts, and compensatory mitigation, as proposed in the SAMP mitigation framework and required by the Section 404(b)(1) Guidelines. The SAMP/WSAA Process is consistent with this policy because it proposes to maintain/protect/restore diverse and contiguous riparian corridors and allow for the continued functioning of downstream riparian ecosystems.

- **Objective L-5: Geophysical Resources, Policy (a):** Promote the development of a flood control channel to handle projected flood waters of the San Diego and Peters Canyon Washes. Where practicable, require that the channel be a natural swale channel with grass or other natural

planting as an integral part of its design as opposed to a concrete design. Ensure environmental impact reports for future development to consider impacts to waterways. Pursue waterway preservation policies while considering drainage, water conservation, storage, and flood control purposes. Promote the development of all lakes and reservoirs for the public use and do not allow residential development at their edge. Study, where possible and practicable, the appearance and ecology of certain existing natural drainage channels to determine which channels or portions of the channels, conservation measures shall be applied to. Channels or portions of channels determined to be suitable for preservation purposes may be modified to enhance their ecology, long term viability and maintenance. Those channels or portions of channels shall be integrated into the design of the surrounding development. Minimize alterations of major creek courses and bottoms. Allow no net loss quantity or quality of surface and subsurface water flow into the San Joaquin Marsh.

- **Objective L-5:** Geophysical Resources, Policy (b): Develop grading standards which reflect sensitivity to land form, habitat, Watershed protection, and appropriate land use intensities.

Consistency Determination: The SAMP/WSAA Process is consistent with these policies because it proposes the following: No net loss of acreage and functions of waters of the U.S.; maintain/protect/restore hydrologic, water quality, and habitat integrity of riparian ecosystems; the protection of headwater areas. The Tenets relating to sediment regime and floodplain connection also address the physical aspects of watershed integrity.

- **Objective L-8:** Preservation Areas, Policy (d): Permit land form, vegetation, and drainage modifications pursuant to all allowable uses except in riparian vegetation areas.
- **Objective L-8:** Preservation Areas, Policy (e): Ensure that riparian vegetation is not significantly modified, except as necessary to provide fire protection, access roads, and flood control, drainage, water, sewer, and utility facilities, and except where habitat is to be enhanced as part of a mitigation program approved by the California Department of Fish and Game.
- **Objective L-8:** Preservation Areas, Policy (g): Participate in cooperative efforts with federal, state, and county agencies and land owners in planning and preserving regionally significant conservation and open space areas within the City and its sphere of influence (Lomas Ridge, Bommer and Shady Canyons, and San Joaquin Marsh).
- **Objective L-8:** Preservation Areas, Policy (I): Maintain significant riparian areas within preservation areas as natural corridors, sources of shelter, and water for wildlife.
- **Objective L-8:** Preservation Areas, Policy (k): Preserve and enhance the San Joaquin Marsh as a habitat resource and mitigation bank through implementation of the “San Joaquin Marsh Habitat Enhancement and Wetlands Creation Program” (See Biotic Resources Program Objective L-2, policy (d)).

Consistency Determination: The SAMP/WSAA Process is consistent with these policies because it proposes to maintain/protect/restore: diverse and contiguous riparian corridors; hydrologic, water quality, and habitat integrity of waters of the U.S and state jurisdictional waters; and protect riparian areas and associated habitats supporting state and federally listed species. Many areas within the Watershed with high and medium integrity ratings were defined as “aquatic resource integrity areas.” Although not a direct conservation mechanism, resources with this designation are subject to greater regulatory oversight, protective conditions and mitigation. The SAMP/WSAA Process provides a framework for pre-

application coordination between agency staff, land owners, and project proponents who seek authorization from the Corps and Department.

- **Objective L-12: Water, Policy (b):** Study, where possible and practicable, the appearance and ecology of certain existing natural drainage channels to determine which channels, or portions of the channels, to which conservation measures shall be applied. Channels or portions of channels determined to be suitable for preservation purposes may be modified to enhance their ecology, long term viability, and maintenance. Those channels or portions of channels shall be integrated into the design of the surrounding development.

Consistency Determination: The SAMP/WSAA Process is consistent with these policies because it proposes the following: no net loss of acreage and functions of waters of the U.S; maintain/protect/restore hydrologic, water quality, and habitat integrity of riparian ecosystems; and protection of headwater areas. The Tenets relating to sediment regime and floodplain connection also address the physical aspects of watershed integrity. The terms and conditions of the LOP, RGP, and WSAA Process address water quality concerns, and a Section 401 water quality certification is required to demonstrate compliance with state water quality standards.

10.7 UNIVERSITY OF CALIFORNIA, IRVINE LONG RANGE DEVELOPMENT PLAN (UCI LRDP)

The primary purpose of the UCI LRDP is to provide a guide for the physical development of the UCI campus. Components of the LRDP include a development plan designed to meet UCI's academic and institutional objectives as well as a land use map to guide the siting of future development. The UCI campus consists of approximately 1,470 acres and is located in the southern portion of the City of Irvine and is adjacent to the City of Newport Beach. Over 50 percent of the campus is currently developed or undergoing development. Most development has occurred in the central campus, while development of the outer campus areas is ongoing. The undeveloped areas consist of rolling topography covered with naturalized grasses, with pockets of native vegetation and wildlife habitat occurring throughout the outer campus. The LRDP is accompanied by a program EIR in conformance with CEQA. The EIR contains detailed discussion of UCI's existing environmental setting, potential environmental impacts of the LRDP, and proposed mitigation measures.

Nine land use categories are associated with the LRDP. Recreation and Open Space is one of the nine land use categories included in the LRDP. This land use category is relevant to water and aquatic resources being regulated by the SAMP/WSAA Process and is described below:

- **Recreation and Open Space** – The recreation and open space system for the campus is comprised of several components: the UCI Open Space Reserve; a network of open space corridors; community parks; athletic/recreational facilities; and the buffer area to the San Joaquin Freshwater Marsh. Approximately 430 acres (30 percent) of the campus will be dedicated to recreation and open space, excluding open space located within residential neighborhoods and building landscaping.
- **Open Space Reserve** – The Open Space Reserve is located south of the central academic core between the University Hills faculty/staff housing community and the West Campus Research Park. This area contains the majority of Coastal Sage Scrub habitat on campus and provides an

on-campus location for teaching and research related to Coastal Sage Scrub and ecological restoration within this habitat.

- **Open Space Corridors** – The LRDP contains a significant network of open space corridors consisting of Aldrich Park, greenbelts, buffer zones, and habitat corridors. These linkages provide a passive open space network for the campus community, including: pedestrian and bike trails; habitat corridors consistent with campus and regional habitat planning objectives; and buffers between UCI land uses. The corridors within the outer campus in particular will provide opportunities for habitat linkages and will be developed with appropriate native plantings. Specific areas of this network are enlisted in the regional NCCP Program.
- **San Joaquin Marsh** – The San Joaquin Freshwater Marsh is an important site for teaching, research, and public education. The Marsh is owned and operated by the UCNRS. Although not part of the UCI campus, the contiguity of the Marsh to the campus makes it a vital element in the UCI open space network. The LRDP includes a marsh open space buffer area located between proposed development on the North Campus and the Marsh Reserve, as described in a 1989 MOU between UCI and the UCNRS. This MOU addresses the buffer’s width and configuration.

Consistency Determination: In their LRDP, UCI proposes remaining campus development while protecting resources such as the CSS habitat and open space corridors. Providing buffers around these areas and maintaining consistency with campus and regional habitat planning objectives guarantee preservation and protection of these resources. The San Joaquin Marsh will be protected through the MOU between UCI and the UCNRS. The Tenets, terms, and conditions associated with the SAMP/WSAA Process (as well as other provisions discussed in Section 11.6) are consistent with the UCI LRDP, and are not expected to restrict the overall approach of the LRDP.

10.8 OTHER MUNICIPAL GENERAL PLANS

The general plans of the remaining municipalities of the Watershed include city of Santa Ana (1998, 2005), city of Tustin (1993, 2005), city of Newport Beach (2006a,b), city of Orange (2004, 2005), city of Lake Forest (1994, 2004, 2006), city of Laguna Hills (1994a,b; 2005), and city of Laguna Woods (2003, 2005). SAMP/WSAA Process consistency with these plans is discussed below.

Consistency Determination: Overall, the SAMP/WSAA Process is consistent with future development presented in these local general plans because projects that could cause significant aquatic resource impacts would be required by the particular jurisdiction to modify the project to avoid the impact, or require mitigation measures to reduce the impact. Also, many of the permits that may be issued as a result of the SAMP/WSAA Process are for projects or activities previously considered in the general plans. Table 10-1 (provided at the end of this section) was prepared to help streamline and summarize the consistency analysis for each relevant policy and objective of these general plans. Specifically the relevant municipal general plan policies are compared with the SAMP Tenets. The Tenets are fully described in Section 2.1.1.3. These Tenets are as follows (with abbreviations used in table):

- No net loss of acreage and functions of waters of the U.S. and/or streambed -A/F
- Maintain/restore hydrologic, water quality, and habitat integrity of waters of the U.S. and/or streambed -INT
- Protect headwater areas -HDW

- Maintain/protect/restore diverse and contiguous riparian corridors -RP COR
- Maintain and/or restore floodplain connection -FP CON
- Maintain and/or restore sediment sources and transport equilibrium -SED
- Maintain adequate buffer for the protected riparian corridors -BFR
- Protect riparian areas and associated habitats supporting state and federally listed endangered, threatened and sensitive species, and their associated critical habitats -SPP

10.8.1 City of Santa Ana

Approximately 3,608 acres of the City of Santa Ana are within the southeastern portion of the Watershed. The City currently has an estimated build-out date of 2010; however, the portion of the City within the Watershed is essentially fully built-out. Within the Watershed area land uses include industrial, commercial, residential, and open space. The industrial designation applies to area developed with industrial and manufacturing uses and the commercial area is intended for business and professional offices; retail and service establishments; vocational, cultural, and entertainment uses; and vocational schools. Policies from the City of Santa Ana General Plan are relevant to water quality, habitat integrity, and aquatic resources being regulated by the SAMP/WSAA Process. Table 10-1 displays consistencies between the Santa Ana General Plan policies and the eight SAMP Tenets described in Section 2.1.1.3.

10.8.2 City of Tustin

The entire City, approximately 7,087 acres, is located within the Watershed. The Tustin General Plan policies emphasize balanced, compatible, and complementary development in addition to the revitalization/redevelopment of older and historic areas (City of Tustin, 2001). The City of Tustin estimates full build-out of the City by 2020. The largest remaining planned development project in the city is MCAS Tustin, which is located west of Jamboree Road and north of Barranca Parkway in the center of the Watershed. Portions of the MCAS Tustin have already been developed or are currently being redeveloped with residential, commercial, and school uses. Several policies from the City of Tustin General Plan are relevant to water quality, habitat integrity, and aquatic resources being regulated by the SAMP/WSAA Process. Table 10-1 summarizes consistencies between the Tustin General Plan policies and the eight SAMP Tenets described in Section 2.1.1.3.

10.8.3 City of Newport Beach

The City of Newport Beach forms the south/southwestern boundary of the Watershed. Existing land uses are primarily residential neighborhoods and commercial areas, as well as marine industrial uses. Since the 1,414-acre Bonita Canyon area has been annexed from Irvine and is now within the City of Newport Beach, the City now represents 2,966 acres within the Watershed. This portion of the City within the Watershed is characterized by light industrial and commercial uses in the vicinity of John Wayne Airport, and residential in the Bonita Canyon area (City of Newport Beach, 1998).

As mandated by the California Coastal Act, the City of Newport Beach is required to periodically update information on the sensitive biological resources as part of their Local Coastal Program. In 2003 the City conducted a study (Coastal Resources Management and Chambers Group, 2003) to update information on sensitive biological resources and their general plan elements. To protect those habitats and associated plants and wildlife, the City has designated the most ecologically valuable areas as Environmentally Sensitive Habitat Areas (ESHAs). Nineteen ESHAs are located in the coastal zone and are addressed in

the Biological Appendix of the Coastal Land Use Plan (Chambers Group, 2002). Nine ESHAs fall within the city limits of Newport Beach and within the City's sphere of influence and are located outside the coastal zone. If development is proposed within or adjacent to an ESHA, it must meet strict criteria: (1) that the development is resource-dependent, and (2) that any development adjacent to an ESHA must be sited to prevent significant degradation to the ESHA. The ESHAs located outside of the coastal zone include: Bonita Canyon Watershed, San Joaquin Reservoir, Arroyo Park, Coyote Canyon, MacArthur Boulevard and Bison Avenue, MacArthur Boulevard and San Miguel Avenue, MacArthur Boulevard and San Joaquin Hills Road, Spyglass Hill, and Non-Coastal Buck Gully.

In their General Plan (City of Newport Beach, 2006), the City has established a series of policies to promote the marine environment of the community, to preserve and enhance the unique natural beauty and quality of the harbor and ocean front areas, and to provide for the public use and enjoyment of the bay and ocean waters and their shorelines consistent with sound conservation principles. Table 10-1 summarizes consistencies between the Newport Beach General Plan policies and the eight SAMP Tenets described in Section 2.1.1.3.

10.8.4 City of Orange

The City of Orange is currently 95 percent developed (Corps 2001). Approximately 1,041 acres of the City are located within the northeastern portion of the Watershed. Within the Watershed, the uses are residential (primarily single family units) and related greenbelts, and a small amount of commercial services.

The City of Orange General Plan contains goals, policies, and programs which are intended to guide land use and development decisions in the 21st century. Such goals include maintaining a balanced inventory of housing in Orange, promoting commercial enterprise, and preservation of open space resources. The Open Space and Conservation element of the City's General Plan is concerned with identifying the City's open space and natural resources and establishing goals and policies directed toward managing these resources for the long-term benefit of the community.

According to their General Plan (City of Orange, 2004), the residents recognize the benefits natural resources provide to the community. Clean air and water are vital to ensure the protection of public health. Plant and wildlife resources enrich the urban setting by providing changes in scenery and environment. Similarly, passive open space, such as landscaped medians or natural ridgelines, gives the community a sense of physical space. Also, the preservation of some open space areas (floodplains, steep hillsides) is necessary to protect public safety. Based on this, the City plans to carry out a number of resource conservation strategies while at the same time allowing development. The policies and goals established by the City ensure the preservation of water resources, biotic resources, and passive open space. Several goals from the Open Space and Conservation Element of the City of Orange General Plan are relevant to aquatic resources being regulated by the SAMP/WSAA Process. Table 10-1 displays consistencies between the City of Orange General Plan policies and the eight SAMP Tenets described in Section 2.1.1.3.

10.8.5 City of Lake Forest

Lake Forest (City and sphere) consists of approximately 10,775 acres. Of this, approximately 5,296 acres is located in the eastern portion of the Watershed and is largely developed. The City's total land area,

including its sphere of influence, is composed of: 37 percent residential uses, 29 percent open space, 17 percent commercial, 8 percent light industrial, 5 percent transportation facilities, and 4 percent public facilities. The City's General Plan policies emphasize establishing the City's identity, developing pre-incorporated Planned Communities, and phasing new development that is compatible with the community (City of Lake Forest, 1994). Industrial development continues to occur to the north and south of SR-241 in the northern portion of the city. Full build-out is anticipated to occur prior to 2020 (Corps, 2001).

Some of the proposed SAMP/WSAA Process regulated activities, such as land development, will occur within the City of Lake Forest. As such, they are subject to the General Plan policies of the City of Lake Forest. These objectives, policies and implementation measures from the Open Space and Conservation elements of the City of Lake Forest General Plan are relevant to aquatic resources being regulated by the SAMP/WSAA Process. Table 10-1 displays the consistencies between the City of Lake Forest General Plan policies and the eight SAMP Tenets described in Section 2.1.1.3.

10.8.6 Laguna Hills

The City of Laguna Hills is almost completely built out. Approximately 758 acres of the City are located within the Watershed. Approximately 51.8 percent of the City is composed of Planned Community developments with their own specific development standards. Overall, the City is deficient in community facilities such as active parks and community centers. The General Plan addresses several land use issues, including the need to 1) unify land uses in and around the Laguna Hills Mall and Saddleback Memorial Hospital, and 2) increase the overall intensity of the nonresidential uses along the I-5 Freeway corridor. The General Plan focuses primarily on the maintenance of the City's residential neighborhoods (City of Laguna Hills 1994). Full build-out of the City is estimated to occur between 2010 and 2015 (Corps, 2001).

Some of the proposed SAMP/WSAA Process regulated activities and their associated land development projects may occur within the City of Laguna Hills. As such, they are subject to the General Plan policies of the City of Laguna Hills. These policies are relevant to aquatic resources being regulated by the SAMP/WSAA Process. Table 10-1, below displays the consistencies between the City of Laguna Hills General Plan strategies and the eight SAMP Tenets described in Section 2.1.1.3.

10.8.7 Laguna Woods

The City of Laguna Woods was incorporated in March 1999. The City's General Plan and Housing Element were adopted in October 2002, with an amendment to the General Plan approved in July 2003 (personal communication, City of Laguna Woods, 2003). Within the Watershed, the City is developed with a variety of residential and commercial uses and a golf course. Approximately 1,033.4 acres of the City is located within the Watershed. Some of the proposed SAMP/WSAA Process regulated activities, such as land development may occur within the City of Laguna Woods. As such, they are subject to the General Plan policies of the City of Laguna Woods. These objectives, policies and implementation measures from the Open Space and Conservation Elements of the City of Laguna Woods General Plan are relevant to water and aquatic resources being regulated by the SAMP/WSAA Process or environmental policies in general. Table 10-1 displays the consistencies between the City of Laguna Woods General Plan policies and the eight SAMP/ Tenets described in Section 2.1.1.3.

Table 10-1. Consistency of SAMP Tenets with Relevant Policies of Municipal General Plans

Municipal General Plan Policies	SAMP Tenets							
	1	2	3	4	5	6	7	8
	A/F	INT	HDW	RIP COR	FP CON	SED	BFR	SPP
Santa Ana								
Protect sensitive land uses		X		X			X	X
Revise zoning regulations to strengthen buffers between land uses		X	X	X			X	X
Protect public health, safety and welfare through effective management of natural resources		X	X	X			X	X
Preserve, maintain and properly use natural and cultural resources	X	X	X	X	X	X	X	X
Preserve and enhance the aesthetic and environmental quality of the community for the enjoyment of all residents		X	X	X	X			X
Integrate natural and cultural resource protection measures into land use and development activities		X	X	X	X	X	X	X
Minimize loss of natural aesthetic, historic, archaeological and paleontological resources as land is developed	X	X	X	X	X	X	X	X
Use provisions of the open space plan as means to achieve applicable conservation objectives		X	X	X	X		X	X
Preserve vegetation along watercourse channels	X	X	X	X				X
Implement open space provisions that encourage multiple use of natural resources such as waterways	X	X		X			X	X
Develop incentives in the zoning code to encourage protection and enhancement of natural, cultural and historic resources		X	X	X	X		X	X
Participate in greenbelt and channel improvement plans for the Santa Ana River and Santiago Creek which aim to preserve natural vegetation		X	X	X	X		X	X
Tustin								
Environmental Compatibility		X						
Flood Control Improvements					X	X	X	
Peter's Canyon Wash		X			X	X		
Water Quality		X			X	X	X	
Biological Resource Restoration	X	X		X				X
Natural Community Conservation Plan								X
Protection of Biological Resources								X
Development in environmental study areas		X						X
Use of buffers							X	
Wetland Protection	X	X						X

Table 10-1. Consistency of SAMP Tenets with Relevant Policies of Municipal General Plans (continued)

Municipal General Plan Policies	SAMP Tenets							
	1	2	3	4	5	6	7	8
	A/F	INT	HDW	RIP COR	FP CON	SED	BFR	SPP
Newport Beach								
Enhancement and protection of water quality of all natural water bodies	X	X	X	X	X	X	X	
Water pollution prevention	X		X		X	X	X	
Natural water bodies	X							
Natural wetlands	X	X						
Restoring natural hydrologic conditions	X		X		X	X		
Terrestrial and marine resource protection	X	X	X	X			X	X
Development in environmental study areas		X	X	X				
Use of buffers							X	
Wetland Protection	X	X		X	X	X	X	X
Orange								
Preventing Environmental Pollution		X	X		X	X	X	
Preservation of Significant Environmental Resources	X	X	X	X			X	X
Preservation of Visual and Aesthetic Resources	X		X	X			X	X
Lake Forest								
Conserve and protect natural plant and animal communities		X		X				X
Conserve and protect important Watershed areas		X	X	X			X	X
Laguna Hills								
Protection of Significant Environmental Resources	X	X		X			X	
Establish Open Space Responsibility and Liability							X	X
Recognize Sensitive Biological Features		X					X	X
Wetlands Alteration	X	X						X
Protection of Water Resources	X	X			X	X		
Biological Resources		X						X
Stormwater Management and Flooding		X	X		X	X	X	
Laguna Woods								
Preserve and enhance the environment		X	X	X			X	X
Protect existing riparian and wildlife habitats	X	X	X	X	X	X	X	X
Cooperate with other cities, governmental units, and private organizations in protecting natural resources of area-wide or regional significance		X	X	X				X
Reduce water pollution		X			X	X	X	

Table 10-1. Consistency of SAMP Tenets with Relevant Policies of Municipal General Plans (continued)

Municipal General Plan Policies	SAMP Tenets							
	1	2	3	4	5	6	7	8
	A/F	INT	HDW	RIP COR	FP CON	SED	BFR	SPP
Cooperate with governmental agencies at the local, County, and State level in attaining established goals for surface and receiving water quality		X	X		X	X	X	
Enforce provisions of the NPDES to reduce pollutant run-off into natural and storm drain systems		X	X		X	X	X	
Develop and implement BMPs as specified by the City Local Implementation Plan to minimize, to the maximum extent practicable, non-stormwater runoff and pollution from entering Aliso Creek, the Laguna Lakes and other sensitive receiving water		X	X		X	X	X	