

MEMORANDUM

To: Jane Chung, City of Redondo Beach
From: Kristen Bogue, Michael Baker International
Date: May 6, 2025
Subject: Coyote Management and Response Plan – CEQA Exemption Memorandum

This memorandum is intended to provide supporting documentation for Exemption under the California Environmental Quality Act (CEQA) Sections 15061(b)(3) and 15308 of the CEQA Guidelines (14 [California Code of Regulations] CCR §§ 15000 et seq.), with the City of Redondo Beach (City) as the CEQA Lead Agency. The intent of the analysis is to document whether the project is eligible for exemption.

PROJECT LOCATION AND SETTING

Redondo Beach is located in the southwestern portion of Los Angeles County, approximately 21 miles southwest of downtown Los Angeles. Surrounding areas include the City of Hawthorne to the north, the City of Lawndale to the east, the City of Torrance to the east and south, and the cities of Manhattan Beach and Hermosa Beach and the Pacific Ocean to the west.

BACKGROUND

In recent years, coyote activity and incidents have increased in the City and nearby communities. The exact cause remains uncertain but may be due to rising coyote populations, territorial expansion, habitat displacement from development, or a combination of these factors. Specifically, between August 2016 and August 2017, the City received approximately 150 reports of coyote-related events, including reports of coyote kills involving 12 cats and one privately owned fowl, and coyote attacks on two dogs. Furthermore, the first known coyote den within City limits was identified in 2024. In response to these events, the City has prepared a Coyote Management and Response Plan based upon published research, expert recommendations, and best management practices adopted by other communities (implemented through the proposed Coyote Management and Response Plan [herein referred to as the “CMRP” or “project”]), which is the subject of this memorandum.

PROJECT DESCRIPTION

The CMRP aims to establish a standardized, proactive, and repeatable strategy for the City to coexist with urban coyotes while prioritizing public safety. Specifically, the CMRP provides insight into coyote behavior and outlines the City’s approach for coyote management. A detailed description of the CMRP’s strategy and approach is outlined within the following CMRP sections: executive summary; background; coyote management and response; incident response; and

education and other public resources sections.¹ A list of the CMRP's definitions, yard audit checklist, and coyote hazing overview are also provided in CMRP Appendix A, *Plan Definitions*, through Appendix C, *Coyote Hazing Overview*.²

EXEMPTION CRITERIA ANALYSIS

Overall, the CMRP would require City adoption of a Categorical Exemption for the purpose of complying with CEQA. 14 CCR § 15061(b)(3), exempts from environmental review actions where it can be seen with certainty that the same will not have a significant effect on the environment. 14 CCR Section 15308 exempts from environmental review activities aimed at assuring the "maintenance, restoration, enhancement, or protection of" the environment. The City's implementation of the CMRP will not have a "significant" impact on the environment because this activity authorized by the same is intended to preserve the normal environmental balance of coyote aversion for humans, their pets, and their food.

The project is also exempt under Section 15308, for actions taken by a regulatory agency as authorized by State law or local ordinance, to assure the maintenance, restoration, enhancement or protection of the environment where the regulatory process involves procedures for protection of the environment. In this case, the City is a regulatory agency, empowered by the police power under California law to take actions to protect the public health, safety, and welfare. Furthermore, human beings and their pets are part of the environment.

As defined in Section 15360 of the CEQA Guidelines, the "environment" includes both natural and man-made conditions. One such man-made condition is the existence of domesticated animals and the keeping of such animals as pets. Moreover, human beings are part of the environment and it is consistent with the purposes of CEQA to protect the health and safety of human beings, provide them with a "decent home and satisfying living environment," and "create and maintain conditions under which man and nature can exist in productive harmony," which includes and requires safety from coyote attacks. (See Public Resources Code Section 21000(d) and (g); Section 21001(e).) Additionally, the City has created a regulatory process through the proposed CMRP to provide for the protection of humans and their pets.

EXCEPTIONS TO CATEGORICAL EXEMPTIONS ANALYSIS

CEQA Guidelines Section 15300.2 lists the following exceptions to categorical exemptions:

- (a) **Location.** *Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.*
- (b) **Cumulative Impact.** *All exemptions for these classes are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.*

¹ City of Redondo Beach, *Coyote Management and Response Plan*, dated May 1, 2025.

² Ibid.

- (c) **Significant Effect.** *A categorical exemption shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.*
- (d) **Scenic Highways.** *A categorical exemption shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR.*
- (e) **Hazardous Waste Sites.** *A categorical exemption shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code.*
- (f) **Historical Resources.** *A categorical exemption shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource.*

This section evaluates the applicability of the exception criteria for a CE pursuant to CEQA Guidelines Sections 15300.2.

EXCEPTION

CRITERION (a)

LOCATION. *State CEQA Guidelines Section 15300.2(a) states that categorical exemption “Classes 3, 4, 5, 6, and 11 are qualified by consideration of where the project is to be located – a project that is ordinarily insignificant in its impact on the environment may in a particularly sensitive environment be significant. Therefore, these classes are considered to apply all instances, except where the project may impact on an environmental resource of hazardous or critical concern where designated, precisely mapped, and officially adopted pursuant to law by federal, state, or local agencies.”*

The project is proposing a categorical exemption under Class 8 per Section 15308 of the CEQA Guidelines (14 [California Code of Regulations] CCR §§15000 et seq.) as well as the CEQA Section 15061(b)(3). Therefore, Exception Criterion (a) would not apply to the project.

EXCEPTION

CRITERION (b)

CUMULATIVE IMPACT. *State CEQA Guidelines Section 15300.2(b) states that all categorical exemptions “are inapplicable when the cumulative impact of successive projects of the same type in the same place, over time is significant.”*

The CMRP aims to establish a strategy for managing coyotes specifically within the City of Redondo Beach. The proposed strategies would not be applied to areas outside of the City's municipal boundaries. It is acknowledged that on November 21, 2023, the City of Manhattan Beach adopted the *City of Manhattan Beach Coyote Management and Response Plan*, which establishes a coyote management strategy similar to the CMRP. Although the CMRP and *City of Manhattan Beach Coyote Management and Response Plan* are similar projects, the CMRP is consistent with the purposes of CEQA to protect the health and safety of human beings, provide them with a “decent home and satisfying living environment,” and “create and maintain conditions under which man and nature can exist in productive harmony,” which includes and requires safety from coyote attacks. (See Public Resources Code Section 21000(d) and (g); Section 21001(e).).

Additionally, the City has created a regulatory process, similar to other cities in the region, through the proposed CMRP to provide for the protection of humans and their pets. As such, the overall, cumulative impacts on the environment would not be significant for the purposes of CEQA and the proposed project would not result in a significant cumulative contribution to such impacts. As such, Exception Criterion (b) would not apply to the project.

EXCEPTION

CRITERION (c) **SIGNIFICANT EFFECT.** *State CEQA Guidelines Section 15300.2(c) states that a categorical exemption “shall not be used for an activity where there is a reasonable possibility that the activity will have a significant effect on the environment due to unusual circumstances.”*

The project would not result in any significant effects on the environment due to unusual circumstances. The CMRP would not result in any physical effects on the environment, other than biological resources. However, as documented in this memorandum, the proposed project would result in less than significant impacts on biological resources. As such, Exception Criterion (c) would not apply to 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 Game or U.S. Fish and Wildlife Service?*

According to CDFW's *Special Animals List*, the coyote is not considered a candidate, sensitive, or special-status species. As such, implementation of the CMRP would not have a direct or indirect impact on candidate, sensitive, or special-status species.³

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 Game or U.S. Fish and Wildlife Service?*

Direct or indirect impacts to riparian habitats and other sensitive natural communities would not occur with implementation of the CMRP. Further, with the exception of coastal areas, Wilderness Park, and marine habitats, such riparian habitats and other sensitive natural communities are not expected to occur within the City. Although trimming vegetation to reduce hiding places and potential denning sites to eliminate coyote attractants is recommended in the CMRP, it is expected that any vegetation trimming would be conducted by homeowners on private property. Further, should any trimming occur on public property, such activities would involve ornamental vegetation in a landscaped environment. Trimming ornamental vegetation is not considered a significant impact to a sensitive natural community. As a result, implementation of the CMRP would have no direct or indirect impact on riparian habitats and other sensitive natural communities identified in any local or regional plan or policy, or regulated by CDFW, U.S. Fish and Wildlife Service, or any other regulatory agency.

³ California Department of Fish and Wildlife, *Special Animals List*, April 2025, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406&inline>, accessed April 25, 2025.

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?*

Direct or indirect impacts to protected wetlands and other aquatic features would not occur with implementation of the CMRP. Further, with the exception of coastal areas, wetlands, and other aquatic features, such aquatic resources are not expected to occur within the City. As a result, implementation of the CMRP would have no direct or indirect impact on federally and/or State protected wetlands and other aquatic features through direct removal, filling, hydrological interruption, or other means.

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?*

Significant direct or indirect impacts to native wildlife movement or access to nursery sites would not occur with implementation of the CMRP. Wildlife linkages that provide movement opportunities for multiple species and native wildlife nursery sites are generally absent from the City, while corridors that provide movement opportunities for local populations are limited by the urbanized environment.⁴ Implementation of the CMRP supports disruption of coyote movement and habituation within the City and encourages coyotes to seek shelter in other areas where the potential for human interactions is reduced. Modifying coyote movements into urbanized areas through implementation of the CMRP's guidelines would not constitute a significant impact under CEQA, as guidelines implemented to change their movement patterns would occur over time and allow coyotes to establish alternative movement patterns that reduce the potential for human interactions. It is also anticipated that modifications to coyote movement over time would work to restore natural coyote behaviors and would not indirectly disrupt or impact the movement of other local native wildlife populations. As a result, implementation of the CMRP would have a less than significant direct or indirect impact on 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.

Trimming or clearing vegetation to reduce potential hiding places and denning sites for coyotes in the City is recommended by the CMRP. Such activities could directly or indirectly impact nesting birds, which are protected under the federal Migratory Bird Treaty Act (MBTA) and under California Fish and Game Code (CFGF) Section 3503, which also protects impacts to all but a handful of bird species that may nest in California but are not native to our State. While it is impossible to accurately ascertain what impacts vegetation trimming by individual residents, certified tree contractors, or the City may have on nesting birds, wide-spread vegetation clearing activities are not anticipated under the CMRP, but would be focused on areas that could become attractants to coyotes. Vegetation trimming or removal activities performed by certified tree contractors would be conditioned to adhere to standard industry guidelines to avoid trees that contain active bird nests and/or vegetation trimming or removal would be conditioned to be conducted outside the bird nesting season (the nesting season is generally considered to extend from February 1 through August 31, and as early as January 1 for raptor species). Trimming or

⁴ California Department of Fish and Wildlife, *BIOS 6 Viewer*, <https://apps.wildlife.ca.gov/bios6/?bookmark=648>, accessed April 30, 2025.

clearing by individual private landowners on their properties is also not anticipated to be widespread and result in significant impacts to nesting birds. As a result, implementation of the CMRP would have a less than significant direct or indirect impact on special-status plant and wildlife species, as well as on birds protected under the federal MBTA and CFGC.

e) *Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?*

Non-compliance with a local policy or ordinance protecting biological resources would result in a significant impact to the protected resource. Vegetation trimming by residents on private properties and by the City on public lands to remove potential coyote hiding and denning opportunities is not expected to conflict with Municipal Code Chapter 11, *Tree Protection and Preservation* (Tree Ordinance). In the unlikely event that removal or trimming of a protected tree is required to clear hiding/denning spaces for coyotes, compliance with the City's Tree Ordinance would reduce significant impacts to City-protected trees to less than significant levels. Further, implementation of trimming/thinning activities would not result in the removal of such trees. As a result, implementation of the CMRP would not conflict with any local policy or ordinance protecting biological resources.

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?*

Non-compliance with an approved Habitat Conservation Plan (HCP), Natural Community Conservation Plan (NCCP), or any other plan that provides species and habitat protections would result in a significant impact to resources protected under such plans. Since the City does not coincide with the boundaries of such plans, implementation of the CMRP would not conflict with the provisions of an adopted HCP, NCCP, or other approved local, regional, or State habitat conservation plan.⁵

Overall, implementation of the CMRP is not expected to have a significant impact to biological resources pursuant to CEQA, and no mitigation measures are required. As such, the proposed project would not introduce activities that would have a significant effect on the environment due to unusual circumstances. Therefore, Exception Criterion (c) would not apply.

EXCEPTION

CRITERION (d)

SCENIC HIGHWAYS. *State CEQA Guidelines Section 15300.2(d) states that a categorical exemption "shall not be used for a project which may result in damage to scenic resources, including but not limited to, trees, historic buildings, rock outcroppings, or similar resources, within a highway officially designated as a state scenic highway. This does not apply to improvements which are required as mitigation by an adopted negative declaration or certified EIR."*

⁵ California Department of Fish and Wildlife, *California Natural Community Conservation Plans*, August 2023, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>, accessed April 30, 2025.

Based on the California Department of Transportation's *California Scenic Highway Mapping System*, there are no scenic highways within the City.⁶ The closest officially designated or eligible State scenic highway is a segment of SR-1 located approximately 8.13 miles to the northwest. Given the distance of the City to SR-1 and nature of the CMRP (i.e., no proposed development), the CMRP would not result in any impacts to State scenic highways (including SR-1). As such, the CMRP would have no impact on scenic resources within an eligible or designated State scenic highway and Exception Criterion (d) would not apply.

EXCEPTION

CRITERION (e)

HAZARDOUS WASTE SITES. *State CEQA Guidelines Section 15300.2(e) states that a categorical exemption "shall not be used for a project located on a site which is included on any list compiled pursuant to Section 65962.5 of the Government Code."*

The CMRP does not involve any development within the City. Rather, the CMRP aims to establish a strategy for managing coyotes within the City's municipal boundaries. As such, no development would occur on a site which is currently listed pursuant to Government Code Section 65962.5 (Cortese List) and Exception Criterion (e) would not apply to the CMRP.⁷

EXCEPTION

CRITERION (f)

HISTORICAL RESOURCES. *State CEQA Guidelines Section 15300.2(f) states that a categorical exemption "shall not be used for a project which may cause a substantial adverse change in the significance of a historical resource."*

The CMRP does not involve any development within the City nor any grading activities. As such, the CMRP would not result in a substantial adverse change in the significance of a historic resource and Exception Criterion (f) would not apply.

CONCLUSION

Based on this analysis, the proposed project meets all criteria pursuant to Sections 15061(b)(3) and 15308 of the CEQA Guidelines (14 CCR §§15000 et seq.). Further, none of the exceptions to an exemption, listed pursuant to CEQA Guidelines Section 15300.2, apply to the proposed project.

⁶ California Department of Transportation, *California Scenic Highway Mapping System*, <https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>, accessed April 25, 2025.

⁷ California Environmental Protection Agency, *Cortese Listing*, <https://calepa.ca.gov/sitecleanup/corteselist/>, accessed April 25, 2025.

REFERENCES

California Department of Fish and Wildlife, *BIOS 6 Viewer*,
<https://apps.wildlife.ca.gov/bios6/?bookmark=648>, accessed April 30, 2025.

California Department of Fish and Wildlife, *California Natural Community Conservation Plans*,
August 2023, <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>,
accessed April 30, 2025.

California Department of Fish and Wildlife, *Special Animals List*, April 2025,
<https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=109406&inline>, accessed April 25,
2025.

California Department of Transportation, *California Scenic Highway Mapping System*,
<https://caltrans.maps.arcgis.com/apps/webappviewer/index.html?id=465dfd3d807c46cc8e8057116f1aaca>, accessed April 25, 2025.

California Environmental Protection Agency, *Cortese Listing*,
<https://calepa.ca.gov/sitecleanup/corteselist/>, accessed April 25, 2025.

City of Redondo Beach, *Coyote Management and Response Plan*, dated May 1, 2025.