

# Appendix A

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CWPP Initial Study, NOP, Comment letters, and NOC





**CITY OF SANTA BARBARA**  
**COMMUNITY DEVELOPMENT DEPARTMENT, PLANNING DIVISION**

**INITIAL STUDY/ ENVIRONMENTAL CHECKLIST**

**PROJECT TITLE: City of Santa Barbara Community Wildfire Protection Plan**

**JULY 2020**

This Initial Study has been completed for the project described below because the project is subject to review under the California Environmental Quality Act (CEQA). CEQA serves as the main framework of environmental law and policy in California. CEQA emphasizes the need for public disclosure and identifying and preventing environmental damage associated with proposed projects. Unless the project or program is deemed categorically or statutorily exempt, CEQA is applicable to any project or program that must be approved by a public agency in order to be processed and established. The proposed project considered herein does not fall under any of the statutory or categorical exemptions listed in the 2018 CEQA Statute and Guidelines (California Public Resources Code, Section 21000 et seq.; 14 CCR 15000 et seq.) and therefore must meet CEQA requirements.

Considering the proposed project has the possibility of creating a significant impact, the preparation of an environmental impact report (EIR) is required by CEQA. The EIR will be analyzed at a program level because the proposed project fits under the scope of a program EIR (PEIR). As stated in Section 15168(a) of the CEQA Statute and Guidelines:

A program EIR is an EIR which may be prepared on a series of actions that can be characterized as one large project and are related either:

1. Geographically,
2. A[s] logical parts in the chain of contemplated actions,
3. In connection with issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or
4. As individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

The intent of this document is to provide an overview and analysis of the environmental impacts associated with the project proposed (the implementation of the Community Wildfire Protection Plan) for the City of Santa Barbara. This document is accessible to the public, in accordance with CEQA, in order to receive feedback and input to be discussed in the PEIR.

**LEAD AGENCY AND PROJECT PROPONENT**

City of Santa Barbara  
Public Safety – Fire  
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**PROJECT ADDRESS/LOCATION**

The Community Wildfire Protection Plan (CWPP) would encompass the jurisdictional limits of the City of Santa Barbara, with the exception of the Santa Barbara Airport. The airport property was excluded from the CWPP as it does not exhibit high wildfire hazard conditions, as identified in the 2017 Santa Barbara Airport Master Plan. The City is located between the coastal Santa Ynez Mountains and the Pacific Ocean, approximately 100 miles northwest of Los Angeles (Figure 1). The City borders the Los Padres National Forest and unincorporated areas of Montecito, Mission Canyon, Hope Ranch, and Eastern Goleta Valley.

## **PROJECT DESCRIPTION**

The City of Santa Barbara Fire Department (SBFD) is proposing to implement a comprehensive, coordinated Community Wildfire Protection Plan (CWPP) to protect lives, property, and natural resources threatened by wildland fire. The proposed CWPP updates the City's 2004 Wildland Fire Plan consistent with the federal Healthy Forests Restoration Act passed in 2003 and subsequent guidance booklet "Preparing a Community Wildfire Protection Plan; A Handbook for Wildland-Urban Interface Communities," issued in 2004, accounting for changes in the City of Santa Barbara's (City's) fire environment and work completed under that 2004 Wildland Fire Plan. While not a governing document requiring action, a CWPP is a strategic plan that outlines a series of policies and action items that are intended to guide implementation of the CWPP. The policies and actions focus on codes and standards, funding, fire rehabilitation, evacuation, fire protection, vegetation/fuels management, and public education. Action items identify tasks to be implemented by the SBFD, and other responsible City departments, to achieve the stated goal of protecting lives, property, and natural resources threatened by wildland fire. The CWPP process is intended to provide the community a forum for identifying values at risk from wildfire, which may include people, property, natural resources, cultural values, economic interests, and infrastructure. The identification of these values at risk by the community strongly influences the potential wildfire hazard mitigation projects identified in the proposed CWPP.

The proposed CWPP includes various goals, policies, and actions that represent a compilation of existing and newly proposed policies and actions related to codes and standards, funding, fire rehabilitation, evacuation, fire protection, vegetation/fuels management, and public education. Current activities conducted by the SBFD under the 2004 Wildland Fire Plan were analyzed in the Final Program Environmental Impact Report for the 2004 Wildland Fire Plan (City of Santa Barbara 2004) and are incorporated herein by reference. This description only addresses new proposed policies and/or actions that could result in impacts to the environment, which include the following categories:

- Proposed modifications to the High Fire Hazard Area
- Proposed modifications to the Vegetation Management Areas
  - Defensible space
  - Roadside clearing
  - City Vegetation Management Units (VMUs)
  - Community Fuels Treatment Network (CFTN)
- Proposed modifications to the Vegetation Management Methods
- Communication Facility Maintenance

The proposed CWPP also includes several other policies and actions that would not involve any physical impacts to the environment, including public education, interagency coordination, acquisition of funding, data gathering and management, acquisition of firefighting and communications equipment, and evacuation planning.

### **Purpose, Need, and Objectives**

The purpose of the proposed Project is to update the 2004 Wildland Fire Plan to account for changes in the City's fire environment and work completed under the 2004 Wildland Fire Plan. The intended result is a comprehensive, coordinated plan to mitigate the impact of wildland fire to the City. The need for the proposed CWPP stems from the inherent risk of wildfire hazards, the history of which is presented in Table 1 and shown on Figure 2. The proposed CWPP's objectives include:

- Develop a comprehensive plan that incorporates procedures and programs to mitigate wildfire risks to the City.
- Engage stakeholders including the people, businesses, and organizations that live and work in the City, especially in the City's High Fire Hazard Areas, as well as the adjacent jurisdictions.
- Inform and educate stakeholders about wildfire risk and shared community and individual responsibilities for fire safety.
- Add, remove, or leave unchanged High Fire Hazard Areas based on technical data and fire modeling.
- Provide guidance for future vegetation maintenance activities, and future roadway access strategies, and development strategies, defensible space and home hardening within the High Fire Hazard Areas.
- Maintain consistency between the CWPP and existing City plans and policies, including but not limited to the City of Santa Barbara General Plan, Climate Action Plan, and Coastal Land Use Plan.

- Balance fire mitigation strategies with the City’s goals of maintaining a vibrant economy and protecting natural resources, historic resources, and community character.
- Provide a basis to seek grant funding or other funding mechanisms to support the policies and actions of the proposed CWPP.
- Reduce potential greenhouse gas emissions resulting from a wildfire by reducing vegetative fuel and structural ignition potential.
- Provide a policy framework to enable property owners in areas with wildland fire risk to work with private insurance companies on issues of coverage and cost of insuring private property.

### Regional Fire History

Fire history is an important component of fire planning and can provide an understanding of fire frequency, fire type and behavior, most vulnerable community areas, and significant ignition sources, amongst others. Several large-scale fires have been recorded by fire agencies in the area, primarily associated with the Santa Ynez Mountain foothills. The topography, vegetation, and climatic conditions in the Santa Barbara area combine to create a unique situation capable of supporting large-scale, high-intensity, and sometimes damaging wildfires, such as the 2017 Thomas Fire. The history of regional wildfires in the Santa Barbara area is summarized in Table 1 and graphically presented in Figure 2.

<b>Table 1. History of Wildfires in the Santa Barbara Area</b>					
<b>Fire</b>	<b>Date</b>	<b>Cause</b>	<b>Acres Burned</b>	<b>Structures Damaged or Destroyed</b>	<b>Deaths</b>
Cave	November 2019	Under investigation by U.S. Forest Service Los Padres National Forest	3,126	0	0
Holiday	July 2018	Power lines	113	24 structures destroyed	0
Thomas	December 2017	Power lines	281,893	1,063 structures destroyed, 280 structures damaged	2
Alamo	July 2017	Under Investigation by San Luis Obispo County/CAL FIRE	28,687	1 residence destroyed, 1 structure damaged	0
Whittier	July 2017	Vehicle	18,430	16 residences destroyed, 1 residence damaged, 30 outbuildings destroyed, 6 outbuildings damaged	0
Rey	August 2016	Under investigation by U.S. Forest Service	32,606	0	0
Sherpa	June 2016	Misc. – disposal of burning log from fireplace	7,474	1	0
Gibraltar	October 2015	Arson	21	0	0
White	May 2013	Escaped embers from approved fire-use day site	1,984	0	0
La Brea	August 2009	Campfire associated with illegal marijuana plantation/grow	91,622	1	0
Jesusita	May 2009	Equipment Use	8,733	80	0
Tea	November 2008	Campfire	1,940	238	0
Gap	July 2008	Arson	9,443	4	0
Zaca	July 2007	Equipment Use	240,207	1	0
Perkins	July 2006	Lightning	14,988	0	0
Gaviota	July 2004	Lightning	7,440	1	0
Marre	September 1993	Smoking	43,882	0	0
Paint	June 1990	Arson	4,270	673	1
Wheeler	July 1985	Miscellaneous	119,361	26	0

**Table 1. History of Wildfires in the Santa Barbara Area**

Fire	Date	Cause	Acres Burned	Structures Damaged or Destroyed	Deaths
Sycamore	July 1977	Kite into power lines	806	234	0
Romero	October 1971	Arson	14,538	N/A	4
Coyote	September 1964	Undetermined	65,338	94	1
Refugio	September 1955	Structure Fire	79,428	20	0

Sources: SBCFD 2018; VCFD 2020.

As presented in Table 1, nearly all significant wildfires have burned in the months of July, September, or October. This timeframe coincides with the end of the dry summer season, where vegetation has lower fuel moistures, and Sundowner winds are prominent. While not all the fires shown in Table 1 were associated with Sundowner winds, the largest and most damaging fires have occurred during such winds.

The history of wildfire ignitions in the Santa Barbara area is directly related to human activity. Wildfire occurrence in the Santa Barbara area predominately occurs in the Santa Ynez Mountains. Mechanized and power equipment use (e.g., mowers) on private, residential parcels is a potential ignition source and was responsible for the Jesusita and Zaca Fires. Arson, campfires, and a vehicle fire have also been sources of significant wildland fires in the Santa Barbara area, including the Whittier, Gibraltar, La Brea, Tea, and Gap fires. However, the largest recorded fire within the County, the Thomas Fire, ignited as a result of line slap (lines coming into contact with each other, creating an electrical arc, which deposits hot, burning or molten material onto the ground into a receptive fuel bed).

Interestingly, most vegetation fires ignited within the City occur in the more urban areas rather than in the foothill areas. However, ignitions in the foothill areas have the potential to spread throughout large expanses of wildland fuels and cause more widespread landscape damage than would a vegetation ignition in an urban setting (Dudek 2014).

### Regional Fire Management

Fire management in the region spans the City and adjacent jurisdictions. The City boundaries adjoin the Los Padres National Forest and County of Santa Barbara (County). Within southern Santa Barbara County, there are several agencies that also have approved CWPPs for their jurisdictions. These CWPPs include the following.

- County of Santa Barbara - San Marcos Pass/Eastern Goleta Valley Mountainous Areas: The San Marcos Pass and Eastern Goleta Valley Mountainous Communities CWPP is the result of efforts by members of the CWPP Development Team. This CWPP is written to ensure that recommended actions developed during the CWPP planning process are in balance with sustainable ecological and cultural resource management practices and fiscal resources.
- County of Santa Barbara - Mission Canyon: The Mission Canyon CWPP recommends priorities and strategies in the wildland-urban interface and vicinity and identifies surrounding lands, including federal and state lands, at risk from catastrophic wildland fire. This CWPP also recommends best practices fuel-reduction treatments to protect lives and reduce structural ignitability of property while protecting other ecological, social, and economic values.
- Montecito Fire Protection District: Montecito's CWPP includes fuel mitigation strategies and community programs to guide future actions of the Montecito Fire Protection District, property owners, businessowners, homeowners' associations, and other interested parties in their efforts to reduce the wildfire threat to the community of Montecito.
- Carpinteria-Summerland Fire Protection District: The Carpinteria-Summerland Fire District CWPP identifies communities and individuals that collaborate to form an action plan to mitigate wildfire risk in the wildland-urban interface communities. Additionally, the Carpinteria-Summerland Fire District CWPP assesses wildfire risks, increasing the community's ability to prepare for, respond to, and recover from wildland fires, and protects economic, social, and ecological resources by using sound best practices for fuel reduction and structural ignitability improvements.
- City of Goleta: Goleta's CWPP identifies measures such as community action plans, development standards, fuel mitigation, maintenance, and monitoring strategies.

The CWPP proposes to maintain the 2004 Wildland Fire Plan activities in relation to neighboring jurisdictions. Both the Montecito Fire Protection District and the Santa Barbara County Fire Department have fuel mitigation strategies independent of SBFD, to reduce the potential or slow the progress of wildfires. These programs include fuel reduction

through identified VMUs, structural hardening (i.e., defensible spaces), and emergency preparedness. The SBFD coordinates vegetation management efforts with the Montecito Fire Protection District and Santa Barbara County Fire Department in areas adjacent to the City, where feasible. Proposed vegetation management activities performed by the SBFD would generally remain the same as considered in the 2004 Wildland Fire Plan and Program EIR. The City's proposed CWPP takes into account the planning and policies of these adjacent CWPPs.

## **Proposed Modifications to the High Fire Hazard Area**

### **Current High Fire Hazard Area**

The 2004 Wildland Fire Plan established the High Fire Hazard Area based on results of the City's hazard and risk assessment. The hazard assessment classified topography, weather, and fuels (vegetation) as the three variables to influence fire behavior and severity. The risk assessment looked at factors that had the potential to increase the loss of life, property, and natural resources. Six factors were evaluated: roof type, proximity of structures to other structures, road systems, water supply, fire response times, and historic fire starts. Four fire hazard zones were identified within the High Fire Hazard Area: (1) Extreme Foothill Zone, (2) Foothill Zone, (3) Coastal Zone, and (4) Coastal Interior Zone (Figure 3). Each zone is described below.

#### **Extreme Foothill Zone**

The Extreme Foothill Zone is located along the northern boundary of the City and includes the areas of the West Mountain Drive, upper Gibraltar Road, Parma Park, Coyote Road, upper San Roque Road, and upper Santa Teresita Drive in the Cielito and Foothill residential neighborhoods. Elevations of this zone range from approximately 450 to 1,250 feet above mean sea level (AMSL). This zone is defined by dense chaparral and oak forests along steep (higher than 30% gradient) south- to southwest-oriented slopes. Canyons in this zone are typically aligned north to south, which can act to funnel and accelerate down-slope Sundowner winds to result in frequent and severe, hot, dry wind conditions. These combined hazards make this zone vulnerable to extreme fire behavior (SBFD 2004; USGS 2015). Building density in this zone is low. Roads are steep and winding, and many properties have long driveways. Resources or developments in this zone include but are not limited to Parma Park, Skofield Park, the Skofield Pump Station, and St. Mary's Seminary. There are also front country publicly accessible trails. This zone is strategically important to SBFD since it is the last line of defense for fire protection resources to suppress a wildfire before it enters more highly populated areas of the City (SBFD 2004).

#### **Foothill Zone**

The Foothill Zone is located within the northwest and northeast portions of the lower foothills, which include either entirely or portions of the residential neighborhoods of Cielito, Riviera, Lower Riviera, Eucalyptus Hill, Foothill, Upper East, and the San Roque area surrounding Stevens Park. Elevations range from approximately 100 feet AMSL to the north of André Clark Bird Refuge and U.S. Highway 101 to approximately 1,050 feet AMSL near Mount Calvary Road. This zone typically contains a mixture of flammable chaparral, oak forest, riparian vegetation, eucalyptus groves, and landscaped fuels intermixed with residential areas. The eucalyptus groves within this area are extensive, dense, and have significant accumulations of dead fuel that threaten the surrounding area. Most slopes in this area have a gradient of 20% to 40% and are oriented to the southeast, south, and southwest. As with the Extreme Foothill Zone, canyons in this zone are aligned north to south and can act to funnel and accelerate down-slope Sundowner winds, which contributes to extreme fire behavior conditions (SBFD 2004; USGS 2015).

Building density in this zone is typically low to moderate. A few areas of high structure density are present in the Foothill Road/Laurel Canyon Road area and in the southern portion of the Riviera. Roads in the zone are variable, with some portions in the south including wider, more heavily traveled roadways (e.g., Alameda Padre Serra, Sycamore Canyons Road, and Foothill Road) and other portions including steep, narrow, and winding roadways (e.g., Las Alturas Road, Mission Canyon Road, and Conejo Road). Resources or developments in this zone include, but are not limited to, the Mission, Hale Park, Franceschi Park, Montecito Country Club, Stevens Park, Riviera Business Park, El Encanto Hotel, Santa Barbara Bowl, Cater Water Treatment Plant, Sheffield Open Space, City Public Works buildings, and City Fire Station No. 7. There is also front country trail access within the area.

#### **Coastal Zone**

The Coastal Zone is located along the southwest boundary of the City and includes the Campanil Hill and Hidden Valley residential neighborhoods. Elevation within this zone ranges from 150 to 600 feet AMSL. The majority of fuels are coastal sage scrub, grassland, and ornamental plants though other vegetation types such as coast live oak and eucalyptus, intermixed with residential areas. Slopes in this zone range from 10% to 35%. The ocean influence dominates this area for much of the year, resulting in lower temperatures and increased fuel moistures, which reduce fire hazard. However, there are several

canyons directly aligned to result in periodic hot, dry wind conditions that occur during our late summer and fall months. This zone has many pockets of moderate fuel made up of chaparral and landscape vegetation. Isolated areas of heavy fuel consisting of eucalyptus and oak vegetation increase the hazard in specific areas within this zone (SBFD 2004; USGS 2015).

Building density in this zone is typically low. Moderate and higher building density occurs in the southern portion of the zone, in the Alan Road/Vista del Mar area where buildings in the residential subdivisions are in closer proximity. Roads in the zone are variable in width, and the zone includes numerous long, dead-end driveways. Resources or developments in this zone include but are not limited to the Arroyo Burro Open Space, Douglas Family Preserve, Arroyo Burro Creek, and Las Positas Road.

### **Coastal Interior Zone**

The Coastal Interior Zone includes portions of the Alta Mesa, hillside areas of the Westside neighborhood, portions of the East and West Mesa and Bel Air residential neighborhoods, and part of Elings Park. Elevation in this zone ranges from approximately 250 to 450 feet AMSL. This zone is defined as areas within the City where the majority of fuel is made up of diverse pockets of vegetation consisting of dense chaparral, oak forests, coastal sage scrub, landscaped vegetation, agricultural lands, and eucalyptus groves. Slopes in this zone range from 10% to 35%. The canyons in this area are dissected and are not in direct alignment to receive hot, dry winds, although these winds are funneled through many of these areas. For the majority of the year, this area is greatly affected by the ocean influence resulting in lower temperatures and increased fuel moistures, which reduce fire hazard; however, when late summer and fall Sundowner winds surface, the risk to this area is significantly increased (SBFD 2004; USGS 2015).

Building density in this zone is typically moderate. A few areas of low structure density are present in the Elings and Honda Valley Park areas. Roads in the zone are variable, with some portions in the south including wider, more heavily traveled roadways (e.g., West Carrillo Street) and other portions including more steep and winding roadways (e.g., Miramonte Drive). Resources or developments in this zone include, but are not limited to, Vic Trace Reservoir, Hilda McIntyre Ray Park, Elings Park, and Honda Valley Park.

### **Proposed High Fire Hazard Area**

As a component of the CWPP, the City proposes to consolidate and re-name the City's High Fire Hazard Area following the California Department of Forestry and Fire Protection's (CAL FIRE's) Very High Fire Hazard Severity Zone (VHFHSZ) update. California law requires CAL FIRE to identify areas based on the severity of fire hazard that is expected to prevail there. These areas, or "zones," are based on factors such as fuel (material that can burn), slope and fire weather. There are three zones based on increasing fire hazard: moderate, high, and very high. The proposed re-naming is in alignment with the National Incident Management System and California Standard Emergency Management System to establish common standards for communication and information management, especially related to common terminology. Common terminology helps by reducing confusion and enhancing interoperability, including organizational functions, resource descriptions, and incident facilities (FEMA 2020). The proposed re-naming would be as follows:

- Merge the Foothill and Extreme Foothill Zones and rename as the City's Very High Fire Hazard Severity Zone (VHFHSZ)
- Merge the Coastal and Coastal Interior Zones and rename as the City's High Fire Hazard Severity Zone (HFHSZ)

As shown in Table 2a, in addition to the re-naming, certain changes to the boundaries of these high fire hazard zones are proposed. Parcels are proposed to be added to the City's high fire hazard zones due to City incorporation boundaries and re-assessment of fire behavior modeling and vegetation data. Additions were based on the City's parcel data (e.g., entire parcels were added, rather than portions of parcels), and the potential additions were extended to logical boundaries (streets, blocks).

<b>Table 2a. High Fire Hazard Area Modification</b>					
<b>Existing</b>				<b>Proposed</b>	
<b>Classification</b>	<b>Acreage Existing</b>	<b>Proposed Addition</b>	<b>Proposed Removal</b>	<b>Classification</b>	<b>Acreage</b>
Coastal Interior	702.18	270.74	1.65	High Fire Hazard Severity Zone	1,657.74
Coastal	523.51	264.44	101.48		
Foothill	2,827.18	118.56	0.0	Very High Fire Hazard Severity Zone	3,666.22
Extreme Foothill	723.91	1.68	5.11		

Areas proposed to be removed from the existing High Fire Hazard Area are outside of City boundaries but were included in the 2004 Wildland Fire Plan (Figure 4). Table 2b provides a more detailed summary of the areas proposed to be modified as part of the CWPP.

<b>Table 2b. City High Fire Hazard Area IDs</b>					
<b>Area ID</b>	<b>Status</b>	<b>Area</b>	<b>Change</b>	<b>Comments</b>	<b>Acres</b>
A	Existing	Extreme Foothill	Existing	Existing	723.91
B	Proposed	Extreme Foothill	Add	Parcel added, incorporated into City after 2004 Plan adopted.	1.68
C	Proposed	Extreme Foothill	Remove	Parcel removed, outside of City.	5.11
D	Existing	Foothill	Existing	Existing	2,827.18
E	Proposed	Foothill	Add	Parcels added, as they back to High Fire Hazard Area with modeled extreme fire behavior, brings boundary down to street (Scenic Drive).	6.25
F	Proposed	Foothill	Add	Parcels added; fire behavior modeling indicates extreme fire behavior associated with lower Mission Canyon vegetation.	25.26
G	Proposed	Foothill	Add	Parcel added; area omitted from previous High Fire Hazard Area mapping effort as it was previously outside the City.	5.31
H	Proposed	Foothill	Add	Parcels added; fire behavior modeling indicates extreme fire behavior associated with San Roque Creek vegetation.	26.84
I	Proposed	Foothill	Add	Parcels added; fire behavior modeling indicates extreme fire behavior associated with Cieneguitas Creek vegetation.	54.90
J	Existing	Coastal Interior	Existing	Existing	702.18
K	Proposed	Coastal Interior	Add	Parcels added due to modeled extreme fire behavior in adjacent High Fire Hazard Area.	12.45
L	Proposed	Coastal Interior	Add	Parcels added due to modeled extreme fire behavior in adjacent park land, capacity for defensible space on these lots is significantly reduced due to limited structure setbacks.	24.62
M	Proposed	Coastal Interior	Add	Parcels added due to modeled extreme fire behavior; brings zone boundary to streets.	223.37
N	Proposed	Coastal Interior	Add	Parcels added due to modeled extreme fire behavior in adjacent High Fire Hazard Area.	1.41
O	Proposed	Coastal Interior	Add	Parcels added due to modeled extreme fire behavior present in adjacent High Fire Hazard Area; brings zone boundary to streets.	8.89
P	Proposed	Coastal Interior	Remove	Road parcel removed from existing High Fire Hazard Area.	1.65
Q	Existing	Coastal	Existing	Existing	523.51
R	Proposed	Coastal	Add	Parcels added due to modeled extreme fire behavior present.	62.27
S	Proposed	Coastal	Remove	Parcels removed as they are in County jurisdiction.	101.48
T	Proposed	Coastal	Add	Parcels added due to modeled extreme fire behavior present. This area is entirely within the state's Coastal Zone Boundary.	202.17

As noted, Area T exists entirely within the state's Coastal Zone Boundary. Vegetation management and defensible space activities conducted in this Area are to be consistent with the City's Local Coastal Program (LCP) and may be subject to additional approvals.

### Proposed Vegetation Management Areas

As a component of the CWPP, vegetation management on both private and public land would occur. Vegetation management is often dependent on the location and proximity to structures and vegetation types (fuels) present in the City and their contribution to fire hazard. Hazardous fuels include live and dead ground, surface, or overstory vegetation that exist in a condition that readily ignites; transmits fire to adjacent structures; and/or is capable of supporting extreme fire behavior. Funding for vegetation management is obtained through several sources, including private landowners, grants, City general fund budget, and the City Wildland Fire Suppression Assessment District<sup>1</sup> (Figure 5).

Table 3 summarizes the different potential vegetation types identified and mapped in the City, and Figure 6 presents the distribution of potential vegetation types in the City. The map is used as a screening tool for planners and the public to evaluate the types of site-specific biological resource studies that may be necessary for development projects. The presence or lack of vegetation types depicted on the map would need to be confirmed in the field on a case-by-case basis.

<b>Table 3. Vegetation Types in the City</b>		
<b>Vegetation Type</b>	<b>Acres</b>	<b>Percentage</b>
Coastal bluff	14.57	0.12%
Chaparral	237.52	2.01%
Coastal strand/beach	122.92	1.04%
California annual grassland	535.03	4.53%
Coastal perennial grassland	36.42	0.31%
Orchard	236.54	2.00%
Riparian woodland	172.5	1.46%
Coastal sage scrub	1,181.69	10.01%
Urban	7,686.04	65.11%
Golf course	218.9	1.85%
Barren	21.55	0.18%
Southern oak woodland	1,140.46	9.66%
Unmapped	200.21	1.70%
<b>Total</b>	<b>11,804.35</b>	<b>100.00%</b>

Source: City of Santa Barbara 2008.

<sup>1</sup> In 2006, the City of Santa Barbara adopted the Wildland Fire Suppression Assessment District (WFSAD). The WFSAD was created pursuant to California Government Code Section 50078 and Article XIID of the California Constitution. The voters of the WFSAD agreed to a levy to fund certain services designed to reduce the severity and damage from wildland fires in the Foothill and Extreme Foothill Zones of the City's High Fire Hazard Area. These areas were included in the WFSAD based on the potential for high-severity wildfire in this portion of the City as presented in the City's 2004 Wildland Fire Plan. WFSAD funds are used to provide services such as defensible space evaluations, chipping, road clearance, and vegetation management.



## Types of Vegetation Communities

### ***Grass/Herbaceous***

Grass/herbaceous fuels in the City are represented by the California annual grassland and coastal perennial grassland vegetation types and are found primarily in the southern, coastal area of the City, although smaller areas exist in the foothills along the City's northern boundary. Grassland types may include scattered and widely spaced trees and/or shrubs, although grasses are the dominant cover type. Grasses are fine fuels that are loosely compacted with a low fuel load. Grasses have a high surface area-to-volume ratio, requiring less heat to remove fuel moisture and raise fuel to ignition temperature. They are also subject to early seasonal drying in late spring and early summer. Live fuel moisture content in grasses typically reaches its low point in early summer, and grasses begin to cure soon after. Due to these characteristics, grasses have potential for a high rate of spread, rapid ignition, and facilitation of extreme fire behavior. Grasses are the vegetation type in the City with the highest risk for wildfire ignition. Their low overall fuel loads typically result in faster moving fires with lower flame lengths and heat output. Untreated grasses can help spread fire into other adjacent surface fuel types (e.g., shrubs) or facilitate surface-to-crown fire transition where they exist beneath tree canopies.

### ***Brush/Scrub***

Brush/scrub fuels in the City are represented by the chaparral and coastal sage scrub vegetation types. Brush/scrub types may include scattered and widely spaced trees, small patches of grass/herbaceous vegetation, or grass herbaceous vegetation occurring beneath shrub canopies, although shrubs are the dominant cover type. Chaparral is found primarily in the foothills along the City's northern boundary, while coastal sage scrub is distributed evenly between the southern, coastal area of the City and the foothills along the City's northern boundary.

Chaparral and coastal sage scrub are considered moderately fine fuels that are loosely compacted. Chaparral has a high fuel load, and coastal sage scrub has a moderate fuel load. Both types have high surface area-to-volume ratios, requiring less heat to remove fuel moisture and raise fuel to ignition temperature. Both are subject to early seasonal drying in the late spring and early summer, but do not fully cure in the way that grasses do. The live fuel moisture content reaches its low point in the late summer and early fall months. Dead fuels consist mainly of 1-hour and 10-hour fuel sizes, or twigs and small stems ranging from 0.25 inches to 1 inch in diameter. Chaparral and coastal sage scrub have the potential for a high rate of spread, rapid ignition, and extreme fire behavior. Chaparral also has a high content of volatile organic compounds, which also contributes to extreme fire behavior potential.

### ***Tree/Woodland***

Tree/woodland fuels in the City are represented by the southern oak woodland and riparian woodland vegetation types. Eucalyptus is included in this type of vegetation due to its prevalence in the City. Tree/woodland types may also include scattered shrubs or shrub groupings, small patches of grass/herbaceous vegetation, or shrub and grass herbaceous vegetation occurring beneath tree canopies, although trees are the dominant cover type. In closed-canopy oak woodlands, understory fuel loads are low. The reduction of fire as an ecosystem process in oak woodlands, however, allows for an accumulation of fuels that had previously been consumed during regular, low-intensity fires. This can cause a build-up of woody vegetation in the understory, including significant increases in dead and down woody material and ladder fuels connecting ground vegetation to tree canopies. As a result, some oak woodlands are more susceptible to severe, crown-consuming fires (McCreary 2004). Oak woodlands are found in the City's drainages and canyons and along north-facing slopes throughout the foothills and southern, coastal area. Riparian woodlands are concentrated in narrow corridors primarily along San Roque Creek, Mission Creek, Sycamore Creek, and Arroyo Burro Creek.

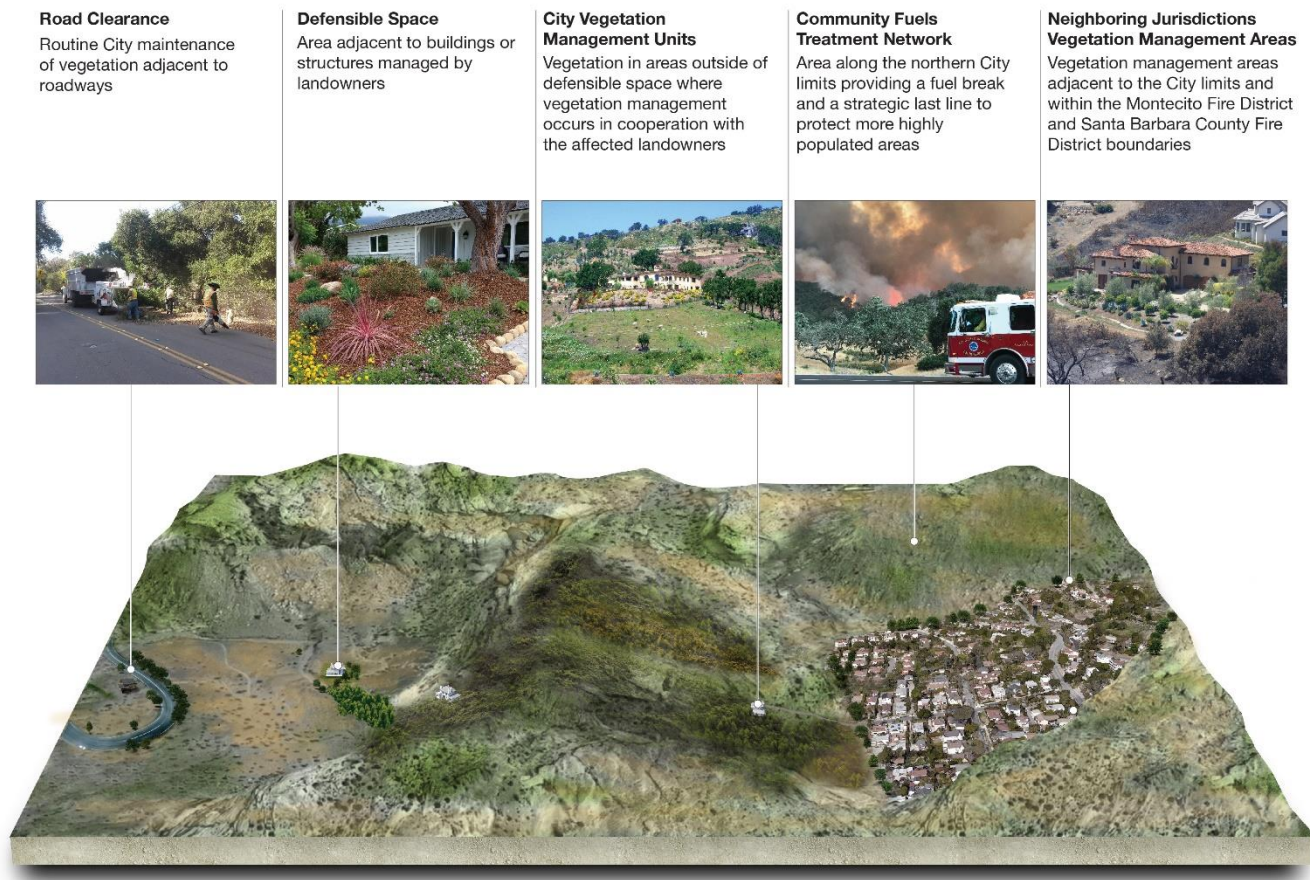
## Vegetation Management

Vegetation management is categorized into five categories, including the following (See Exhibit 1):

- **Defensible Space:** area adjacent to buildings or structures managed by landowners
- **Roadside Clearance:** maintenance of vegetation adjacent to roadways
- **City Vegetation Management Units (VMUs):** vegetation in areas outside of defensible space where vegetation management occurs in cooperation between the affected landowners and City

- Community Fuels Treatment Network (CFTN): area along the northern portion of the City limits to provide a break between continuous decadent stands of chaparral fuel and a strategic last line to protect more highly populated areas
- Neighboring Jurisdictions Vegetation Management Areas: vegetation management areas adjacent to the City limits and within the Montecito Fire District and Santa Barbara County Fire Department boundaries (The CWPP does not propose treatment within these areas; included for informational purposes.)

## Five categories of Vegetation Management



### Exhibit 1: Five Categories of Vegetation Management

#### Defensible Space

Defensible space is an area around a building or structure in which vegetation, debris, and other types of combustible fuels have been treated, cleared, or reduced to slow the spread of fire to and from the building (FEMA 2008). As outlined in Chapter 8.04 of the City of Santa Barbara Municipal Code (adopted by Ordinance No. 5920), all parcels in the City's High Fire Hazard Area are required to meet City-defined defensible space requirements year-round. Vegetation within defensible space zones, native or otherwise, must be maintained to create an effective fuel break by thinning dense vegetation and removing dry brush, flammable vegetation, and combustible growth.

Chapter 8.04 outlines treatment standards and identifies exceptions to identified standards and special considerations for increasing defensible space widths (or distances), minimizing erosion potential, and reducing water quality and habitat impacts. Where required defensible space occurs on an adjoining property (e.g., property line setback is less than required defensible space distance), it is up to the adjoining property owner to provide defensible space for their neighbor. In cases where cooperation is not achievable, SBFD may enforce defensible space management requirements on adjoining properties.

The CWPP does not propose modifications to the defensible space distances from buildings and structures as identified in the 2004 Wildland Fire Plan. The actual vegetation management methods within defensible space areas would also generally remain the same as discussed in the 2004 Wildland Fire Plan and Program EIR. The proposed HFHSZ would require 30 feet to 70 feet from a building or structure and 100 feet to 150 feet for the new VHFHSZ. Within any HFHSZ, additional defensible space may be required on slopes greater than 30% and may require up to 300 feet of defensible space. Defensible space within the state Coastal Zone would need to be consistent with the City's certified Coastal Land Use Plan. A summary of existing and proposed defensible space requirements is provided in Table 4. Based on site-specific circumstances, the Fire Marshal has the authority to determine the appropriate defensible space based on these standards.

Table 4. Defensible Space Requirement			
Existing		Proposed	
Classification	Distance (feet)	Classification	Distance (feet)*
Coastal Interior	30–50	High Fire Hazard Severity Zone	30-70
Coastal	50–70		
Foothill	100	Very High Fire Hazard Severity Zone	100-150
Extreme Foothill	150		
*Within any HFHSZ/VHFHSZ, additional defensible space up to 300 feet may be required at the discretion of the Fire Marshal on slopes greater than 30%.			

#### Roadside Clearance

The City Municipal Code requires property owners within a high fire hazard area to clear flammable vegetation and combustible growth horizontally and vertically (i.e., overhanging vegetation) on the portions of their property that abut highways and private streets ordinarily used for vehicle traffic as provided in Table 5. As funding is available, the SBFD conducts roadside vegetation management to reduce the amount of vegetation along roadways, enhance evacuation during a wildfire, and allow greater access for fire engines and equipment to respond during a wildfire. Funding is also provided by property owners through the Wildland Fire Suppression Assessment District. Road clearance activities would generally remain the same as considered in the 2004 Wildland Fire Plan and Program EIR.

<b>Table 5. Road Clearance Requirement</b>		
	<b>Existing</b>	<b>Proposed</b>
Horizontal	10 feet	10 feet
Vertical	13 feet 6 inches	13 feet 6 inches

#### City Vegetation Management Units

The CWPP proposes certain modifications to the 2004 Wildland Fire Plan VMU boundaries (Figure 7). VMUs have unique hazards and include, or are adjacent to, values threatened by wildfire; have the potential for extreme fire behavior; and pose a challenge for fire protection because of dense, flammable vegetation, lack of access due to topography and roads, and firefighter exposure. VMUs encompass land outside defensible space on both City-owned and private property where the City would conduct vegetation management in cooperation with the affected landowners.

Current management is performed in accordance with Mitigation Measure BIO-1 outlined in the 2004 Wildland Fire Plan EIR (City of Santa Barbara 2004). The City consults with a qualified biologist during the preparation of work plans for each VMU. Based on this consultation, site-specific measures to avoid or reduce impacts to biological resources (including Environmentally Sensitive Habitat Areas) known or likely to occur in the VMU are identified. Vegetation management actions are then modified to reduce impacts to special status species. The biological assessments conducted prior to vegetation management work conducted in VMUs also consider the presence of invasive species. Treatment techniques are identified to minimize potential invasive species spread during vegetation management activities. Finally, the City implements a vegetation treatment hierarchy during work plan development at each VMU where vegetation treatment/removal is prioritized in the following order: dead plant material, dying plant material, invasive species, and native species.

The proposed changes to the VMUs are based on geographic information system (GIS) analysis and compared with fire behavior modeling results, fire hazard mapping data sets, fire history data, and the location of other City and non-City Vegetation Management Areas. A priority has also been assigned. Additions were identified where they would close a gap

between existing VMUs, provide additional protection to the community, or where historic fires have burned into the City. Additions were based on the City's parcel data, with the exception of an area identified in Parma Park that follows a ridgeline rather than a parcel boundary. Potential additions were extended to logical boundaries (streets, existing VMUs). No VMUs are proposed for removal. Table 6 provides the estimated acreage. Proposed vegetation management activities within the VMUs would generally remain the same as considered in the 2004 Wildland Fire Plan and Program EIR.

<b>Table 6. Vegetation Management Units</b>		
	<b>HFHSZ VMU (acres)</b>	<b>VHFHSZ VMU (acres)</b>
Existing	292.95	707.10
Proposed	356.32	520.22
<b>Total (Acres)</b>	<b>649.27</b>	<b>1,227.32</b>

Proposed modifications and area identification information of the City's VMUs are presented in Table 7 and Figure 8.

<b>Table 7. Vegetation Management Unit and Community Fuels Treatment Network Area ID and Modifications</b>					
<b>Area ID</b>	<b>Status</b>	<b>Priority</b>	<b>Change</b>	<b>Comments</b>	<b>Acres</b>
7	Existing	Low	Existing	Mountain/Las Tunas VMU	45.18
8	Existing	Low	Existing	Fire Station 7 VMU	2.42
26	Proposed	Low	Addition	Mountain Drive Extension	5.38
27	Proposed	Low	Addition	Las Alturas/Stanwood Connection	30.86
1	Existing	Medium	Existing	Conejo Road VMU	93.80
2	Existing	Medium	Existing	Jimeno/Garcia Canyon VMU	64.54
3	Existing	Medium	Existing	Las Canoas Road VMU	52.77
5	Existing	Medium	Existing	Coyote Road VMU	11.58
10	Existing	Medium	Existing	Eucalyptus Hill Drive VMU	63.02
11	Existing	Medium	Existing	Camino Viejo VMU	23.78
12	Existing	Medium	Existing	Alston Place VMU	39.10
15	Existing	Medium	Existing	Cleveland School Area VMU	7.91
16	Existing	Medium	Existing	Loma Alta VMU	42.05
17	Existing	Medium	Existing	Hondo Valley VMU	84.25
19	Existing	Medium	Existing	Flora Vista VMU	40.95
20	Existing	Medium	Existing	Garcia/Ferrelo Canyon VMU	5.51
21	Existing	Medium	Existing	Hillcrest Road VMU	69.53
22	Existing	Medium	Existing	Alturas Del Sol VMU	18.15
24	Proposed	Medium	Addition	Jesusita Drive	2.92
30	Proposed	Medium	Addition	Alston/Cleveland Connection	8.29
31	Proposed	Medium	Addition	Owen Road Extension	7.22
32	Proposed	Medium	Addition	Via Alicia	15.48
33	Proposed	Medium	Addition	Hondo Valley Extension	8.90
34	Proposed	Medium	Addition	Miramonte	1.75
35	Proposed	Medium	Addition	W. Carillo 1	6.66
36	Proposed	Medium	Addition	Skyline Way	7.28
37	Proposed	Medium	Addition	Loma Alta Extension	1.41
38	Proposed	Medium	Addition	Flora Vista Extension	25.92
39	Proposed	Medium	Addition	W. Victoria	1.79
41	Proposed	Medium	Addition	W. Carillo 2	1.38
42	Proposed	Medium	Addition	Nirvana Rd.	14.04
44	Proposed	Medium	Addition	Bel Air	38.75
45	Proposed	Medium	Addition	Calle de los Amigos	9.34
4	Existing	High	Existing	Upper Coyote Road VMU	23.36
6	Existing	High	Existing	Coyote Circle VMU	11.36

**Table 7. Vegetation Management Unit and Community Fuels Treatment Network Area ID and Modifications**

Area ID	Status	Priority	Change	Comments	Acres
9	Existing	High	Existing	Westmont/Las Barrancas VMU	50.22
13	Existing	High	Existing	Cima Linda Lane VMU	16.96
14	Existing	High	Existing	Owen Road VMU	25.20
18	Existing	High	Existing	Las Positas Road VMU	125.70
23	Existing	High	Existing	San Roque Creek VMU	82.73
25	Proposed	High	Addition	Northridge Road	97.30
28	Proposed	High	Addition	Parma Park	105.83
29	Proposed	High	Addition	Lauro Canyon/Arriba Way	45.49
40	Proposed	High	Addition	Elings Park	91.94
43	Proposed	High	Addition	Campanil	124.71
46	Proposed	High	Addition	Senda Verde	22.44
47	Proposed	High	Existing	Community Fuels Treatment Network	15.31
48	Proposed	High	Existing	Community Fuels Treatment Network	47.62
49	Proposed	High	Existing	Community Fuels Treatment Network	120.55
50	Proposed	High	Existing	Community Fuels Treatment Network	17.97

Proposed modifications to the City's VMUs are presented in Figure 8 and Table 7.

#### Community Fuels Treatment Network

The CWPP proposes to maintain the 2004 Wildland Fire Plan CFTN located along the northern portion of the existing Extreme Foothill Zone/proposed VHFHSZ. The CFTN encompasses 242 acres and provides a break between continuous stands of chaparral fuel outside the City boundary and the City area. The CFTN also provides a strategic last line of defense for fire protection resources to suppress a wildland fire before it enters more highly populated areas of the City. Figure 7 shows the existing and proposed CFTN, and Table 8 provides the estimated acreage. The CFTN is an area where multiple property owners interlink their individual defensible space areas and treat continuous strips of hazardous vegetation to form a vegetation management network (SBFD 2004).

Fuels management treatments in this area are focused outside of 150-foot defensible space areas for structures. The activities include the removal of flammable vegetation (brush and understory) by preferentially removing exotic plants; thinning, pruning, and limbing of vegetation to remove fire ladders; limbing up of oak overstory; pruning out of dead material; and thinning out continuous areas of brush using a mosaic pattern. Eucalyptus trees are thinned to obtain 6 to 12 trees per 1,000 square feet. Proposed vegetation management activities within the CFTN would generally remain the same as considered in the 2004 Wildland Fire Plan and Program EIR.

**Table 8. Community Fuels Treatment Network**

	VHFSZ
Existing	242
Proposed	—
<b>Total (Acres)</b>	<b>242</b>

#### **Proposed Vegetation Management Methods**

The 2004 Wildland Fire Plan outlined a suite of vegetation management methods to reduce wildland fuel hazards. The CWPP proposes to maintain the same general vegetation management methods as described in the 2004 Wildland Fire Plan and Program EIR. Before commencing any work, SBFD develops a work plan that identifies the specific areas to be treated, permits required, the best methods to be used based on site-specific circumstances, and any subsequent monitoring. Treatment area identification and vegetation management methods are also informed by a site-specific biological evaluation conducted prior to operations. VMUs are prioritized based on the level of hazard; however, implementation of fuels reduction work in VMUs has largely been dependent on funding, recent wildfire activity (e.g., recently burned VMUs would

not be prioritized for treatment as fuel loads would be low), and, in the case of private property, landowner permission, as well as dependent on slopes, exposures, vegetation types, and access (City of Santa Barbara 2004). Different vegetation management techniques can be utilized, depending on vegetation type, location, condition, and configuration. Given the dynamic nature of vegetation, a single treatment technique or management prescription may not be appropriate for one site over time. Vegetation management techniques will be identified by SBFD personnel during project development and will be dictated by site-specific conditions and effort needed to meet identified vegetation management standards.

In general, vegetation management techniques can be classified into four categories:

- Manual (e.g., hand pulling, cutting, planting)
- Mechanical (e.g., mowing, masticating, felling, yarding)
- Biological (e.g., grazing)
- Prescribed fire (e.g., burn piles, broadcast burning, air curtain destructors)

Herbicide can also be used to manage vegetation for wildfire hazard mitigation purposes and is typically applied to control re-sprouting of cut vegetation or to control undesirable plant species. Historically, the City has not used herbicide during implementation of vegetation management projects in VMUs or in the CFTN. The City's Integrated Pest Management Strategy also seeks to reduce or eliminate the use of chemicals in treating vegetation. Herbicide use is therefore not proposed as a vegetation treatment technique in the CWPP and will not be analyzed in the PEIR.

The following discussion presents each of the vegetation management techniques that may be implemented, including information regarding equipment, application, timing, limiting factors, special considerations, and best management practices (BMPs). Selection of a qualified and trained contractor, appropriate training, scheduling, and supervision to carry out vegetation management treatments and any associated BMPs are also key components of an effective vegetation management program. Preparation of the appropriate plans, obtaining necessary permits, and adherence to these standards is required.

#### Manual Vegetation Management Methods

Manual or hand labor involves pruning, cutting, or removal of trees or other vegetation by hand or using hand-held equipment. Other hand labor treatments involve removing dead wood, piling material, and spreading chips/mulch. Hand labor is most effective in small treatment areas or areas with difficult access where the use of heavy equipment is infeasible. Hand labor also allows for selective management or removal of targeted vegetation and is typically used in conjunction with other techniques. Manual treatment may also include multi-cutting. Multi-cutting involves cutting vegetation (using hand tools, chainsaws, weed whips, and mowers), and cut vegetation is then reduced in size by cutting into lengths no longer than 6 inches long. The multi-cut vegetation is then left on the ground within the project area no greater than 12 inches in depth. Minimal ground disturbance results using this method since the root structure of vegetation is left intact and biomass generated from vegetation treatment is left on site.

Proper training and supervision of hand labor workers is necessary to reduce the dangers to workers using sharp tools on steep and/or unstable terrain, or where other environmental hazards exist. Hand tools include, but are not limited to, shovels, Pulaski hoes, McLeod fire tools, line trimmers, weed wrenches, chain saws, pruning shears, and loppers. Personal protection equipment typically includes long pants and long-sleeved shirts, gloves, safety goggles, hard hats, chaps, and sturdy boots.

#### Mechanical Vegetation Management Methods

Mechanical practices include all methods that employ motorized heavy equipment to remove or alter vegetation. Mechanical practices rearrange vegetation structures, compact or chip material, and move material to landings, staging areas, or burn piles. Mechanical equipment is usually equipped with either rubber tires or tracks, although skids and cables are also used. In some instances, two or more pieces of heavy equipment will work in concert to achieve a management standard. Mechanical equipment includes, but is not limited to, masticators, tractors, and chippers. Chippers are moved around as work occurs and placement is dependent on the ability to minimize the distance vegetation must be hauled to the chipper.

Constraints to mechanical equipment use include steep slopes, dense tree cover that prohibits travel, saturated soils, and dry, high-fire-hazard weather conditions where equipment use could result in ignition. Use of mechanical equipment may also result in damage to retained vegetation. Use of mechanical equipment should consider the terrain, access, vegetation type, and treatment recommendation to effectively treat vegetation and minimize impact potential. Supervision and specialized training are also necessary. The use of mechanical equipment is often done in conjunction with other treatment techniques, particularly hand labor (prior to mechanical treatment) and prescribed fire (following mechanical treatment.)



## Biological Vegetation Management Methods

Biological management includes using grazing as a method to treat grasses, shrubs, and small trees. Grazing is an effective management tool for maintaining areas previously treated with hand labor or mechanical practices. Livestock each have different grazing habits, and not all livestock are ideally suited for grazing treatments in all areas. Goats are an effective option as they will consume live or dead, tough, woody plant material.

Grazing is typically conducted in the late spring, when growth of annual grasses has slowed, and continues through the summer to reduce fine fuels prior to the onset of peak fire season. Development of site-specific grazing management plans should be completed for proposed grazing treatments. Management plans should identify goals and implementation techniques to ensure that grazing treatments meet vegetation management standards and to minimize impacts to natural resources. Grazing management plans should also identify the optimal stocking rate and grazing duration, typically measured in pounds per acre of residual dry matter. Control of livestock movements and preventing overgrazing is also important for successful implementation.

## Prescribed Fire Method

Prescribed fire can be used to burn piles of cut vegetation (pile burns) or over a designated prepared area (broadcast burn). Broadcast and pile burning are often implemented in conjunction with hand labor and mechanical treatment methods as a means of treating residual materials. Prescribed burning also serves to rapidly break down vegetative material and convert it to soil nutrients, reduce brood material for pests and pathogens, control invasive species, and reduce surface fuel buildup and the threat of severe wildfires. SBFD burning activities must adhere to the standards outlined by the Santa Barbara County Air Pollution Control District (SBCAPCD).

Small pile burning is typically conducted at or near the treatment area. Piles should be constructed by hand and should be free of dirt, debris, and stumps. Material should be piled soon after cutting with the butt end of branches and limbs toward the outside of the pile so that branches are overlapping and forming a series of dense layers. Piles typically range in size from 10 feet x 10 feet x 10 feet to 12 feet x 12 feet x 25 feet. The top of the pile should be covered with a small sheet of heavy paper (e.g., butcher paper) to keep the pile interior dry. One or two limbs should be placed atop the paper to keep it in place. The dry interior portion of the pile should be ignited at the appropriate time using a weed burner or other igniting tool. Alternatively, tractors or hand crews can create piles of material on flat or gently sloping ground that can be burned during wet conditions (pile burn), although the volume of fuel in the piles can produce localized heat, which may impact adjacent retained vegetation.

Broadcast burns are usually done where a maximum amount of fuel treatment can take place and can be used to control invasive species and treat cut material (slash) on the ground surface, or reduce surface and/or ladder fuels beneath tree canopies in shaded fuel breaks. Treatment boundaries are often roads, trails, or other nonburnable features, reducing the number of firebreaks that need to be created. Treatment area is typically less than 1 acre in size. This approach reduces labor costs and preparation time, and minimizes soil disturbance and the potential for soil erosion. Broadcast burns can be used in all forest types, where conditions allow for effective control.

Broadcast burning may occur throughout the year; however, it is usually conducted during the late spring months when the ground is still wet or during fall or winter after plants have completed their yearly growth cycle and their moisture content has declined. Fall burns are more closely aligned with the natural fire cycle found in California. Piles of vegetation may be burned any time after the vegetation has dried. Hand-held tools, such as drip torches, propane torches, and flares, may be used for igniting prescribed fires.

Broadcast burns must be conducted by trained fire protection personnel. Timing is critical to the use of this treatment technique due to variances in weather conditions and the necessity to time treatments to minimize impacts to plant and animal species. Fuel moisture content must be determined to assess if the treatment area is safe to burn. There are typically more appropriate burn days in the spring and early summer months when there is a greater chance of atmospheric conditions conducive to smoke dilution and dispersion.

All prescribed burning would be conducted under safe burning conditions outside of the SBFD's designated fire season and will require a California Air Resources Board-designated burn day and the development of a burn plan that will be approved by the fire chief and SBCAPCD. A pile burn plan will outline weather, topography, and fuel within the project area; the prescribed burn objectives; the required fire organization and resources needed to control the fire; and the weather parameters under which the burn can be conducted safely and with minimal smoke disturbance.

Prescribed burning of cut vegetation would result in minimal ground disturbance. Hand tools (Pulaskis, McLeod's, shovels) would be used to clear a shallow trench or line no more than 2 inches in depth around each pile, group of piles, or broadcast burn area to confine the fire and catch any burned materials that may roll downhill during burning.

#### Schedule, Staff, and Equipment Estimates

The SBFD has consistently implemented the vegetation management strategies in the 2004 Wildland Fire Plan. Vegetation management work will occur during the period August 1 through April 1. Prescribed burning would only occur outside the designated fire season, which varies from year to year, but is typically June through October. Hence, prescribed burns would typically occur in the period November through May. Table 9 provides a summary of available data related to typical maintenance equipment, estimated noise levels and staff level required to complete the work.

Table 9. Staff and Equipment Estimates (Annually)			
Equipment	Noise Level (dB) At 50 feet	Staff Hours	Equipment Hours
Manual (Hand Tools) Vegetation Management Techniques			
Hand tools	—	600	40
Shovels	—		24
Pulaski hoes	—		24
McLeod fire tools	—		—
Line trimmers	70		—
Weed wrenches	—		—
Chainsaws	85		40
Pruning shears	—		24
Loppers	—		40
Weed whips	70		40
Mowers	87		40
Pickup truck	—		225
Small dump truck	—		50
Mechanical Vegetation Management Techniques			
Masticators	87	400	—
Tractors	84		—
Chippers	75		300
Skip loader	—		50
Biological Vegetation Management Techniques			
Grazing livestock	34	100	NA
Prescribed Burn Vegetation Management Techniques			
Fire engine	—	100	12
Tractors	84		24

#### **Vegetation Management Best Management Practices**

The CWPP proposes to include the BMPs identified in Table 10 to eliminate or reduce potential environmental effects from vegetation maintenance. The BMPs may be applicable to each vegetation management method depending on the site-specific circumstances.

<b>Table 10. Best Management Practices</b>		
<b>Resource Area</b>	<b>Focus</b>	<b>CWPP Proposed Best Management Practices</b>
Biological	Habitat Evaluation	<ul style="list-style-type: none"> <li>The SBFD shall perform a site-specific biological evaluation prior to operations.</li> </ul>
Biological	Removal of Invasive Exotic Plants	<ul style="list-style-type: none"> <li>During the site-specific biological evaluation, the SBFD will identify invasive exotic plants (such as pampas grass [<i>Cortaderia</i> sp.]) for removal consistent with the City's Integrated Pest Management Plan and the 2004 Wildland Fire Plan. To the extent feasible, the vegetation management will preferentially remove exotic</li> </ul>



**Table 10. Best Management Practices**

Resource Area	Focus	CWPP Proposed Best Management Practices
		plants that pose a fire hazard, and generally remove exotic plants in the work area as the opportunity arises.
Biological	Nesting Bird Protection	<ul style="list-style-type: none"> <li>• Vegetation management work should be completed outside of the defined nesting season for birds (typically February 1 to August 31, but dependent on a site-specific assessment). If vegetation management work must occur within the project areas during nesting season, a site survey shall be conducted by a qualified wildlife biologist to determine any presence of nesting birds.</li> <li>• Vegetation management activities shall not occur within 200 feet of active nests located during the nesting bird survey.</li> </ul>
Biological	Oak Tree Protection	<ul style="list-style-type: none"> <li>• Vegetation management within 50 feet from the outer edge of the tree canopy shall be the minimum necessary to meet the fire department requirements and shall be designed to minimize erosion and impacts on habitat values.</li> <li>• No coast live oak trees (<i>Quercus agrifolia</i>) with one trunk larger than 4 inches in diameter at 4 feet, 6 inches in height above grade shall be removed.</li> <li>• Oak saplings less than 4 inches in diameter at 4 feet, 6 inches in height above grade shall be protected from damage or cutting during the work.</li> <li>• To the extent feasible, other healthy native understory components such as toyon (<i>Heteromeles arbutifolia</i>), lemonade berry (<i>Rhus integrifolia</i>), and currant (<i>Ribes</i> spp.) shall be retained within oak woodlands, as long as they do not create fire ladders.</li> <li>• Lower oak branches (up to 6 feet above grade in height) of oaks shall be thinned to eliminate potential fire ladders.</li> <li>• Dried non-native grasses, dead branches, and non-native resinous woody species shall be removed in oak tree understory.</li> <li>• Wood chips shall not be spread more than 6 inches in depth, and all chip piles shall be kept at least 5 feet from the outer edge of the tree canopy.</li> <li>• Removed oak limbs shall be clean-cut, using the best industry standard practices.</li> </ul>
Biological	Sensitive Habitat	<ul style="list-style-type: none"> <li>• Within the Coastal Zone, vegetation treatment within environmentally sensitive habitat areas (ESHAs), wetlands, creeks, and buffers shall avoid, and where full avoidance is not possible, shall minimize impacts to ESHA to the extent feasible consistent with Policy 4.1-21 of the Coastal Land Use Plan.</li> <li>• Vegetation treatment within City-designated creek channels outside of the Coastal Zone shall be limited to the removal of dead brush that is easily accessible and the removal of exotic or invasive species within a 25-foot buffer along the top of banks, as long as the work does not cause damage to the bank structure.</li> <li>• As a component of the site-specific work plan, for work within a creek channel (both Coastal Zone and non-Coastal Zone areas), a vegetation management plan shall be prepared by a qualified biologist and peer reviewed by the City Creeks Division.</li> <li>• No placement of cut vegetation shall occur within a 25-foot buffer along the top of banks. The top of bank shall be defined by the first bank out from the present, active stream channel (denoted by an incised bank and cobble bed). The 25-foot buffer shall be measured out from the top of bank, marked in the field by an approved biologist and the City project manager prior to any vegetation management work occurring in drainage areas.</li> <li>• Equipment will not be placed within sensitive habitat areas.</li> <li>• Vehicles and equipment shall arrive at the treatment area clean and weed-free.</li> <li>• Trees shall be pruned according to International Society of Arboriculture and American National Standards Institute A300 standards.</li> </ul>

**Table 10. Best Management Practices**

Resource Area	Focus	CWPP Proposed Best Management Practices
		<ul style="list-style-type: none"> <li>Retained trees and vegetation shall be protected from tool and equipment damage.</li> <li>Tools shall be serviced and fueled only in areas that will not allow grease, oil, fuel, or other hazardous materials to pass into streams or retained vegetation.</li> <li>Refuse, litter, trash, and non-vegetative debris resulting from vegetation treatment operations, and other activity in connection with vegetation treatment operations, shall be removed from the treatment area and properly disposed of.</li> <li>Do not place or deposit chipped material into any streambeds.</li> <li>Streams and watercourses in potential grazing areas shall be identified and assessed prior to turn-out and exclusionary fencing shall be installed where necessary.</li> <li>Grazing activities shall be routinely monitored in riparian areas to minimize the potential for stream bank damage, soil compaction, and soil deposition into streams and watercourses.</li> <li>Prior to grazing in riparian areas, thresholds shall be identified that would trigger a cessation of grazing activity.</li> <li>Grazing in unstable slope areas shall be avoided or measures shall be implemented to minimize impacts to slope stability (e.g., reducing herd size to retain vegetation, avoiding grazing where saturated soil conditions exist).</li> <li>The timing and level of grazing practices shall be considered to promote plant recruitment (e.g., timing prior to seed set of annual grasses to promote perennial species establishment).</li> <li>The spread of invasive plants and pathogens shall be minimized through the use of quarantine periods; holding areas; clean stock water; and personnel, equipment, and vehicle sanitation.</li> <li>Retained trees and vegetation shall be protected from tool and equipment damage.</li> </ul>
Hazards/Health & Safety	Worker Training Safety	<ul style="list-style-type: none"> <li>Equipment operators and project personnel shall have appropriate personal protective equipment and are properly trained in equipment use.</li> <li>As necessary, tools used between project areas shall be sanitized to prevent the spread of pathogens.</li> </ul>
Noise	Construction Hours	<ul style="list-style-type: none"> <li>The hours of work will include weekdays between the hours of 7:00 a.m. to 5:00 p.m. No work will be completed on weekends or designated holidays unless fire conditions (e.g., red flag alert) dictate immediate action.</li> </ul>
Water Quality	Litter Removal	<ul style="list-style-type: none"> <li>All refuse, litter, trash, and non-vegetative debris resulting from vegetation treatment operations, and other activity in connection with vegetation treatment operations, shall be removed from the treatment area and properly disposed of.</li> <li>Tools shall be serviced and fueled only in areas that will not allow grease, oil, fuel, or other hazardous materials to pass into streams or retained vegetation.</li> </ul>
Wildfire	Fire Safety	<ul style="list-style-type: none"> <li>Appropriate fire safety measures shall be implemented.</li> <li>For safety purposes, necessary signage alerting the public to active operations shall be provided.</li> </ul>

### Evacuation Planning

Evacuation during a wildfire in Santa Barbara is not necessarily directed by the fire department, except in specific areas where fire personnel may enact evacuations on-scene. The Santa Barbara County Sheriff's Department, Santa Barbara Police Department, and other cooperating law enforcement agencies have the primary responsibility for evacuations. These agencies work closely within the Unified Incident Command System with the County Office of Emergency Services, and responding fire department personnel who assess fire behavior and spread, which should ultimately guide evacuation

decisions. To that end, the SBFD, Santa Barbara Police Department, and Santa Barbara Public Works Department have worked with a County Pre-Fire Mitigation Task Force to address wildland fire evacuation planning for Santa Barbara. The task force also received input from the Montecito Fire Protection District, Carpinteria/Summerland Fire Protection District, California Highway Patrol, the California Department of Transportation, and various homeowners' associations throughout the Santa Barbara area (Dudek 2014).

Through supportive measures, the County Pre-Fire Mitigation Task Force resulted in an evacuation preplan that outlines the SBFD response routes, probable public evacuation routes, traffic control points, and staging areas. The interagency plan would be used by law enforcement, fire, and public works agencies during a wildfire evacuation. However, based on actual fire conditions occurring in the field, the preplans may be modified at the time of the incident (Dudek 2014).

The evacuation preplans separated the City's High Fire Hazard Area, including the Extreme Foothill, Foothill, Coastal, and Coastal Interior Zones (proposed VHFHSZ and HFHSZ, respectively), into evacuation areas or "evacuation blocks." The development of the evacuation blocks was determined by landforms, primarily major canyons, and road systems. A total of 26 blocks were identified within the City. The evacuation blocks are based on a variety of features, including watersheds, terrain including ridgelines, population areas, significant landscape transitions including roadways, and vegetation. The 2014 Wildland Fire Evacuation Procedures Analysis Plan (Dudek 2014) recommended maintaining existing preplan evacuation block maps, which are presented in Figure 9. The 2014 Plan also outlined management recommendations for enhancing evacuation capabilities. The proposed CWPP does not include construction or physical impacts to the environment including, but not limited to, road widening for the purposes of revising the City's evacuation plans, and as such, Evacuation Planning is noted as part of the CWPP project description for public awareness purposes only. Future evacuation enhancements that could result in physical impacts to the environment may require additional environmental analysis.

### **Water Supply**

Water systems that supply adequate quantity, pressure, and duration are essential to structure protection. Without adequate water supply the ability to safely protect structures and suppress fires is compromised. The Fire Department Water Supply and Fire Hydrant standards (City Municipal Code, Ordinance No. 5920) outline the City's water supply requirements. The Public Works Department has developed an extensive water distribution system that consists of many components, including reservoirs, pump stations, pressure zones, water mains, and fire hydrants. Fire hydrants (with fire flow ratings) and water reservoirs important for fire suppression were identified during development of the 2004 Wildland Fire Plan (Figure 10).

A portion of the Extreme Foothill Zone/proposed VHFHSZ is not connected to the City water system. Most of the water system on West Mountain Drive onto Coyote Road is owned and operated by Montecito Water District. A small section of West Mountain Drive in this area is not serviced by the City or Montecito Water District and does not have fire hydrants. This area has additional requirements included in the City's Municipal Ordinance (No. 5920). Specifically, for buildings, or portions of buildings, constructed within the boundaries of Zone 2, a water tank with a minimum capacity of 10,000 thousand gallons is required to be provided for fire protection purposes only and designated, installed, and maintained in a manner approved by the Fire Code Official. These individual projects would be evaluated on a project-specific level at the time of permitting.

### **Communications**

California is comprised of 58 counties considered Operational Areas (OA). The OA consists of all political subdivisions within a county's geographical area. It provides communication and coordination between local jurisdictions and the California Office of Emergency Services (CalOES) Regions. Coordination between the OA and local government is accomplished through the OA Emergency Operations Center. (City of Santa Barbara Emergency Management Plan 2013).

Radio communications systems are critical to fire department response capabilities and the life safety of firefighters and the public depends on reliable, functional communication tools that work in harsh environments. The SBFD currently operates an analog radio system, which will require an upgrade to a digital platform to comply with Project 25, a suite of standards developed to provide digital voice and data communication systems suited to public safety and first responders.

The City's current radio system generally functions well, though there are some interoperability issues between this system and other agency systems that operate on digital platforms. Radio coverage in the City is affected by terrain and the current placement of repeaters, which are devices that allow radio communications to be broadcast over greater distances and variable terrain. There are several "dead spots" in the City where radio communications do not work as radio signals are blocked by steep slopes, narrow canyons, or ridgelines. Additionally, the City's radio communications system components are aging and will require routine maintenance of components over time. Replacement of communication facilities may involve replacement of existing support poles with similar size and material new poles, replacement of analog technology

systems to support more advanced Internet Protocol (IP)-based networks ground-mounted or pole-mounted and other installation of conduit. Maintenance activities would be consistent with the practices described in the 2004 Wildland Fire Plan and Program EIR. Funding for communication upgrades is not available at this time however could be secured during the forecasted life of the proposed CWPP. These individual projects would be evaluated on a project-specific level at the time of permitting.

## **Public Review Process**

### **Required Permits and Approvals**

The lead agency, the City of Santa Barbara Fire Department, is responsible for CEQA clearance and plan review. A public agency, other than the lead agency, that has discretionary approval over the project is known as a “responsible agency,” as defined by the CEQA Guidelines (14 CCR 15000 et seq.). The responsible agencies and their corresponding approvals for this project include CAL FIRE. Other agencies such as California Department of Fish and Wildlife may have regulatory authority over activities conducted under the CWPP.

## **COMMUNITY WILDFIRE PROTECTION PLANS AND POLICY DISCUSSION**

The City of Santa Barbara General Plan-Seismic Safety-Safety Element, originally adopted by City Council in 1979 and updated in 2013, directed periodic review and revision of the Safety Element and was amended within the City's Fire Master Plan. An update of the City Fire Master Plan was completed in 1986. In 1993, the City completed a Wildland (Vegetation) Fuels Management Plan for City-owned lands. The Plan identified vegetation management projects on 1,600 acres of undeveloped City park and open space lands. The Plan was adopted by the City Council in 1993 and was implemented by the Parks and Water Resource Departments. Maintenance continues under this Plan. However, this Plan only addressed City lands.

In 1993, a City wildland interface specialist was hired to update the Fire Master Plan and provide expertise and direction in developing a comprehensive wildland fire program. In 2000/2001, a hazard and risk assessment was completed to accurately portray existing conditions within the City and the surrounding area. The results of the assessment were compiled, and policies and actions were then developed into a City Wildland Fire Plan, adopted in 2004.

The purpose of the 2004 Wildland Fire Plan was to update the City Fire Master Plan and create a comprehensive, coordinated plan to mitigate the impact of wildland fire. The 2004 Wildland Fire Plan ranks the City's existing High Fire Hazard Areas based on hazard and risk, identifies policies and actions to reduce the community's threat from wildland fire, and provides a process to prioritize and fund implementation of wildland fire projects.

The proposed CWPP is an update to the 2004 Wildland Fire Plan based on new hazard and risk assessment, modeling data, and revised High Fire Hazard Areas. It also takes into account land use policies of the General Plan and the Coastal Land Use Plan.

## **LAND USE COMPATIBILITY**

Certain land uses have the potential to result in incompatibility with existing surrounding land uses or activities. Typically, development applications for General Plan Amendments, Rezones, Conditional Use Permits, Performance Standard Permits, and certain modifications have the greatest potential to result in land use compatibility issues. Incompatibility can result from a proposed project's generation of noise, odor, safety hazards, traffic, visual effects, or other environmental impacts. This Initial Study provides an analysis of environmental impacts, including land use compatibility, within the primary impact sections (i.e., noise, air quality, etc.). However, in instances where an impact does not rise to a level of significance, land use compatibility concerns may still exist due to adverse (less than significant) impacts. Other potentially significant, adverse impacts related to future recommended wildland fire mitigation projects may occur and would be evaluated on a site-specific basis. These potential impacts do not raise any significant land use compatibility issues, however.

## **MITIGATION MONITORING AND REPORTING PROGRAM**

A Mitigation Monitoring and Reporting Program (MMRP) will be prepared for the CWPP in compliance with Public Resources Code Section 21081.6 and will be included in the Program Environmental Impact Report (PEIR) for the CWPP. Monitoring and reporting requirements are adopted as conditions of project approval.

## **ENVIRONMENTAL CHECKLIST**

The following checklist contains questions concerning potential changes to the environment that may result if this project is implemented. The potential level of significance should be indicated as follows:

**Significant:** Known substantial environmental impacts. Further review is needed to determine whether there are feasible mitigation measures and/or alternatives to reduce the impact.

**Potentially Significant:** Unknown, potentially significant impacts that need further review to determine significance level and whether any impacts identified as potentially significant are mitigable.

**Potentially Significant, Mitigated:** Potentially significant impacts that are avoided or reduced to less than significant levels with identified mitigation measures agreed-to by the applicant.

**Less Than Significant:** Impacts that are not substantial or significant.

**Beneficial Impact:** Impacts would improve environmental conditions.

**No Impact:** Project would not cause this type of impact.

### **Environmental Factors Potentially Affected**

The environmental factors checked below would be potentially affected by this project, involving at least one impact that is a "Potentially Significant Impact," as indicated by the checklist on the following pages.

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> Aesthetics           | <input type="checkbox"/> Agriculture and Forestry Resources            | <input checked="" type="checkbox"/> Air Quality/Greenhouse Gas Emissions |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Energy  |
| <input checked="" type="checkbox"/> Geology and Soils    | <input checked="" type="checkbox"/> Hazards & Hazardous Materials      | <input checked="" type="checkbox"/> Hydrology/Water Quality              |
| <input checked="" type="checkbox"/> Land Use/Planning    | <input type="checkbox"/> Mineral Resources                             | <input checked="" type="checkbox"/> Noise                                |
| <input type="checkbox"/> Population/Housing              | <input checked="" type="checkbox"/> Public Services                    | <input checked="" type="checkbox"/> Recreation                           |
| <input checked="" type="checkbox"/> Transportation       | <input checked="" type="checkbox"/> Tribal Cultural Resources          | <input checked="" type="checkbox"/> Utilities and Service Systems        |
| <input checked="" type="checkbox"/> Wildfire             | <input checked="" type="checkbox"/> Mandatory Findings of Significance |  |

## Determination

(To be completed by the Lead Agency)

On the basis of this initial evaluation:

- ☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.
- ☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.
- ☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.
- ☐ I find that the proposed project MAY have a “potentially significant impact” or “potentially significant unless mitigated” impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.
- ☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier ENVIRONMENTAL IMPACT REPORT or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, nothing further is required.

By City of Santa Barbara

*Allison DeBusk*

07/02/2020

Signature

Date

## Evaluation of Environmental Impacts

1. A brief explanation is required for all answers except “No Impact” answers that are adequately supported by the information sources a lead agency cites in the parentheses following each question. A “No Impact” answer is adequately supported if the referenced information sources show that the impact simply does not apply to projects like the one involved (e.g., the project falls outside a fault rupture zone). A “No Impact” answer should be explained where it is based on project-specific factors as well as general standards (e.g., the project will not expose sensitive receptors to pollutants, based on a project-specific screening analysis).
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and construction as well as operational impacts.
3. Once the lead agency has determined that a particular physical impact may occur, then the checklist answers must indicate whether the impact is potentially significant, less than significant with mitigation, or less than significant. “Potentially Significant Impact” is appropriate if there is substantial evidence that an effect may be significant. If there are one or more “Potentially Significant Impact” entries when the determination is made, an Environmental Impact Report (EIR) is required.
4. “Negative Declaration: Less Than Significant with Mitigation Incorporated” applies where the incorporation of mitigation measures has reduced an effect from “Potentially Significant Impact” to a “Less-Than-Significant Impact.” The lead agency must describe the mitigation measures, and briefly explain how they reduce the effect to a less than significant level (mitigation measures from “Earlier Analyses,” as described in (5) below, may be cross-referenced).

5. Earlier analyses may be used where, pursuant to the tiering, program EIR, or other CEQA process, an effect has been adequately analyzed in an earlier EIR or negative declaration. Section 15063(c)(3)(D). In this case, a brief discussion should identify the following:
  - a. Earlier Analysis Used. Identify and state where they are available for review.
  - b. Impacts Adequately Addressed. Identify which effects from the above checklist were within the scope of and adequately analyzed in an earlier document pursuant to applicable legal standards, and state whether such effects were addressed by mitigation measures based on the earlier analysis.
  - c. Mitigation Measures. For effects that are “Less than Significant with Mitigation Measures Incorporated,” describe the mitigation measures which were incorporated or refined from the earlier document and the extent to which they address site-specific conditions for the project.
6. Lead agencies are encouraged to incorporate into the checklist references to information sources for potential impacts (e.g., general plans, zoning ordinances). Reference to a previously prepared or outside document should, where appropriate, include a reference to the page or pages where the statement is substantiated.
7. Supporting Information Sources: A source list should be attached, and other sources used or individuals contacted should be cited in the discussion.
8. This is only a suggested form, and lead agencies are free to use different formats; however, lead agencies should normally address the questions from this checklist that are relevant to a project’s environmental effects in whatever format is selected.
9. The explanation of each issue should identify:
  - a. The significance criteria or threshold, if any, used to evaluate each question; and
  - b. The mitigation measure identified, if any, to reduce the impact to less than significance.

<b>1. AESTHETICS</b>  Except as provided in Public Resources Code Section 21099* ( <i>CEQA provisions for Transit-Oriented In-Fill Projects</i> ), would the project:	<b>Level of Significance</b>	<b>Analyzed in Prior Document</b>
a) Have a substantial adverse effect on a public scenic vista or a private scenic vista visible to a large portion of the community?	Potentially Significant	
b) Substantially damage scenic resources, including, but not limited to trees, rock outcroppings, and historic buildings within a state scenic highway?	Potentially Significant	
c) Substantially degrade the existing visual character or quality of public views of the site and its surroundings? (Public views are those that are experienced from publicly accessible vantage point.) If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality?	Potentially Significant	
d) Result in substantial grading on steep slopes or permanent substantial changes in topography?	Potentially Significant	
e) Create a new source of substantial light or glare which would adversely affect surrounding areas or important public day or nighttime views in the area?	Less Than Significant	

\* *CEQA Excerpt: CA Public Resources Code Section 21099 “(d)(1) Aesthetic and parking impacts of a residential, mixed-use, or employment center project on an infill site within a transit priority area shall not be considered significant impacts on the environment. (2)(A) This subdivision does not affect, change, or modify the authority of a lead agency to consider aesthetic impacts pursuant to local design review ordinances or other discretionary powers provided by other laws or policies. (B) For the purposes of this subdivision, aesthetic impacts do not include impacts on historical or cultural resources.”*

### **Aesthetics/Visual Resources - Discussion**

**Issues:** Issues associated with visual resources and aesthetics include the potential blockage of important public scenic views, on-site visual aesthetics and compatibility with the surrounding area, and changes in exterior lighting.

**Impact Evaluation Guidelines:** Aesthetic quality, whether a project is visually pleasing or unpleasing, may be perceived and valued differently from one person to the next, and depends in part on the context of the environment in which a project is proposed. The significance of visual changes is assessed qualitatively based on consideration of the proposed physical change and project design within the context of the surrounding visual setting. First, the existing visual setting is reviewed to determine whether important existing visual aesthetics are involved, based on consideration of existing views, existing visual aesthetics on and around the site, and existing lighting conditions. Under CEQA, the evaluation of a project’s potential impacts to scenic views is focused on views from public (as opposed to private) viewpoints and larger community wide views (those things visible by a larger community, as opposed to select individuals). The importance of existing views is assessed qualitatively based on whether important visual resources such as mountains, skyline trees, or the coastline, can be seen, the extent and scenic quality of the views, whether the views are experienced from public viewpoints, and how many people can see the views. The visual changes associated with the project are then assessed qualitatively to determine whether the project would result in *substantial effects* associated with important public scenic views, on-site visual aesthetics, or lighting.



Significant visual resources impacts may potentially result from:

- Substantial obstruction of important public or community wide scenic views.
- Substantial damage to scenic resources within a state scenic highway (Highway 154). Impacts to local scenic roads should also be considered. These include Highway 101; Cabrillo Boulevard between Highway 101 and Castillo Street; Sycamore Canyon Road (144) / Stanwood Drive (192) / Mission Ridge Road (192) / Mountain Drive to the Old Mission on Los Olivos Street, or Shoreline Drive from Castillo Street to the end of Shoreline Park.
- Substantial negative aesthetic effect or incompatibility with surrounding land uses or structures due to project size, massing, scale, density, architecture, signage, or other design features.
- Substantial degradation of important public or community wide scenic views or the visual quality of the site through extensive grading and changes in topography, removal of substantial amounts of vegetation and trees visible from public areas without adequate landscaping; or substantial loss of important public open space.
- Substantial light and/or glare that substantially affects off-site properties, safe travel, or sensitive wildlife, or substantially affects important public views.

### **Aesthetics – Existing Conditions and Project Impacts**

#### **1.a-d) Scenic Views, Scenic Highways, Visual Character and Quality, and Grading and Topography**

**Potentially Significant.** The CWPP proposes certain vegetation management methods including removal, trimming, installation of fuel breaks, and controlled burns that would occur in the proposed HFHSZ and VHFHSZ (currently referred to as Extreme Foothill, Foothill, Coastal, and Coastal Interior). These areas, especially on the higher foothill areas of the City, would be visible from scenic vistas in the City and from several local scenic roads. Vegetation management may also impact the visual character of an area due to the reduction of vegetation cover necessary to meet defensible space requirements. Grading to establish fuel breaks may also create a temporary alteration in the visual setting and potentially damage trees or rock outcroppings, which could be visible from scenic vistas. Additionally, future communication infrastructure maintenance activities could be visible from a scenic highway or a scenic view. This issue will be analyzed further in the PEIR for the CWPP.

#### **1.e) Lighting and Glare**

**Less Than Significant.** Activities that would be performed under the proposed CWPP could potentially require lighting. However, the CWPP includes proposed BMPs that would limit activities to the hours of 7:00 a.m. to 5:00 p.m. for routine activity. Substantial long-term lighting would not be required for routine activity. Emergency or immediate need activities, such as during a red flag event, that could require lighting would not be subject to the same restriction and may occur rarely. As such, this issue will not be further analyzed in the PEIR.

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

### 2.a) Prime Farmland

**No Impact.** The proposed CWPP would not convert farmland to nonagricultural use. Wildfire management activities would not impede the agriculture use of any properties. Furthermore, irrigated agricultural land often forms a natural fuel break that may provide some beneficial effects during a wildfire. This issue will not be analyzed further in the PEIR.

### 2.b-c) Conflict with Zoning or Williamson Act or Forest Land or Timberland Production

**Less Than Significant.** The CWPP includes the jurisdictional limits of the City, with the exception of the Santa Barbara Airport. The City's General Plan and Coastal Land Use Plan does not include agriculturally designated and zoned property. The Williamson Act, also known as the California Land Conversion Act of 1969 (California Government Code, Section 51200 et seq.), preserves agricultural and open space lands from the conversion to urban land uses by establishing a contract between local governments and private landowners to voluntarily restrict their land holdings to agricultural or open space use. The CWPP does not include lands with Williamson Act contracts. No land within the City is zoned as forest land, timberland, or timberland zoned as timberland production, according to the City's General Plan and Coastal Land Use Plan. Wildfire management activities would not impede or conflict with the agricultural use of any properties. These issues will not be analyzed further in the PEIR.

### 2.d-e) Loss of Forest Land or Change in the Existing Environment

**Less Than Significant.** The City is bordered by the Los Padres National Forest to the north of the City limits. Certain wildfire management activities, such as fuel breaks within the CFTN, could require grading and vegetation removal on forest land. The CFTN occupies approximately 242 acres that are maintained based on the priorities of the SBFD and the adjacent fire management agencies. The use of the land for fire management purposes, including communication facility maintenance, would remain consistent with current activities performed under the 2004 Wildland Fire Plan and associated PEIR. The CFTN activities would not remove the land from the forest or preclude the public from accessing the area. As such, there would be not conversion of land to non-forest use. These issues will not be analyzed further in the PEIR.

<b>3. AIR QUALITY AND GREENHOUSE GAS EMISSIONS</b> Would the project:	<b>Level of Significance</b>	Analyzed in Prior Document
a) Conflict with or obstruct implementation of the applicable air quality plan?	Potentially Significant	
b) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is designated in non-attainment under an applicable federal or state ambient air quality standard?	Potentially Significant	
c) Expose sensitive receptors to substantial pollutants?	Potentially Significant	
d) Result in other emissions such as those leading to odors adversely affecting a substantial number of people?	Potentially Significant	
e) Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?	Potentially Significant	
f) Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases?	Potentially Significant	

### **Air Quality - Discussion**

**Issues.** Air quality issues involve pollutant emissions from vehicle exhaust, stationary sources (e.g. gas stations, boilers, diesel generators, dry cleaners, oil and gas processing facilities, etc.), and minor stationary sources called “area sources” (e.g. residential heating and cooling, fireplaces, etc.) that contribute to smog, particulates, nuisance dust associated with grading and construction processes, and nuisance odors. Stationary sources of air emissions are of particular concern to sensitive receptors, as is construction dust and particulate matter. Sensitive receptors include children, elderly, or ill people that can be more adversely affected by air quality emissions. Land uses typically associated with sensitive receptors include schools, parks, playgrounds, childcare centers, retirement homes, convalescent homes, hospitals, and clinics.

Smog, or ozone, is formed in the atmosphere through a series of photochemical reactions involving interaction of oxides of nitrogen [NO<sub>x</sub>] and reactive organic compounds [ROC] (referred to as ozone precursors) with sunlight over a period of several hours. Primary sources of ozone precursors in the South Coast area are vehicle emissions. Sources of particulate matter (PM<sub>10</sub> and PM<sub>2.5</sub>) include demolition, grading, road dust, agricultural tilling, mineral quarries, and vehicle diesel exhaust.

The City of Santa Barbara is part of the South Coast Air Basin (Santa Barbara County area). The City is subject to the National Ambient Air Quality Standards and the California Ambient Air Quality Standards (CAAQS). The CAAQS apply to six pollutants: photochemical ozone, carbon monoxide, sulfur dioxide, nitrogen dioxide, particulate matter (PM), and lead. The Santa Barbara County Air Pollution Control District (APCD) provides oversight on compliance with air quality standards and preparation of the County clean air plan, the Ozone Plan (2019). The APCD uses the term clean air plan to describe the strategic plans that the APCD is required to prepare. The goal of the clean air plan is to reduce air pollution so that the air in the county meets the state and federal health standards. Santa Barbara County is in compliance with all standards as of July 1, 2020 except for PM<sub>10</sub>, particulate matter less than 10 micrometers or less in diameter (SPCAPCD 2020)

Global climate change refers to accelerated changes occurring in average worldwide weather patterns, measurable by factors such as air and ocean temperatures, wind patterns, storms, and precipitation. Climate changes are forecasted to result in increasingly serious effects to human health and safety and the natural environment now and in coming decades, such as from more extreme weather, sea level rise effects on flooding and coastal erosion, frequency and severity of wildfires, precipitation variability, drought, and impacts on air and water quality, habitats and wildlife, and agriculture.

California is a substantial contributor of greenhouse gas (GHG) emissions; as of the 2017 inventory, transportation and industrial uses (e.g., landfills, manufacturing, oil and gas) represented the largest sources (41% and 24%, respectively) (CARB 2020). In Santa Barbara, direct sources of greenhouse gas emissions are on-road vehicles, natural gas consumption,

and off-road vehicles and equipment. Indirect sources (emissions removed in location or time) are electricity consumption (power generation), landfill decomposition (methane releases), and State Water Project transport (electricity use).

California Assembly Bill 32 (2006 Global Warming Solutions Act) required CARB to create a program to reduce statewide GHG emissions to 1990 levels by the year 2020. Senate Bill 375 (2008 Sustainable Communities and Climate Protection Act) required regional coordination of transportation and land use planning throughout the State to reduce vehicle GHG emissions. CARB established targets for Santa Barbara County to not exceed 2005 per capita vehicle emissions in the years 2020 and 2035. State Senate Bill 97 (enacted in 2007 and amended in 2010) required that project environmental reviews include analysis of greenhouse gas impacts and mitigation, and established that public agencies may provide for a communitywide greenhouse gas emissions mitigation program through an adopted climate action plan.

The City of Santa Barbara Climate Action Plan (CAP) was adopted in September 2012. Past, present, and forecasted future citywide GHG emissions were analyzed in the CAP and associated *Addendum to the 2010 Final Program EIR for the General Plan Update* in comparison to the then State and City GHG emissions targets (2020 total GHG emissions at 1990 level; 2020 and 2035 per capita vehicle emissions at 2005 level). The analysis demonstrated that citywide emissions are decreasing. With continued implementation of State legislation and City programmatic and private sector efforts, citywide GHG emissions associated with growth under the General Plan and Coastal Land Use Plan are expected to meet these State and City emissions reduction targets. Implementation of additional CAP measures would further reduce citywide emissions.

The City CAP constitutes a citywide mitigation program for GHG in accordance with SB 97 for existing and forecasted future growth to the year 2030 under the adopted General Plan. In 2015, new statewide targets of 40 percent below 1990 levels by 2030 were adopted, as well as new regional per capita vehicle reduction targets of 13 percent below 2005 levels in 2020 and 17 percent below in 2035. The City plans to update the CAP to reflect these new State and City targets.

**Impact Evaluation Guidelines:** A project may create a significant air quality impact associated with criteria air pollutants from the following:

- Exceeding an APCD pollutant threshold; inconsistency with District regulations; or exceeding population forecasts in the adopted County Ozone Plan 2019.
- Exposing sensitive receptors, such as children, elderly or ill, to substantial pollutant concentrations.
- Substantial unmitigated nuisance dust during earthwork or construction operations.
- Creation of nuisance odors inconsistent with APCD regulations.

Long-Term (Operational) Impact Guidelines: The City of Santa Barbara uses the APCD thresholds of significance for evaluating air quality impacts. The APCD has determined that a proposed project will not have a significant air quality impact on the environment if operation of the project will:

- Emit (from all project sources, both stationary and mobile) less than 240 pounds per day for ROC and NO<sub>x</sub>, and 80 pounds per day for PM<sub>10</sub>;
- Emit less than 25 pounds per day of ROC or NO<sub>x</sub> from motor vehicle trips only;
- Not cause a violation of any California or National Ambient Air Quality Standard (except ozone);
- Not exceed the APCD health risks public notification thresholds adopted by the APCD Board; and
- Be consistent with the adopted federal and state air quality plans for Santa Barbara.

Substantial long-term project emissions could potentially stem from stationary sources which may require permits from the APCD and from motor vehicles associated with the project and from mobile sources. Examples of stationary emission sources that require permits from APCD include gas stations, auto body shops, diesel generators, boilers and large water heaters, dry cleaners, oil and gas production and processing facilities, and wastewater treatment facilities.

Short-Term (Construction) Impacts Guidelines: Projects involving grading, paving, construction, and landscaping activities may cause localized nuisance dust impacts and increased particulate matter (PM<sub>10</sub>). Dust-related impacts are considered mitigable and less than significant with the application of standard dust control mitigation measures pursuant to APCD recommendations and City ordinance provisions (SBMC 22.04.020), such as dampening graded areas and soil stockpiles. Exhaust from construction equipment also contributes to air pollution.

Quantitative thresholds of significance are not currently in place for short-term or construction emissions for non-stationary sources because cumulative basin-wide effects are not identified as significant. However, APCD uses a criterion for stationary sources, which is also considered a guideline for evaluating impacts of construction emissions for non-stationary source projects. The criterion states that a project's combined emissions from all construction equipment not exceed 25 tons of any pollutant except carbon monoxide within a 12-month period. Standard equipment exhaust mitigation measures are recommended by APCD to be applied to projects.

**Cumulative Impacts:** If the project-specific impact exceeds the ozone precursor significance threshold, it is also considered to have a considerable contribution to cumulative impacts. If a project would exceed the Clean Air Plan growth projections, then the project's impact may also be considered for whether it represents a considerable contribution to cumulative air quality impacts. The Santa Barbara County Association of Governments and Air Resources Board on-road emissions forecasts are used as a basis for vehicle emission forecasting. If a project provides for increased population growth beyond that forecasted in the most recently adopted Clean Air Plan, or if the project does not incorporate appropriate air quality mitigation and control measures, or is inconsistent with APCD rules and regulations, then the project may be found inconsistent with the Clean Air Plan and may constitute a significant impact on air quality.

**Global Climate Change:** In accordance with Appendix G of the CEQA Guidelines, a project may have a significant impact related to global climate change if it would generate substantial greenhouse gas emissions either directly or indirectly, or would conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emission of greenhouse gases.

Based on the analysis within the City Climate Action Plan and the General Plan Program EIR Addendum, projects within the growth assumptions of the 2030 General Plan and that meet applicable City regulations for greenhouse gas emission reductions:

- (1) Would be consistent with the City Climate Action Plan and associated policies and regulations for reducing greenhouse gas emissions;
- (2) Would be within the citywide greenhouse gas impact assessment in the Climate Action Plan and associated General Plan Program EIR Addendum, which found that total citywide greenhouse gas emissions and per capita vehicle emissions would meet State and City reduction targets and would not constitute a significant environmental impact; and
- (3) Would be within the City Council Climate Action Plan adoption finding that no significant greenhouse gas impacts would result from General Plan build out of the City to 2030.

## **Air Quality – Existing Conditions and Project Impacts**

### **3.a) Clean Air Plan**

**Potentially Significant.** The SBCAPCD and the Santa Barbara County Association of Governments (SBCAG) are responsible for developing and implementing the Clean Air Plan (SBCAPCD and SBCAG 2015) for attainment and maintenance of the ambient air quality standards in the South Coast Air Basin. Activities contemplated in the CWPP could have the potential to conflict with or obstruct the implementation of the local air quality plan because emissions from controlled burns, operation of mechanized equipment and vehicle transit related to the CWPP could cause an exceedance of a standard. Further analysis is required to assess the proposed CWPP's impact to air quality plans. This issue will be further analyzed in the PEIR.

### **3.b-d) Air Pollutant Emissions, Sensitive Receptors, and Cumulative Impacts**

**Potentially Significant.** Implementation of the proposed CWPP would involve activities using mechanized equipment (such as vegetation management) and vehicle use that would generate both short-term and long-term criteria pollutants and other emissions. These emissions may occur in proximity to sensitive receptors such as residences or schools. Further air quality analysis is required to determine whether the CWPP could potentially result in any adverse effects to air quality on sensitive receptors related to air pollutant emissions and cumulative impacts. This issue will be further analyzed in the PEIR.

### **3.e) Odors**

**Potentially Significant.** Although the SBCAPCD has not adopted quantitative thresholds of significance for odor impacts, SBCAPCD recommends the development of an odor abatement plan for development that may generate nuisance odors that may affect a substantial number of people. For example, potential sources that may emit odors during vegetation management include diesel equipment, gasoline fumes, and sawdust. As such, implementation of the proposed CWPP could result in potentially significant impacts. Further analysis is required to determine the proposed CWPP's impact related to odors onto the environment. This issue will be further analyzed in the PEIR.

### **3.f-g) Greenhouse Gases**

***Potentially Significant.*** Sources of direct carbon dioxide and other GHG emissions that could result from CWPP implementation include vegetation management-related traffic, release of emissions through controlled burns, natural gas use, and landscaping/maintenance equipment. Indirect emissions are associated with power generation for electricity consumption; electricity and travel associated with consumer product production, transport, and use; solid waste disposal/decomposition; and potable water delivery. Implementation of the CWPP could therefore result in the potential exceedances of standards within an adopted air quality and GHG plan. As such, the CWPP could result in potentially significant impacts into the environment. Further GHG analysis is required to determine whether implementation of the CWPP could potentially result in any adverse effects related to GHGs. Therefore, these issues will be analyzed in the PEIR.

<b>4. BIOLOGICAL RESOURCES</b> Would the project:	<b>Level of Significance</b>	Analyzed in Prior Document
a) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Potentially Significant	
b) 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?	Potentially Significant	
c) Conflict with the provisions of an adopted Habitat Conservation plan, Natural Community Conservation plan, or other approved local, regional, or state habitat conservation plan?	Potentially Significant	
d) Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	Potentially Significant	
e) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Wildlife or U.S. Fish and Wildlife Service?	Potentially Significant	
f) 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?	Potentially Significant	

### **Biological Resources - Discussion**

**Issues:** Biological resources issues involve the potential for a project to substantially affect biologically-important natural vegetation and wildlife, particularly species that are protected as rare, threatened, or endangered by federal or state wildlife agencies, and their habitats.

**Impact Evaluation Guidelines:** Existing native wildlife and vegetation on a project site are assessed to identify whether they constitute important biological resources, based on the types, amounts, and quality of the resources within the context of the larger ecological community. If important or sensitive biological resources exist, project effects on the resources are qualitatively evaluated to determine whether the project would substantially affect these important biological resources. Significant biological resource impacts may potentially result from substantial disturbance to important wildlife and vegetation in the following ways:

- Elimination, substantial reduction or disruption of important natural vegetative communities, wildlife habitat, migration corridors, or habitats supporting sensitive species such as oak woodland, coastal strand, riparian, and wetlands.
- Substantial effect on a protected plant or animal species listed or otherwise identified or protected as endangered, threatened or rare.
- Substantial loss or damage to biologically important native trees such as oak or sycamore trees (note that, if applicable, historic or landmark trees are discussed in Section 5. Cultural Resources, and other trees are discussed in Section 1. Aesthetics/Visual Resources).

## **Biological Resources – Existing Conditions and Project Impacts**

### **4.a) Riparian Habitats**

**Potentially Significant.** Proposed activities associated with the implementation of the CWPP could have the potential to impact riparian habitat or other sensitive natural communities. For example, vegetation management within the vicinity of a creek could reduce the quality of the riparian habitat by removing vegetation that is essential to providing suitable habitats for existing species. As such, the CWPP could result in a potentially significant impact on riparian habitats or other sensitive natural communities. Certain BMPs have been incorporated into the CWPP to reduce potential effects to biological resources. Further analysis is required to determine the proposed CWPP's impact related to riparian and other sensitive communities. This issue will be discussed further in the PEIR.

### **4.b) Protected Wetlands**

**Potentially Significant.** Within the City of Santa Barbara, wetlands are found with the City's Coastal Zone as creekside wetlands, ponds, lagoons, and estuaries (City of Santa Barbara 2019). Under the proposed CWPP, vegetation management activities could occur along wetlands, which could adversely impact riparian habitats due to vegetation thinning and vegetation modification activities. As such, the CWPP could have a potentially significant impact related to protected wetlands, and this issue will be discussed further in the PEIR.

### **4.c) Conservation Plans**

**No Impact.** The CWPP site is not located within the boundaries of a habitat conservation plan or a natural communities conservation plan area (CDFW 2019). The City is not a part of other local, regional, or state habitat conservation plans. As such, there would be no impact. This issue will not be analyzed further in the PEIR.

### **4.d) Trees and Local Ordinances**

**Potentially Significant.** The City of Santa Barbara's General Plan and Coastal Land Use Plan identifies policies, development standards, and guidelines related to biological resources such as tree preservation. The CWPP's development would include vegetation management practices, which could conflict with local policies and ordinances protecting biological resources, including the protection of certain trees. Additionally, future communication facility maintenance may require trimming tree branches or removal to eliminate risk to or operational constraints of the equipment. As such, the CWPP could have a potentially significant impact related to trees and local ordinances. This issue will be discussed further in the PEIR.

### **4.e) Endangered, Threatened, or Rare Species**

**Potentially Significant.** The proposed CWPP would include vegetation management as part of its wildfire prevention strategy. Vegetation management would have the potential to impact sensitive habitats. Further analysis is required to determine the potential for direct impacts or indirect impacts from habitat modifications on any species identified as a candidate, sensitive, or special status.

Because of the diversity of biotic communities in the City, many different rare, endangered, and threatened animal species exist. The protection of these plants and animals is required by law and is essential to biological diversity. Like biotic communities, these plants and animals are threatened by wildfire. The following rare, endangered, or threatened wildlife species are present in the City and may be adversely affected by the proposed CWPP:

- American peregrine falcon (*Falco peregrinus anatum*)
- southern bald eagle (*Haliaeetus leucocephalus leucocephalus*)
- California brown pelican (*Pelecanus occidentalis californicus*)
- California least tern (*Sterna albifrons browni*)
- light-footed clapper rail (*Rallus longirostris levipes*)
- Belding's savannah sparrow (*Passerculus sandwichensis beldingi*)
- black rail (*Laterallus jamaicensis coturniculus*)
- monarch butterfly (*Danaus plexippus*)
- white-tailed kite (*Elanus leucurus*)
- western snowy plover (*Charadrius alexandrinus nivosus*)
- California gnatcatcher (*Polioptila californica*)
- California grunion (*Leuresthes tenuis*)



- southern steelhead trout (*Oncorhynchus mykiss*)
- tidewater goby (*Eucyclogobius newberryi*)
- southwestern pond turtle (*Clemmys marmorata*)
- California least tern and bank swallow (*Riparia riparia*)
- silvery legless lizard (*Anniella pulchra pulchra*)
- California red-legged frog (*Rana draytonii*)
- big free-tailed bat (*Nyctinomops macrotis*)
- gray whale (*Eschrichtius robustus*)
- ring-tailed cat (*Bassariscus astutus*)
- short-eared owl (*Asio flammeus*)
- sharp-shinned hawk (*Accipiter striatus*)
- burrowing owl (*Athene cunicularia*)
- bank swallow (*Riparia riparia*)
- California black rail (*Laterallus jamaicensis*)

The following rare and endangered plant species are present in the City and may be adversely affected by wildfire:

- saltmarsh bird's beak (*Cordylanthus maritimus* spp. *Maritimus*)
- yellow dicentra (*Dicentra ochroleuca*)
- pholisma (*Pholisma arenarium*)
- Hoffman's sanicle (*Sanicula hoffmannii*)
- Contra Costa bueria (*Lasthenia conjugens*)
- purple needlegrass (*Nassella pulchra*)
- cliff aster (*Malacothrix saxatilis*)
- Davidson's saltscale (*Atriplex serenana* var. *davidsonii*)
- black-flowered figwort (*Scrophularia atrata*)
- Coulter's saltbush (*Atriplex coulteri*)
- Davidson's saltscale (*Atriplex serenana* var. *davidsonii*)
- Nuttall's scrub oak (*Quercus dumosa*)
- mesa horkelia (*Horkelia cuneata* ssp. *puberula*)
- Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*)
- Catalina mariposa lily (*Calochortus catalinae*)
- Coulter's goldfields (*Lasthenia glabrata* ssp. *coulteri*)
- Hoffmann's bitter gooseberry (*Ribes amarum* var. *hoffmannii*)
- island morning glory (*Calystegia macrostegia* ssp. *amplissima*)
- southern tarplant (*Centromadia parryi* ssp. *australis*)
- white-flowered sticky phacelia (*Phacelia viscida* var. *albiflora*)

Additional biological resource analysis in the PEIR may identify other species potentially affected. As such, the proposed CWPP could have a potentially significant impact that will be discussed further in the PEIR.

#### 4.f) Wildlife Dispersal and Migration Corridors

**Potentially Significant.** Within the City of Santa Barbara, wildlife corridor and habitat linkage, namely linear or patchy habitat connecting adjacent larger patches of habitat, occur in the form of chaparral, oak woodlands, and riparian areas. The CWPP includes fuel reduction activities in undeveloped areas where wildlife corridors may occur, which could potentially adversely affect potential existing wildlife corridors. Further analysis is required to determine the potential impacts associated with the interference with the movement of wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites. As such, the implementation of the CWPP could result in potentially significant impacts that will be discussed further in the PEIR.

<b>5. CULTURAL RESOURCES</b>  Would the project:	<b>Level of Significance</b>	Analyzed in Prior Document
a) Cause a substantial adverse change in the significance of a historical resource pursuant to CEQA Section 15064.5?	Potentially Significant	
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to CEQA Section 15064.5?	Potentially Significant	
c) Disturb any human remains, including those interred outside of formal cemeteries?	Potentially Significant	

### **Cultural Resources - Discussion**

**Issues:** Archaeological resources are subsurface deposits dating from Prehistoric or Historical time periods. Native American culture appeared along the channel coast over 10,000 years ago, and numerous villages of the Barbareno Chumash flourished in coastal plains now encompassed by the City. Spanish exploration and eventual settlements in Santa Barbara occurred in the 1500's through 1700's. In the mid-1800's, the City began its transition from Mexican village to American city, and in the late 1800's through early 1900's experienced intensive urbanization. Tribal Cultural Resources are discussed in Section 17. Historic resources are above-ground structures and sites from historical time periods with historic, architectural, or other cultural importance. The City's built environment has a rich cultural heritage with a variety of architectural styles, including the Spanish Colonial Revival style emphasized in the rebuilding of Santa Barbara's downtown following a destructive 1925 earthquake. Paleontological resources refers to the fossilized remains of animal or plant organisms and are discussed in Section 7, Geology and Soils.

**Impact Evaluation Guidelines:** Archaeological, historical, paleontological, and tribal cultural impacts are evaluated qualitatively by archeologists, historians, paleontologists, and tribal representatives. First, existing conditions on a site are assessed to identify whether important or unique resources exist, based on criteria specified in the *CEQA Guidelines* and City Master Environmental Assessment *Guidelines for Archaeological Resources and Historical Structures and Sites*, summarized as follows:

- Contains information needed to answer important scientific research questions and there exists a demonstrable public interest in that information.
- Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- Is directly associated with an important prehistoric or historic event or person.
- Constitutes a tribal cultural resource based on statutory criteria.

If important resources exist on the site, project changes are evaluated to determine whether they would substantially affect these important resources.

### **Cultural Resources – Existing Conditions and Project Impacts**

#### **5.a-b) Historic Resources and Cultural Resources**

**Potentially Significant.** The CWPP would involve the implementation of activities such as vegetation management across various areas throughout the City. Additionally, communication facilities may require maintenance such as replacement of support poles. Typically, a significant impact to historical resources would occur as a result of physical adverse changes to a historic-age structure (i.e., 45 years or older), such as demolition. Archeological resources may be found throughout the project area during CWPP implementation. For example, vegetation management activities associated with the CWPP could inadvertently discover unknown archaeological sites and thereby adversely impact the resources. There are known cultural and historic resources within the High Fire Hazard Zones, as shown in Table 11.

<b>Table 11. Cultural and Historic Resources, by High Fire Hazard Zone</b>		
<b>Resource</b>	<b>Zone – Existing</b>	<b>Zone - Proposed</b>
Carl Oscar Borg House	Coastal Interior	HFHSZ
Hunt-Stambach House	Coastal Interior	HFHSZ
Bernhard and Irene Hoffman Residence	Foothill	VHFHSZ
Birss-Campbell Residence	Foothill	VHFHSZ
Cobb Residence	Foothill	VHFHSZ
D’Alfonso House	Foothill	VHFHSZ
Ebbets Hall	Foothill	VHFHSZ
El Encanto Hotel Historic District	Foothill	VHFHSZ
Franceschi Residence	Foothill	VHFHSZ
Frederick H, Booth House	Foothill	VHFHSZ
Furse Hall	Foothill	VHFHSZ
Grand Staircase/Quadrangle Building	Foothill	VHFHSZ
Jack’s Trough (aka Courtney Fountain)	Foothill	VHFHSZ
MacKellar Court	Foothill	VHFHSZ
Mission Historical Park	Foothill	VHFHSZ
Mission Santa Barbara	Foothill	VHFHSZ
Mont Joie Residence	Foothill	VHFHSZ
Oliver-Mistretta Residence	Foothill	VHFHSZ
Peter Grant House	Foothill	VHFHSZ
Riviera Campus Historic District	Foothill	VHFHSZ
Riviera Streetcar Shelter	Foothill	VHFHSZ
Santa Barbara Museum of Natural History	Foothill	VHFHSZ
Sipress House	Foothill	VHFHSZ
St. Anthony’s Seminary and Grounds	Foothill	VHFHSZ
Stark House	Foothill	VHFHSZ

**Notes:** HFHSZ = High Fire Hazard Severity Zone; VHFHSZ = Very High Fire Hazard Severity Zone

Further analysis is required to determine the potential impacts to historical resources within the CWPP Planning Area. As such, the CWPP could result in a potentially significant impact. These issues will be further analyzed in the PEIR.

### 5.c) Human Remains

**Potentially Significant.** Although it is not anticipated that implementation of the CWPP would result in the distribution of intact subsurface human remains, activities associated with the CWPP could result in ground-disturbing activities such that could result in potentially significant impacts. Further analysis is required to determine the potential impacts related to human remains. Potentially significant impacts could occur as a result of implementation of the CWPP, and this issue will be discussed further in the PEIR.

<b>6. Energy</b> Would the project:	<b>Level of Significance</b>	<b>Analyzed in Prior Document</b>
a) Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation?	Less Than Significant	
b) Conflict with or obstruct a state or local plan for renewable energy or energy efficiency	Less Than Significant	

### **Energy - Discussion**

**Issues:** Production and use of energy may cause environmental impacts through extraction practices, land use, biological impacts (e.g., bird strike) and other areas.

**Impact Evaluation Guidelines:** If analysis of the project's energy use reveals that the project may result in significant environmental effects due to wasteful, inefficient, or unnecessary use of energy, or wasteful use of energy resources, the EIR shall mitigate that energy use. This analysis should include the project's energy use for all project phases and components, including transportation-related energy, during construction and operation. In addition to building code compliance, other relevant considerations may include, among others, the project's size, location, orientation, equipment use and any renewable energy features that could be incorporated into the project. This analysis is subject to the rule of reason and shall focus on energy use that is caused by the project. This analysis may be included in related analyses of air quality, greenhouse gas emissions, transportation or utilities in the discretion of the lead agency.

### **Energy – Existing Conditions and Project Impacts**

#### **6.a) Energy Use**

**Less Than Significant.** The proposed CWPP would implement certain methods to mitigate fire risk within the City. Such methods largely relate to vegetation management. Most vegetation management techniques would require the use of hand tools, requiring little to no consumption of energy resources. For larger tasks, such as establishing fuel breaks, some mechanized equipment may be necessary. However, the overall benefit of the wildland fire management would reduce fuel loads and minimize the risk of wildfire. Wildfires can also contribute to GHG emissions. The state's major study on climate impacts, the Fourth Climate Assessment (Bedsworth et al. 2018), projects that California's wildfire burn area is likely to increase by 77% by the end of the century. As identified in Governor Newsom's Strike Force report (State of California 2019), the growing risk of catastrophic wildfires has created an imperative for the state to act urgently and swiftly to expand fire prevention efforts. City of Santa Barbara Climate Action Plan (City of Santa Barbara 2012) acknowledges the need to address fire prevention as a component of addressing climate change. Impacts would be less than significant, and this topic will not be analyzed further in the PEIR.

#### **6.b) Conflict with Plan for Renewable Energy or Energy Efficiency**

**No Impact.** As noted above, the proposed CWPP would support the goals and policies of the City's Climate Action Plan. The methods identified within the CWPP would not conflict with the installation of use of renewable energy or impede energy efficiency measures. Home hardening measures contained within the CWPP may in fact benefit property owners by providing greater resiliency and reducing heating and cooling costs through improved roofing materials and windows with greater heat reduction. Impacts would be less than significant, and this topic will not be analyzed further in the PEIR.

<b>7. GEOLOGY AND SOILS</b>  Would the project:	<b>Level of Significance</b>	<b>Analyzed in Prior Document</b>
a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving:  i) Rupture of a known earthquake fault as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42)  ii) Strong seismic ground shaking?  iii) Seismic-related ground failure, including liquefaction  iv) Landslides	Potentially Significant	
b) Result in substantial soil erosion or the loss of topsoil?	Potentially Significant	
c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on or off-site landslide, lateral spreading, subsidence, liquefaction or collapse?	Potentially Significant	
d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property	Potentially Significant	
e) Have soils incapable of adequately supporting the use of septic tanks or alternative waste water disposal systems where sewers are not available for the disposal of waste water?	No Impact	
f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	Less Than Significant	

### **Geology and Soils - Discussion**

**Issues:** Geophysical impacts involve geologic and soil conditions, and their potential to create physical hazards affecting persons or property; or substantial changes to the physical condition of the site. Included are earthquake-related conditions such as fault rupture, groundshaking, liquefaction (a condition in which saturated soil loses shear strength during earthquake shaking), or seismic waves; unstable soil or slope conditions, such as landslides, subsidence (the downward shifting of the Earth's surface; can result in sinkholes), expansive or compressible/collapsible soils, or erosion; and extensive grading or topographic changes.

**Impact Evaluation Guidelines:** Potentially significant geophysical impacts may result from:

- Exposure of people or structures to risk of loss, injury, or death involving unstable earth conditions due to: seismic conditions (such as earthquake faulting, groundshaking, liquefaction, or seismic waves); landslides; sea cliff retreat; or expansive soils.
- Exposure to or creation of unstable earth conditions due to geologic or soil conditions, such as landslides, settlement, or expansive, collapsible/compressible, or expansive soils.

- Substantial erosion of soils.
- Placement of a septic system in an area with soils not capable of adequately supporting disposal of waste water or where waste water could potentially cause unstable conditions or water quality problems.

## **Geology and Soils – Existing Conditions and Project Impacts**

### **7.a) Seismic Geologic Hazards**

#### **Fault Rupture:**

**No Impact.** Surface fault rupture occurs when movement on a fault breaks through the surface. Ground surface fault rupture may also accompany fault creep or natural or man-induced subsidence. Fault rupture can cause structural damage and safety risks on and near the rupture. The City is located within a seismically active area with local faults known to be present, including the Mission Ridge, More Ranch, Mesa, Lagoon, Lavigia, and Rocky Nook Faults (City of Santa Barbara 2013). However, implementation of the CWPP would not result in construction of new structures or buildings. The CWPP would result in implementation of fire prevention measures primarily targeting vegetation management. As such, no impacts would occur with respect to fault rupture, and this issue will not be analyzed further in the PEIR.

#### **Ground Shaking and Liquefaction:**

**Less Than Significant.** Liquefaction is the process by which water-saturated sediment temporarily loses strength and acts as a fluid. Liquefaction potential in the City is largely concentrated in the lower topographic areas in the downtown corridor, Westside, and Lower Eastside, coincident with Laguna Creek, Mission Creek, and drainages from the foothills (City of Santa Barbara 2013, 2020; UCSB 1928). The areas of the City mapped with “moderate” or “high” liquefaction potential are generally not within the High Fire Hazard Area. Furthermore, the CWPP does not propose construction of new buildings or structures that could be affected by ground shaking and liquefaction. The CWPP would result in implementation of fire prevention measures primarily targeting vegetation management. As such, no impacts would occur with respect to ground shaking and liquefaction, and this issue will not be analyzed further in the PEIR.

#### **Landslides/Sea Cliff Failure:**

**Potentially Significant.** Landslides occur on unstable ground when the weight of the material that comprises the slope and the weight of objects placed on the slope exceeds the strength of the slope material. The down-slope movement of earth material is part of the continuous and natural process of erosion; however, the stability of a slope can be adversely affected by a wide variety of factors, including adding water to a slope and the loss of vegetation. Vegetation roots can act as a net along slopes, stabilizing the underlying soils.

The CWPP covers areas within the City of varying slope steepness. The removal of vegetation, although primarily surficial, could potentially compromise the stability of the slope on a vulnerable hillside. The City GIS database denotes certain areas within the City, primarily near Campanil Hill and along Cliff Drive, with documented slope movement (City of Santa Barbara 2020a). As such, vegetation management could result in a potentially significant impact related to landslides, and further analysis is required in the PEIR.

### **7.b - d) Erosion, Geologic or Soil Instability**

The CWPP would result in wildfire management methods that could result in the removal or disturbance of ground cover vegetation that provides soil stability as well as the use of mechanized equipment to establish fuel breaks.

**Potentially Significant.** The City of Santa Barbara lies on the coastal plain and lower foothills of the Santa Ynez Mountains. The Santa Ynez Mountains, foothills, and alluvial plains are composed of sedimentary rocks that are highly erodible (City of Santa Barbara 2004). Wind and water soil erosion in the foothills of Santa Barbara is a natural process. The natural rate of erosion is moderated by native vegetation due to several characteristics. For example, canopy cover by trees and shrubs intercepts rainfall, reducing the volume and velocity of rainfall reaching the ground surface. Plant roots are also effective in reducing water erosion because roots secure the soil with millions of fine roots, and also create favorable conditions for percolation of low rainfall events. Plant litter and grass or herb cover also reduce erosion by intercepting rainfall. Plant cover and litter also inhibit the formation of gullies that can form during heavy rainfall events, causing localized erosion (City of Santa Barbara 2004).

The CWPP would implement vegetation management actions in which vegetation would be removed or reduced in order to reduce or eliminate the potential for wildfires. Communication facilities may also require maintenance such as pole replacement.

The reduction in vegetation in the vegetation management areas could increase the potential for erosion from rainfall and overland flow because there would be a net decrease in the canopy coverage, plant density, deadwood and heavy plant litter, and overall plant biomass. While individual vegetation management actions on individual units may not cause a significant erosion problem, there is a potential for the cumulative effects of vegetation management on all units to increase the overall erosion rates of these treated areas (City of Santa Barbara 2004). As such, implementation of the CWPP could result in a substantial increase in soil erosion and associated potentially significant impacts. This issue will be further analyzed in the PEIR.

#### Lateral Spreading, Subsidence, and Collapse:

**Less Than Significant.** Lateral spreading refers to lateral soil movement on an unsupported slope, due to liquefaction. As previously discussed, areas of the City mapped with “moderate” or “high” liquefaction potential are generally not within the High Fire Hazard Area. Implementation of the CWPP does not include the construction of new structures or buildings that could be susceptible to lateral spreading or soil collapse. The activities proposed in the CWPP would be primarily targeting vegetation management above the ground surface, leaving the soil structure largely intact. As such, no impacts would occur with respect to lateral spreading and collapse, and this issue will not be analyzed further in the PEIR.

Subsidence occurs when a large portion of land is vertically displaced, usually due to the withdrawal of groundwater, oil, or natural gas, or as a result of decomposition of natural organic materials. Soils that are particularly subject to subsidence include those with high silt or clay content and/or high organic content. It is unlikely that implementation of the CWPP would result in withdrawal of large quantities of groundwater beneath the City (i.e., enough to cause ground subsidence). As previously discussed in the Project Description, the Public Works Department has developed an extensive water distribution system that consists of many components including reservoirs, pump stations, pressure zones, water mains, and fire hydrants. As indicated in Section 14, Public Services and Utilities, vegetation management practices would indirectly lower the demand for water supply facilities as the amount of water needed to fight wildland fires, and the frequency and intensity of wildfires is anticipated to be reduced.

#### Expansive Soils:

**Less Than Significant.** Expansive soil conditions, as defined in Section 1803.5.2 of the 2019 California Building Code (supersedes Table 18-1-B of the Uniform Building Code), occur where alluvial soils such as clay and silt underlie surface soils. Expansive soils tend to swell with seasonal increases in soil moisture in the winter months and subsequently shrink as soils become drier in the summer months. The City of Santa Barbara is underlain by soils that could contain clay minerals susceptible to soil expansion (City of Santa Barbara 2013). Additionally, the City GIS database reflects that a significant portion of the City is susceptible to “moderate” or “high” potential for expansive soil (City of Santa Barbara 2020a). However, the CWPP does not propose any construction that could be subject to damage by soil expansion. In addition, implementation of the CWPP would not increase or exacerbate the potential for soil expansion to occur because activities are primarily targeting surficial vegetation removal. The limited grading activities to establish fuel breaks would be performed using the BMPs included in the CWPP and performed according to industry standards. As such, impacts would be less than significant, and this issue will not be analyzed further in the PEIR.

### **7.e) Septic Systems**

**No Impact.** The CWPP would not include use of septic tanks or alternative wastewater disposal systems. Portable toilets would be used by vegetation maintenance crews, as necessary. As such, the CWPP would have no impact related to septic systems, and this issue will not be analyzed further in the PEIR.

### **7.f) Paleontological Resource/Unique Geologic Feature**

**Less Than Significant.** Paleontology is a branch of geology that studies plant and animal fossils to ascertain information about past life forms. Fossils are found in the sedimentary rock layers in which they were originally buried (San Diego Natural History Museum 2020). Sedimentary rock is formed from particles of older rocks that have been broken apart by water or wind. The gravel, sand, and mud settle to the bottom in rivers, lakes, and oceans. These sedimentary particles may bury living and dead animals and plants on the lake or sea bottom. With the passage of time and the accumulation of more particles, and often with chemical changes, the sediments at the bottom of the pile become rock (USGS 2020a). Given that the CWPP proposes methods to manage vegetation and control wildfire risk through establishing fuel breaks at the surface or with limited grading, the likelihood of disturbing a fossil specimen, or unique geological feature is considered less than significant. This issue will not be analyzed further in the PEIR

<b>8. HAZARDS AND HAZARDOUS MATERIALS</b>		<b>Level of Significance</b>	<b>Analyzed in Prior Document</b>
Would the project:			
a)	Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	Potentially Significant	
b)	Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	Potentially Significant	
c)	Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	Potentially Significant	
d)	Be located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	Less Than Significant	
e)	For a project located within the SBCAG Airport Land Use Plan, Airport Influence Area, would the project result in a safety hazard or excessive noise for people residing or working in the project area?	No Impact	
f)	Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	Potentially Significant	
g)	Expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires?	Potentially Significant	

### **Hazards and Hazardous Materials - Discussion**

**Issues:** Hazardous materials issues involve the potential for public health or safety impacts from exposure of persons or the environment to hazardous materials or risk of accidents involving combustible or toxic substances.

**Impact Evaluation Guidelines:** Significant impacts may result from the following:

- Siting of incompatible projects in close proximity to existing sources of safety risk, such as pipelines, industrial processes, railroads, airports, etc.
- Exposure of project occupants or construction workers to unremediated soil or groundwater contamination.
- Exposure of persons or the environment to hazardous substances due to improper use, storage, or disposal of hazardous materials.
- Physical interference with an emergency evacuation or response CWPP.
- Siting of development in a high fire hazard areas or beyond adequate emergency response time, with inadequate access or water pressure, or otherwise in a manner that creates a fire hazard.

Emergency access is discussed in Section 16, Transportation. Toxic air contaminants are discussed in Section 3, Air Quality and Greenhouse Gas Emissions.



## **Hazards and Hazardous Materials – Existing Conditions and Project Impacts**

### **8.a-c) Public Health and Safety**

**Potentially Significant.** Hazardous materials would be used during the wildfire management methods described in the CWPP, potentially including fuels, lubricating fluids, solvents, and cleaning products. If these materials are released, they could prove to be hazardous; therefore, the SBFD would be responsible for implementing programs to prevent any risks involved with handling these materials. The types, amounts, and concentrations of these materials are not known at this time; however, the transport, use, and disposal of hazardous materials will be analyzed further in the PEIR.

There are over 20 schools within the Santa Barbara Unified School District, some of which are located within 0.25 miles of areas that would be affected by the CWPP (SBUSD 2019). Vegetation management and maintenance of communication facilities could occur within 0.25 miles of an existing school and thereby potentially expose students and staff to hazardous materials if a release occurred. This issue will be further analyzed in the PEIR.

### **8.d) Hazardous Materials Site**

**Less Than Significant.** Based on a review of the Department of Toxic Substances Control EnviroStor database, there is one Hazardous Waste and Substances site within the City. The site is the Southern California Gas Company manufactured gas plant at 630 East Montecito Street and not within an existing or proposed High Fire Hazard Area (DTSC 2020). There are several sites noted in the State Water Control Board's GeoTracker database related to Leaking Underground Storage Tank sites. These sites are either actively managed by the State Water Resources Control Board, or the cases have been closed (SWRCB 2020). There are no solid waste disposal sites with waste constituents above hazardous waste levels outside the waste management unit within the City (CalEPA 2020). Therefore, this issue will not be analyzed further in the PEIR.

### **8.e) Airport Land Use**

**No Impact.** The nearest airport to the Planning Area is the Santa Barbara Airport, approximately 4 miles to the west of the Planning Area. The CWPP excludes the airport from consideration as it does not exhibit high wildfire hazard conditions, as identified in the 2017 Santa Barbara Airport Master Plan. As a result, this issue will not be analyzed further in the PEIR.

### **8.f) Emergency Evacuation and Response**

**Potentially Significant.** The CWPP discusses evacuation planning and incorporates the 2014 Wildland Fire Evacuation Procedures Analysis report prepared by Dudek (Dudek 2014). The recommendations from the 2014 report are included as Appendix A in the CWPP. The CWPP provides additional recommendations for enhanced emergency evacuation. However, in light of recent wildfire evacuation challenges in the state, such as in Paradise, California, further analysis will be included in the PEIR.

### **8.g) Fire Hazard**

**Potentially Significant.** The CWPP is a community-based guidance document intended to mitigate wildfire risk. Although wildfire management methods would have an overall beneficial reduction in wildfire risk, there are certain activities that could create a temporary risk of wildfire. Ground-disturbing activities associated with the CWPP would include vegetation stockpiling, mechanized land clearance, vegetation management and potentially pole replacement activities for communication infrastructure. Ground-disturbing activities would typically employ the use of heavy equipment (e.g., dump truck, chipper, crane truck). Use of maintenance equipment around flammable vegetation and other materials that are potential fire hazards could result in a wildland fire risk. As such, risks associated with incidental sparks from the use of maintenance equipment or from the refueling of equipment could result in potentially significant impacts related to fire hazards. This issue will be further analyzed in the PEIR.

<b>9. HYDROLOGY AND WATER QUALITY</b>  Would the project:	<b>Level of Significance</b>	<b>Analyzed in Prior Document</b>
a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality?	Potentially Significant	
b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin?	Less Than Significant	
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would: <ul style="list-style-type: none"> <li>i) result in substantial erosion or siltation on- or off-site;</li> <li>ii) substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;</li> <li>iii) create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff;</li> <li>iv) impede or redirect flood flows?</li> </ul>	Potentially Significant	
d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation?	Potentially Significant	
e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan?	Potentially Significant	

### **Hydrology and Water Quality – Discussion**

**Issues:** Water resources issues include changes in surface drainage, creeks, surface water quality, groundwater quantity and quality, flooding, and inundation.

**Impact Evaluation Guidelines:** A significant impact would result from:

#### **Water Resources and Drainage**

- Substantially changing the amount of surface water in any water body or the quantity of groundwater recharge.
- Substantially changing the drainage pattern or creating a substantially increased amount or rate of surface water runoff that would exceed the capacity of existing or planned drainage and stormwater systems.
- Altering drainage patterns or affecting creeks in a way that would cause substantial erosion, siltation, on- or off-site flooding, or impacts to sensitive biological resources (See Section 4 as well).

#### **Water Quality**

- Substantial discharge of sediment or pollutants into surface water or groundwater, or otherwise degrading water quality, including temperature, dissolved oxygen, or turbidity.

Under most existing conditions, stormwater runoff from urban areas picks up pollutants as it flows across roofs, sidewalks, driveways and streets, and then is conveyed by gutters, channels, and storm drains directly to local creeks and the ocean, without any treatment. This runoff carries sediment, nutrients, bacteria, hydrocarbons, metals, pesticides, and trash. Urban stormwater runoff is the single largest source of surface water pollution in Santa Barbara (City of Santa

Barbara 2013). The City of Santa Barbara adopted the Storm Water Management Program (SWMP) in January of 2009, and the SWMP is implemented through City ordinance provisions. The purpose of the SWMP is to implement and enforce a program designed to reduce the discharge of pollutants to the “maximum extent practicable” to protect water quality. The SWMP addresses discharge of pollutants both during construction and after construction. The City of Santa Barbara is in the process of updating the Storm Water BMP Guidance Manual (draft released February 26, 2020) as a part of the SWMP (City of Santa Barbara 2020c).

#### Flooding and Inundation Hazards

- Locating development within floodway or 100-year flood hazard area; substantially altering the course or flow of flood waters or otherwise exacerbating flood hazard to persons or property.
- Exposing people or structures to substantial unmitigated risk involving inundation by seiche, tsunami, or mudflow.

### **Hydrology and Water Quality – Existing Conditions and Project Impacts**

#### **9.a) Water Quality Standards for Surface and Groundwater**

**Potentially Significant.** Surface water in the City includes creeks and water bodies. The primary watersheds and major water courses flowing within the City include Mission, Sycamore, Arroyo Burro, and Laguna Creek watersheds, and surface water bodies include the Andrée Clark Bird Refuge and Sheffield Reservoir. These sources are mapped in the City’s GIS database (City of Santa Barbara 2020a). Groundwater in the City is obtained from two primary groundwater basins: Storage Unit 1 of the Santa Barbara basin and the Foothill basin (City of Santa Barbara 2020b; Santa Barbara County Water Agency 2020). Storage Unit 1 is located in the general vicinity of downtown. The Foothill Basin is located in the upper State Street area. Storage Unit 3 of the Santa Barbara basin, located generally in the Westside, also has the potential for limited production, though water quality is relatively poor (City of Santa Barbara 2020b, Santa Barbara County Water Agency, 2020).

The U.S. Geological Survey has characterized many linkages between water use and water quality and found that the processes affecting water quality vary widely and depend on a complex suite of factors. These factors can include natural geology and local aquifer conditions, human activities related to land use, and well construction and operation. Determining changes in groundwater quality over time involves systematic monitoring of constituents of concern, coupled with an understanding of the dynamics of a groundwater-flow system (USGS 2020b). The CWPP proposes methods that focus on vegetation management and fire risk management, such as fuel breaks and communication infrastructure replacement. Vegetation management activities may include soil disturbance, use of mechanized equipment or vegetation clippings that could potentially impact surface water quality. Although the CWPP includes proposed BMPs, it is possible that both surface and groundwater quality could be affected. As such, this issue will be further analyzed in the PEIR.

#### **9.b) Groundwater Supply**

**Less Than Significant.** Since the 1960s, the majority of the City’s water has come from local surface water, and the remainder has come from groundwater, State Water Project, recycled water, increased water conservation, and as needed, seawater desalination. As noted above, Although groundwater from the Santa Barbara and Foothill groundwater basins only accounts for a small percentage of the long-term supply, it is an important source of supplemental water during times of surface-water shortages (Nishikawa 2018). As part of a joint 2018 study between the U.S. Geological Survey and City, the sustainable yield, or volume of groundwater that can be pumped from storage without causing water-level drawdowns and associated seawater intrusion, was evaluated based on five optimization scenarios. The scenarios revealed a maximum pumpage in the basin of around 30,000 acre-feet over a 10-year period (Nishikawa 2018). Perennial yield is the amount of water that can be pumped from the basins on a continual basis without causing overdraft. The portion of the perennial yield used by the City from all Storage Unit 1 and the Foothill Basins is approximately 1,300 acre-feet per year. Storage Unit 3 is not normally used. The City’s Water Supply Management report for the 2018–2019 Water Year notes that the City focused on resting its groundwater basins in Water Year 2019 to help them recover to pre-drought levels. The City pumped only two out of nine potable groundwater wells from May to August 2019 during peak summer demands, providing 318 acre-feet of supply in Water Year 2019 (City of Santa Barbara 2020d). Groundwater recharge can be augmented through releases to Mission Creek and through injection capability at various production wells (City of Santa Barbara 2020b). Although cyclical drought will remain a challenge in California, the City’s management of water resources provides supplies to address City water needs, including firefighting. Additionally, the activities proposed in the CWPP would not result in a

significant increase in water demand beyond current practices. As such, the impacts would be less than significant, and this issue will not be analyzed further in the PEIR.

### **9.c) Drainage, Stormwater Runoff, and Water Quality and Creeks**

**Potentially Significant.** The CWPP would implement vegetation management practices in which vegetation would be removed or reduced in order to reduce the potential for wildfire. It would also result in communication equipment maintenance activities, such as pole replacement, that could cause soil disturbance. Water quality impacts could occur during vegetation management and ground-disturbing activities if they result in the release of pollutants, such as spilled or leaked petroleum products, and/or runoff of sediment, herbicides, ash debris, or other vegetation-related materials into receiving waters. The City of Santa Barbara would require the implementation of standard site management practices (e.g., perimeter controls, storm drain inlet protection, maintaining a clean and orderly work area) consistent with the City's existing SWMP. The CWPP is not expected to change groundwater demand. However, further analysis would be required to assess the CWPP's potential to impact changes to drainage, stormwater runoff, and water quality. As such, these issues will be discussed further in the PEIR.

### **9.d) Flooding**

**Potentially Significant.** The proposed fuel reduction as a result of vegetation management could cause a potential increase in soil erosion from the specified areas because of the reduction in vegetation canopy and plant density. These measures could also result in minor increases of flows from these areas and thus, result in an increase in runoff and pollutant sources. In addition, the Federal Emergency Management Agency maps areas within the CWPP with multiple variations of flood risk zones (FEMA 2008). The CWPP addresses areas located adjacent to the Pacific Ocean, and this area could be susceptible to inundation by a tsunami. Further analysis is required to assess the CWPP's potential for impacts related to flooding. Potentially significant impacts may occur. These issues will be further analyzed in the PEIR.

### **9.e) Conflict with a Water Quality Control Plan or Groundwater Management Plan**

**Potentially Significant.** As discussed in 9.b) above, the CWPP would not conflict with a groundwater management plan. Best management practices are proposed in the CWPP and would minimize potential water quality impacts. However, as discussed in 9.a) and 9.c), the implementation of vegetation management practices could potentially cause increased sedimentation due to soil disturbance, which could conflict with the City's SWMP. As such, impacts related to conflict with a Water Quality Control Plan may be significant and will be further analyzed in the PEIR.

<b>10. LAND USE AND PLANNING</b> Would the project:	<b>Level of Significance</b>	Analyzed in Prior Document
a) Physically divide an established community?	Less than Significant	
b) Cause a significant environmental impact due to a conflict with any applicable land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect?	Potentially Significant	

### **Land Use and Planning – Discussion**

#### **10.a) Physically Divide Community**

***Less Than Significant.*** The CWPP provides guidance regarding wildfire mitigation. Methods contained in the CWPP largely address vegetation management. While the CWPP does include evacuation planning, the routes contemplated do not limit or impede access in various areas of the City. The project does not involve a cross-town freeway, storm channel, utility transmission lines or any other improvements that have the potential to physically divide the community. The project would not close any existing bridges or roadways. Impacts would be less than significant, and no further analysis is required. This topic will not be analyzed in the PEIR.

#### **9.b) Conflicts with Plans for Avoiding Environmental Effect**

***Potentially Significant.*** The proposed project would involve the implementation of the CWPP largely focused on vegetation management. Although it is unlikely that CWPP would result in a conflict with applicable land use plans, policies, or regulations, further analysis is required. Impacts would be potentially significant, and this topic will be discussed within the PEIR.

<b>11. MINERAL RESOURCES</b> Would the project:	<b>Level of Significance</b>	Analyzed in Prior Document
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	No Impact	
b) Result in the loss of availability of a locally-important mineral resource recovery site delineated on a local general plan, specific plan, or other land use plan?	No Impact	

### **Mineral Resources – Discussion**

#### **11.a) Mineral Resource of Regional Significance**

**No Impact.** Implementation of the CWPP would not impede access to mineral resources within the City. Therefore, the proposed project would not result in the loss of availability of a known mineral resource that would be of value to the region and residents of the state. No impact would occur. This issue will not be analyzed further in the PEIR.

#### **11.b) Mineral Resource of Local Significance**

**No Impact.** The Plan Santa Barbara Program EIR notes that the City is largely urbanized with few agricultural and mineral resources present in the City (City of Santa Barbara 2010). Therefore, no impact would occur, and no further analysis is required. This issue will not be analyzed further in the PEIR.

<b>12. NOISE</b>  Would the project result in:	<b>Level of Significance</b>	Analyzed in Prior Document
a) Generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	Potentially Significant	
b) Generation of excessive ground borne vibration or ground borne noise levels?	Potentially Significant	
c) Siting of a land use in an area with noise levels exceeding City General Plan noise policies and land use compatibility guidelines?	No Impact	
d) For a project located within the vicinity of a private airstrip or the SBCAG Airport Land Use Plan/Airport Influence Area, would the project expose people residing or working in the project area to excessive noise levels?	No Impact.	

### **Noise - Discussion**

**Issues:** Noise issues are generally associated with placement of a noise-generating land use next to existing noise-sensitive land uses, and/or short-term construction-related noise. Similarly, construction techniques such as major earthmoving activities, pile driving and blasting can present issues of groundborne vibration. If groundborne vibration is excessive, it can impact the integrity of structures and can affect sensitive land uses.

**Definitions:** Vibrations, traveling as waves through air from a source, exert a force perceived by the human ear as sound. Sound pressure level (referred to as sound level) is measured on a logarithmic scale in decibels (dB) that represent the fluctuation of air pressure above and below atmospheric pressure. Frequency, or pitch, is a physical characteristic of sound and is expressed in units of cycles per second or hertz (Hz). The normal frequency range of hearing for most people extends from about 20 to 20,000 Hz. The human ear is more sensitive to middle and high frequencies, especially when the noise levels are quieter. As noise levels get louder, the human ear starts to hear the frequency spectrum more evenly. To accommodate for this phenomenon, a weighting system to evaluate how loud a noise level is to a human was developed. The frequency weighting called “A” weighting is typically used for quieter noise levels which de-emphasizes the low frequency components of the sound in a manner similar to the response of a human ear. This A-weighted sound level is called the “noise level” and is referenced in units of dB(A).

Ambient noise refers to the existing outdoor sound level resulting from all sources, near and far, including transportation facilities (i.e., freeways, railroads, airports) and stationary land uses such as industrial and commercial establishments. In an urban setting, this ambient noise is often referred to as the community noise level. The primary source of ambient noise in the City of Santa Barbara is vehicle traffic noise along Highway 101 and on major local streets. The City Master Environmental Assessment Noise Contour Map identifies average ambient noise levels within the City.

Ambient noise levels are generally reported as averaged 24-hour weighted levels, using the Day-Night Noise Level ( $L_{dn}$ ) or Community Noise Equivalence Level (CNEL) measurement scales. The  $L_{dn}$  averages the varying sound levels occurring over the 24-hour day and adds a 10 decibel penalty to each of the measured hourly average noise levels occurring between the hours of 10:00 p.m. and 7:00 a.m. to take into account the greater annoyance of intrusive noise levels during nighttime hours. Since  $L_{dn}$  is a 24-hour average noise level, an area could have sporadic loud noise levels above 60 dB(A) which average out over the 24-hour period. CNEL is similar to  $L_{dn}$  but includes a separate 5 dB(A) addition to the measured hourly average noise levels occurring between of 7:00 p.m. and 10:00 p.m. CNEL and  $L_{dn}$  values usually agree with one another within 1 dB(A). The Equivalent Noise Level ( $L_{eq}$ ) is a single noise level, which, if held constant during the measurement time period, would represent the same total energy as a fluctuating noise.  $L_{eq}$  values are commonly expressed for periods of one hour, but longer or shorter time periods may be specified.

Since sound is measured on a logarithmic scale, a doubling of sound energy results in a 3 dB(A) increase in the noise level. Changes in a community noise level of less than 3 dB(A) are not typically noticed by the human ear. Changes from 3 to 5 dB(A) may be noticed by some individuals who are extremely sensitive to changes in noise. A 5 dB(A) increase is readily noticeable. The human ear perceives a 10 dB(A) increase in sound level as a doubling of the sound level (i.e., 65 dB(A) sounds twice as loud as 55 dB(A) to a human ear).

Guidance for appropriate long-term background noise levels for various land uses are established in the City General Plan Noise Element Land Use Compatibility Guidelines. Building codes also establish maximum average ambient noise levels for the interiors of structures. This guidance applies to community noise levels that are permanent in nature, rather than to temporary noise sources or activities (such as construction).

High construction noise levels occur with the use of heavy equipment such as scrapers, rollers, graders, trenchers and large trucks for demolition, grading, and construction. Equipment noise levels can vary substantially through a construction period, and depend on the type of equipment, number of pieces operating, and equipment maintenance. Construction equipment generates noise levels of more than 80 or 90 dB(A) at a distance of 50 feet, and the shorter impulsive noises from other construction equipment (such as pile drivers and drills) can be even higher, up to and exceeding 100 dB(A). Noise during construction is generally intermittent and sporadic. For “point sources” such as construction activity, noise outdoors attenuates (or is reduced) by 6 dB each time the distance from the source to a receiver is doubled (80 dB(A) at 50 feet is reduced to 74 dB(A) at 100 feet).

The Noise Ordinance (Chapter 9.16 of the Santa Barbara Municipal Code) governs short-term or periodic noise, such as construction noise, operation of motorized equipment or amplified sound, or other sources of nuisance noise. The ordinance establishes limitations on hours of construction and motorized equipment operations, and provides criteria for defining nuisance noise in general.

Groundborne vibration is an oscillatory motion that can be described in terms of displacement, velocity, or acceleration. Heavy construction equipment that causes percussive action against the ground surface may be experienced by building occupants as perceptible vibration (EPA 1971). It is also common for groundborne vibration to cause windows, pictures on walls, or items on shelves to rattle. Although the perceived vibration from such equipment operation can be intrusive to building occupants, the vibration is seldom of sufficient magnitude to cause even minor cosmetic damage to buildings. Vibration impacts to buildings are generally discussed in terms of peak particle velocity (PPV) that describes particle movement over time (in terms of physical displacement of mass, expressed as inches/second or in/sec). Groundborne vibration generated by construction projects is usually highest during pile driving, rock blasting, soil compacting, jack hammering, and demolition-related activities (Caltrans 2002). Next to pile driving and soil compacting, grading activity has the greatest potential for vibration impacts if large bulldozers, large trucks, or other heavy equipment are used. The California Department of Transportation employs a vibration significance level of 0.2 in/sec PPV for the prevention of structural damage to typical residential buildings; the City does not have an adopted vibration significance threshold (Caltrans 1980).

Aircraft traffic also creates intermittent higher noise levels and is a major source for noise in the communities surrounding the Santa Barbara Airport. The Airport is located outside of the continuous boundary of the City, and areas affected by aircraft noise include several neighborhoods within the City of Goleta, UCSB [University of California, Santa Barbara], and unincorporated areas of the County. The Santa Barbara Airport’s Noise Compatibility Program and the Airport Land Use Plan provide noise abatement procedures and policies for the airport to minimize noise; guidelines for placement of noise sensitive land uses near the airport, and mitigation measures to prevent impacts to residential areas from airport noise.

**Impact Evaluation Guidelines:** A significant noise impact may result from:

1. Project Noise Generation: Substantial noise and/or vibration from project operations or grading and construction activity in close proximity to noise-sensitive receptors for an extensive duration; or
2. Ambient Noise Policies: Siting of a project such that persons would be subject to long-term ambient noise levels in excess of the Noise Element land use compatibility guidelines as follows. The guidelines include maximum interior and exterior noise levels.
  - a. Interior noise levels are of primary importance for residences due to the health concerns associated with continued exposure to high interior noises. Projects not meeting interior noise levels would have significant noise impacts.



- b. For exterior noise levels, there are two levels of noise:
  - i. “Clearly unacceptable” exterior levels are those levels above which it would be prohibitive, even with mitigation, to achieve the maximum interior noise levels, and the outdoor environment would be intolerable for the assigned use. Projects exceeding the maximum “clearly unacceptable” noise levels would have significant noise impacts.
  - ii. “Normally unacceptable” noise levels are those levels which it is clear that with standard construction techniques maximum interior noise levels will be met and there will be little interference with the land use. Projects below the maximum “normally unacceptable” noise levels would have less than significant noise impacts.
  - iii. Projects with exterior noise levels exceeding the “normally acceptable” level and below the maximum “clearly unacceptable” level are evaluated on a case by case basis to identify mitigation to achieve the “normally acceptable” exterior levels to the extent feasible and to determine the level of significance of the noise exposure.
    - *Commercial (retail, restaurant, etc.) and Office (personal, business, professional): Normally acceptable maximum exterior ambient noise level of 75 dB(A) Ldn; clearly unacceptable maximum exterior noise level of 80 dB(A) Ldn; maximum interior noise level of 50 dB(A) Ldn.*
    - *Residential: Normally acceptable maximum exterior ambient noise level of 60 dB(A) Ldn in single family zones and 65 dB(A) Ldn in non-residential or multi-family zones); clearly unacceptable maximum exterior noise level of 75 dB(A) Ldn; maximum interior noise level of 45 dB(A) Ldn.*
3. Aircraft Noise: Project site location near an airport or air strip that would result in excessive noise exposure for project residents or employees.

## **Noise – Existing Conditions and Project Impacts**

### **12.a) Increased Noise Levels from Project**

**Potentially Significant.** Implementation of the proposed CWPP would result in noise-generating activities through the use of mechanized equipment, such as chainsaws and backhoes. Chainsaws may generate noise up to 85 dB(A) at 50 feet. While impacts would be short term, the project would have the potential to temporarily increase noise levels at existing residences. Further analysis is required to determine the impacts relating to the substantial temporary or permanent increases in ambient noise levels within the CWPP. As such, impacts could be potentially significant. This issue will be further analyzed in the PEIR.

### **12.b) Increased Vibration Levels from Project**

**Potentially Significant.** Groundborne vibration can cause damage to surrounding structures within areas of ground-disturbing activities. Although short-term, groundborne vibration produced from construction or maintenance activities is anticipated to be less than significant, further analysis is required to determine the potential vibration levels within the CWPP’s vicinity and the associated impacts to sensitive receptors. As such, impacts related to groundborne vibration could be potentially significant. This issue will be further analyzed in the PEIR.

### **12.c) Land Use**

**No Impact.** The CWPP provides community-based guidance to mitigate wildfire risk. The methods contained in the CWPP are generally related to vegetation management and evacuation planning. The CWPP does not include the introduction of any noise-sensitive uses such as residences, nor would it increase the development potential of and existing land use and zoning designations within the City. As a result, this issue will not be analyzed further in the PEIR.

### **12.d) Aircraft Noise**

**No Impact.** The CWPP encompasses the City limits excluding the Santa Barbara Airport. The closest airport is Santa Barbara Airport, approximately 4 miles west of the City proper. The activities described in the CWPP would not occur on or near the airport. This issue will not be analyzed further in the PEIR.

<b>13. POPULATION AND HOUSING</b>  Would the project:	<b>Level of Significance</b>	<b>Analyzed in Prior Document</b>
a) Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (e.g. through extension of roads or other infrastructure)?	Less Than Significant	
b) Displace substantial numbers of existing people or housing, necessitating the construction of replacement housing elsewhere?	No Impact	

### **Population and Housing - Discussion**

**Impact Evaluation Guidelines:** Issues of potentially significant population and housing impacts may involve:

- Growth inducement, such as provision of substantial population or employment growth or creation of substantial housing demand; development in an undeveloped area, or extension/expansion of major infrastructure that could support additional future growth.
- Loss of a substantial number of people or housing units, especially loss of lower cost housing.

### **Population and Housing – Existing Conditions and Project Impacts**

#### **13.a) Growth-Inducing Impacts**

**Less Than Significant.** The proposed CWPP would not introduce new development directly through construction of homes or businesses or indirectly through the construction of roads or expansion of infrastructure. The proposed CWPP would expand certain areas of the High Fire Hazard Severity Zone (currently the Coastal and Coastal Interior Zones) and Very High Fire Hazard Severity Zones (currently the Foothill and Extreme Foothill Zones).

State law for Accessory Dwelling Units and Junior Accessory Dwelling Units (ADUs/JADUs)<sup>2</sup> became effective January 1, 2020. The new state law significantly expanded the types and numbers of ADUs allowed per parcel and voided much of the City’s existing ADU and JADU regulations. In response, City Council adopted an Interim Urgency Ordinance to temporarily prohibit ADU/JADU development in the Foothill and Extreme Foothill High Fire Hazard Area Zones until December 2020 to allow staff time to analyze the issues before returning with an amended ordinance for adoption. Prior to expiration of the Urgency Ordinance, the City will adopt Zoning Ordinance amendments for ADUs and JADUs in compliance with new state law. As of February 2020, 185 ADUs/JADUs have been constructed, and an additional 296 are in process or pending building permits citywide. In the event the City maintains the same prohibition on ADU/JADU, the expanded high fire hazards zones would potentially reduce the number of potential ADU/JADU that could be permitted.

The CWPP proposes a series of fire risk reduction methods to address existing development within the City, and especially within the designated High Fire Hazard Areas. As such, growth-inducing impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

#### **13.b) Housing Displacement**

**No Impact.** The CWPP would be limited to fire hazard management activities and would not displace any numbers of existing people or housing necessitating the need to construct replacement housing elsewhere. Methods contained within the CWPP are intended to promote sound fire management practices to protect buildings and structures, including housing, within the High Fire Hazard Areas. No impact would result from the project. This issue will not be further analyzed in the PEIR.

<sup>2</sup> Accessory Dwelling Units (ADUs) are self-contained residential units, typically used as a rental, and either incorporated within, detached from, or attached to the primary residential unit(s) on the same property. A Junior Accessory Dwelling Unit (JADU) is a unit up to 500 square feet in size contained within an existing or proposed home with a separate exterior entry and an efficiency kitchen.

<b>14. PUBLIC SERVICES AND UTILITIES</b> Would the project:	<b>Level of Significance</b>	<b>Analyzed in Prior Document</b>
a) Require or result in the relocation or construction of new or expanded storm water drainage facilities or expansion of water, wastewater treatment, storm water drainage, electric power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects?	Less Than Significant	
b) Have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years?	Less Than Significant	
c) Result in a determination by the wastewater treatment provider which serves or may serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	Less Than Significant	
d) Generate solid waste in excess of State or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals?	Potentially Significant	
e) Comply with federal, state, and local management and reduction statutes and regulations related to solid waste?	Potentially Significant	
f) Comply with federal, state, and local statutes and regulations related to solid waste?	Potentially Significant	
g) Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: i) Fire Protection? ii) Police Protection? iii) Schools? iv) Parks? v) Other Public Facilities?	Less Than Significant	

### **Public Services and Utilities - Discussion**

**Issues:** This section evaluates project effects on fire and police protection services, schools, public facility maintenance and other governmental services, utilities, including electric and natural gas, water and sewer service, and solid waste disposal.

**Impact Evaluation Guidelines:** The following may be identified as significant public services and facilities impacts:

- Inadequate water, sewage disposal, or utility facilities.
- Substantial increase in solid waste disposal to area sanitary landfills.

- Creation of a substantial need for increased police department, fire department, public facility maintenance, or government services staff or equipment.
- Generation of substantial numbers of students exceeding public school capacity where schools have been designated as overcrowded.

Water: The City of Santa Barbara's water supply comes primarily from the following sources, with the actual share of each determined by availability and level of customer demand: Lake Cachuma and Tecolote Tunnel; Gibraltar Reservoir, Devils Canyon and Mission Tunnel; groundwater; State Water Project Table A allotment; desalination; and recycled water. Conservation and efficiency improvements are projected to contribute to the supply by offsetting demand that would otherwise have to be supplied by additional sources. On June 14, 2011, based on the comprehensive review of the City's water supply, the City Council approved the Long Term Water Supply Program (LTWSP) for the planning period 2011-2030. The LTWSP outlines a strategy to use the above sources to meet the City's estimated system demand (potable plus recycled water) of 14,000 acre-feet per year, plus a 10% safety margin equal to 1,400 acre-feet per year, for a total water supply target of 15,400 acre-feet per year. The LTWSP concludes that the City's water supply is adequate to serve the anticipated demand plus safety margin during the planning period.

Sewer: The maximum capacity of the El Estero Treatment Plant is 11 million gallons per day (MGD), with current average daily flows in 2011 of 8 MGD. In 2010, the City certified a citywide Program Final Environmental Impact Report (FEIR) for the Plan Santa Barbara General Plan Update. This FEIR concluded that the increased wastewater flows to El Estero Wastewater Treatment Plant are enough to accommodate the growth planned through 2030 for the City. The FEIR also concluded that the increased wastewater flows into the City's collection systems would not substantially contribute to current problems of off-site inflow and infiltration of wastewater flows from the City's system.

Solid Waste: Most of the waste generated in the City is transported on a daily basis to seven landfills located around the County. The County of Santa Barbara, which operates the landfills, has developed impact significance thresholds related to the impacts of development on remaining landfill capacity. These thresholds are utilized by the City to analyze solid waste impacts. The County thresholds are based on the projected average solid waste generation for Santa Barbara County from 1990-2005. The County assumes a 1.2% annual increase (approximately 4,000 tons per year) in solid waste generation over the 15-year period. The County's threshold for project specific impacts to the solid waste system is 196 tons per year (this figure represents 5% of the expected average annual increase in solid waste generation [4,000 tons per year]) for project operations. Source reduction, recycling, and composting can reduce a project's waste stream by as much as 50%. If a proposed project generates 196 or more tons per year after reduction and recycling efforts, impacts would be considered significant and unavoidable. Proposed projects with a project specific impact as identified above (196 tons per year or more) would also be considered cumulatively significant, as the project specific threshold of significance is based on a cumulative growth scenario. However, as landfill space is already extremely limited, any increase in solid waste of 1% or more of the expected average annual increase in solid waste generation [4,000 tons per year], which equates to 40 tons per year, is considered adverse significant cumulative impact.

The County of Santa Barbara adopted revised solid waste generation thresholds and guidelines in October 2008. According to the County's thresholds of significance, any construction, demolition or remodeling project of a commercial, industrial or residential development that is projected to create more than 350 tons of construction and demolition debris is considered to have a significant impact on solid waste generation. The County's 350 ton threshold has not been formally adopted by the City; however, it provides a useful method for calculating and analyzing construction waste generated by a project.

Facilities and Services: In 2010, the City certified the PEIR for the Plan Santa Barbara General Plan Update. The PEIR concluded that under existing conditions as well as the projected planned development and all studied alternatives, all public services (police, fire, library, public facilities, governmental facilities, electrical power, natural gas and communications) could accommodate the potential additional growth until 2030. The PEIR also determined that growth in the City under the General Plan would not result in a considerable contribution to cumulative impacts on public services on the South Coast.

Schools: None of the school districts in the South Coast have been designated "overcrowded" as defined by California State law. Per California Government Code Section 66000, the City collects development impact fees from new development to offset the cost of providing school services/additional infrastructure to accommodate new students generated by the development.

## **Public Services and Utilities – Existing Conditions and Project Impacts**

### **14.a-c) Water and Sewer**

***Less Than Significant.*** As discussed in Section 8, Hydrology and Water Quality, the City's available water supply accounts for firefighting purposes and is sufficient to address the methods included in the CWPP. There is no impact to wastewater anticipated as there are no measures within the CWPP that would affect sewer availability or capacity. Impacts would be less than significant, and this issue will not be further analyzed in the PEIR.

### **14.d-f) Solid Waste Generation/ Disposal**

***Potentially Significant.*** As part of the effort to divert materials from landfills and comply with state-mandated diversion goals, the County of Santa Barbara has implemented a number of programs designed to reduce the generation of organic waste materials, and recycle those organic materials that end up in the waste stream for beneficial reuse (City of Santa Barbara 2004).

Vegetation management associated with the CWPP is anticipated to generate large volumes of organic waste. The amount of solid waste associated with the implementation of the proposed CWPP could have the potential to significantly exceed the current capacity and goals aimed at reducing organic waste materials and could conflict with regulations related to solid waste. As such, further analysis will be required to determine the CWPP's potentially significant impacts related to solid waste. This issue will be further discussed in the PEIR.

### **14.g) Fire, Police, Schools, Parks, and Public Facilities**

***Less Than Significant.*** The CWPP would be a continuation of ongoing efforts to reduce wildland fire hazards and ideally minimize the need for firefighting response. No new governmental facilities would be constructed as a part of the CWPP. Existing communication infrastructure requires certain maintenance to address outdated technology however these activities would not create a significant environmental impact as they would occur on existing communication equipment with established structural footprints. The proposed CWPP is not anticipated to have any direct impacts on police protection, school facilities, or other government services. Park facility impacts are discussed in Section 15 Recreation. Impacts would be less than significant (with the exception of parks, discussed in Section 15 Recreation) and as such, this issue will not be further analyzed in the PEIR.

15. RECREATION	Level of Significance	Analyzed in Prior Document
a) Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated?	Less Than Significant	
b) Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?	Potentially Significant	
c) Would the project result in substantial loss or interference with existing park space or other public recreational facilities (such as hiking, cycling or horse trails)?	Potentially Significant	

### **Recreation - Discussion**

**Issues:** Recreational issues are associated with increased demand for recreational facilities, or, loss of or impacts to existing recreational facilities or parks.

**Impact Evaluation Guidelines:** Recreation impacts may be significant if they result in:

- Substantial increase in demand for park and recreation facilities in an area under-served by existing public park and recreation facilities.
- Substantial loss or interference with existing park space or other public recreational facilities such as hiking, cycling, or horse trails.

### **Recreation – Existing Conditions and Project Impacts**

#### **15.a) Recreational Demand**

According to the certified Final Program EIR (2010) for the General Plan Update, the City's park, waterfront, beach, and recreational facilities are sufficient overall for the projected levels of future population anticipated to the 2030 timeframe.

**Less Than Significant.** There are several parks within the proposed CWPP area. Several of the larger park facilities within the High Fire Hazard Areas include:

- Extreme Foothill Zone: Parma Park, Skofield Park, and Sheffield Reservoir
- Foothill Zone: Mission Historical Park, Hale Park, Orpet Park, Stevens Park, and Franceschi Park
- Coastal Zone: Douglas Family Preserve/Arroyo Burro Beach
- Coastal Interior Zone: Hilda McIntyre Ray Park, Elings Park, and Honda Valley Park

The proposed CWPP would not increase the demand on park facilities; nor does it include creation of new park facilities. As such, the impacts would be less than significant, and these issues will not be further analyzed in the PEIR.

#### **15.b - c) Recreational Facilities and Interference with Park Space or Recreational Use**

**Potentially Significant.** The CWPP would not require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment. However, the proposed vegetation management activities would occur in, and in the immediate vicinity of a number of parks and recreation areas. Communication equipment may also be located within or in proximity to existing park space or recreational uses, such as trails. Methods associated with the CWPP would include the maintenance and stockpiling of vegetation and mechanized land clearance. Ground-disturbing activities would typically involve the use of heavy equipment (e.g., dump truck, chipper, crane truck). In addition, ground-

disturbing activities would involve a temporary influx of workers, vehicles, and equipment into the identified recreation areas, which could result in the temporary physical deterioration of public trail facilities, reducing the availability of recreational opportunities to area residents and recreationists, and could impact species located within local parks. As such, the implementation of the CWPP could potentially result in the physical deterioration of parks and recreation areas. As a result, the CWPP could have potentially significant impacts that will be discussed further in the PEIR.

<b>16. TRANSPORTATION</b> Would the project:	<b>Level of Significance</b>	<b>Analyzed in Prior Document</b>
a) Conflict with a program, plan, ordinance or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities?	Potentially Significant	
b) Conflict or be inconsistent with CEQA Guidelines section 15064.3 (Determining the Significance of Transportation Impacts)?	Potentially Significant	
c) Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	Potentially Significant	
d) Result in inadequate emergency access?	Potentially Significant	

### **Transportation - Discussion**

**Issues:** Transportation issues include traffic, access, circulation and safety. Vehicle, bicycle and pedestrian, and mass transit modes of transportation are all considered, as well as emergency vehicle access. Projects near the City's airport may also be considered for effects to air traffic patterns and safety.

The City General Plan Circulation Element contains policies addressing circulation, vehicle traffic, and alternative mode travel in the City. Vehicle traffic and alternative mode policies are also contained in other adopted City Planning documents, including the Growth Management ordinance, Pedestrian Master Plan, Bicycle Master Plan, Upper State Street Plan, etc., as well as regional transportation plans.

The Program Environmental Impact Report for the 2011 General Plan provides a citywide transportation impact assessment addressing forecasted growth to the year 2030.

### **Impact Evaluation Guidelines:**

On September 27, 2013, Senate Bill (SB) 743 was signed into law, which creates a process to change the way that transportation impacts are analyzed under CEQA. SB 743 required the Governor's Office of Planning and Research (OPR) to amend the CEQA Guidelines to provide an alternative to level of service (LOS) for evaluating transportation impacts. Under the new transportation guidelines, LOS, or vehicle delay, will no longer be considered an environmental impact under CEQA. OPR recommended vehicle miles traveled (VMT) as the most appropriate measure of project transportation impacts for land use projects and land use plans. The updates to the CEQA Guidelines required under SB 743 were approved on December 28, 2018.

Under the new guidelines, VMT has been adopted as the most appropriate measure of transportation impacts under CEQA. The OPR's regulatory text indicates that a public agency may immediately commence implementation of the new transportation impact guidelines, and that the guidelines must be implemented statewide by July 1, 2020. The City of Santa Barbara has not yet adopted VMT specific guidelines and is in the process of updating its transportation-specific CEQA thresholds.

### **Vehicle and Alternate Mode Travel**

- Cause an increase in vehicle traffic that is substantial in relation to the existing traffic load and street system capacity inconsistent with adopted City policy (see vehicle traffic thresholds below).
- Result in a substantial increase in future vehicle miles travelled beyond that identified for the City in the General Plan Program Environmental Impact Report transportation analysis (2011).
- Cause insufficiency in the transportation system, taking into account all modes of transportation.
- Conflict with the adopted transportation plan or policy pertaining to vehicle or transit systems.



## Circulation and Traffic Safety

- Create potential hazards due to addition of traffic to a roadway that has design features (e.g., narrow width, roadside ditches, sharp curves, poor sight distance, inadequate pavement structure) or that supports uses that would be incompatible with substantial increases in traffic.
- Diminish or reduce effectiveness, adequacy, or safety of pedestrian, bicycle, or public transit circulation.
- Result in inadequate emergency access on-site or to nearby uses.
- Conflict with regional and local plans, policies, or ordinances regarding the circulation system, including all modes of transportation (vehicle, pedestrian, bicycle, and public transportation).

## **Transportation – Existing Conditions and Project Impacts**

### **16.a) Bicycle/Pedestrian/Public Transit**

**Potentially Significant.** Implementation of the CWPP would involve vegetation management-related traffic in order to meet wildfire risk reduction goals outlined in the proposed CWPP. Vegetation management could have the potential to temporarily obstruct roadways, bicycle paths, walkways, and transit routes. If communication infrastructure is adjacent to public roadways, bicycle paths, or walkways, maintenance activities could impede access. As such, further analysis is required to assess the proposed CWPP's potentially significant impacts. This issue will be further analyzed in the PEIR.

### **16.b) Vehicle Traffic**

**Potentially Significant.** CEQA Guidelines Section 15064.3, subdivision (b), focuses on specific criteria (VMT), for determining the significance of transportation impacts. It is further organized into four subdivisions: (1) land-use projects, (2) transportation projects, (3) qualitative analysis, and (4) methodology. The proposed CWPP could have the potential to generate temporary vegetation management-related traffic and maintenance traffic. Further analysis is required to determine the CWPP's potentially significant impacts related to vehicle traffic under VMT. As such, this issue will be further analyzed in the PEIR.

### **16.c-d) Access/Circulation/Safety Hazards**

**Potentially Significant.** The CWPP is not anticipated to involve physical changes to roadways. Vegetation management activities may occur in proximity to roadways, potentially causing short-term roadway closures. The PEIR will further evaluate the potential for the CWPP to substantially increase hazards due to traffic-related design features. Incompatible uses are not anticipated since typical maintenance equipment would be transported on standard City vehicles.

Similarly, implementation of the CWPP may involve activities that would have the potential to impede emergency access, such as temporary closure of travel lanes and generation of construction traffic affecting the capacity of adjacent roadways. As such, potentially significant impacts may occur as a result of CWPP implementation. Further analysis of this issue will be provided in the PEIR.

<b>17. TRIBAL CULTURAL RESOURCES</b> a) Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in Public Resources Code section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:	<b>Level of Significance</b>	<b>Analyzed in Prior Document</b>
i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or	Potentially Significant	
ii) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.	Potentially Significant	

### **Tribal Cultural Resources - Discussion**

**Issues:** Tribal cultural resources are subsurface deposits dating from Prehistoric or Historical time periods. Native American culture appeared along the channel coast over 10,000 years ago, and numerous villages of the Barbareno Chumash flourished in coastal plains now encompassed by the City.

**Impact Evaluation Guidelines:** Tribal cultural impacts are evaluated qualitatively by archeologists, historians, and tribal representatives. First, existing conditions on a site are assessed to identify whether important or unique resources exist, based on criteria specified in the CEQA *Guidelines* and City Master Environmental Assessment *Guidelines for Archaeological Resources and Historical Structures and Sites*, summarized as follows:

- Contains information needed to answer important scientific research questions and there exists a demonstrable public interest in that information.
- Has a special and particular quality such as being the oldest of its type or the best available example of its type.
- Is directly associated with an important prehistoric or historic event or person.
- Constitutes a tribal cultural resource based on statutory criteria.

If important resources exist on the site, project changes are evaluated to determine whether they would substantially affect these important resources.

### **Tribal Cultural Resources – Existing Conditions and Project Impacts**

**17.i.– ii.) Potentially Significant.** Implementation of the CWPP would result in ground disturbing activities on parcels identified throughout the project area. Such activities could potentially have an adverse effect on currently unrecorded, unknown historical, archaeological, or tribal cultural resources. Further tribal cultural resources analysis is required to determine whether the CWPP could potentially result in any adverse effects related to tribal cultural resources. These issues will be analyzed further in the PEIR.

<b>18. WILDFIRE</b>  Would the project:	<b>Level of Significance</b>	Analyzed in Prior Document
a) Substantially impair an adopted emergency response plan or emergency evacuation plan?	Beneficial Impact	
b) Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire?	Beneficial Impact	
c) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment?	No Impact	
d) Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?	Potentially Significant	

### **Wildfire - Discussion**

This section focuses on whether projects located in or near state responsibility areas (where the state has financial responsibility of preventing and suppressing fires), or lands classified as very high fire severity zones by local agencies, would:

- Substantially impair an adopted emergency response plan or emergency evacuation plan;
- Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to, pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;
- Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or
- Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

CAL FIRE publishes Fire Hazard Severity Zone Maps for all regions in California. The fire hazard measurement used as the basis for these maps includes the speed at which a wildfire moves, the amount of heat the fire produces, and most importantly, the burning fire brands that the fire sends ahead of the flaming front. Lead agencies and project proponents can review the CAL FIRE maps to determine whether a given project site will be subject to the new CEQA wildfire impacts analysis.

### **Wildfire—Existing Conditions and Project Impacts**

**18.a) Beneficial Impact.** The CWPP provides a community-based guidance for mitigating wildfire risk. The CWPP reevaluates wildfire potential throughout the City’s jurisdiction in accordance with fire behavior modeling software, all relevant datasets, and field site investigations. These evaluations would be used to improve both the emergency response plans and emergency evacuations plans of the City rather than impair them. As such, no impacts would occur.

**18.b) Beneficial Impact.** As previously discussed, the CWPP evaluates wildfire potential throughout the City’s jurisdiction in accordance with fire behavior modeling software, all relevant datasets, and field site investigations. The CWPP would also reevaluate current hazard abatement programs (e.g., defensible space, vegetation management, code enforcement) and where necessary, would present policies and management actions to reduce wildland fire hazards and impacts throughout the City. In addition, the CWPP would account for slope, prevailing winds (e.g., Sundowner winds), and other factors when evaluating the efficiency of current hazard abatement programs. As such, the CWPP would have no impacts.

**18.c) *No Impact.*** Implementation of the CWPP would not require the installation of roads, fuel breaks, emergency water sources, power lines, or other utilities. In addition, the CWPP would effectively reduce wildfire risk throughout the City of Santa Barbara. As no installation or maintenance is needed, the CWPP would have no impacts.

**18.d) *Potentially Significant.*** Implementation of the proposed CWPP would involve fuel management practices through the removal of vegetation as well as controlled burns in areas with steep slopes, uphill of residential areas. These measures could result in an increase in surface flows because vegetation in these areas would no longer absorb a portion of the runoff in the area. In addition, slope stability could be compromised as vegetation in these areas would no longer stabilize the hillslopes. As a result, these actions could potentially exacerbate the potential for downslope flooding and landslides. However, implementation of BMPs during vegetation management activities (e.g., use of low-ground pressure equipment, protection of retained vegetation, retention of cut stumps, heavy equipment use restrictions, retention of overstory trees and mulch on the soil surface) will reduce the potential for increased runoff and slope instability. For prescribed burning, similar BMPs would be implemented and the quantity, size, and frequency of prescribed burns would be low. Based on these factors, the increase in runoff and decrease in slope stability would be minimal but may occur. Additional discussion regarding soils, slope stability, and runoff is discussed in Section 7 Geology and Soils and Section 9 Hydrology and Water Quality. As such, CWPP impacts would be considered potentially significant and will be addressed in the PEIR.

MANDATORY FINDINGS OF SIGNIFICANCE		YES	NO
a)	Does the project have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	X	
b)	Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects)	X	
c)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	X	

a) **Biological and Cultural Resources**

**Potentially Significant.** As discussed in Section 4 (Biological Resources), implementation of the proposed CWPP could result in the reduction of habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or reduce the number or restrict the range of a rare or endangered plant or animal. Further analysis is required to determine the *potentially significant impacts* to biological resources. Similarly, as discussed in Section 5 (Cultural Resources), the proposed CWPP could have the potential to adversely impact important prehistoric or historic resources. Further analysis is required to determine the potentially significant impacts to cultural resources.

b) **Cumulative Impacts**

**Potentially Significant.** Further analysis is required to determine the proposed CWPP's potential to have a considerable contribution to cumulative impacts. As such, potentially significant cumulative impacts on the environment will be further analyzed in the PEIR.

c) **Other Environmental Effects**

**Potentially Significant.** Further analysis on the proposed CWPP's potentially significant effects on humans (direct or indirect) is required. These issues will be further discussed in the PEIR.

**LIST OF SOURCES USED IN PREPARATION OF THIS INITIAL STUDY**

The following sources used in the preparation of this Initial Study are located at the Community Development Department, Planning Division, 630 Garden Street, Santa Barbara and are available for review upon request.

**General Sources**

California Building Code as adopted by City

California Emissions Estimator Model (CalEEMod)

California Environmental Quality Act (CEQA) & CEQA Guidelines

City of Santa Barbara Climate Action Plan and EIR Addendum (2012)

Envirostor web site, State Department of Toxic Substances Control

Erosion/Sediment Control Program, City of Santa Barbara (2012)

Farmland of Statewide Importance Map, California Resources Agency

General Plan, City of Santa Barbara, and General Plan Map

General Plan Certified Final Environmental Impact Report (2011) and Addenda

Geology Assessment for the City of Santa Barbara  
 Geotracker website, State Water Resources Control Board  
 Institute of Traffic Engineers Trip Generation Manual  
 Long Term Water Supply Plan (2011)  
 Local Coastal Plan (*Main or Airport*)  
 Master Environmental Assessment, MEA Guidelines, and MEA Maps  
 Regional Growth Impacts Study (1980)  
 Santa Barbara County APCD Scope and Content of Air Quality Sections in Environmental Documents (2017)  
 Santa Barbara Municipal Code & City Charter  
 Special District Map  
 Water Demand Factors Update Report (2009)  
 Zoning Ordinance & Zoning Map

### **Project-Specific Sources**

- 14 CCR 15000–15387 and Appendices A through N. Guidelines for Implementation of the California Environmental Quality Act, as amended.
- Bedsworth, L., D. Cayan, G. Franco, L. Fisher, and S. Ziaya. 2018. . 2018. *California's Fourth Climate Change Assessment, Statewide Summary Report*. California Governor's Office of Planning and Research, Scripps Institution of Oceanography, California Energy Commission, and California Public Utilities Commission, coordinating agencies. Publication number: SUMCCCA4-2018-013. [https://www.energy.ca.gov/sites/default/files/2019-11/Statewide\\_Reports-SUM-CCCA4-2018-013\\_Statewide\\_Summary\\_Report\\_ADA.pdf](https://www.energy.ca.gov/sites/default/files/2019-11/Statewide_Reports-SUM-CCCA4-2018-013_Statewide_Summary_Report_ADA.pdf).
- CARB (California Air Resources Board). 2020. GHG Current California Emission Inventory Data. Accessed June 29, 2020. <https://ww2.arb.ca.gov/ghg-inventory-data>.
- CalEPA (California Environmental Protection Agency). 2020. List of Solid Waste Disposal Sites with Waste Constituents above Hazardous Waste Levels Outside the Waste Management Unit. Accessed June 2, 2020. <https://calepa.ca.gov/wp-content/uploads/sites/6/2016/10/SiteCleanup-CorteseList-CurrentList.pdf>.
- California Public Resources Code, Section 21000–21177. California Environmental Quality Act, as amended.
- Caltrans (California Department of Transportation). 1980. *Fundamentals and Abatement of Highway Traffic Noise*. September 1980.
- Caltrans. 1998. *Technical Noise Supplement – A Technical Supplement to the Traffic Noise Analysis Protocol*. California Department of Transportation; Environmental Program; Environmental Engineering; Noise, Air Quality, and Hazardous Waste Management Office. October 1998. <http://www.dot.ca.gov/hq/env/noise/pub/Technical%20Noise%20Supplement.pdf>.
- Caltrans. 2002. *Transportation-Related Earthborne Vibrations*. Report No. TAV-02-01-R9201. California Department of Transportation; Environmental Program; Environmental Engineering; Noise, Air Quality, and Hazardous Waste Management Office. February 20, 2002. <http://www.dot.ca.gov/hq/env/noise/pub/TRANSPORTATION%20RELATED%20EARTHBORNE%20VIBRATIONS.pdf>.
- CDFW (California Department of Fish and Wildlife). 2019. “California Natural Community Conservation Plans” [map]. April 2019. Accessed October 3, 2019. <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=68626&inline>
- City of Santa Barbara. 2004 EIR. *Final Program Environmental Impact Report Wildland Fire Plan*. City of Santa Barbara, Community Development Department and Fire Department. February 2004. Accessed September 30, 2019. <https://www.santabarbaraca.gov/civicax/filebank/blobdload.aspx?BlobID=18330>.
- City of Santa Barbara. 2008. Vegetation (GIS Data).

- City of Santa Barbara. 2010. *Certified Final Program Environmental Impact Report for the Plan Santa Barbara General Plan Update*. SCH No. 2009011031. September 2010. Accessed on September 30, 2019. <https://www.santabarbaraca.gov/civicax/filebank/blobdload.aspx?BlobID=16926>.
- City of Santa Barbara. 2012. *City of Santa Barbara Climate Action Plan*. September 2012. Accessed June 2020. <https://www.santabarbaraca.gov/civicax/filebank/blobdload.aspx?BlobID=17720>.
- City of Santa Barbara. 2013. *Santa Barbara General Plan, Safety Element*. Accessed on September 30, 2019. <https://www.santabarbaraca.gov/civicax/filebank/blobdload.aspx?BlobID=38671>.
- City of Santa Barbara. 2013. *2013 Emergency Management Plan*. Accessed on June 17, 2020. <https://www.santabarbaraca.gov/civicax/filebank/blobdload.aspx?BlobID=39294>.
- City of Santa Barbara. 2013. *Storm Water BMP Guidance Manual*. Accessed on June 28, 2020. <https://www.santabarbaraca.gov/civicax/filebank/blobdload.aspx?BlobID=16665>.
- City of Santa Barbara. 2019. Coastal Land Use Plan, 4.1 Biological Resources. Accessed on September 30, 2019. <https://civicaweb.santabarbaraca.gov/civicax/filebank/blobdload.aspx?BlobID=202917>
- City of Santa Barbara. 2020a. Map Analysis and Printing System. [http://maps.santabarbaraca.gov/Html5Viewer/Index.html?configBase=/Geocortex/Essentials/REST/sites/City\\_of\\_Santa\\_Barbara\\_Public/viewers/SantaBarbaraPublic/virtualdirectory/Resources/Config/Default](http://maps.santabarbaraca.gov/Html5Viewer/Index.html?configBase=/Geocortex/Essentials/REST/sites/City_of_Santa_Barbara_Public/viewers/SantaBarbaraPublic/virtualdirectory/Resources/Config/Default).
- City of Santa Barbara. 2020b. "Groundwater." Accessed June 4, 2020. <https://www.santabarbaraca.gov/gov/depts/pw/resources/system/sources/groundwater.asp>.
- City of Santa Barbara. 2020c. *Storm Water BMP Guidance Manual*. Accessed on June 28, 2020. <https://www.santabarbaraca.gov/civicax/filebank/blobdload.aspx?BlobID=226227>.
- City of Santa Barbara. 2020d. *Water Supply Management Report 2018-2019 Water Year*. City of Santa Barbara, Water Resources Division, Public Works Department. January 28, 2020.
- Dudek. 2014. *Wildland Fire Evacuation Procedures Analysis*. July 2014. Accessed April 30, 2020. <https://www.santabarbaraca.gov/civicax/filebank/blobdload.aspx?BlobID=226239>.
- DTSC (California Department of Toxic Substance Control). 2020. EnvirStor Database. Accessed June 2, 2020. [https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site\\_type=CSITES,FUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29](https://www.envirostor.dtsc.ca.gov/public/search?cmd=search&reporttype=CORTESE&site_type=CSITES,FUDS&status=ACT,BKLG,COM&reporttitle=HAZARDOUS+WASTE+AND+SUBSTANCES+SITE+LIST+%28CORTESE%29).
- EPA (U.S. Environmental Protection Agency). 1971. *Noise from Construction Equipment and Operations, Building Equipment and Home Appliances*. Prepared by Bolt, Beranek & Newman, Boston, Massachusetts. Washington, D.C.: EPA.
- FEMA (Federal Emergency Management Agency). 2008. FEMA Flood Map Service Center: Search By Address, Map #: 06083C1387J, effective 09/28/2018; 06083C1386H, effective on 11/04/2015; 06083C1391J, effective on 09/28/2018; 06083C1379H, effective on 11/04/2015; 06083C1378H, effective on 11/04/2015; and 06083C1383H, effective on 11/04/2015. Accessed on September 30, 2019. <https://msc.fema.gov/portal/search?AddressQuery=march%20airforce%20base#searchresultsanchor>.
- FEMA. 2020. ICS -100C: Introduction to the Incident Command System, ICS 100. Accessed on June 3, 2020. <https://training.fema.gov/is/courseoverview.aspx?code=IS-100.c>.
- McCreary D. 2004. *Fire in California's Oak Woodlands*. University of California Cooperative Extension. June 2004. <https://ucanr.edu/sites/fire/files/288191.pdf>.
- Nishikawa, T., ed. 2018. *Santa Barbara and Foothill Groundwater Basins Geohydrology and Optimal Water Resources Management—Developed using Density Dependent Solute Transport and Optimization Models*. U.S. Geological Survey, Scientific Investigations Report 2018-5059. Accessed May 2020. <https://doi.org/10.3133/sir20185059>.
- San Diego Natural History Museum. 2020. "Frequently Asked Questions." Accessed June 4, 2020. <https://www.sdnhm.org/science/paleontology/resources/frequent/>.

- Santa Barbara County Water Agency. 2020. Foothill Groundwater Basin. January. Accessed June 9, 2020. <http://www.countyofsb.org/uploadedImages/pwd/Content/Water/WaterAgency/Foothill%20Web.jpg>.
- SBCAPCD (Santa Barbara County Air Pollution Control District). 2016. *2016 Ozone Plan*. Accessed on September 30, 2019. <https://www.ourair.org/wp-content/uploads/Final-2016-Ozone-Plan -Approved-October-20-2016.pdf>.
- SBAPCD and SBCAG (Santa Barbara County Air Pollution Control District and Santa Barbara County Association of Governments). 2015. 2013 Clean Air Plan. Draft. March 2015. Accessed June 9, 2020. <https://www.ourair.org/wp-content/uploads/2015-03bd-2013cap-att4.pdf>.
- SBCAPCD. 2020. *Meeting Air Quality Standards. 2016 Ozone Plan*. Accessed on June 19, 2020. <https://www.ourair.org/air-quality-standards/>.
- SBCFD (Santa Barbara County Fire Department). 2018. "Major Wildfires in Santa Barbara County 1955-2018." Accessed March 12, 2020. <https://www.sbcfire.com/wp-content/uploads/2018/08/Major-Wildfires-in-Santa-Barbara-County-1955-2016.pdf>.
- SBFD (Santa Barbara Fire Department). 2004. *City of Santa Barbara Fire Department Wildland Fire Plan*. Accessed on September 30, 2019. <https://www.santabarbaraca.gov/civicax/filebank/blobdload.aspx?BlobID=14539>.
- SBUSD (Santa Barbara Unified School District). 2019. "Schools." Accessed on October 1, 2019. <https://www.sbunified.org/schools/>.
- SWRCB (State Water Resources Control Board). 2020. GeoTracker. Accessed June 2, 2020. <https://geotracker.waterboards.ca.gov/>.
- UCSB (University of California, Santa Barbara). 1928. Aerial Photography Information. Flight C\_311C, Frame B-13. January 1, 1928.
- USGS (U.S. Geological Survey). 1998. *Geohydrology of Storage Unit III and a Combined Flow Model of the Santa Barbara and Foothill Ground-water Basins, Santa Barbara County*. California Water-Resources Investigations Report 97-412 by J.R. Freckleton, P. Martin, and T. Nishikawa. Accessed June 9, 2020. <https://pubs.er.usgs.gov/publication/wri974121>.
- USGS. 2015. "Santa Barbara, CA" [map]. 1:24,000. 7.5-Minute Series (Topographic). Reston, Virginia: USGS. Accessed March 10, 2020. <https://www.sciencebase.gov/catalog/item/58260099e4b01fad86e705ec>.
- USGS. 2020a. "Rocks and Layers." Accessed June 4, 2020. <https://pubs.usgs.gov/gip/fossils/rocks-layers.html>.
- USGS. 2020b. "Sustainable Groundwater." Accessed June 28, 2020. <https://ca.water.usgs.gov/sustainable-groundwater-management/water-quality-california.html>.
- VCFD (Ventura County Fire Department). 2020. "VCFD Determines Cause of the Thomas Fire." Accessed March 12, 2020. <https://vcfd.org/news/335-vcfd-determines-cause-of-the-thomas-fire>.







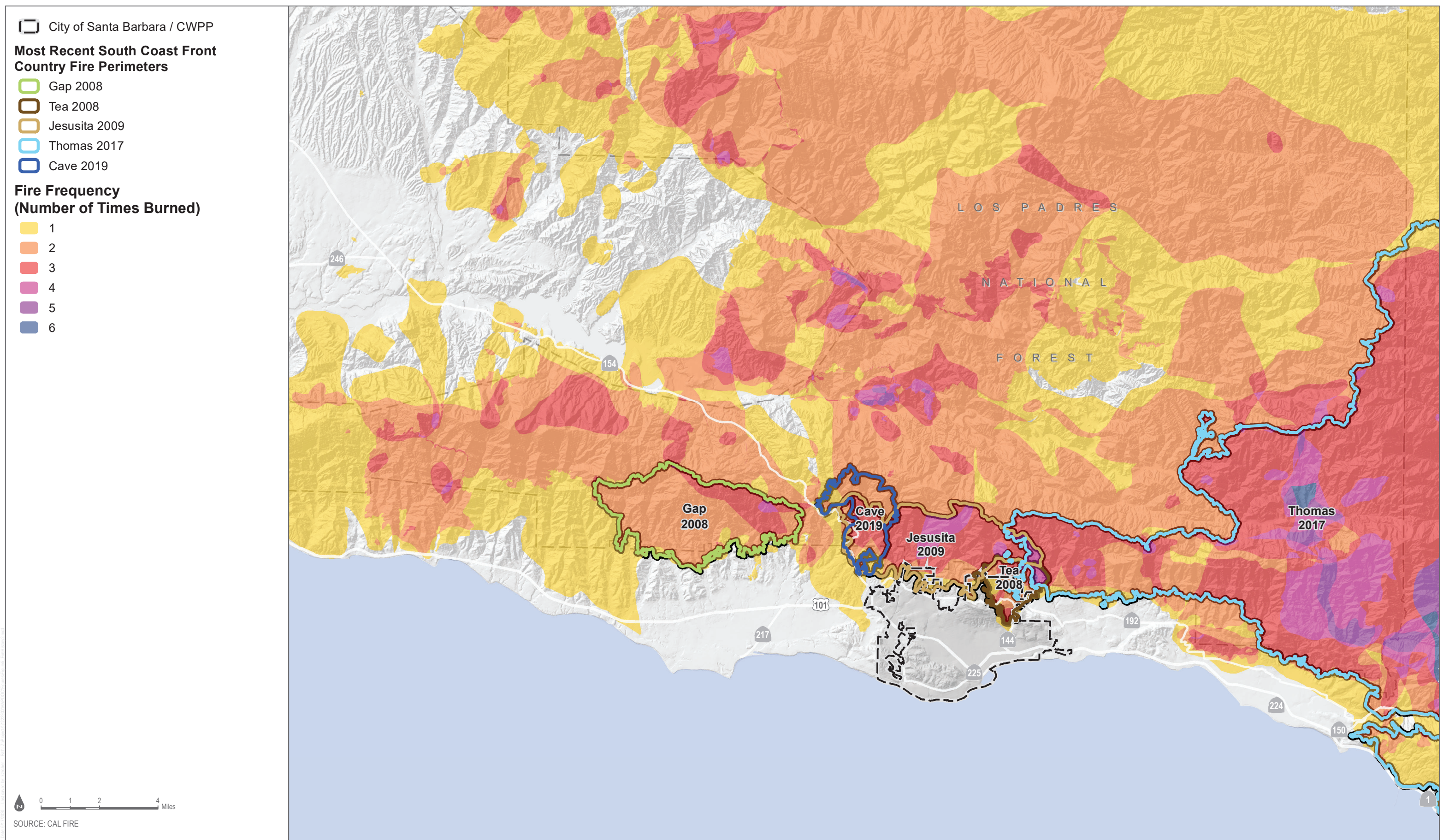
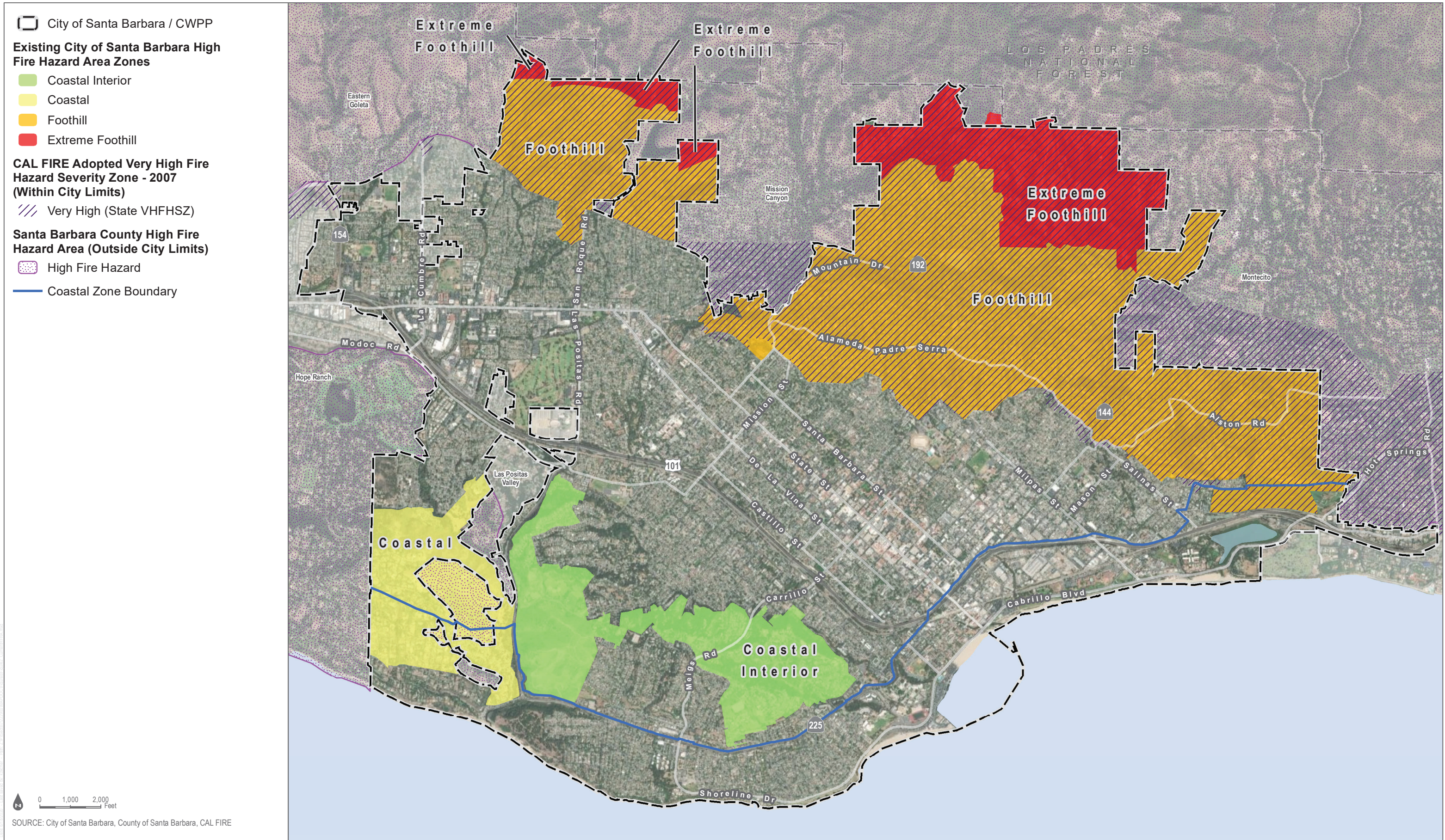


FIGURE 2

Fire History in the Santa Barbara Area

City of Santa Barbara Community Wildfire Protection Plan





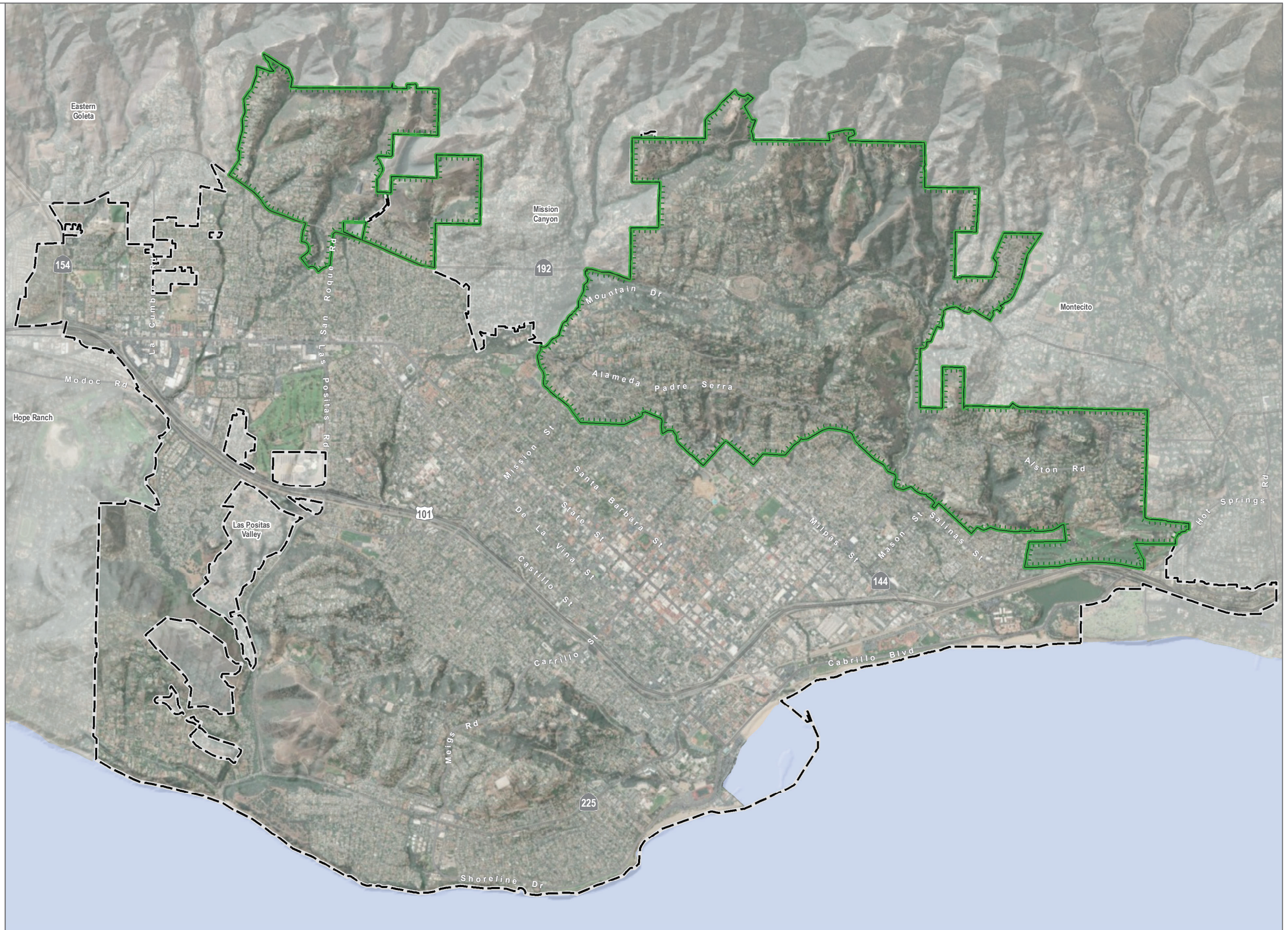








-  City of Santa Barbara / CWPP Area
-  Wildland Fire Supression Assessment District (WFSAD) Boundary



0 1,000 2,000 Feet

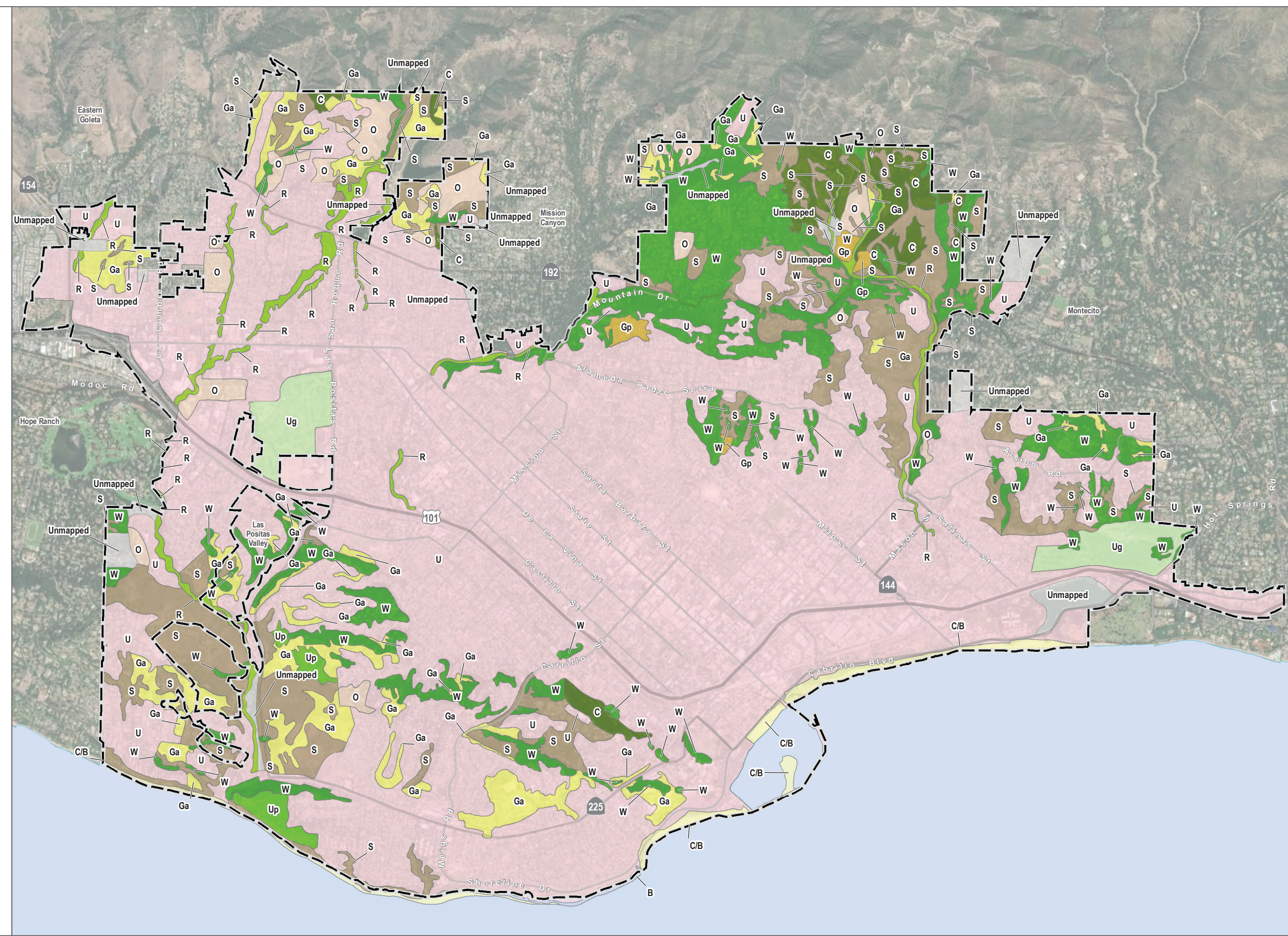
SOURCE: City of Santa Barbara



 City of Santa Barbara / CWPP

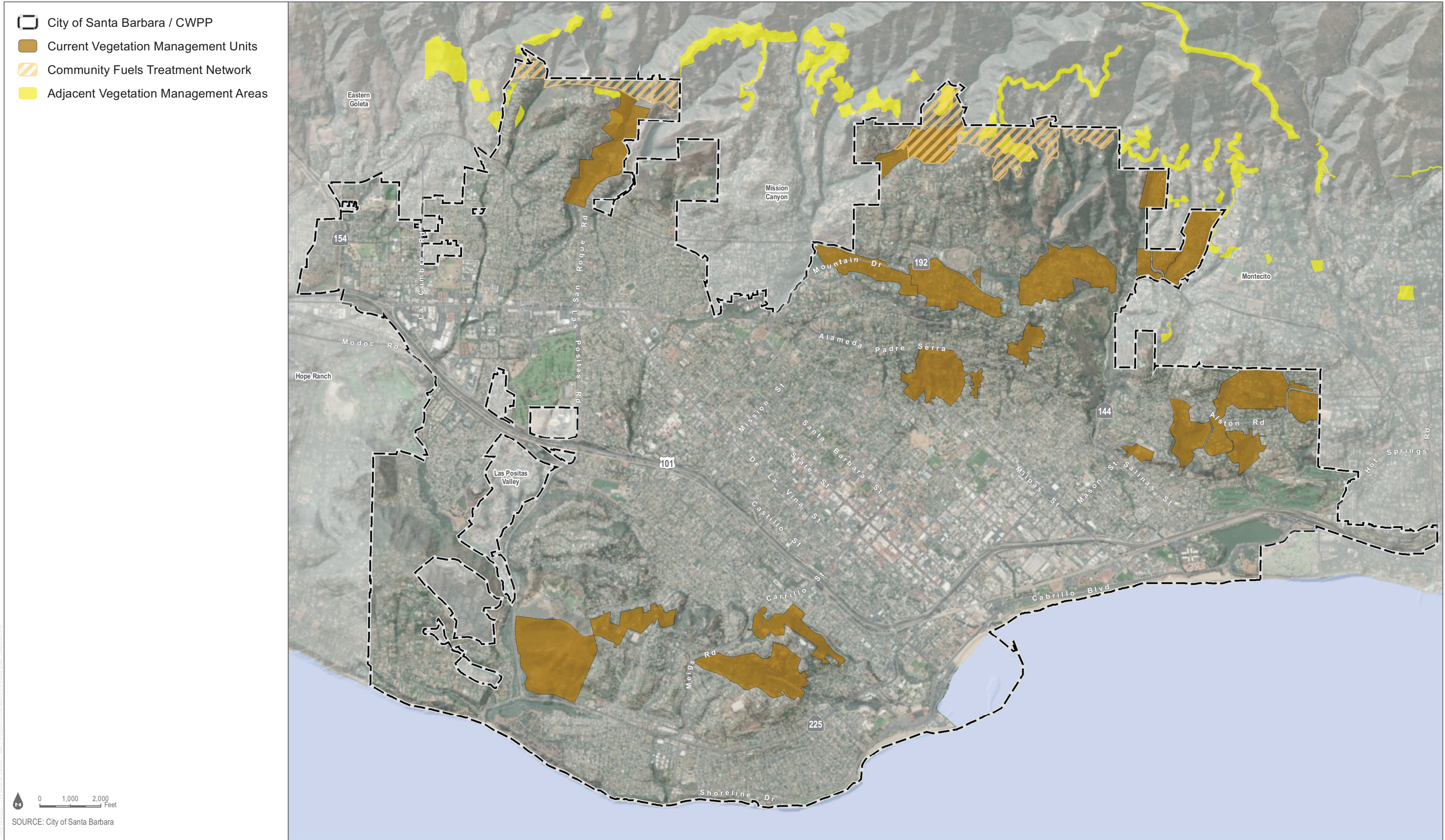
**Vegetation Communities and Land Cover Types**

- B - Coastal bluff
- C/B - Coastal strand/beach
- C - Chaparral
- W - Southern oak woodland
- R - Riparian woodland
- Ga - California annual grassland
- Gp - Coastal Perennial grassland
- S - Coastal sage scrub
- O - Orchard
- U - Urban
- Ug - Golf course
- Up - Parkland
- None/Unmapped

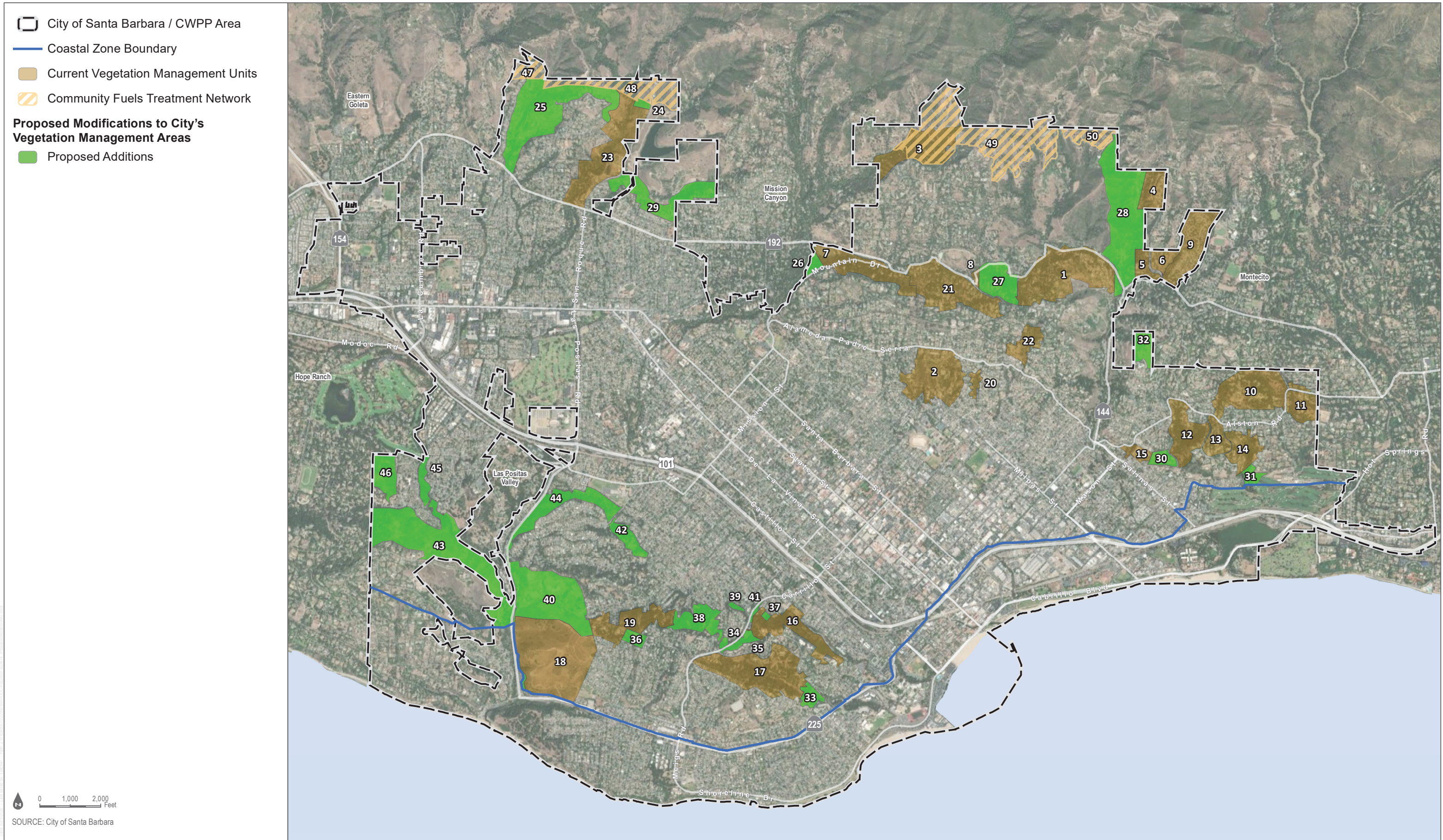


0 1,000 2,000 Feet  
SOURCE: USGS National Map

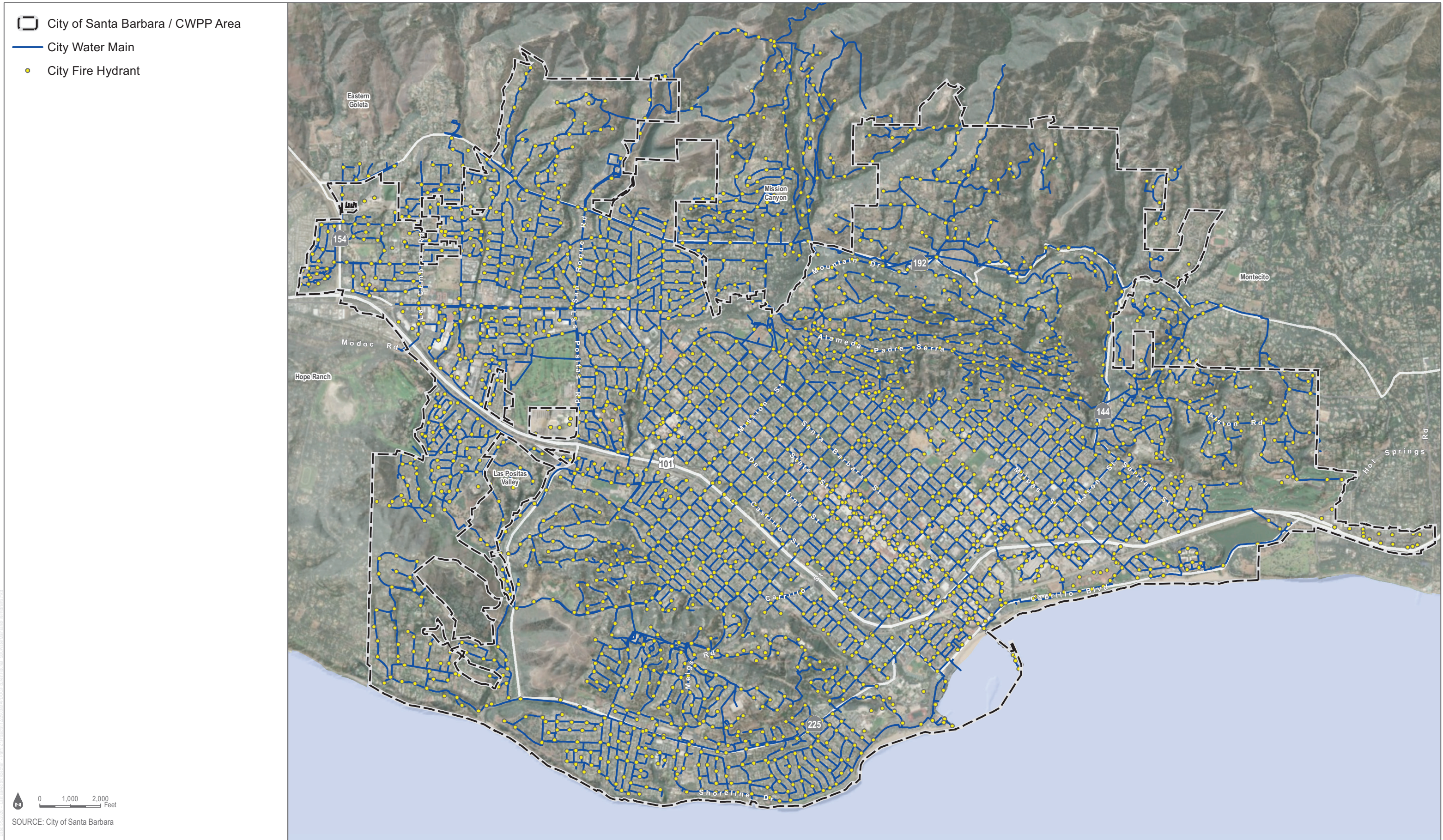














**NOTICE OF EIR PREPARATION**  
**PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE**  
**COMMUNITY WILDFIRE PROTECTION PLAN**

**Date:** July 3, 2020

**TO:** State Clearinghouse, Responsible and Trustee Agencies, Community Members  
and Interested Parties

**PROJECT TITLE:** City of Santa Barbara Community Wildfire  
Protection Plan

**LEAD AGENCY:**  
  
City of Santa Barbara  
Public Safety – Fire  
925 Chapala Street  
Santa Barbara, CA 93101

**PROJECT CONTACT:**  
  
Amber Anderson, Wildland Fire Specialist  
(805) 564-5720//cwpp@SantaBarbaraCA.gov

**PROJECT LOCATION:**  
  
City of Santa Barbara

**PURPOSE OF THIS NOTICE OF PREPARATION**

The City of Santa Barbara as the Lead Agency under the California Environmental Quality Act has prepared this notice of preparation (NOP) to inform agencies and interested parties that a program EIR will be prepared for the Community Wildfire Protection Plan (CWPP). The purpose of a NOP is to provide sufficient information about the project and its potential environmental impacts; to allow agencies and interested parties the opportunity to provide a meaningful response related to the scope and content of the Program EIR; and consider mitigation measures and alternatives that should be addressed (California Code of Regulations Section 15082[b]). Additional details about the project's potential effects are included in the attached Initial Study.

**PROJECT DESCRIPTION:**

The City of Santa Barbara Fire Department (SBFD) is proposing to implement a comprehensive, coordinated Community Wildfire Protection Plan (CWPP) to protect lives, property, and natural resources threatened by wildland fire. The proposed CWPP updates the City's 2004 Wildland Fire Plan consistent with the federal Healthy Forests Restoration Act passed in 2003 and subsequent guidance booklet "Preparing a Community Wildfire Protection Plan; A Handbook for Wildland-Urban Interface Communities," issued in 2004, accounting for changes in the City of Santa Barbara's (City's) fire environment and work completed under that 2004 Wildland Fire Plan. While not a

governing document requiring action, a CWPP is a strategic plan that outlines a series of policies and action items that are intended to guide implementation of the CWPP. The policies and actions focus on codes and standards, funding, fire rehabilitation, evacuation, fire protection, vegetation/fuels management, and public education. Action items identify tasks to be implemented by the SBFD, and other responsible City departments, to achieve the stated goal of protecting lives, property, and natural resources threatened by wildland fire. The CWPP process is intended to provide the community a forum for identifying values at risk from wildfire, which may include people, property, natural resources, cultural values, economic interests, and infrastructure. The identification of these values at risk by the community strongly influences the potential wildfire hazard mitigation projects identified in the proposed CWPP.

The proposed CWPP includes various goals, policies, and actions that represent a compilation of existing and newly proposed policies and actions related to codes and standards, funding, fire rehabilitation, evacuation, fire protection, vegetation/fuels management, and public education. Current activities conducted by the SBFD under the 2004 Wildland Fire Plan were analyzed in the Final Program Environmental Impact Report for the 2004 Wildland Fire Plan (City of Santa Barbara 2004) and are incorporated herein by reference. This description only addresses new proposed policies and/or actions that could result in impacts to the environment, which include the following categories:

- Proposed modifications to the High Fire Hazard Area
- Proposed modifications to the Vegetation Management Areas
  - Defensible space
  - Roadside clearing
  - City Vegetation Management Units (VMUs)
  - Community Fuels Treatment Network (CFTN)
- Proposed modifications to the Vegetation Management Methods
- Communication Facility Maintenance

The proposed CWPP also includes several other policies and actions that would not involve any physical impacts to the environment, including public education, interagency coordination, acquisition of funding, data gathering and management, acquisition of firefighting and communications equipment, and evacuation planning.

The City has prepared an Initial Study and determined that the CWPP could have significant environmental impacts and therefore an environmental impact report shall be prepared. The Initial Study is included as Attachment A of this NOP. Impacts could occur in the following resource areas:

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> Aesthetics           | <input type="checkbox"/> Agriculture and Forestry Resources            | <input checked="" type="checkbox"/> Air Quality/Greenhouse Gas Emissions |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Energy  |
| <input checked="" type="checkbox"/> Geology and Soils    | <input checked="" type="checkbox"/> Hazards & Hazardous Materials      | <input checked="" type="checkbox"/> Hydrology/Water Quality              |
| <input checked="" type="checkbox"/> Land Use/Planning    | <input type="checkbox"/> Mineral Resources                             | <input checked="" type="checkbox"/> Noise                                |
| <input type="checkbox"/> Population/Housing              | <input checked="" type="checkbox"/> Public Services                    | <input checked="" type="checkbox"/> Recreation                           |
| <input checked="" type="checkbox"/> Transportation       | <input checked="" type="checkbox"/> Tribal Cultural Resources          | <input checked="" type="checkbox"/> Utilities and Service Systems        |
| <input checked="" type="checkbox"/> Wildfire             | <input checked="" type="checkbox"/> Mandatory Findings of Significance |  |

**ALTERNATIVES TO BE EVALUATED IN THE EIR** In accordance with the State CEQA Guidelines (14 CCR Section 15126.6), the Program EIR will describe a range of reasonable alternatives to the project that are capable of meeting most of the projects' objectives and that would avoid or substantially lessen any of the significant effects of the project. The EIR will also identify any alternatives that were considered but rejected by the lead agency as infeasible and briefly explain the reasons why. The EIR will provide an analysis of the No Project Alternative and will also identify the environmentally superior alternative.

#### **DOCUMENTS AVAILABLE FOR PUBLIC REVIEW**

Due to COVID 19 shelter-in-place restrictions, all documents are available online at the City's project website: <https://cwpp.santabarbaraca.gov/>

**PUBLIC COMMENT PERIOD: July 3, 2020 to August 3, 2020.**

The City of Santa Barbara encourages the public to provide written comment on this and other projects. Comments on the Initial Study must be submitted by **Monday August 3, 2020 at 4:30 p.m.**

Please send your comments to:

Amber Anderson City of Santa Barbara, Public Health - Fire  
P.O. Box 1990, Santa Barbara, CA 93102-1990

or send them electronically to [cwpp@SantaBarbaraCA.gov](mailto:cwpp@SantaBarbaraCA.gov)

**NOTICE OF SCOPING MEETING:**

Pursuant to California Public Resources Code Section 21083.9 and California Code of Regulations, Title 14 ("CEQA Guidelines") Section 15082, the Lead Agency will conduct a scoping meeting for the purpose of soliciting oral and written comments from interested parties requesting notice, responsible agencies, agencies with jurisdiction by law, trustee agencies, and involved federal agencies, as to the appropriate scope and content of the EIR.

**SCOPING MEETING:**

Date: July 16, 2020

Time: 1:00 pm

Location: Most City Board and Commission meetings are being facilitated through telecommunications to avoid close personal contact during the COVID-19 crisis. Please refer to the current Board/Commission meeting agenda for further information on how to participate, or contact the Board/Commission secretary for further assistance.

**AMERICANS WITH DISABILITIES ACT:** In compliance with the Americans with Disabilities Act, if you need special assistance to gain access to, comment at, or participate in this meeting, **please contact Amber Anderson at (805) 564-5720**. If possible, notification at least 48 hours prior to the meeting will enable the City to make reasonable arrangements in most cases.

**DEPARTMENT OF TRANSPORTATION**

CALTRANS DISTRICT 5

50 HIGUERA STREET

SAN LUIS OBISPO, CA 93401-5415

PHONE (805) 549-3101

FAX (805) 549-3329

TTY 711

[www.dot.ca.gov/dist05/](http://www.dot.ca.gov/dist05/)Making Conservation  
a California Way of Life.

August 3, 2020

SB-Citywide  
SCH #: 2020070069

Amber Anderson, Wildland Fire Specialist  
City of Santa Barbara  
Public Safety – Fire  
935 Chapala Street  
Santa Barbara, CA 93101

COMMENTS FOR THE NOTICE OF PREPARATION FOR THE PROGRAM ENVIRONMENTAL  
IMPACT REPORT FOR THE CITY OF SANTA BARBARA COMMUNITY WILDFIRE PROTECTION  
PLAN PROJECT

Dear Ms. Anderson:

The California Department of Transportation (Caltrans) thanks you for the opportunity to review the Notice of Preparation for the Program Environmental Impact Report (PEIR) for the City of Santa Barbara Community Wildfire Protection Plan (CWPP) Project and offers the following comments at this time.

Caltrans supports local planning efforts that are consistent with State planning priorities intended to promote equity, strengthen the economy, protect the environment, and promote public health and safety. We accomplish this by working with local jurisdictions to achieve a shared vision of how the transportation system should and can accommodate interregional and local travel.

We look forward to early coordination with the City on this project, and reviewing the additional studies in the PEIR particularly related to permits, hydraulics, and aesthetics.

Please be aware that any encroachment in the State's right-of-way it will require a permit from Caltrans and must be done to our engineering and environmental standards, and at no cost to the State. The conditions of approval and the requirements for the permit are issued at the discretion of the Permits Office, and nothing in this letter shall be implied as limiting those future conditioned and requirements. For more information regarding the encroachment permit process, please visit our Encroachment Permit Website at: <https://dot.ca.gov/programs/traffic-operations/ep>.

All future work will need to conform to the Caltrans Encroachment Permits Manual, Chapter 600. Additional utility installation requirements, which may apply, are found in

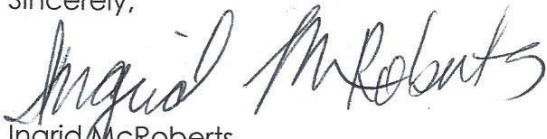


Ms. Amber Anderson  
August 3, 2020  
Page 2

Chapter 17 of the Project Development Procedures Manual. Deviations to these policies may require an exception. These requirements and processes will be outlined by the District Permit Engineer in the pre-submittal conference.

We look forward to continued coordination with the City on this project. If you have any questions, or need further clarification on items discussed above, please contact me at (805) 835-6555 or [ingrid.mcroberts@dot.ca.gov](mailto:ingrid.mcroberts@dot.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Ingrid McRoberts", written in a cursive style.

Ingrid McRoberts  
Development Review Coordinator  
District 5, LD-IGR South Branch



State of California – Natural Resources Agency  
DEPARTMENT OF FISH AND WILDLIFE  
South Coast Region  
3883 Ruffin Road  
San Diego, CA 82123  
(858) 467-4201  
[www.wildlife.ca.gov](http://www.wildlife.ca.gov)

**GAVIN NEWSOM, Governor**  
**CHARLTON H. BONHAM, Director**



August 5, 2020

Amber Anderson  
City of Santa Barbara  
Department of Public Safety  
925 Chapala Street  
Santa Barbara, CA 93101  
[aanderson@santabarbaraca.gov](mailto:aanderson@santabarbaraca.gov)

**Notice of Preparation of a Draft Programmatic Environmental Impact Report for the Proposed Community Wildfire Protection Plan, City of Santa Barbara, Los Angeles County**

Dear Ms. Anderson:

The California Department of Fish and Wildlife (CDFW) has reviewed the above-referenced Notice of Preparation (NOP) of a Draft Programmatic Environmental Impact Report (DPEIR) for the Community Wildfire Protection Plan (Project). The NOP's supporting documentation includes an *Initial Study* (IS) provided by the City of Santa Barbara (City).

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, we appreciate the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

**CDFW's Role**

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

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take", as defined by state law, of any species protected under the California Endangered Species Act (CESA) (Fish & Game Code, § 2050 et seq.), or state-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish



Amber Anderson  
City of Santa Barbara  
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& Game Code, §1900 et seq.) authorization as provided by the applicable Fish and Game Code will be required.

## Project Description and Summary

**Objective:** The proposed Project is the result of implementation of the updated Community Wildfire Protection Plan, which updates the City's policies regarding wildfire preparedness calling for an increase in the vegetation/fuels management activities within the City and incorporation of new fuel management techniques. The DPEIR will cover the aspects in the Community Wildfire Protection Plan that may result in physical changes to the environment.

The Project will reevaluate the areas that are classified as the City's High Fire Hazard Areas and reclassify them based on the CALFIRE standards for High Fire Severity Zones (HFSZ) and Very High Fire Hazard Severity Zone (VHFHSZ), resulting in a net increase in average of the areas classified fire hazard zones which may be subject to vegetation management activities for the purpose of fuel modification.

Vegetation management is categorized into five categories and fuel treatment expectations/management standards within each category is defined by the level of fire hazard severity (HFSZ or VHFHSZ). The vegetation management categories that will result in treatment activities within the City limits include the following:

- *Defensible Space*: area adjacent to buildings or structures managed by landowners;
- *Roadside Clearance*: maintenance of vegetation adjacent to roadways;
- *City Vegetation Management Units (VMUs)*: vegetation in areas outside of defensible space where vegetation management occurs in cooperation between the affected landowners and City; and,
- *Community Fuels Treatment Network (CFTN)*: area along the northern portion of the City limits to provide a break between continuous decadent stands of chaparral fuel and a strategic last line to protect more highly populated areas.

Proposed vegetation management methods include, manual (e.g., hand pulling, cutting, planting), mechanical (e.g., mowing, masticating, felling, yarding), biological (e.g., grazing), and/or prescribed fire (e.g., burn piles, broadcast burning, air curtain destructors).

**Location:** The Project is located within the jurisdictional limits of the City of Santa Barbara, with the exception of the Santa Barbara Airport. The City is located between the coastal Santa Ynez Mountains and the Pacific Ocean, approximately 100 miles northwest of Los Angeles (Figure 1). The City borders the Los Padres National Forest and unincorporated areas of Montecito, Mission Canyon, Hope Ranch, and Eastern Goleta Valley.

## Comments and Recommendations

CDFW offers the comments and recommendations below to assist the City in adequately identifying, avoiding, and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Additional comments or other suggestions may also be included to improve the document.

For impacts demonstrated to be unavoidable in the NOP, CDFW recommends the measures or revisions below be included in a science-based monitoring program that contains adaptive

Amber Anderson  
 City of Santa Barbara  
 August 5, 2020

management strategies as part of the Project's CEQA mitigation, monitoring, and reporting program (Public Resources Code, § 21081.6 and CEQA Guidelines, § 15097).

### Specific Comments

- 1) **Lake and Streambed Alteration (LSA)**: Implementation of the Project activities would involve fuel management practices through the removal of vegetation as well as controlled burns in areas with streams areas.
  - a) As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow; or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream; or use material from a streambed. For any such activities, the Project applicant (or "entity") must provide written notification to CDFW pursuant to section 1600 et seq. of the Fish and Game Code. Based on this notification and other information, CDFW determines whether an LSA Agreement (Agreement) with the applicant is required prior to conducting the proposed activities. CDFW's issuance of an Agreement for a Project that is subject to CEQA will require related environmental compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document prepared by the local jurisdiction (Lead Agency) for the Project. To minimize additional requirements by CDFW pursuant to section 1600 et seq. and/or under CEQA, the DPEIR should fully identify the potential impacts to the stream or riparian resources and provide adequate avoidance, mitigation, monitoring and reporting commitments for issuance of the LSA (available at [www.wildlife.ca.gov/habcon/1600](http://www.wildlife.ca.gov/habcon/1600)).
  - b) In areas of the Project site which may support ephemeral streams, herbaceous vegetation, woody vegetation, and woodlands also serve to protect the integrity of ephemeral channels and help maintain natural sedimentation processes; therefore, CDFW recommends effective setbacks be established to maintain appropriately-sized vegetated buffer areas adjoining ephemeral drainages.
  - c) Project-related changes in upstream and downstream drainage patterns, runoff, and sedimentation should be included and evaluated in the DPEIR.
  - d) As part of the LSA Notification process, CDFW requests the 100, 50, 25, 10, 5, and 2-year frequency storm event for existing and proposed conditions. CDFW recommends the DPEIR evaluate the results and address avoidance, minimization, and/or mitigation measures that may be necessary to reduce potential significant impacts.
- 2) **Impacts to Sensitive Natural Communities**: Project activities which involve vegetation management for fuel modification purposes should consider the biological characteristics of key species comprising the vegetative community, including growth rate, species postfire regenerative methods, stand maturity, and recent fire history in order to avoid the likelihood of habitat degradation through introduction of invasive species or type conversion of sensitive habitats. The vegetation types included in Table 3 on Page 7 of the IS Project Description used GIS data from 2008 which used the Holland ecosystem classification system to describe the following vegetative communities: coastal bluff, chaparral, coastal strand/beach, California annual grassland, Coastal perennial grassland, California annual grassland, coastal perennial grassland, riparian woodland, coastal sage scrub, and southern oak woodland. These classifications lack specificity to identify key species within each distinctive vegetative community.

Amber Anderson  
 City of Santa Barbara  
 August 5, 2020

CDFW tracks sensitive natural communities and their respective rankings using the MCV alliance and association names for vegetation communities. An S3 ranking indicates there are 21-80 occurrences of this community in existence in California, S2 has 6-20 occurrences, and S1 has less than 6 occurrences. CDFW considers natural communities with ranks of S1-S3 to be sensitive natural communities that meet the CEQA definition (CEQA Guidelines, §§ 15380, 15063, 15065) to be addressed in CEQA (CEQA Guidelines, § 15125[c]). Without identifying the alliance/association vegetation community or their state rankings, the Project may impact sensitive vegetation communities or wildlife species that depend on these communities.

- a) CDFW recommends that the DPEIR include a thorough, recent, floristic-based assessment of special status plants and natural communities, following the CDFW's recent updated Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities (CDFW, 2018). The protocols are available at the following website: <http://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959>. CDFW recommends that floristic, alliance- and/or association-based mapping and vegetation impact assessments be conducted at the project site and neighboring vicinity. The Manual of California Vegetation, second edition, should also be used to inform this mapping and assessment (Sawyer et al. 2008). Adjoining habitat areas should be included in this assessment where site activities could lead to direct or indirect impacts off-site. Habitat mapping at the alliance level will help establish baseline vegetation conditions.
  - b) CDFW recommends the DPEIR include an analysis of the sensitive natural communities that may be impacted by Project activities related to vegetation management or other vegetation or ground disturbing activities. The analysis should include a discussion of any potential vegetation management technique in the context of vegetative type.
  - c) CDFW recommends that the DPEIR include specific mitigation measures to minimize or mitigate for impacts to vegetative communities that may be affected by Program-level actions to ensure that any active fuel modification treatments be consistent with the fire history, frequency and conditions for which the key species comprising these habitats are adapted.
  - d) CDFW recommends the DPEIR should include measures to fully avoid and otherwise protect Rare Natural Communities from project-related impacts as much as possible. CDFW considers these communities as threatened habitats having both regional and local significance.
- 3) **Impacts to Nesting Birds.** The project will result in an increase in the area of fuel modifications areas within the Urban Wildlife Interface (UWI). Conducting fuel modification activities during the nesting season could result in the incidental loss of fertile eggs or nestlings or otherwise lead to nest abandonment in nesting habitat. Project activities may result in degradation or net loss of habitat for bird species who depend on the existing vegetation for nesting and foraging grounds.

Table 10 on page 17 of the Project Description included in the IS describes the proposed Best Management Practices (BMPs) for nesting bird protections. While CDFW does agree that surveys should be conducted if Project activities cannot be completed outside of nesting

Amber Anderson  
 City of Santa Barbara  
 August 5, 2020

bird season, the proposed BMP makes a general comment that surveys will be conducted and that if a nest is identified, an avoidance buffer of 200 feet may be required. Tolerance of nesting birds to potential disturbances from alterations to the adjacent vegetation, noise, or other anthropogenic disturbance may vary among species and individual nesting pairs.

Fish and Game Code § 3503 makes it unlawful to take, possess, or needlessly destroy the nest or eggs of any bird, except as otherwise provided by Fish and Game Code or any regulation made pursuant thereto. Fish and Game Code § 3503.5 makes it unlawful to take, possess, or destroy any birds in the orders Falconiformes or Strigiformes (birds-of-prey) to take, possess, or destroy the nest or eggs of any such bird except as otherwise provided by Fish and Game Code or any regulation adopted pursuant thereto. Fish and Game Code § 3513 makes it unlawful to take or possess any migratory nongame bird or part thereof except as provided by the rules and regulations adopted by the Secretary of the Interior under provisions of the Migratory Bird Treaty Act of 1918 (MBTA; 16 U.S.C. § 703 et seq.) before January 1, 2017, and subsequent rules and regulations adopted pursuant to the MBTA that are consistent with the Fish and Game Code.

Within and adjacent to the Project area there are documented occurrences of CESA-listed avian species including least Bell's vireo (*Vireo bellii pusillus*) tricolored blackbird (*Agelaius tricolor*), as well as species that are fully protected under Fish and Game Code § 3511 including white tailed kite (*Elanus leucurus*), Belding's savannah sparrow (*Passerculus sandwichensis beldingi*), light-footed ridgeway rail (*Passerculus sandwichensis beldingi*), California least tern (*Sternula antillarum browni*).

CDFW considers adverse impacts to a species protected by CESA to be significant without mitigation under CEQA. As to CESA, take of any endangered, threatened, candidate species, or State-listed avian species that results from the Project is prohibited, except as authorized by state law (Fish and G. Code, §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Fully protected status precludes CDFW from authorizing any amount of incidental take or intentional take to meet any project mitigation requirement.

- a) CDFW emphasizes the avoidance of Project activities involving vegetation management between February 15 through August 31 (and as early as January 1 for raptors) on to protect nesting birds that may occur within the project area.
- b) Prior to initiation of Project activities, CDFW recommends conducting site specific habitat assessments to determine the suitability of the Project area support special status species. If baseline surveys determine that suitable habitat exists, CDFW recommends species specific surveys following recommended survey protocols, when available. Survey and monitoring protocols and guidelines are available at: <https://www.wildlife.ca.gov/Conservation/Survey-Protocol>.
- c) CDFW recommends the DPEIR include an analysis of potential noise related disturbances to avian species and other wildlife associated with vegetation management treatments. The analysis should consider factors such as equipment type, seasonality of treatment, and site topography.
- d) CDFW recommends the DPEIR specify mitigation measures, including species specific measures for special status species, to minimize or mitigate for impacts to avian species that may be affected by Program-level actions. When projects show the potential to cause take of fully protected species, CDFW advises the DPEIR include appropriate

Amber Anderson  
City of Santa Barbara  
August 5, 2020

measures to avoid take. Given the legal status of fully protected animals, take avoidance measures should meet very high standards of effectiveness, substantially greater than the measures to minimize take required under Incidental Take Permits.

- 4) **Invasive Species:** Pre-fire fuel manipulations may contribute to increases in both population numbers and distribution of invasive plant species. CDFW recommends the City consider additional BMPs to address the potential for the increased spread of invasive species.

CDFW recommends the DPEIR complete an assessment of pre-existing conditions on and adjacent to each proposed Project area that would be subject to vegetation management to note the extent of non-native invasive species likely to provide a seed source in the project area. Where invasive species like Mediterranean annual grasses and forbs are present near proposed treatments, CDFW recommends prescribed fires in intact habitats adjoining areas supporting these species be minimized.

CDFW recommends DPEIR specify measures to control the spread of invasive species in post treatment zones, including follow-up monitoring at years 1, 5, and 10, to identify and address changed conditions stemming from vegetation management activities. An adaptive management plan should be developed to effectively control and remove noxious and problematic weeds.

### **General Comments**

- 5) To enable CDFW to adequately review and comment on the proposed Project from the standpoint of the protection of plants, fish, and wildlife, we recommend the following information be included in an DPEIR:
- a) A complete discussion of the purpose and need for, and description of, the proposed Project, including specific descriptions of each vegetation management method and an explanation of when and where each method may be applied.
  - b) A range of feasible alternatives to Project component location and design features to ensure that alternatives to the proposed Project are fully considered and evaluated. The alternatives should avoid or otherwise minimize direct and indirect impacts to sensitive biological resources and wildlife movement areas.

### **Biological Resources within the Project's Area of Potential Effect**

- 6) To provide a complete assessment of the flora and fauna within and adjacent to the project area, with particular emphasis upon identifying endangered, threatened, sensitive, and locally unique species and sensitive habitats, the DPEIR should include the following information:
- a) Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis placed on resources that are rare or unique to the region.
  - b) A current inventory of the biological resources associated with each habitat type on site and within the area of potential effect. CDFW's California Natural Diversity Data Base in Sacramento should be contacted at [www.wildlife.ca.gov/biogeodata/](http://www.wildlife.ca.gov/biogeodata/) to obtain current information on any previously reported sensitive species and habitat, including



Amber Anderson  
City of Santa Barbara  
August 5, 2020

Significant Natural Areas identified under Chapter 12 of the Fish and Game Code.

An inventory of rare, threatened, endangered, and other sensitive species on site and within the area of potential effect. CDFW recommends the final environmental document address species which meet the CEQA definition, including SSC (CEQA Guidelines, §§ 15380, 15063, and 15065). This should include sensitive fish, wildlife, reptile, and amphibian species. Seasonal variations in use of the project area should also be addressed. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable are strongly recommended. Acceptable species-specific survey procedures should be developed in consultation with CDFW and the U.S. Fish and Wildlife Service. In assigning "impact significance" to populations of non-listed species, such as SSC, factors to consider include population-level effects, proportion of the taxon's range affected by a project, regional effects, and impacts to habitat features.

### **Analyses of the Potential Project-Related Impacts on the Biological Resources**

- 7) To provide a thorough discussion of direct, indirect, and cumulative impacts expected to adversely affect biological resources, with specific measures to offset such impacts, the following should be addressed in the DPEIR:
  - a) Potential adverse impacts from lighting, noise, human activity, exotic species, and drainage should also be included. The latter subject should address: project-related changes on drainage patterns on and downstream of the project site; the volume, velocity, and frequency of existing and post-project surface flows; polluted runoff; soil erosion and/or sedimentation in streams and water bodies; and, post-project fate of runoff from the project site. Mitigation measures proposed to alleviate any identified potential impacts should be included in the DPEIR.
  - b) Indirect project impacts on biological resources, including resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands (e.g., preserve lands associated with a Natural Community Conservation Program [NCCP; Fish & Game Code, § 2800 *et seq.*]). Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in adjacent areas, should be fully evaluated in the DPEIR.
  - c) The land use designations and zoning of areas for development projects or other uses that are nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these land use/zoning conflicts should be included in the DPEIR.
  - d) A cumulative effects inventory and analysis. General and specific plans, as well as past, present, and anticipated future projects, should be analyzed relative to their impacts on similar plant communities and wildlife habitats.

### **Mitigation for the Project-related Biological Impacts**

- 8) The DPEIR should include mitigation measures for adverse project-related impacts to sensitive plants, animals, and habitats. Mitigation measures should emphasize avoidance and reduction of project impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not

Amber Anderson  
 City of Santa Barbara  
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be biologically viable, and therefore not adequately mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. For off-site mitigation, we recommend use of a CDFW-approved mitigation bank or other acceptable location approved by CDFW. Any lands proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands pursuant to Assembly Bill 1094 (2012), which amended Government Code sections 65965-65968.

- 9) For proposed preservation and/or restoration, the DPEIR should include measures to perpetually protect the targeted habitat values from direct and indirect negative impacts. The objective should be to offset the project-induced qualitative and quantitative losses of wildlife habitat values. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, increased human intrusion, etc.
- 10) Plans for restoration and revegetation should be prepared by persons with expertise in southern California ecosystems and native plant revegetation techniques. Each plan should include, at a minimum: (a) the location of the mitigation site; (b) the plant species to be used, container sizes, and seeding rates; (c) a schematic depicting the mitigation area; (d) planting schedule; (e) a description of the irrigation methodology; (f) measures to control exotic vegetation on site; (g) specific success criteria; (h) a detailed monitoring program; (i) contingency measures should the success criteria not be met; and (j) identification of the party responsible for meeting the success criteria and providing for conservation of the mitigation site in perpetuity.
- 11) If the Project or any Project-related activity during the life of the Project will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a consistency determination in certain circumstances, among other options [Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)]. Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required in order to obtain a CESA Permit. Revisions to the Fish and Game Code, effective January 1998, may require that CDFW issue a separate CEQA document for the issuance of an ITP unless the Project CEQA document addresses all Project impacts to CESA-listed species and specifies a mitigation monitoring and reporting program that will meet the requirements of an ITP. For these reasons, biological mitigation monitoring and reporting proposals should be of sufficient detail and resolution to satisfy the requirements for a CESA ITP.

To ensure that all measures to avoid or mitigate significant impacts to biological resources are implemented, the DPEIR should include a mitigation monitoring and reporting program that clearly describes the impact, proposed measure, implementing entity, timeframe, reporting entity/mechanism, and completion date.

## **Filing Fees**

The project, as proposed, could have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee

Amber Anderson  
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August 5, 2020

is required in order for the underlying project approval to be operative, vested, and final (Cal. Code Regs, tit. 14, § 753.5; Fish & Game Code, § 711.4; Pub. Resources Code, § 21089).

## Conclusion

We appreciate the opportunity to comment on the project to assist the City in adequately analyzing and minimizing/mitigating impacts to biological resources. CDFW requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of any forthcoming hearing date(s) for the project. If you have any questions or comments regarding this letter, please contact Audrey Kelly, Environmental Scientist, at (562) 430-7882 or by email at [Audrey.Kelly@wildlife.ca.gov](mailto:Audrey.Kelly@wildlife.ca.gov).

Sincerely,

DocuSigned by:



B6E58CFE24724F5...

Erinn Wilson

Environmental Program Manager I

cc: CDFW  
Steve Gibson  
Audrey Kelly  
Susan Howell

## References

California Department of Fish and Wildlife, 2018. Updated Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Natural Communities. Accessed at: <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959>.

Sawyer, J.O., Keeler Wolf, T., and Evens J.M. 2008. A manual of California Vegetation, 2<sup>nd</sup> ed. ISBN 978 0 943460 49 9.





July 31, 2020

**VIA EMAIL**

Ms. Amber Anderson, Wildland Fire Specialist  
City of Santa Barbara  
Public Safety – Fire  
925 Chapala Street  
Santa Barbara, CA 93101  
Email: [cwpp@santabarbaraca.gov](mailto:cwpp@santabarbaraca.gov)

Dear Ms. Anderson:

SANTA BARBARA COMMUNITY WILDFIRE PROTECTION PLAN, STATE CLEARINGHOUSE  
NO. 22020070069

The California Geologic Energy Management Division (CalGEM) has reviewed the Initial Study/Environmental Checklist for the above referenced project dated July 2020. The project is within the boundaries of the city of Santa Barbara and includes the abandoned Mesa Oil Field. CalGEM provides the following comments.

1. With the mission of safeguarding public health and protecting the environment, CalGEM administers regulations and procedures pertaining to all oil and gas wells on California public, private land, and offshore. This includes plugged and abandoned oil and gas wells. Wells must be constructed and maintained in accordance with CalGEM regulations. No well work may be performed on any oil, gas, or geothermal well without written approval from CalGEM. This includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any re-abandonment work.

The Initial Study/Environmental Checklist does not appear to mention the potential hazards associated with plugged and abandoned oil and gas wells and natural oil and gas seeps. The abandoned Mesa Oil Field is located in the city of Santa Barbara and has 134 plugged and abandoned oil and gas wells within the designated oil field. Additional plugged and abandoned wells are located outside of the Mesa Oil Field and within the city. The city has at least one natural oil seep at the foot of the sea cliff at Santa Barbara Point according to Publication No. TR26, Onshore Oil & Gas Seeps in California. To view California

July 31, 2020  
Ms. Amber Anderson  
City of Santa Barbara

oil and gas wells and natural seep locations please visit  
<https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx>

2. Please contact CalGEM immediately if the wellhead of an oil and gas well is located after a fire or during management practices.

Thank you for considering CalGEM's comments. If you have any questions, please contact our District office at (805) 937-7246 or via email at [CalGEMCoastal@conservation.ca.gov](mailto:CalGEMCoastal@conservation.ca.gov).

Sincerely,

A handwritten signature in black ink, appearing to read 'Patricia A. Abel'.

Patricia A. Abel  
Coastal District Deputy

cc: Chrono  
CEQA  
CEQA HQ

August 3, 2020

Amber Anderson  
City of Santa Barbara  
Public Health – Fire  
P.O. Box 1990  
Santa Barbara, CA 93102-1990

**Re: Air Pollution Control District Response to Notice of Preparation of a Program Environmental Impact Report for the Community Wildfire Protection Plan**

Dear Amber Anderson:

The Santa Barbara County Air Pollution Control District (District) appreciates the opportunity to provide comments on the Notice of Preparation (NOP) of a Draft Program Environmental Impact Report (EIR) for the Community Wildfire Protection Plan (CWPP). The City of Santa Barbara Fire Department proposes to implement a comprehensive, coordinated CWPP to protect lives, property, and natural resources threatened by wildland fire in the City of Santa Barbara. The proposed CWPP includes various goals, policies, and actions that represent a compilation of existing and newly proposed policies and actions related to codes and standards, funding, fire rehabilitation, evacuation, fire protection, vegetation/fuels management, and public education.

The CWPP describes a number of activities and equipment that involve air pollutant emissions and may be subject to District permit requirements and prohibitory rules. Specifically, the use of an Air Curtain Destructor to conduct prescribe burning would require a District-issued operating permit pursuant to Title V/Part 70 of the federal Clean Air Act. More information on the District's Title V Operating Permit program is available at [www.ourair.org/title-v-permits](http://www.ourair.org/title-v-permits). The proposed project may also include other equipment and operations that are subject to District permit requirements and prohibitory rules. Therefore, **the District may be a responsible agency under the California Environmental Quality Act (CEQA), and will rely on the EIR when evaluating any District permits for proposed equipment.** In order to avoid additional CEQA documentation related to District permit issuance, the EIR should include the air pollutant emissions for all proposed operations and equipment in the project's air quality impact analysis and include mitigation as appropriate to reduce the impacts. The District's guidance document, entitled *Scope and Content of Air Quality Sections in Environmental Documents* (updated June, 2017), is available online at [www.ourair.org/land-use](http://www.ourair.org/land-use). This document should be referenced for general guidance in assessing air quality impacts in the Draft EIR.

District staff reviewed the Initial Study and NOP of a Draft Program EIR and concurs that air quality impacts should be addressed in the EIR. The EIR should evaluate the following potential impacts related to the CWPP:

**1. Attainment Status and Consistency with the District's Ozone Plan.** Attainment status for the County is posted on the District website at [www.ourair.org/air-quality-standards](http://www.ourair.org/air-quality-standards). The most recent Ozone Plan (previously known as the Clean Air Plan) was adopted in December 2019 and is available at [www.ourair.org/clean-air-plans](http://www.ourair.org/clean-air-plans). The District website should be consulted for the most up-to-date air quality information prior to the release of the Public Draft EIR.

Consistency with local and regional plans, including the District's 2019 Ozone Plan, is required under CEQA for all projects. Consistency with the Ozone Plan should be evaluated on a case-by-case basis, and the EIR should include an assessment of whether the proposed project will be consistent with the Ozone Plan. The Ozone Plan relies primarily on land use, population, and on-road emissions projections provided by the California Air Resources Board (CARB) as a basis for vehicle emission forecasting. All development projects should be evaluated to determine whether direct and indirect emissions associated with the project are accounted for in the Ozone Plan's emissions growth assumptions, and whether the project is consistent with policies adopted in the Ozone Plan.

Many industrial and manufacturing sources, as well as buildings with large heating devices or generator engines, may be subject to District rules and permit requirements. Commercial or industrial stationary source projects will generally be considered consistent with the Ozone Plan if they are consistent with District rules and regulations.

**2. Land Use Conflicts Related to Air Pollutant Emissions.** The EIR should examine whether any of the operations associated with the proposed project will result in air quality impacts to sensitive land uses such as residential, childcare facilities, schools, or senior living communities. Examples of this type of impact include dust and toxic air contaminants such as diesel particulate emissions from trucks and diesel-powered equipment.

Depending on the proposed use of an Air Curtain Destructor to conduct prescribed burning, an evaluation of health risk may be required as part of District permit issuance to demonstrate that its operation does not cause a significant risk to the surrounding community and any nearby sensitive receptors. We recommend that health risk assessments be performed up front during the land use review process to ensure that project-related equipment will not result in a significant impact. Whenever a Health Risk Assessment analysis is required, the results should be incorporated into the CEQA review for the project. **Please contact the District Engineering Division at [engr@sbcapcd.org](mailto:engr@sbcapcd.org) for more information regarding a health risk assessment for this project.**

**3. Increase in Criteria Pollutant Emissions from Proposed Project.** The EIR should present significance thresholds for ozone precursor emissions (reactive organic compounds [ROC], and oxides of nitrogen [NO<sub>x</sub>]) and particulate matter and determine whether the proposed project will produce emissions in excess of the thresholds. The District's *Scope and Content* document contains the District Board-adopted criteria for evaluating the significance of air quality impacts for District projects. In the absence of locally-adopted thresholds, the District recommends that these thresholds be used to determine significance of air quality impacts.

The proposed project will involve mobile source air quality impacts associated with temporary vegetation management-related traffic and maintenance traffic. The air quality impact analysis for

mobile source emissions should be disclosed and should be based on project-specific information. In addition to motor vehicle emissions, the analysis should include emissions associated with the use of mechanized equipment for vegetation management. These emissions (termed “area source” emissions) should be included in the operational phase emission evaluation. The District’s June, 2017 *Scope and Content* document, Section 6, presents recommended mitigation measures for fugitive dust and equipment exhaust emissions associated with construction equipment. Mitigation measures for the mechanized equipment should be enforced as conditions of approval for the project. The EIR should include a Mitigation Monitoring and Reporting Plan that explicitly states the required mitigation and establishes a mechanism for enforcement.

The emissions due to the use of an Air Curtain Destructor to conduct prescribed burning, and any other equipment that requires a District permit, should also be presented in the analysis. These emissions and area source emissions should be added to transportation source emissions prior to applying the project-specific thresholds of significance. If the proposed project exceeds the significance thresholds for air quality, mitigation should be applied to reduce those emissions as appropriate under CEQA. Section 6 of the District’s *Scope and Content* document offers ideas for air quality mitigation. However, project-specific measures should be developed that are pertinent to the specific project and are enforceable by the lead agency.

**4. Global Climate Change/Greenhouse Gas Impacts.** Greenhouse gas (GHG) emissions and global climate change impacts should be addressed in the CEQA document. Global climate change is a cumulative impact; a project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of greenhouse gases.

The EIR should include a quantification of GHG emissions from all project sources (direct and indirect), present significance thresholds, and make a determination regarding the significance of impacts. In addition, we recommend that climate change impacts be mitigated to the extent reasonably possible, whether or not they are determined to be significant.

At a minimum, the project should include any feasible greenhouse gas reduction measures as applicable from the following sector-based list:

- Energy use (energy efficiency, low carbon fuels, renewable energy)
- Utilization of truck fleet and equipment with alternatively fueled or the newest/cleanest possible vehicles and equipment
- Water conservation (improved practices and equipment, landscaping)
- Waste reduction (material re-use/recycling, composting, waste diversion, waste minimization)

For guidance regarding greenhouse gas analysis for CEQA environmental documents, please refer to the CAPCOA CEQA & Climate Change document. CAPCOA has also published *Quantifying Greenhouse Gas Mitigation Measures*, an extensive sector-by-sector compendium of project-specific mitigation measures, including quantification methods to calculate GHG reductions. Both of these documents are available online at [www.capcoa.org](http://www.capcoa.org).

The District has identified some potential strategies for local GHG mitigation that could be implemented in Santa Barbara County. The District solicited feedback from the community on these strategies in a series of workshops. The strategies research by the APCD and the input received from the public has been summarized and posted on the District's website at [www.ourair.org/ghgmitigation-sbc](http://www.ourair.org/ghgmitigation-sbc).

We hope you find our comments useful. We look forward to reviewing the Draft Program EIR. Please contact me at (805) 961-8878 or by e-mail at [WaddingtonE@sbcapcd.org](mailto:WaddingtonE@sbcapcd.org) if you have questions.

Sincerely,



Emily Waddington  
Air Quality Specialist  
Planning Division

cc: Planning Chron File  
William Sarraf, Supervisor, District Engineering Division [email only]



**Mona Miyasato**  
County Executive Officer

105 East Anapamu Street  
Room 406  
Santa Barbara, California 93101  
805-568-3400 • Fax 805-568-3414  
[www.countyofsb.org](http://www.countyofsb.org)

## County Of Santa Barbara



### Executive Office

*Assistant County Executive Officers*  
**Nancy Anderson**  
**Jeff Frapwell**  
**Bernard Melekian**  
**Terri Nisich**

August 3, 2020

Amber Anderson, Wildland Fire Specialist  
City of Santa Barbara  
Public Health-Fire  
P.O. Box 1990  
Santa Barbara, CA 93102-1990  
[cwpp@santabarbaraca.gov](mailto:cwpp@santabarbaraca.gov)

RE: Notice of Preparation for a Program Environmental Impact Report for the City of Santa Barbara Community Wildfire Protection Plan

Dear Ms. Anderson:

Thank you for the opportunity to comment on the Notice of Preparation for a Program Environmental Impact Report for the City of Santa Barbara Community Wildfire Protection Plan. At this time, the County submits comments from the Community Services Department, Parks Division and the Fire Department.

If you should have further questions, please do not hesitate to contact my office directly, or George Chapjian, Director of the Community Services Department, at (805) 568-2467 or Rob Hazard, Fire Marshal for Santa Barbara County Fire, at (805) 681-5554.

Sincerely,

Nancy Anderson  
Assistant County Executive Officer

cc: George Chapjian, Director, Santa Barbara County Community Services Department  
Rob Hazard, Deputy Director of Long Range Planning, Planning and Development Department

Enclosure: Santa Barbara County Community Services Department Letter, dated July 29, 2020  
Santa Barbara County Fire Department Letter, dated July 29, 2020



# Fire Department

*"Serving the community since 1926"*

## HEADQUARTERS

4410 Cathedral Oaks Road  
Santa Barbara, CA 93110-1042  
(805) 681-5500 FAX: (805) 681-5563

Mark A. Hartwig  
Fire Chief  
County Fire Warden

Rob Heckman  
Deputy Fire Chief  
Administration

Woody Enos  
Deputy Fire Chief  
Operations

July 29, 2020

Amber Anderson  
City of Santa Barbara, Public Health-Fire  
P.O. Box 1990  
Santa Barbara, CA 93102-1990

**RE: Notice of Preparation for the Draft Program Environmental Impact Report for the Community Wildfire Protection Plan**

Dear Ms. Anderson,

Thank you for the opportunity to comment on the Notice of Preparation for the draft Program Environmental Impact Report (DEIR) for the draft Santa Barbara City Community Wildfire Protection Plan (CWPP).

The revised draft CWPP provides a well-crafted and cohesive list of recommended actions to mitigate wildfire risk to the City of Santa Barbara. These recommendations are consistent with efforts being taken by stakeholders across Santa Barbara County, including the Santa Barbara County Fire Protection District and the Montecito Fire Protection District.

In particular, the recommended changes to the City fire hazard areas are consistent with both the County Fire Hazard Areas and the State Fire Hazard Severity Zones. Additionally, the recommended vegetation management units in the Foothill and Extreme Foothill zones are well coordinated with existing and proposed fuel treatment projects in the adjoining unincorporated County areas. These recommended actions were based on fire behavior modeling which is standard practice when developing wildfire mitigation strategies. The modeling as presented in the draft CWPP appears thorough and objective.

The CEQA topic areas identified in the Initial Study are appropriate for the scope of the project and appear consistent with the recently approved California Vegetation Treatment Program (CalVTP) PEIR. The CalVTP did analyze all CEQA topic areas and found less than significant impact in the areas of Population/Housing, Agriculture and Forestry

*Serving the cities of Buellton, Goleta, and Solvang, and the Communities of Casmalia, Cuyama, Gaviota, Hope Ranch, Los Alamos, Los Olivos, Mission Canyon, Mission Hills, Orcutt, Santa Maria, Sisquoc, and Vandenberg Village*

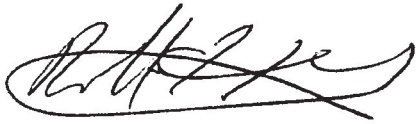


Resources, Mineral Resources and Energy. The CalVTP is now being utilized by Santa Barbara County Fire for project CEQA compliance. As such, I would recommend that the CalVTP be reviewed by CWPP project staff to ensure an appropriate level of consistency.

Santa Barbara County Fire Department supports the Initial Study findings and look forward to review of the final product.

Please feel free to give me a call if you have any questions. I look forward to continued collaboration in our common goal of making the Santa Barbara communities as safe as possible.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Hazard", with a stylized flourish at the end.

Rob Hazard  
Division Chief/ Fire Marshal  
Santa Barbara County Fire Department  
805-896-6402



**Community  
Services  
Department**  
Connecting People to Opportunities

George Chapjian, Director, Community Services  
Sarah York Rubin, Executive Director, Office of Arts & Culture  
Ryder Bailey, CPA, Chief Financial Officer, Community Services  
Dinah Lockhart, Deputy Director, Housing & Community Development  
Jeff Lindgren, Superintendent, Parks Division  
Ashley Watkins, Division Chief, Sustainability Division



July 29, 2020

Amber Anderson  
City of Santa Barba, Public Health- Fire  
P.O. Box 1990  
Santa Barbara, CA 93102-1990

**RE: Notice of Preparation for the Draft Program Environmental Impact Report for the Community  
Wildfire Protection Plan**

Dear Ms. Anderson:

Thank you for the opportunity to comment on the Notice of Preparation for the draft Program Environmental Impact Report (DEIR) for the draft Community Wildfire Protection Plan (CWPP).

Rocky Nook County Park is located at the base of Mission Canyon. The historic Rockwood Clubhouse, County administration buildings, and recreational amenities all exist within the park. Although the park is just outside the boundaries of the CWPP, it is directly adjacent to as well as down slope of the Mountain Drive/Las Tunas Vegetation Management Unit (VMU) as identified in the CWPP. As such, wildfire protection activities within this VMU would appear to affect the park and its structures. Therefore, the Parks Division requests the Cultural Resources, Recreation and Wildfire sections of the program DEIR include assessment of impacts and mitigation to this particular park.

The Parks Division does recognize the park is located within the Mission Canyon CWPP area however the down slope adjacent proximity of the park to the VMU would warrant such analysis in the DEIR particularly given that the overall area is included within the Cal Fire Adopted Very High Fire Hazard Severity Zone. The Parks Division is appreciative that the 5.38 acre Mountain Drive Extension directly adjacent to the park is proposed to be added to this VMU that will provide added protection.

I can be reached at (805) 729-6922 if you have any questions or concerns.

Sincerely,

George Amoon  
Contract Park Planner

Cc: Rob Hazard, Santa Barbara County Fire Department

RECEIVED

JUL 14 2020

SB COUNTY  
PLANNING & DEVELOPMENT

**NOTICE OF EIR PREPARATION**  
**PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE**  
**COMMUNITY WILDFIRE PROTECTION PLAN**

**Date:** July 3, 2020

**TO:** State Clearinghouse, Responsible and Trustee Agencies, Community Members  
and Interested Parties

**PROJECT TITLE:** City of Santa Barbara Community Wildfire  
Protection Plan

**LEAD AGENCY:**  
City of Santa Barbara  
Public Safety – Fire  
925 Chapala Street  
Santa Barbara, CA 93101

**PROJECT CONTACT:**  
Amber Anderson, Wildland Fire Specialist  
(805) 564-5720//cwpp@SantaBarbaraCA.gov

**PROJECT LOCATION:**  
City of Santa Barbara

**PURPOSE OF THIS NOTICE OF PREPARATION**

The City of Santa Barbara as the Lead Agency under the California Environmental Quality Act has prepared this notice of preparation (NOP) to inform agencies and interested parties that a program EIR will be prepared for the Community Wildfire Protection Plan (CWPP). The purpose of a NOP is to provide sufficient information about the project and its potential environmental impacts; to allow agencies and interested parties the opportunity to provide a meaningful response related to the scope and content of the Program EIR; and consider mitigation measures and alternatives that should be addressed (California Code of Regulations Section 15082[b]). Additional details about the project's potential effects are included in the attached Initial Study.

**PROJECT DESCRIPTION:**

The City of Santa Barbara Fire Department (SBFD) is proposing to implement a comprehensive, coordinated Community Wildfire Protection Plan (CWPP) to protect lives, property, and natural resources threatened by wildland fire. The proposed CWPP updates the City's 2004 Wildland Fire Plan consistent with the federal Healthy Forests Restoration Act passed in 2003 and subsequent guidance booklet "Preparing a Community Wildfire Protection Plan; A Handbook for Wildland-Urban Interface Communities," issued in 2004, accounting for changes in the City of Santa Barbara's (City's) fire environment and work completed under that 2004 Wildland Fire Plan. While not a



governing document requiring action, a CWPP is a strategic plan that outlines a series of policies and action items that are intended to guide implementation of the CWPP. The policies and actions focus on codes and standards, funding, fire rehabilitation, evacuation, fire protection, vegetation/fuels management, and public education. Action items identify tasks to be implemented by the SBFD, and other responsible City departments, to achieve the stated goal of protecting lives, property, and natural resources threatened by wildland fire. The CWPP process is intended to provide the community a forum for identifying values at risk from wildfire, which may include people, property, natural resources, cultural values, economic interests, and infrastructure. The identification of these values at risk by the community strongly influences the potential wildfire hazard mitigation projects identified in the proposed CWPP.

The proposed CWPP includes various goals, policies, and actions that represent a compilation of existing and newly proposed policies and actions related to codes and standards, funding, fire rehabilitation, evacuation, fire protection, vegetation/fuels management, and public education. Current activities conducted by the SBFD under the 2004 Wildland Fire Plan were analyzed in the Final Program Environmental Impact Report for the 2004 Wildland Fire Plan (City of Santa Barbara 2004) and are incorporated herein by reference. This description only addresses new proposed policies and/or actions that could result in impacts to the environment, which include the following categories:

- Proposed modifications to the High Fire Hazard Area
- Proposed modifications to the Vegetation Management Areas
  - Defensible space
  - Roadside clearing
  - City Vegetation Management Units (VMUs)
  - Community Fuels Treatment Network (CFTN)
- Proposed modifications to the Vegetation Management Methods
- Communication Facility Maintenance

The proposed CWPP also includes several other policies and actions that would not involve any physical impacts to the environment, including public education, interagency coordination, acquisition of funding, data gathering and management, acquisition of firefighting and communications equipment, and evacuation planning.

The City has prepared an Initial Study and determined that the CWPP could have significant environmental impacts and therefore an environmental impact report shall be prepared. The Initial Study is included as Attachment A of this NOP. Impacts could occur in the following resource areas:

- |  |  |  |
|--|--|--|
| <input checked="" type="checkbox"/> Aesthetics           | <input type="checkbox"/> Agriculture and Forestry Resources            | <input checked="" type="checkbox"/> Air Quality/Greenhouse Gas Emissions |
| <input checked="" type="checkbox"/> Biological Resources | <input checked="" type="checkbox"/> Cultural Resources                 | <input type="checkbox"/> Energy  |
| <input checked="" type="checkbox"/> Geology and Soils    | <input checked="" type="checkbox"/> Hazards & Hazardous Materials      | <input checked="" type="checkbox"/> Hydrology/Water Quality              |
| <input checked="" type="checkbox"/> Land Use/Planning    | <input type="checkbox"/> Mineral Resources                             | <input checked="" type="checkbox"/> Noise                                |
| <input type="checkbox"/> Population/Housing              | <input checked="" type="checkbox"/> Public Services                    | <input checked="" type="checkbox"/> Recreation                           |
| <input checked="" type="checkbox"/> Transportation       | <input checked="" type="checkbox"/> Tribal Cultural Resources          | <input checked="" type="checkbox"/> Utilities and Service Systems        |
| <input checked="" type="checkbox"/> Wildfire             | <input checked="" type="checkbox"/> Mandatory Findings of Significance |  |

**ALTERNATIVES TO BE EVALUATED IN THE EIR** In accordance with the State CEQA Guidelines (14 CCR Section 15126.6), the Program EIR will describe a range of reasonable alternatives to the project that are capable of meeting most of the projects' objectives and that would avoid or substantially lessen any of the significant effects of the project. The EIR will also identify any alternatives that were considered but rejected by the lead agency as infeasible and briefly explain the reasons why. The EIR will provide an analysis of the No Project Alternative and will also identify the environmentally superior alternative.

#### **DOCUMENTS AVAILABLE FOR PUBLIC REVIEW**

Due to COVID 19 shelter-in-place restrictions, all documents are available online at the City's project website: <https://cwpp.santabarbaraca.gov/>

**PUBLIC COMMENT PERIOD: July 3, 2020 to August 3, 2020.**

The City of Santa Barbara encourages the public to provide written comment on this and other projects. Comments on the Initial Study must be submitted by **Monday August 3, 2020 at 4:30 p.m.**

Please send your comments to:

Amber Anderson City of Santa Barbara, Public Health - Fire  
P.O. Box 1990, Santa Barbara, CA 93102-1990

or send them electronically to [cwpp@SantaBarbaraCA.gov](mailto:cwpp@SantaBarbaraCA.gov)

**NOTICE OF SCOPING MEETING:**

Pursuant to California Public Resources Code Section 21083.9 and California Code of Regulations, Title 14 ("CEQA Guidelines") Section 15082, the Lead Agency will conduct a scoping meeting for the purpose of soliciting oral and written comments from interested parties requesting notice, responsible agencies, agencies with jurisdiction by law, trustee agencies, and involved federal agencies, as to the appropriate scope and content of the EIR.

**SCOPING MEETING:**

Date: July 16, 2020

Time: 1:00 pm

Location: Most City Board and Commission meetings are being facilitated through telecommunications to avoid close personal contact during the COVID-19 crisis. Please refer to the current Board/Commission meeting agenda for further information on how to participate, or contact the Board/Commission secretary for further assistance.

**AMERICANS WITH DISABILITIES ACT:** In compliance with the Americans with Disabilities Act, if you need special assistance to gain access to, comment at, or participate in this meeting, **please contact Amber Anderson at (805) 564-5720.** If possible, notification at least 48 hours prior to the meeting will enable the City to make reasonable arrangements in most cases.





**Santa Barbara Audubon Society**  
*A Chapter of the National Audubon Society*

PO Box 5508  
Santa Barbara, CA 93150  
[www.SantaBarbaraAudubon.org](http://www.SantaBarbaraAudubon.org)

July 13, 2020

City of Santa Barbara  
Planning Commission  
c/o Planning Commission Secretary  
P.O. Box 1990, Santa Barbara, CA 93102-1990  
[PCSecretary@SantaBarbaraCA.gov](mailto:PCSecretary@SantaBarbaraCA.gov)

Ms. Amber Anderson  
City of Santa Barbara, Public Health - Fire  
P.O. Box 1990, Santa Barbara, CA 93102-1990  
[cwpp@SantaBarbaraCA.gov](mailto:cwpp@SantaBarbaraCA.gov)

The Santa Barbara Audubon Society (SBAS) would like to thank the City of Santa Barbara's Planning Commission and Fire Department for this opportunity to comment on the scope and content of the Programmatic Environmental Impact Report (PEIR) and associated Initial Study (IS) for the revised draft City of Santa Barbara Community Wildfire Protection Plan (hereafter CWPP). We primarily offer recommendations on the scope and content of the PEIR, but also include comments on the IS and CWPP.

SBAS is a chapter of the National Audubon Society with approximately 1100 members in the Santa Barbara area. The mission of the SBAS is to protect area birdlife and habitat and connect people with birds through education, conservation, and science. Our members, many of whom reside in Santa Barbara, frequently use the open spaces, parks, and natural areas in and around the City of Santa Barbara for recreational and outreach activities.

We appreciate the large amount of time and effort that the City and its consultant (Dudek) have devoted to the development of the CWPP and IS. We support many aspects of the plan, including provisions for structure hardening, fire-resistant building codes, retrofit programs for non-conforming structures, prompt Fire Department responses, warning and evacuation procedures, defensible space standards, educational and outreach programs, reductions in invasive species, and vegetation clearances along roads. Most of our comments, then, revolve around the protection of natural resources and the need to balance vegetation management practices sensitively and effectively.

We respectfully request that the following issues be addressed by the PEIR.

**Bird protections:**

We appreciate that the CWPP addresses bird protections, primarily in Appendices C and especially Appendix E. We emphasize that both federal (the Migratory Bird Treaty Act, MBTA) and state [California Dept. of Fish and Wildlife (CDFW) Codes 3503, 3503.5, 3505, 3513] statutes collectively protect migratory birds, raptors, their nests, and eggs. As a consequence, it is incumbent on the City of Santa Barbara to develop plans and actions that insure compliance with these statutes. As a consequence, we recommend that the PEIR include:

- A detailed discussion of the MBTA and CDFW Codes 3503, 3503.5, 3505, and 3513.
- An analysis of the completeness and adequacy of the CWPP's bird protection measures for ensuring that vegetation management policies and actions comply with state and federal statutes, with recommendations for Implementation Actions that specify and strengthen bird protections. The bird protection provisions included in the revised draft CWPP need to include more detailed specifications regarding the timing (relative to vegetation management actions), frequency (during actions), and extent (distance from vegetation management activities) of nesting bird and natural resources surveys by qualified biologists, as well as the avoidance distances from any nests that are found. Detailed guidelines for bird protection provisions can be found in the plans for neighboring jurisdictions (such as the County's Eastern Goleta Valley Community Plan [[https://www.countyofsb.org/uploadedFiles/plndev/Content/Code\\_and\\_Policy/EGVCP%20Adopted%20w%20CCC%20Modifications%20FINAL%20Online%20Version.pdf](https://www.countyofsb.org/uploadedFiles/plndev/Content/Code_and_Policy/EGVCP%20Adopted%20w%20CCC%20Modifications%20FINAL%20Online%20Version.pdf)] and the San Marcos Pass/Eastern Goleta Valley CWPP [<https://www.countyofsb.org/plndev/projects/cwpp.sbc>], as well as the California Department of Fish and Wildlife's (CDFW) Conservation Measures for Biological Resources that may be Affected by Program-level Actions.
- An analysis of the impacts of vegetation management activities on raptors, as well as birds more generally protected by the MBTA. County and state statutes (e.g., CDFW 3503.5) often provide special status to raptors and vultures, so the PEIR should include a detailed analysis of impacts on raptors and vultures. Because many raptors and vultures rely on both trees for nesting or resting and nearby grassland areas for foraging, and a variety of migratory birds nest in grassland habitat, it is important that vegetation management work avoid the bird nesting season in all habitats (grasslands, woodlands, chaparral, coastal sage scrub).
- An analysis of the impacts of noise associated with vegetation management or maintenance activities on birds and other wildlife.
- A list of vertebrates found within the City's boundaries. This inventory will allow a more rigorous assessment of the impacts of CWPP policies and actions on native species. We suggest that the developers of the PEIR consult with local experts (Mark Holmgren and Adrian O'Loughlen [SBAS], Paul Lehman [WINGS], Paul Collins [Santa Barbara Museum of Natural History], Sam Sweet [UCSB], Larry Hunt [Hunt Consulting]) and examine local databases and literature (e.g., SBAS's Breeding Bird Study and UCSB's Cheadle Center for Biodiversity and Ecological Restoration records, in addition to the CNDDB) in developing such a list. We note that the FEIR for the City's GP lists 27 sensitive plant and 30 sensitive animal species within the City's limits.



## Impacts on habitat and migration corridors

SBAS contends that the protection of birds and their habitats depends primarily on protecting or restoring native vegetation, so a major concern is the degree to which the CWPP creates a template for destroying or degrading native vegetation. Because the CWPP primarily represents a program rather than a set of detailed vegetation management projects, it is difficult to assess the environmental impacts of various CWPP provisions. To do so would require knowledge of the environmental conditions and the exact methods (manual, mechanical, biological, prescribed fire) to be used at each site or in each area. We recommend that the PEIR address the following.

- A list and discussion of all relevant City General Plan (GP) and City Coastal Land Use Plan (CLUP) environmental policies, as well as City ordinances, pertinent to areas that will be affected by the CWPP. Because the 2019 CLUP is much more detailed, prescriptive, and up-to-date than the 2011 GP it is not clear if CLUP policies apply outside the Coastal Zone or if CLUP policies and actions represent standard City practice in all City areas. This should be clarified, particularly with regards to special CLUP dispensations accorded to fire management activities in sensitive habitat (eg., 4.1.6 G, 4.1.17, 4.1-21).
- Examination of the congruence of CWPP policies and actions with GP/CLUP policies. The intent and content of many GP/CLUP policies are to protect, maintain, and restore sensitive habitats and species. (e.g., GP ER 11, 12, 19, 21)
- Analysis of the impacts of CWPP policies and actions on City GP/CLUP native habitat restoration goals (see, e.g., GP ER 12.4.d).
- Detailed maps of environmentally sensitive habitat areas (ESHAs), creeks, wetlands, and wildlife migration corridors, as well as habitat buffers. Although the CWPP contains a vegetation map, it should be accompanied by a map of sensitive and critical habitats, habitat buffers, and migratory corridors. The map of the proposed Vegetation Management Units (VMUs) should be superimposed on the map of sensitive habitats and their buffers and, separately, on the map of vegetation types so that overlap or adjacency between VMUs and sensitive or native habitat can be discerned. Although it will need to be updated, a map of biological resources for the City can be found in the FEIR, Section 7, for the City's GP (Fig. 7.1). Maps of sensitive resources are required by GP ER 12.1, as a matter of policy.
- Analysis of the impacts and possible mitigations for CWPP policies and actions affecting sensitive habitats, species, habitat buffers, and migration corridors as per standard EIR procedures. The PEIR should include a discussion of the rarity of and threats to specific sensitive vegetation types at regional and statewide levels, to provide a context for local actions. For example, coastal sage scrub is a rare and dwindling vegetation formation, which deserves special consideration in planning efforts. Because sage, buckwheat, and coyote bush are native species that characterize coastal sage scrub, control of these

species could destroy or degrade rare and dwindling native habitat and associated sensitive plant and animal species.

- Analysis of the impacts of CWPP policies and actions on creeks, their riparian zones, their habitat buffers, and downstream receiving waters (wetlands, estuaries, ocean) because these are biodiversity hotspots, support many sensitive species, and are the focus of protection provisions at several jurisdictional levels. As the CWPP mentions, streams and riparian zones can actually act as fire buffers because of a high fuel moisture content. Although it is laudable that the Fire Department will work with the Creeks Division and others to develop guidelines and best management practices for work in creeks, riparian zones, wetland, and habitat buffers, we contend that such work should be completely avoided, consistent with City GP/CLUP and state policies. Downed and understory riparian and creek vegetation provides important habitat and dispersal corridors for small mammals, some birds, reptiles, and amphibians, with repercussions for species that consume them, such as raptors and carnivorous mammals. It is not at all clear how vegetation management activities would affect creek setback areas (GP ER21.1a: 25' outward from stream bank tops) and if the proposed activities will follow Santa Barbara Flood Control District recommendations (ER21.1c: 50' setbacks from the tops of natural banks, 25' from the tops of hard banks). We also note that GP ER 12.4.b. stipulates that impacts to understory vegetation, soils, and aquatic habitats underneath trees should be minimized. As a consequence, we have concerns about any CWPP work that is conducted in creek beds, riparian zones, wetlands, and habitat buffers, and believe that any intrusive work or activities in these habitats (such as removal of dead brush or snags, grazing in stream channels or riparian zones) should be prohibited, except for the purpose of removing exotic plant species (contrast with Best Management Practices in IS Table 10, Biological, Sensitive Habitat).
- A rigorous analysis of the environmental impacts of different vegetation management methods (i.e., manual, mechanical, biological, and/or prescribed fire methods), then propose Implementation Actions that specify the methods that actually will be used. We greatly appreciate that the City and revised draft CWPP eschew the use of herbicides in vegetation management; that oak seedlings, saplings, and trees will be retained, perhaps leading to shaded fuel breaks; and the emphasis on reducing fine, dead, and ladder fuels, in most cases manually. Except for mowing, the scientific literature indicates that most of the mechanical methods, such as mastication or the use of bulldozers in constructing fuel breaks, have negative long-term impacts on birds, other wildlife, and their habitats. Because SBAS supports the protection and maintenance of native vegetation, including native shrublands, we contend that goats, because of their broad diets, can damage or destroy native as well as exotic vegetation (see discussion in SMP/EGV CWPP). We do support the emphasis on manual methods and suggest that sheep may be a suitable replacement for goats in managing flammable annual grasslands because they do not eat sensitive shrubs, so the PEIR should recommend Implementation Actions that stipulate that intrusive and damaging methods (mastication, bulldozing, goats) should be avoided.

Judging from the estimated staff and equipment needs for CWPP actions (Table 9), the City appears to avoid the use of masticators and tractors in vegetation management activities already, so these implementation actions would simply formalize this practice. We also suspect that broadcast prescribed fire, as opposed to pile burns, may have limited utility in urban and suburban environments because of liability and air quality concerns; however, the small area affected by most prescribed burns within the City (< 1 acre) indicate that this method may be useful in some contexts. Finally, proposed vegetation management activities would remove 30 – 50 % of vegetation; however, it is not clear how this is measured (cover, biomass, etc.), how vegetation removal is spread across the landscape (the spatial pattern of vegetation removals or reductions), and how these aspects of vegetation management practices would affect native species and habitats.

- Delineation of the exact location and extent of VMUs, then evaluation of their effectiveness in preventing fire ignitions and fire spread, as well as their local environmental impacts. Proposed VMU expansions are extensive (IS: over 876.5 acres according to Table 6, over 675 acres summing additions in Table 7). Although new fire hazard designations were based largely on the City's FlamMap modeling efforts, these models emphasized vegetation characteristics rather than weather (they use only one set of meteorological variable values). Thus, they do not capture the range of weather conditions experienced by Santa Barbara.
- An integrated analysis of the impacts of the CWPP's policies and actions on hydrological, geological/soil, water quality, and biological conditions. CWPP policies and actions have the potential to affect runoff, erosion, sediment transport and deposition, and contaminant (nutrients, biocides, metals) mobilization and inputs. Thus, CWPP policies and actions have the potential to affect habitats and species at the location of actions, in downslope or adjacent habitats, including in buffer habitats, riparian zones, and creeks, and in downstream habitats, such as wetlands, estuaries, and the ocean. The PEIR needs to evaluate all of these downslope and downstream impacts of CWPP actions.
- Evaluations of the effectiveness and environmental impacts of ongoing vegetation management practices, both to act as a guide to proposed vegetation management actions and to determine their efficacy in preventing environmental damage. The City developed the revised draft CWPP because climatic, infrastructure, vegetation, and other conditions affecting the frequency, severity, and impacts of wildfires have changed greatly in the last 16 years since the 2004 Wildland Fire Plan was approved. Following this same logic, then, it is not clear that ongoing vegetation management activities based on the 2004 plan are still appropriate or effective, so these need to be evaluated. Because we assume that much native vegetation in existing VMUs or the Community Fuels Treatment Network (CTFN) have been converted to annual grassland or ruderal land, which is highly flammable, a key consideration is the degree to which funding constraints impinge on the Fire Department's ability to maintain these areas frequently enough to

prevent fire ignition and spread. Further, although we generally support the City's defensive space requirements, we do have concerns when defensive space creation or maintenance impinges on sensitive habitats and species. We suggest that the PEIR examine balancing defensive space and environmental considerations, perhaps indicating Implementation Actions that stipulate a process for site-specific evaluations and adjustments to avoid impacts on sensitive natural resources.

- Analysis of the impacts of CWPP actions in parks and open spaces on natural resources and recreational activities. Because many citizens use parks and open spaces for walking, hiking, bird watching, nature study, and aesthetic enjoyment, the PEIR needs to evaluate the impacts of CWPP policies and actions on recreational activities.
- List of regulatory agencies (CDFW, US Fish and Wildlife Service, National Marine Fisheries Service, Army Corps of Engineers, Regional Water Quality Control Board), their purviews and relevance to the CWPP, required permits for CWPP actions (e.g., CDFW 1601 permit), and the associated processes for consultation.

## **Coastal Zone**

The CWPP proposes no new actions in the Coastal Zone; however, it does re-designate an area in the southwestern coastal corner of Santa Barbara (Area T) as a High Fire Hazard Area. SBAS suggests that the City consult with the California Coastal Commission (CCC) to determine if this re-designation is subject to Coastal Code provisions and the oversight of the CCC.

## **General comments**

Wildfires are a natural, ubiquitous, and pervasive feature of our local landscapes, and native plants and animals have adapted to natural fire regimes. Without human interventions, most local natural vegetation and wildlife recover quickly from wildfire and a succession of plant and associated bird and wildlife species occur after fires. As a consequence, fire is actually necessary to insure the existence and diversity of native species in our local ecosystems. Wildfire, however, has increased in southern California because of human development and impacts, particularly expansions into wildlands and the wildland-urban interface (WUI), against a backdrop of climate change. Fire expert Jon Keeley, of USGS and UCLA, has stated that 95% of the fires in southern California are started by humans, and that increases in the incidence and extent of fires parallel expanded road systems and WUIs. If native shrublands, for example, are burned too often, it frequently results in type conversion to exotic grasslands, which are even more flammable than native shrublands. This points to the need to counteract fire risk with management actions that reduce, rather than exacerbate, fire ignitions and spread.

Fire and fuel management practices, however, actually can exacerbate increasing fire threats by promoting the establishment of fine, dead, flammable fuels, such as exotic grasses. As a consequence, vegetation management actions must be completed frequently in areas that have already been type-converted to flammable exotic vegetation (see above). The difference, then, between wildfires versus fire and vegetation management actions is that the local fauna and flora

are adapted to and recover from wildfires but their abundances and habitats are altered more-or-less permanently by fire and vegetation management practices. In the latter case, then, important habitat for native species is lost or degraded, resulting in long-term declines in those species. As a consequence, the PEIR needs to examine both the short- and long-term consequences of CWPP provisions and actions for both fire suppression and the protection of environmental values. The PEIR should include:

- An examination of how type conversion caused by vegetation management activities both increases fire risk (unless fuel loads are frequently reduced) and diminish native species and their habitats.
- An analysis of the influence of foreseeable climate change on the environmental impacts of CWPP policies and actions.

There is little mention of post-fire management policies or practices in the CWPP. As a consequence, we suggest that the PEIR include:

- An analysis of the City's management policies and practices after fire, focusing on the impacts of these policies and practices on natural resources. These actions could include attempts to replant areas, remove snags and debris, and stabilize slopes (e.g., through hydromulching), and should include the activities of associated agencies, such as County Flood Control.

Finally, we offer suggestions for other, general sections of the PEIR.

- Mitigation measures and alternative projects that minimize intrusion into native habitats and that minimize impacts on native species.
- Detailed processes for evaluating the effectiveness and environmental impacts of specific vegetation management projects (i.e., those at specific locations) with provisions for public input. For inland areas, the City of Santa Barbara GP and associated FEIR note that certain habitats (e.g., creeks, riparian zones, wetlands) are generally considered ESHAs because of their sensitivity and high biodiversity. On the other hand, these documents note that chaparral and coastal sage scrub (but see above) may be considered ESHA if they contain sensitive species; however, such determinations are usually not made until the time that a project is activated. Although these determinations are made in consultation with a qualified biologist and the City's Environmental Analyst, they would probably benefit from public input, given the diversity of expertise and information found in Santa Barbara. Further, it is not clear if any approved PEIR will be invoked to plead CEQA compliance as individual projects for specific locations move forward, or if there will be additional CEQA analysis with public input based on site-specific information. All of this should be clarified in the PEIR.

Because wildfire is a natural feature of our local ecosystems, the so-called "fire" or "fuel" problems are essentially human problems, created and maintained by people, their activities, and

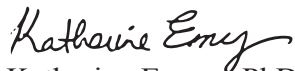
their institutions. Many of the fire issues facing the City of Santa Barbara result from the historical absence of judicious planning efforts, appropriate zoning ordinances, and rigorous building codes. As a consequence, we strongly support City policies that reduce or prevent further development in High Fire Hazard Severity Zones (LG 6.5, S33 b and .1) and for aggressively pursuing retrofit programs for nonconforming structures. We also suggest that the PEIR include:

- An examination of possible City programs that purchase properties that frequently burn and convert them to green fire buffers, as has been done in other California municipalities.

We believe that such policies and actions will get at the root of the fire problem, saving many lives and protecting many properties in the future, while protecting our precious natural resources.

We hope these comments are useful. Thank you for your time and consideration.

Sincerely,



Katherine Emery, PhD  
Executive Director  
Santa Barbara Audubon Society





July 14, 2020

Chair Deborah Schwartz  
Commissioner Roxana Bonderson  
Commissioner Gabriel Escobedo  
Commissioner Jay Higgins  
Commissioner Sheila Lodge  
Commissioner Barrett Reed  
Commissioner Lesley Wiscomb  
630 Garden Street  
Santa Barbara, CA 93101

RE: Community Wildfire Protection Plan Scoping Hearing

Dear Chair Schwartz and Commissioners,

The Santa Barbara Association of REALTORS® (SBAOR) represents roughly 1,300 REALTORS® throughout the South Coast and our mission includes engaging in real estate related community issues affecting our members and/or their clients who are homeowners, landlords, tenants, and commercial owners. While we understand there will be no action taken at this scoping hearing on the environmental review or the Draft Community Wildfire Protection Plan (CWPP), in reviewing the CWPP we have some comments and concerns on some of the policy actions that we want to bring to your attention for future consideration.

*Policy 1.1 Consolidate and re-name the City's High Fire Hazard Area following the California Department of Forestry and Fire Protection's (CAL FIRE's) next Very High Fire Hazard Severity Zone (VHFHSZ) update as follows: • Merge the Foothill and Extreme Foothill Zones and rename as the City's Very High Fire Hazard Severity Zone • Merge the Coastal and Coastal Interior Zones and rename as the City's High Fire Hazard Severity Zone (HFHSZ). Defensible space distances for the new zones shall be 50 to 100 feet for the new HFHSZ and 100 to 150 feet for the new VHFHSZ. Within any HFHSZ, additional defensible space may be required on slopes greater than 30%. Slopes ranging between 30% and 40% may require 200 feet of defensible space. Slopes ranging from 41% to 60% may require 250 to 300 feet of defensible space.*

SBAOR is very concerned with merging the Coastal and Coastal Interior Zones and rename as the City's High Fire Hazard Severity Zone (HFHSZ). We support the spirit of merging these two zones and renaming them to consolidate and simplify, however this is not the only thing this proposed modification would do. This proposal would be disastrous for homeowners in these zones because the proposed modifications to the Very High Fire Hazard Severity Zone (VHFHSZ) and HFHSZ would add a total of **547.18 acres and 1,417 structures**.

The added areas include large swaths of neighborhoods (e.g. Bel Air) that have not had a history of fires per the Fire History Map. Conflating the non-fire prone inland areas with the foothill zones that are demonstrably fire prone, is not supported in this document. We are concerned with the decrease of property values and increase costs associated with insurance and landscape/remodeling this mapping could cause. If this designation lowers property values, tax revenues and the City budget (which includes the Fire Department) would be negatively affected.

Instead of renaming and adding parcels to these zones, we suggest you place an overlay in these areas stating the properties need to comply with the "High Fire Hazard Landscape Guidelines and Defensible Space Requirements."

Santa Barbara Association of REALTORS® | 1415 Chapala Street | Santa Barbara, CA 93101  
(805) 963-3787 | (805) 966-9664 FAX | [www.sbaor.com](http://www.sbaor.com)



REALTOR® is a registered trademark that identifies a professional in real estate who subscribes to a strict code of ethics as a member of the National Association of REALTORS®

We also want to address that changing the designation would take away property owners' right to have an Accessory Dwelling Unit (ADU) on their property. We understand prohibiting ADU's in the extremely high fire zone, but not in all the high fire zones, especially the newly designated ones. We request that you and the City Council really review the ADU allowance within high fire zones since "one size" does not fit all. Now is not the time to remove the ability of Santa Barbarans to legally add housing units when we are in a housing crisis and some of the residents might be looking for ways to supplement their income during the COVID crisis.

Should you have any questions regarding our comments, please contact Krista Pleiser, Government Affairs Director, at [kpleiser@sbaor.com](mailto:kpleiser@sbaor.com) or (805) 884-8609. Thank you.

Sincerely,



Staci Caplan  
2020 President





From: Cathy Conried [<mailto:conried@cox.net>]  
Sent: Thursday, July 16, 2020 4:44 PM  
To: Community Wildfire Protection Plan <[CWPP@SantaBarbaraCA.gov](mailto:CWPP@SantaBarbaraCA.gov)>  
Subject: Proposed border

EXTERNAL

I oppose being included in the geographical wildfire zone. We are not at risk, and see this as a way for insurance companies to either cancel or increase insurance fees.

Cathy Conried  
1537 W. Valerio St.  
SB, CA 93101

**From:** Claudia Lapin <[claudia.lapin@gmail.com](mailto:claudia.lapin@gmail.com)>  
**Sent:** Thursday, July 16, 2020 8:24 AM  
**To:** Joe Poire <[JPoire@SantaBarbaraCA.gov](mailto:JPoire@SantaBarbaraCA.gov)>  
**Subject:** Fwd: flaw in your thinking re CWPP Initial Study/Environmental Checklist

EXTERNAL

----- Forwarded message -----

**From:** **Claudia Lapin** <[claudia.lapin@gmail.com](mailto:claudia.lapin@gmail.com)>  
**Date:** Thu, Jul 16, 2020 at 8:19 AM  
**Subject:** flaw in your thinking re CWPP Initial Study/Environmental Checklist  
**To:** <[cwpp@santabarbaraca.gov](mailto:cwpp@santabarbaraca.gov)>

Greetings All,

Though your intentions are good, I see a defect in your sudden decree to ban ADUs in the foothills based on fire evacuation limits.

It's important to offer a sunset provision to those in the pipeline already, who may have spent hundreds of thousands, like me, preparing to submit to the City under then-current legal limits. You can't suddenly impose a ban, ignoring that people are harmed who may not have been so fortunate as me to escape your ban by 5 days.

Additionally, I challenge your notion of evacuation standards. Consider how little difference there is between evacuation of a 5 bedroom house, or a 3 bedroom house with a 1 bedroom ADU. If someone has the driveway width, the turnaround, is this not adequate?

I installed my own fire hydrant at the entrance to our property. Having repaired the main house after Jesusita, I am very fire conscious in how I'm building the new structure, exceeding all basic standards.

Your actions can be viewed as an attempt to defeat the purpose of the statewide law mandating fast-tracking of ADUs. We have a housing crisis. We need more housing! It took me over a year to prepare to submit to the city, then 503 days to get a permit. You owe the people who didn't make the cut a sunset provision. You need to reconsider how some people are choosing to build, and what they already have onsite in terms of size/evacuation requirements.

Note that the City of San Jose lends its constituents money to build ADUs. Note the repressive atmosphere for builders in SB. Note how little regard you gave those of us who were diligently preparing, to scramble under your mandate closure.

My own response is I will never vote for anyone in office again who did this. It's irresponsible, probably going to result in an expensive lawsuit.

Sincerely,  
Claudia Lapin

**From:** Stephen Pearson [<mailto:happyswede123@gmail.com>]  
**Sent:** Thursday, July 16, 2020 11:56 AM  
**To:** Community Wildfire Protection Plan <[CWPP@SantaBarbaraCA.gov](mailto:CWPP@SantaBarbaraCA.gov)>  
**Cc:** 'Diane Pearson' <[peacefuldiane@gmail.com](mailto:peacefuldiane@gmail.com)>; 'Stephen Pearson' <[happyswede123@gmail.com](mailto:happyswede123@gmail.com)>  
**Subject:** Further comment and concern on the most recent CWPP draft.

**EXTERNAL**

I have previously sent my comments on several aspects of the proposed Community Wildfire Protection Plan. I have seen the revised draft. Rather than reiterate other comments, I will simply note my major concern on the proposed consolidation of high and extreme high fire hazard areas into a single Very High Fire Hazard Severity Zone (VHFHSZ). Beyond regulatory and zoning impacts that may significantly impact value, improvements and salability of homes throughout the Foothill area, the consolidation will further impact **insurance availability and cost!** Non-renewals, tripling of rates (if coverage is even available) are already rampant. The change/consolidation may simply act as a further spur to insurance companies to continue that process.

Without insurance, we cannot sell, buyers cannot borrow, and may not be interested in any event unless the property is reasonably and reliably insurable. We may end up holding a property that has significantly reduced value, salability, and significantly increased personal risks of uninsured losses.

At least at this time, the California Fair Plan does not provide a solution. Although the limits have increased to \$ 3,000,000, it still does not cover liability (but requires that type of coverage through third parties as a precondition of coverage under the Fair Plan). Those needing to use the California Fair Plan need additional separate coverages in liability, and "Difference in Condition" policies.

Our request is that the Plan better allow flexibility in assigning names/requirements/restrictions to the actual conditions in various neighborhoods before simply grouping them all together in a single "Very High Fire Hazard Zone." We are in a low density neighborhood with both water and low traffic roads. So far, we have been able to retain our existing insurance, but that could non-renew at any time. The company is no longer writing new policies in California. If we cannot reasonably insure, we will simply have to sell for whatever we can get. We cannot risk losing an uninsured home.

Stephen Pearson  
275 El Cielito Road  
Santa Barbara, CA 93105  
(805) 637-6236

**From:** [medesign@verizon.net](mailto:medesign@verizon.net) [<mailto:medesign@verizon.net>]  
**Sent:** Friday, July 17, 2020 5:37 PM  
**To:** Community Wildfire Protection Plan <[CWPP@SantaBarbaraCA.gov](mailto:CWPP@SantaBarbaraCA.gov)>  
**Subject:** Environmental Checklist comments

EXTERNAL

Hello,

**My name is Lawrence Thompson, a local architect since 1967, and former member of the California Regional and State Coastal Commissions. For eight years I have been involved in creating a Southcoast Fire Helicopter project without much success, due to the orientation of most citizens to let the County and City execute fire protection.**

**Yet the east side of the South Coast has to wait over a half of an hour to receive fire support, as the only fire heliports operating are in Santa Ynez (SB County) and Camarillo (Ventura Co.), leaving Carpinteria-Santa Barbara as the furthest locations to reach, locations which have the highest net worth of real estate in either County.**

**Although I introduced this plan to the Montecito Association several times, no one came forward to help fund or promote the promote, despite the approval of County Fire and support of Salud Carbajal and his successor(at least for half a year for the latter.**

**Had the operation been in place in a Summerland Polo Field, as has been arranged by my dedicated Fire Helicopter Company based in Santa Maria, the debris flow would never have happened- as the operation is only responsive to the Southcoast and cannot be side-tracked by out of Southcoast emergencies- as detoured County Fire when the Jesusita Fire occurred (response took 90 minutes). The fires that set the situation for the debris flows would have been put out within 10-15 minutes, not 40-50 minutes (includes launch time). This fact alone points to the invaluable importance of this project, especially next to and in wildfire areas.**

**Your program would be very remise in ignoring such a program, and I would gladly sit down with anyone from your team to go over the details. The benefits of the program not only reach out to preserve environmental resources, but also save the financial resources, dislocation costs, and precious irreplaceable family belongings which are often irreplaceable.**

**Please call 805 962-2236 to discuss the details or set a meeting.**

**Thank you,**

**Lawrence Thompson, Architect and Energy Consultant**

**Former Member, State and Regional Coastal Commissions  
Originator of State Title 24 Building Standards, 1978  
California State Energy Commission Chairman, 1980-82 for T24  
Co-developer of the County Energy Star Program**

**Operational Reference:**

**Proposal for a First Response Helicopter Service     **DRAFT 2.0****

Date: 30 December 2015     To: Lawrence Thompson

**Summary:** IES LLC will provide 24/7 initial attack RW (Rotor Wing) service on an Exclusive Use (EU) basis for the 2016 fire season with a less than five minute response time from alert to take off and a 90% dispatch reliability.

**Mission:** Reduce the response time from first call to the first RW delivered water being dropped on the target and then supporting and integrating into the added resources when they arrive on the fire, as directed by the Incident Commander.

**Assumptions:** The helicopter and any required support equipment will be located at the Santa Barbara County Fire Headquarters or designated “Hot Pad” alternate.

Pilots can eat and sleep within one minute of the cockpit.

At night an external power supply will be plugged in with lights on if the fire danger is high.

An IES fuel truck will be located near the “Hot Pad” to reduce the need for using the Santa Barbara Airport. Hot refueling will be authorized.

The priority flights will be for homes and structures on the front face of Santa Barbara and Montecito.

IES pilots will only respond to the Santa Barbara County Fire Chief or officials authorized by him.

**Phase 1:**

Place a night vision equipped Type 3 (90-110 gallon capacity) helicopter at the Santa Barbara County Fire Headquarters, switches set,

pilot ready, initial water loaded, and able to divert after takeoff to any location on the front face of the Santa Barbara/Montecito area as directed by the Fire Chief.

**Phase 2:** Replace or supplement the Type 3 with a Type 2 (200-350 gallon capacity) after an initial period of service and integration of the type 3.

**Phase 3:** Option to add to or replace the Type 3 and Type 2 with a Type 1 (1,000+ gallon capacity) after full evaluation.

**Cost Reduction:** While under EU contract, the helicopter service is fully dedicated to the Fire Chief and “Team Santa Barbara.” Should the Fire Chief determine that the fire danger is low during the Exclusive Use service period, other missions may be approved that could result in other operating income to IES. On an open book basis IES will rebate 50% of the net income created by the other missions to reduce the EU contract costs.

#### **An Optional Development, UAVs (Drones):**

The technology and regulatory framework has arrived that can result in an IES-Santa Barbara Team development program with the following goal.

*Demonstrate in 2016, single or multiple UAVs loaded with effective quantities of water or retardant ready to launch in less than 2 minutes (less than one minute if electric) and fly automatically to the initial fire target in limited visibility with control oversight from the Incident Commander.*

*This has the possible potential to reduce standby costs and costs per gallon of water delivered with low development and operational risks and can be done in parallel with the proposed IES RW fire response service. IES will prepare a separate proposal for consideration.*

**Future:** IES will offer future Be 200 “scooper” services to Santa Barbara County Fire when it is FAA certified. The Be 200 can scoop 12 tons of water in 18-20 seconds from Santa Barbara Bay and Lake Cachuma and drop it on individual houses or the fire head.

#### **Service Periods:**

Minimum 100 days per year expandable to 365 days with both day and night service.

A minimum of 100 hours with a maximum of 1,000+ hours.

Expect 90% O/R (Operational Readiness) and dispatch reliability.

Most routine maintenance can be done during low fire risk times at the “hot pad”.

Annual inspections (normally scheduled during January) may require a hangar or tent for a few days. During those times, if the fire risk is high, IES will arrange for a temporary replacement.

In case of unexpected maintenance down time that may exceed 10% of the contract service time, IES will have a backup helicopter on call of equal or better performance.

**Training:** If not flying on fires or for other missions directed by the Fire Chief, IES pilots will fly at least once per week for a full hour and every two weeks will train for a full hour at night. The syllabus will include:

1. A “fire patrol” over the front face of Santa Barbara to include low altitude hovers over designated targets.
2. Dropping a load of water on a target.
3. Landing at pre- selected emergency landing spots.
4. The Fire Chief or his designee may be in the aircraft.
5. Practicing water pickups from authorized spots.

**Insurance:** IES will have Industry required liability and aircraft loss insurance.

**Operating Regulations:** Commercial operations are conducted under FAA FAR Part 135 (Air Taxi) rules for helicopters when carrying paying passengers or cargo. Those rules can limit certain flights (example: there is heavy fog, clouds or smoke that reduces visibility or ceilings to below regulatory limits). When firefighting or for search and rescue, the aircraft operates under “Public Authority” which allows flights in the fire or target area with fewer limitations and often with special equipment added that may classify the helicopter as being in a “Restricted” category. In all cases, when flying to and from the



fire area, the aircraft pilots are expected to comply with normal FAA flight rules.

**Start Date:** IES expects to have the first Type III RW on site 90 days after contract signing and a Type II 60-90 days following that.

**Costs:** This proposal is based on normal US Forest Service sunup to sundown daily rates for the first 100 days and the first 100 flight hours. The USFS often uses six day weeks with one day for crew rest and maintenance.

The 24/7 service is a 50% added cost to both daily ready and flight rates. Pilot and technician per diem, travel, hotels, trucks, hangars, fuel up to \$3 per gallon, insurance, maintenance, training, fire carding, inspections, operating margins and other necessary costs are included in the IES G&A 32% (General and Administrative)

Adding more standby days and flights to the 100 days and 100 hours reduces the cost per added days and added flight hours.

**Rate schedule and assumptions:**

**Type III**

Standby 100 Days (maximum two splits)	
.....	\$336,000
Flying 100	
Hours.....	87,900
G&A.....	
.....	131,472
Total for 100 days & 100 hours	
Daylight seven day service	
.....	\$555,575
24/7	
service.....	\$833,362

**Discounts for extended exclusive use day and flight hours:**

13% per day over 100 days

8% per hour over 100 hours

**Type II**

Daily 100	
Days.....	\$486,000
Flight 100	
Hours.....	178,000
G&A.....	
.....	206,088
Daylight 7 day service	
.....	\$870,888
One hundred days and 100 flight hours of 24/7 service <b>\$1,306,332*</b>	
<b>*Expect a cost below \$1.306M due to initial Type III service days</b>	

**Discounts for extended exclusive use day and flight hours:**

13% per day over 100 days  
8% per flight hour over 100 hours

**Terms and Conditions:**

Upon signing Contract	
.....	\$250,000
Standby Days, billed bi-weekly.....	Net 30
days	
Flight Hours, billed bi-weekly.....	Net 30
days	

Signed \_\_\_\_\_

Date \_\_\_\_\_

Fire season June through December, depending on El Nino

Type II Belly Tank Helicopter

- 120 days (.87x 4860 x 120) \$ 507, 384
- G/A 1.2 x 206,088 \$ 247, 306
- Subtotal \$ 754, 690
- Night Flying at 1.35 \$ 1, 018, 832

Type III helicopter

- 60 Days at 3,360 \$ 201,6 00
- Flying 100 Hours \$ 87, 900
- G/A .6 x 131, 472 \$ 78, 832
- Subtotal \$ 368, 383
- With Night Flying at 1.5x \$ 552, 575

Contract Total \$ 1, 571, 407

Budget for Additional Flight Hours: (80x 4860x .87) \$ 338, 356

Total \$ 1, 909, 663

Budget \$ 1, 930,000

Reference: IES Proposals dated December 29 and 30<sup>th</sup>-

From: Diana Arya [<mailto:darya@ucsb.edu>]

Sent: Thursday, July 30, 2020 8:37 AM

To: Community Wildfire Protection Plan <[CWPP@SantaBarbaraCA.gov](mailto:CWPP@SantaBarbaraCA.gov)>

Subject: Request for clarification on initial Study/Environmental Checklist

EXTERNAL

Good Morning,

As a resident within the Vista Del Campo HOA, I want to express my concerns about the recent Community Wildfire Protection Plan, which has marked our area as a High Fire Risk Designation area. I request that the board that created such a plan reconsider this unwarranted new designation based on the following points:

1. The length of the property is abutted by the Middle School activity grounds which are mowed grass; therefore no 'fire ladder' from vegetation exists.
2. The nearest fire station is less than a quarter of a mile to this HOA.
3. According to the Fire Department Water Supply Standards (5.2.3.2 Table 10 page 78) there is "Adequate water supply for firefighting in this zone makes the risk in this area low."
4. The HOA already maintains the 30 to 50 feet defensible space currently required (see 2.8.1 page 37).
5. The majority of the trees on the property are oak. "Oak trees are highly flame resistant as the leaves do not readily catch fire" (see Southern Oak Woodland page 29).
6. The trees behind the HOA are 'closed canopy' oaks with low fuel loads as there are no plants underneath to ignite. Fuel buildup occurs very slowly in oak woodland stands in California (USFS 2020a), and litter forms a thick, compacted mat resulting in very low surface fuel loads. Oak woodland understory fuel loads are low. Oak trees are highly flame resistant as the leaves do not readily catch fire". (See Fires Southern Oak Woodland, 2.5.2.3 page 29).
7. Fire in "Oaks do not spread from crown-to-crown readily (Sonoma Veg Map 2018; page 29).
8. The HOA has a Northern Exposure, which reduces the likelihood of conditions for fires.
9. Much of the property is irrigated with low height vegetation, further reducing conditions for fires.

As a tax paying citizen of Santa Barbara living within this HOA, I appreciate your earnest attention to this issue.

Sincerely,

Diana J. Arya

**From:** Andrew Maul [<mailto:amaul@ucsb.edu>]  
**Sent:** Thursday, July 30, 2020 8:19 AM  
**To:** Community Wildfire Protection Plan <[CWPP@SantaBarbaraCA.gov](mailto:CWPP@SantaBarbaraCA.gov)>  
**Subject:** comments on Initial Study/Environmental Checklist

EXTERNAL

Hello,

I am a homeowner on Vista del Campo, and Secretary for our HOA's board. I am writing to express some concern about the Community Wildfire Protection Plan, and to request that Vista del Campo be excluded from the High Fire Risk Designation area. We request this exclusion for the following nine reasons:

1. The length of the property is abutted by the Middle School activity grounds which are mowed grass; therefore no 'fire ladder' from vegetation exists.
2. The nearest fire station is extremely close to this HOA.
3. Water Supply Coastal Interior – "Adequate water supply for firefighting in this zone makes the risk in this area low." Fire hydrants meet Fire Department Water Supply Standards. 5.2.3.2 Table 10 page 78
4. The HOA already maintains the 30 to 50 feet defensible space currently required 2.8.1 page 37
5. The majority of the trees on the property are oak. "Oak trees are highly flame resistant as the leaves do not readily catch fire" Southern Oak Woodland page 29
6. The trees behind the HOA are 'closed canopy' oaks with low fuel loads as there are no plants underneath to ignite. Fuel buildup occurs very slowly in oak woodland stands in California (USFS 2020a), and litter forms a thick, compacted mat resulting in very low surface fuel loads. Oak woodland understory fuel loads are low. Oak trees are highly flame resistant as the leaves do not readily catch fire". Fires Southern Oak Woodland, 2.5.2.3 page 29
7. Fire in "Oaks do not spread from crown-to-crown readily (Sonoma Veg Map 2018) page 29
8. The HOA has a Northern Exposure
9. Much of the property is irrigated with low height vegetation

Thank you kindly for your attention, and all the best,

Andrew Maul  
2319 Vista del Campo  
Santa Barbara, CA 93101

**From:** Raymond Aller [<mailto:raller@usc.edu>]  
**Sent:** Saturday, August 1, 2020 6:41 PM  
**To:** Community Wildfire Protection Plan <[CWPP@SantaBarbaraCA.gov](mailto:CWPP@SantaBarbaraCA.gov)>  
**Subject:** Comments on the draft CWPP

EXTERNAL

To: Amber Anderson  
Santa Barbara City Fire Department

The following are my comments on the July 3 draft CWPP

I hope that you and your colleagues will incorporate these concerns into the next version of the CWPP

The present draft ignores the role of the flammable housing stock.

thank you  
Ray Aller  
=====

Comments on the CWPP  
1 August 2020

The focus of this report is on Fire Risk Reduction. Unfortunately, the biggest opportunity for reducing fire risk in Santa Barbara has not been considered.

My May/June comments have not been considered in creating the July 3 proposal. I hope that you will now incorporate both my August 1 comments, as well as my early June comments

This is an extensive plan (73 pages) with a myriad of details. Therefore, some of my comments may be redundant with elements that are in the plan. However, I was surprised to find no mention of eliminating a major fuel source - flammable housing.

No matter how much modification we do to vegetation, and other elements surrounding our buildings, our buildings themselves continue to be highly flammable. We will not substantially prevent wildfire until we remove the combustible element. I recommend that we require that all new building in Santa Barbara - but particularly those in the periphery, "high fire danger zone" be constructed of fire proof materials - and our flammable possessions within our buildings - such as clothing and furniture - be positioned far away from the outside walls, such that a conflagration outside will not ignite the contents inside.

The building codes should be modernized, to encourage the construction of residential and commercial buildings which will NOT burn. Otherwise, we continue to play a game of whack-a-

mole - when a fire risk shows up in one neighborhood, we whack it - but fail to correct the problems in other neighborhoods

I attend church in a building with steel framing, and non-flammable materials. This was constructed sixteen years ago. We certainly have the knowledge - today to construct our buildings with non-flammable materials.

Our friends built such a non-combustable home in Montecito in the mid 90's - I am sure there are many other examples of residences and businesses that will not go up in smoke.

Some might complain that it is "more costly" to build with non-flammable materials - I would counter that, in cost of the wood building, one has to include the cost of replacing it when it burns down - as well as the cost of all of the possessions and records abruptly lost in a fire - as well as the risk to the residents' life (and to the life of the firefighters) to because we live in a torch

Please add this element to your analysis, and your report.

thank you

Ray Aller

Santa Barbara resident, 1979 - 2000

(since then, I have rented out our home on Cedar Lane)

=====

Previous comment:

The following is the comment I submitted in early June. I don't see any evidence of these concerns being incorporated in the July 3 draft.

I have been a resident of Santa Barbara since 1979, and dozens of my friends have lost their wood homes to wildfire. We need to recognize the reality of how we have devastated our climate – and not keep building as if it was 1945.

All new construction in the high-fire-risk zone should be of fireproof materials – steel, stone, brick. It is nonsense to build houses or commercial buildings of wood. Also, the fireproof materials should be thick and insulating enough that any flammable materials inside the building cannot reach an ignition point. Obsolete and flammable materials (e.g, methane gas, propane) should be banned from the Santa Barbara area. Heating must be by heat pumps – not fossil fuels. In the longer term, all electrical supplies (power lines) must be underground..



**From:** [xkejag68@aol.com](mailto:xkejag68@aol.com) [<mailto:xkejag68@aol.com>]

**Sent:** Saturday, August 1, 2020 9:29 AM

**To:** Community Wildfire Protection Plan <[CWPP@SantaBarbaraCA.gov](mailto:CWPP@SantaBarbaraCA.gov)>

**Cc:** Rosie Dyste <[rdyste@SantaBarbaraCA.gov](mailto:rdyste@SantaBarbaraCA.gov)>; Joe Poire <[JPoire@SantaBarbaraCA.gov](mailto:JPoire@SantaBarbaraCA.gov)>; Mike Jordan <[MJordan@SantaBarbaraCA.gov](mailto:MJordan@SantaBarbaraCA.gov)>

**Subject:** CWPP IS Comment - Mountain Avenue / Bel Air area

EXTERNAL

Dear Amber,

I renew all of my comments and objections in my previous communications regarding the CWPP as it applies to the expansion of the Coastal Interior Zone on the Westside/Bel Air area. Specifically, the Coastal Interior Zone includes many standard city lot properties of 5,000 to 7,500 square feet that have a street defining the boundary, so properties on one side are "in the zone" and properties on the other side of the street are "outside the zone" with no apparent significant distinction for threat of fire.

As previously indicated, the expansion of the Coastal Interior Zone in this area seems to be based on the Fire Behavior Modeling Results. The Modeling shows areas of theoretical flame lengths exceeding 11 feet in the downtown corridor, same as Mountain Avenue properties, yet no downtown properties are designated to be in a fire hazard zone. Additionally, the Fire History shows no fires in the Mountain Avenue/Bel Air area; I have lived on Mountain Avenue since 1977 and there have been no vegetation fires in this area; and, I have never heard from long time residents in the area of any vegetation fires in this area.

It is my understanding that the CWPP is being conducted to provide the Fire Department to expand its abilities to manage vegetation on private properties and receive additional funding for certain services. Owning a property of 5,000 to 7,500 square feet with no significant vegetation, other than perhaps a few fruit trees, seems to be no valid reason to consider the property in a Coastal Interior Zone. Even considering the proximity of what one might call an oak grove, all of which is on private property, seems to be no reason to impose a potential zoning burden on the smaller neighboring properties. The specific properties with several large oak trees should be considered for this zone and not their neighbors.

As indicated in previous communications, fire hazard zones impact insurance rates. It is arbitrary to draw a line in the middle of a street merely for simplicity of creating a "zone" boundary. This will have a negative impact on small city lot property owners to which I object. I suggest the zone boundary be adjusted to properties that require control, rather than the arbitrary center of the street determination.

Also, I do not understand why Population/Housing is eliminated from the CEQA scoping, but will be reviewed in detail in the PEIR. I would like an explanation for this determination. And, I understand this is a Scoping Hearing for the Program Environmental Impact Report and I am not certain my concerns are relevant to this specific hearing. However, I want my concerns on the record at each step of the process.

Please feel free to contact me with any questions or comments.

Thank you.

Skip Szymanski  
1923 Mountain Avenue

-----Original Message-----

From: Carol Ritz [<mailto:dddgallery@aol.com>]

Sent: Sunday, August 2, 2020 4:15 PM

To: Community Wildfire Protection Plan <[CWPP@SantaBarbaraCA.gov](mailto:CWPP@SantaBarbaraCA.gov)>

Subject: CieneguitasCreek

EXTERNAL

As many of my neighbors, I am very concerned about the brush removal from the Cieneguitas Creek. If it is such an issue that will affect our insurance, the agency who is responsible for creek cleanup should do exactly that..clean up the creek. If this isn't happening, we would certainly like to know why it isn't as it will prevent a hazard from happening to our community. Carol Ritz DDDGallery 4018B Otono Drive, Santa Barbara CA 93110."

Sent from my iPad

From: ron weaver [<mailto:ronwflyboy@yahoo.com>]  
Sent: Sunday, August 2, 2020 6:52 PM  
To: Community Wildfire Protection Plan <[CWPP@SantaBarbaraCA.gov](mailto:CWPP@SantaBarbaraCA.gov)>  
Subject: Re: SB Community Wildlife Protection Plan

EXTERNAL

Sent from my iPad

> On Aug 2, 2020, at 6:43 PM, ron weaver <[ronwflyboy@yahoo.com](mailto:ronwflyboy@yahoo.com)> wrote:

>

> On behalf of the community of Vista Del Campo I see no reason to include us in your future plans as a high fire risk properties. I have lived here for 35 years with no incidence of any fires. 13 homes share 3 separate fire hydrants and property adjacent to LaCumbre School Campus and the Fire Station.

> Sincerely, Mary Weaver, 2309 Vista Del Campo, SB 93101

>

> Sent from my iPad

**From:** JEFF OTIS [<mailto:jotis8877@outlook.com>]  
**Sent:** Sunday, August 2, 2020 3:56 PM  
**To:** Community Wildfire Protection Plan <[CWPP@SantaBarbaraCA.gov](mailto:CWPP@SantaBarbaraCA.gov)>  
**Cc:** 3D Studio Gallery <[dddgallery@aol.com](mailto:dddgallery@aol.com)>  
**Subject:** Protection Plan - Ceineguitas Creek

EXTERNAL

My name is Jeff Otis. I am a Homeowner at 4018 Otono Dr. Unit A, S.B., Ca. 93110.

I've become aware of the Protection Plan regarding Ceineguitas Creek area. I'm wondering who or what agency (s) are responsible for the maintaince of brush, tree and grass removal. If this creek is a high fire risk , then it seems to me that **removal of the hazard** would be the solution, not have nearby Los Robles II Homeowners fire insurance go up.

I look forward to hearing your response.

Sincerely

Jeff Otis

**From:** [ssckmc@verizon.net](mailto:ssckmc@verizon.net) [<mailto:ssckmc@verizon.net>]

**Sent:** Monday, August 3, 2020 1:45 PM

**To:** Community Wildfire Protection Plan <[CWPP@SantaBarbaraCA.gov](mailto:CWPP@SantaBarbaraCA.gov)>

**Subject:** Comments on Initial Community Wildfire Protection Plan - Scott and Kathleen Cunningham, 3526 Chuparosa Drive

**EXTERNAL**

We are writing to provide initial comments and request further information regarding the proposed inclusion of the 3500 block of Chuparosa Drive into the new Very High Fire Hazard Severity Zone. We were unaware that our neighborhood would be affected until a neighbor brought it to our attention a week ago.

Our initial thoughts are mixed. We want to better understand what is being highlighted as a greater fire safety risk than we had previously thought (which requires better understanding of the modeling and vegetation data reference in the report – see below). At the same time, we are concerned that too broad a brush (i.e. using a street block to make the mapping easier) could handicap property values and raise insurance costs without a commensurate increase in risk mitigation. This balance of interests will be our focus as this process unfolds.

**Is All Severity the Same? What About Fire-Safe Community Factors?**

It is hard to understand at this juncture how our block can be considered in the same fire risk category as the areas well above us that have had frequent fires and greater distance between fire hydrants. We take great comfort in having several fire-safe elements in our neighborhood:

- a fire hydrant next door to us
- electric utilities on our street undergrounded (which may not have been considered but should be), and
- the Santa Barbara City Fire Department Station 4 is two blocks away.

**Public Communications**

Regarding public communications, we did receive and review the one mailer discussing the process generally, but assumed (incorrectly) it would not impact us directly. We do encourage notification of all affect property owners sooner rather than later in this process. Also, the overall study document seems well organized and written.

**Requested Information – Fire Behavior Modeling and Vegetation Data**

We would like to review the documentation supporting the inclusion, such as “fire behavior modeling” and “vegetation data” as reference on page 6. We are especially interested in how the modeling compares San Roque Creek northeast of Ontare Road (which would be the part behind our property) to the properties on our street (which are well away from the creek bed) and San Roque Creek as it continues southwest of Ontare Road. We placed a call to Amber Anderson on this earlier today.

Please include us in the distribution list for further developments on this effort.

Sincerely,

Scott & Kathy Cunningham  
3526 Chuparosa Drive  
Santa Barbara, CA 93105  
Kathy Cell: (626) 808-2736  
Scott Cell: (805) 770-0431

**From:** Rob Koehorst [<mailto:rob.koehorst@gmail.com>]  
**Sent:** Monday, August 3, 2020 2:40 PM  
**To:** Community Wildfire Protection Plan <[CWPP@SantaBarbaraCA.gov](mailto:CWPP@SantaBarbaraCA.gov)>  
**Subject:** cwpp community comment

EXTERNAL

Hello,

Re Table 13 Action Number 4.3 and 4.4 and all of Table 18 Policy 11: I hope that encouragement of native plants is a part of this education and working with property owners. City and State encouragement of low water landscaping seems to have greatly reduced the number of lawns and other high water usage plants in this area. Many native plants have a much lower burn rate than their counterparts from other parts of the world that have been widely incorporated in our water safe programs.

The plan makes several references to human-triggered wildfires, but no specific mention that I found of homeless and/or vagrants who live in the vegetation. I apologize if I missed a reference. These people seem much more likely to cause fires intentionally or through unsafe practices. We have seen several vegetation fires in Goleta as a result of lax enforcement of homeless relocation due to fears of spreading Covid-19 into the community. When that virus threat has been contained, I hope that the city of Santa Barbara will aggressively pursue the re-homing or relocation of people who willfully camp in open spaces and the prosecution of those who start fires.

Thanks for your consideration,

Rob Koehorst

**From:** Stacey Gannon [<mailto:gannonstacey4@gmail.com>]

**Sent:** Monday, August 3, 2020 9:12 AM

**To:** Community Wildfire Protection Plan <[CWPP@SantaBarbaraCA.gov](mailto:CWPP@SantaBarbaraCA.gov)>

**Cc:** Rosie Dyste <[rdyste@SantaBarbaraCA.gov](mailto:rdyste@SantaBarbaraCA.gov)>; Joe Poire <[JPoire@SantaBarbaraCA.gov](mailto:JPoire@SantaBarbaraCA.gov)>; Mike Jordan <[MJordan@SantaBarbaraCA.gov](mailto:MJordan@SantaBarbaraCA.gov)>

**Subject:** Re: CWPP IS Comment - Mountain Avenue / Bel Air area

EXTERNAL

Dear Amber,

As a resident of Mountain Avenue, I concur with Skip's statements regarding this matter. Please reconsider the rezoning of the Coastal Interior Zone as a fire hazard zone for the reasons Skip states.

Thank you,  
Stacey Gannon  
2117 Mountain Ave

Sent from my iPhone

On Aug 2, 2020, at 6:37 PM, Skip <[xkejag68@aol.com](mailto:xkejag68@aol.com)> wrote:

Sent from my iPhone

Begin forwarded message:

**From:** [xkejag68@aol.com](mailto:xkejag68@aol.com)

**Date:** August 1, 2020 at 9:29:19 AM PDT

**To:** "[CWPP@SantaBarbaraCA.gov](mailto:CWPP@SantaBarbaraCA.gov)" <>

**Cc:** "[RDyste@SantaBarbaraCA.gov](mailto:RDyste@SantaBarbaraCA.gov)" <>, "[JPoire@SantaBarbaraCA.gov](mailto:JPoire@SantaBarbaraCA.gov)" <>, "[mjordan@santabarbaraca.gov](mailto:mjordan@santabarbaraca.gov)" <[mjordan@santabarbaraca.gov](mailto:mjordan@santabarbaraca.gov)>

**Subject:** CWPP IS Comment - Mountain Avenue / Bel Air area

**Reply-To:** [xkejag68@aol.com](mailto:xkejag68@aol.com)

Dear Amber,

I renew all of my comments and objections in my previous communications regarding the CWPP as it applies to the expansion of the Coastal Interior Zone on the Westside/Bel Air area. Specifically, the Coastal Interior Zone includes many standard city lot properties of 5,000 to 7,500 square feet that have a street defining the boundary, so properties on one side are "in the zone" and properties on the other side of the street are "outside the zone" with no apparent significant distinction for threat of fire.

As previously indicated, the expansion of the Coastal Interior Zone in this area seems to be based on the Fire Behavior Modeling Results. The Modeling shows areas of theoretical flame lengths exceeding 11



feet in the downtown corridor, same as Mountain Avenue properties, yet no downtown properties are designated to be in a fire hazard zone. Additionally, the Fire History shows no fires in the Mountain Avenue/Bel Air area; I have lived on Mountain Avenue since 1977 and there have been no vegetation fires in this area; and, I have never heard from long time residents in the area of any vegetation fires in this area.

It is my understanding that the CWPP is being conducted to provide the Fire Department to expand its abilities to manage vegetation on private properties and receive additional funding for certain services. Owning a property of 5,000 to 7,500 square feet with no significant vegetation, other than perhaps a few fruit trees, seems to be no valid reason to consider the property in a Coastal Interior Zone. Even considering the proximity of what one might call an oak grove, all of which is on private property, seems to be no reason to impose a potential zoning burden on the smaller neighboring properties. The specific properties with several large oak trees should be considered for this zone and not their neighbors.

As indicated in previous communications, fire hazard zones impact insurance rates. It is arbitrary to draw a line in the middle of a street merely for simplicity of creating a "zone" boundary. This will have a negative impact on small city lot property owners to which I object. I suggest the zone boundary be adjusted to properties that require control, rather than the arbitrary center of the street determination.

Also, I do not understand why Population/Housing is eliminated from the CEQA scoping, but will be reviewed in detail in the PEIR. I would like an explanation for this determination. And, I understand this is a Scoping Hearing for the Program Environmental Impact Report and I am not certain my concerns are relevant to this specific hearing. However, I want my concerns on the record at each step of the process.

Please feel free to contact me with any questions or comments.

Thank you.

Skip Szymanski  
1923 Mountain Avenue

**From:** Kristin Hart Schuhrke [<mailto:knhart@gmail.com>]  
**Sent:** Monday, August 3, 2020 11:27 AM  
**To:** Community Wildfire Protection Plan <[CWPP@SantaBarbaraCA.gov](mailto:CWPP@SantaBarbaraCA.gov)>  
**Subject:** Comment - Initial Study / Environmental Checklist

EXTERNAL

Amber Anderson:

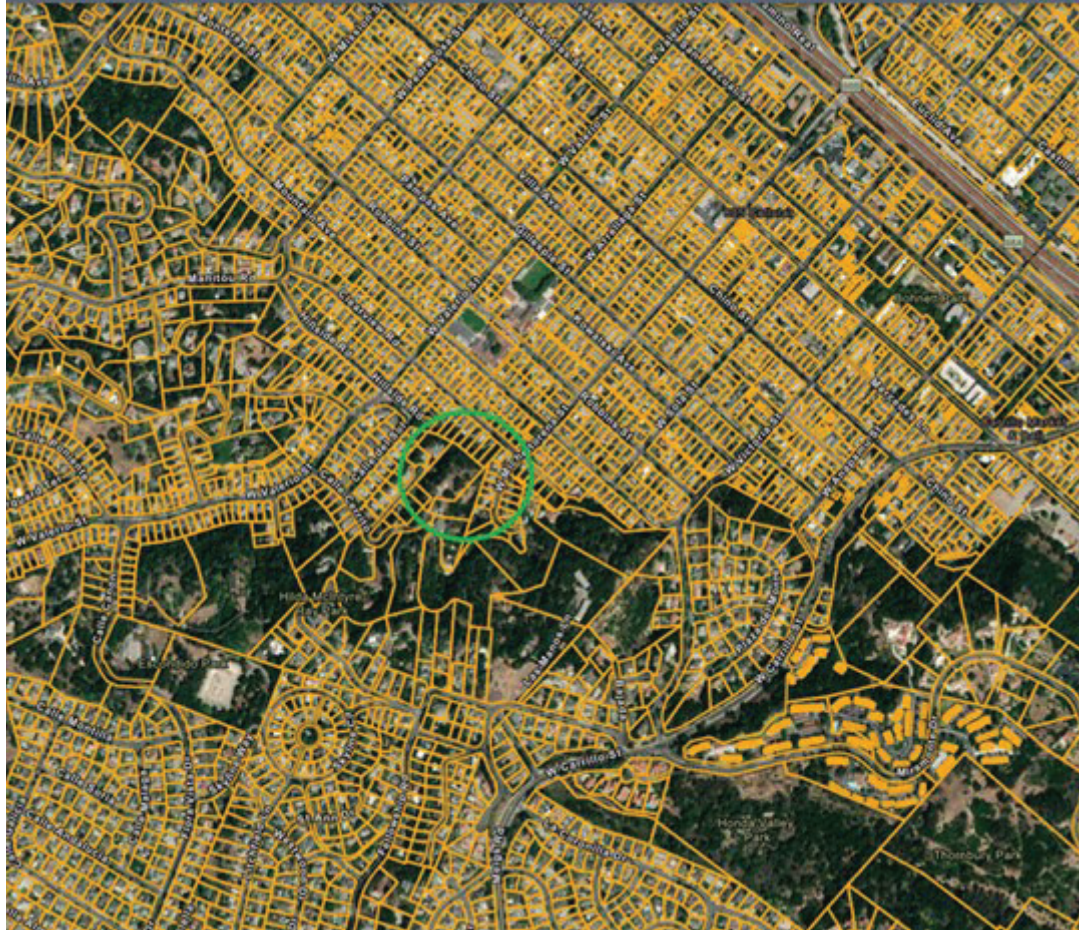
I am writing to make a comment on the Community Wildfire Protection Plan.

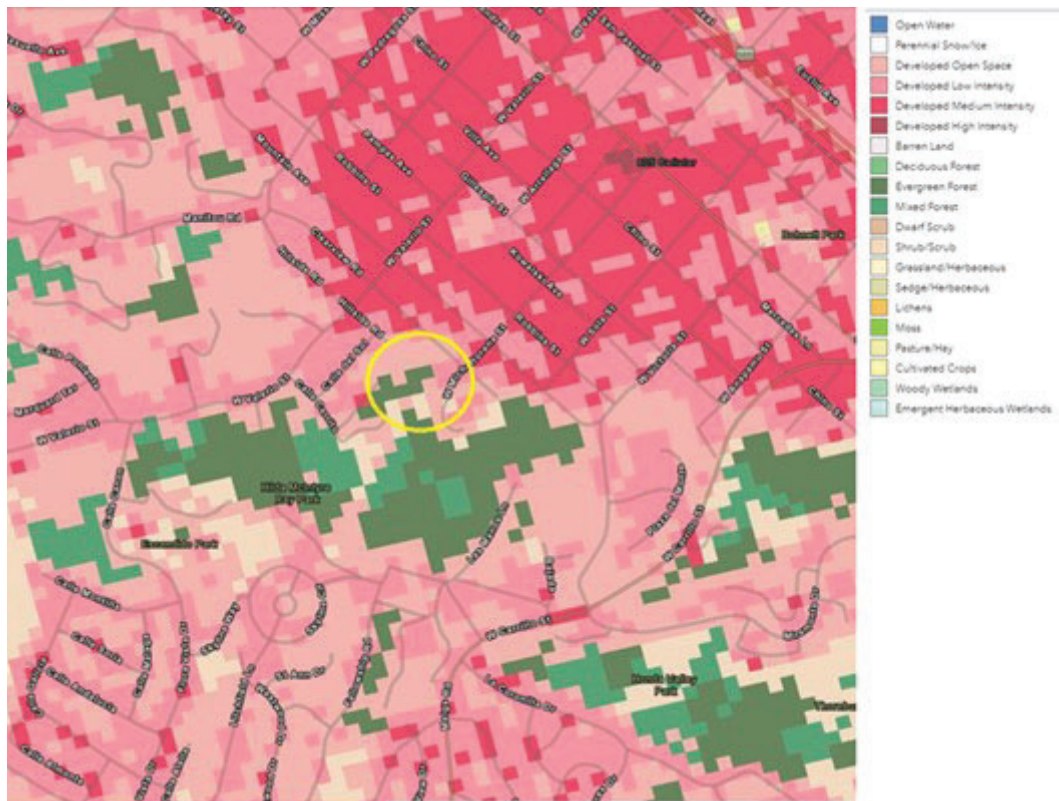
This comment focuses on the inclusion of several small (less than a quarter acre) residential parcels on Santa Barbara's Westside. The parcels are located on Clearview Road and West Micheltorena Street within what the plan identifies as a portion of Area O.

Due to the small size and developed nature of the parcels in question do not seem appropriate for inclusion in the Coastal Interior Zone.

Below you will find two images illustrating the point. One showing the parcel configuration with the parcels in question contained in a circle. The other image shows the land cover from the National Land Cover Database again with the parcels in question contained in a circle. Similar land cover data is presented within the plan's Figure 8--calling out the parcels in question as 'Urban' land cover. Reviewing the images provided below and referring back to Figure 6 of the plan, you will see many small parcels (less than a quarter acre) and all with land cover within the 'developed' (or 'Urban') designation. You will also note in the parcel image the the aerial image shows tree cover within the parcels in question to is similar to tree covers as those parcels with mature street trees throughout the Westside. This comparison seems to highlight the inconsistency in the methodology for including these parcels in question and not other small parcels with mature street trees throughout the Westside. The aerial image and land cover image (and Figure 6) also illustrates how small and isolated the tree covered areas are adjacent to the parcels in question.

Due to the parcel size and developed land cover of the parcels in question, it is my recommendation that the parcels in question be removed from the Coastal Interior Zone as it seems the methods for identifying them for risk are flawed. Some of the flaws in methodology may be due to the desktop approach the plan tool to identifying areas to add to the Coastal Interior Zone.





It also seems that the true risk of wildfire in the developed residential area in question is very low (due to the developed nature and existing defensible space of the parcels) in comparison to the heavy burden adding the parcels in question to the Coastal Interior will place on the property owners. It is my hope that the potential impact those have on the owners of parcels in question be weighed with the true risk of wildfire in the urban, developed setting of the parcels in question. I believe if the plan's analysis is refined in Area O to better address the actual conditions of the urban, developed area, small parcels with defensible space will be found not to have merit for inclusion in the Coastal Interior Zone.

Thank you for your consideration,

Kristin Hart Schuhrke

--

Kristin Hart Schuhrke  
(805) 680-7609



**From:** Jonathon Schuhrke [<mailto:schuhrke@gmail.com>]  
**Sent:** Monday, August 3, 2020 3:01 PM  
**To:** Community Wildfire Protection Plan <[CWPP@SantaBarbaraCA.gov](mailto:CWPP@SantaBarbaraCA.gov)>  
**Subject:** Comment: CWPP IS/Environmental Checklist

**EXTERNAL**

On Clearview Road, the small parcel size and the developed and built-out nature of the parcels do not seem to make them an appropriate fit for addition to the City High Fire Hazard Area. It seems designating a small (less than .25ac) parcel which is mostly (2/3 or more of parcel) built-out to the City High Fire Hazard Area is not consistent with considerations of the effort. I recommend the parcels on Clearview Road be removed from the proposed addition.

Regards,

Jonathon Schuhrke

**From:** Bob Bizness [<mailto:bobbizness@yahoo.com>]  
**Sent:** Monday, August 3, 2020 3:45 PM  
**To:** Community Wildfire Protection Plan <[CWPP@SantaBarbaraCA.gov](mailto:CWPP@SantaBarbaraCA.gov)>  
**Subject:** CWPP - Errors in Modeling

EXTERNAL

Amber Anderson

[CWPP@SantaBarbaraCA.gov](mailto:CWPP@SantaBarbaraCA.gov)

Dear Ms. Anderson,

Attached please find a graphic that shows problems with the CWPP wildfire modeling in the La Colina area (northwest Santa Barbara City). The La Colina Apartment complex and the La Colina Junior High School athletic field were erroneously modeled as wildland grass and/or shrub. Consequently the model indicates fire lengths of 11+ feet. Obviously neither area is any type of wildland. These are input errors to the model. Of course, 11-foot flames will never occur on a vast, green, mowed, and well-watered lawn.

Errors like these also occur elsewhere in the City. Assume that the Planning Commission and City Council will see these graphics (highly likely). How will you and Dudek defend the modeling results?

Thank you for your work on this important community issue. Additional emails on differing related topics will follow.

Sincerely,

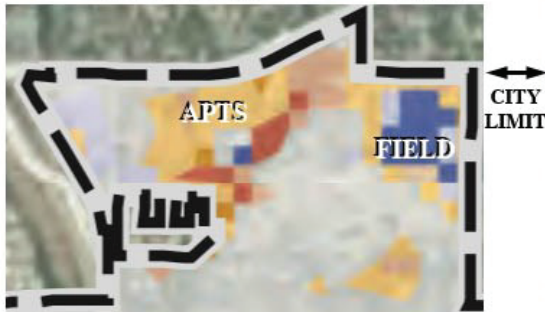
Bob

Robert E. Crippen, Ph.D. (Earth Science)  
1129 Nirvana Road, SB 93101  
818-967-1122  
for the  
Runyan Subdivision HOA (upper Nirvana Road)

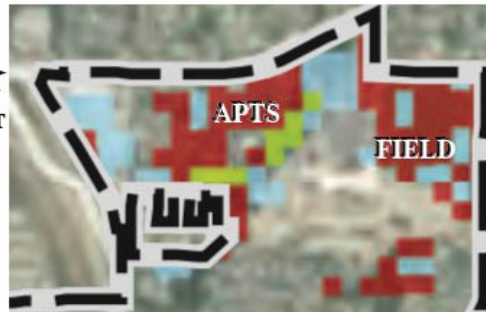
## ERRORS IN WILDLAND FIRE BEHAVIOR MODELING RESULTS

**FUEL MODEL VEGETATION TYPE**  
 WILDLAND GRASS & SHRUB (Yellow) WILDLAND TREES (Red)

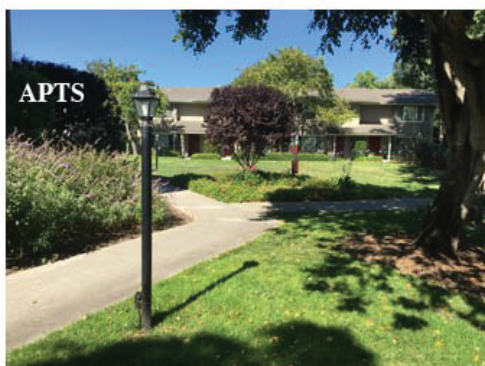
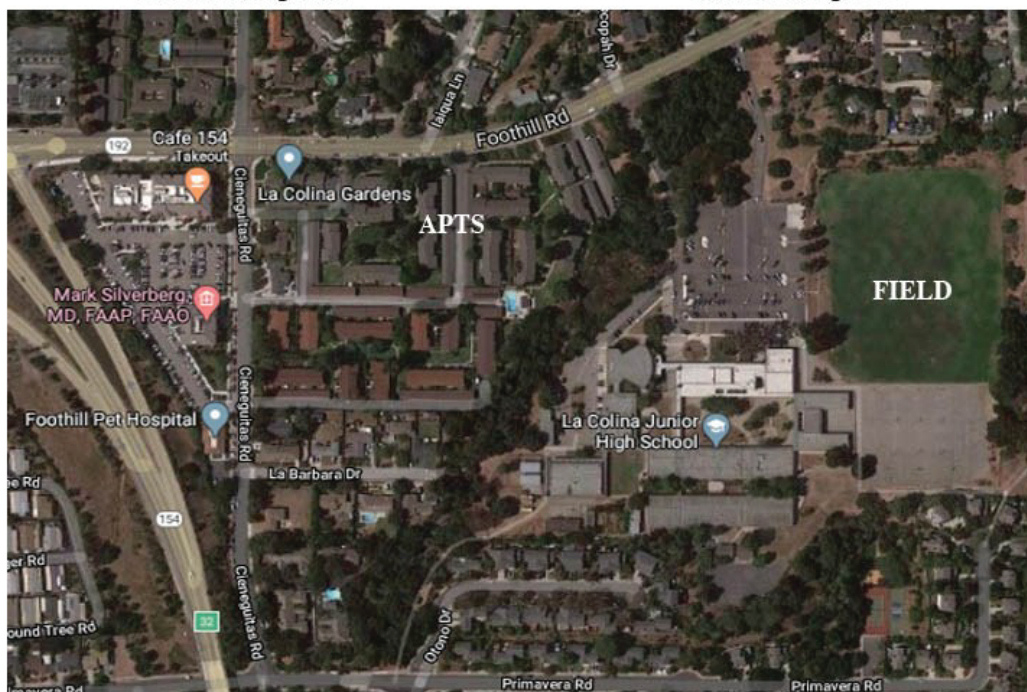
**FIRE MODELING FLAME LENGTH (FT)**  
 0.1 - 4 (Light Blue) 4 - 8 (Green) 8 - 11 (Orange) 11+ (Red)



From CWPP Figure D-1



From CWPP Figure D-2



- Apartments should not be modeled as wildland grass and shrub.
- School athletic fields should not be modeled as wildland grass and cannot possibly have 11+ feet of flame length.

**From:** Bob Bizness [<mailto:bobbizness@yahoo.com>]  
**Sent:** Monday, August 3, 2020 3:53 PM  
**To:** Community Wildfire Protection Plan <[CWPP@SantaBarbaraCA.gov](mailto:CWPP@SantaBarbaraCA.gov)>  
**Subject:** CWPP - Justification for the Zoning Additions

EXTERNAL

Amber Anderson

[CWPP@SantaBarbaraCA.gov](mailto:CWPP@SantaBarbaraCA.gov)

Dear Ms. Anderson,

The draft CWPP adds substantial areas to the Santa Barbara fire hazard zoning. These additions are probably the biggest conclusion of the CWPP. The only justification presented for these additions is the fire model (flame length) map. However, as shown in some locations (e.g. La Colina, Santa Barbara Golf Course, upper Santa Barbara Avenue) the fire model flame length map is clearly wrong.

The largest addition to the hazard map is the Bel Air area (area ID "M"). Not one paragraph (nor even one sentence) is presented to specifically justify this large addition individually (or any other large addition individually). The only justification given is a phrase in Table 6 that says, "Parcels added due to extreme fire behavior". How subjective versus objective was this evaluation?

Likewise, no specific justification was presented in the community workshops. Worse yet, in the second community workshop some weight was given to consistency with older mapping to justify some minor edits in the coastal area. But the addition of the Bel Air area (the largest addition to the entire map) was not discussed at all. Notably, the Bel Air area was not mapped as a fire hazard in the older mapping. If you use the older mapping as justification for new minor edits, it is disingenuous to then ignore the older mapping in new major edits.

The Planning Commission suggested that the new mapping may be an "overreach". I suggest that you take that thought and the comments above to either provide substantial specific justification for the new map additions or perhaps reconsider the inclusion of each addition.

Thank you for your work on this important community issue. Additional emails on various related topics may follow at a later date.

Sincerely,

Bob



Robert E. Crippen, Ph.D. (Earth Science)  
1129 Nirvana Road, SB 93101  
818-967-1122  
for the  
Runyan Subdivision HOA (upper Nirvana Road)

**From:** Bob Hart [<mailto:bhart@sbaor.com>]

**Sent:** Monday, August 3, 2020 3:39 PM

**To:** Amber Anderson <[aanderson@SantaBarbaraCA.gov](mailto:aanderson@SantaBarbaraCA.gov)>

**Cc:** Krista Pleiser <[kpleiser@sbaor.com](mailto:kpleiser@sbaor.com)>; Joe Poire <[JPoire@SantaBarbaraCA.gov](mailto:JPoire@SantaBarbaraCA.gov)>

**Subject:** Response Letter to CWPP

EXTERNAL

Good Afternoon Amber and Joe.

Please see my letter attached in response to the CWPP proposal. The letter is from me personally as a resident of Bel Air Knolls. Although I believe that my views would be echoed by the Association of REALTORS®, I have not presented it to our Board Directors for approval, so it is not officially the response of SBAOR.

Bob Hart, RCE  
Executive Officer



1415 Chapala Street  
Santa Barbara, CA 93101  
(805) 963-3787 Main  
(805) 884-8607 Direct



please don't print this e-mail unless you really need to and have eliminated all paperless options.

Bob Hart  
1102 Crestline Drive  
Santa Barbara, CA 93105  
805-884-8607  
[bhart@sbaor.com](mailto:bhart@sbaor.com)

August 3, 2020

Re: Santa Barbara Community Wildfire Protection Plan

To the Consultants, and Fire Professionals,

At the Planning Commission Scoping Hearing on July 16<sup>th</sup>, Fire Chief Eric Nickel reported that wildfires begin in the Forest and burn down into the City area. “Much like we saw with the Cave Fire, the week of Thanksgiving, fire starts in the National Forest at the top of the mountains and is wind driven down into wildland/urban interface.”

Whenever a story hits the national news about a fire in Santa Barbara, friends and relatives call to make sure that we are OK. Our answer has always been, we are on the other side of town. We have a view of the fires, but we are not in danger. Yet, your proposal is that we be included as living in a high fire severity zone. In the 27 years that we have owned our home in Bel Air Knolls, we have not been evacuated due to the threat of a wildfire. We have, however, seen many fires, across town from our home. My wife and I have often commented that as the fires become more prevalent than 27 years ago, we are so glad we bought where we did and not in the fire prone areas near the National Forest. Yet your proposal is that our home be designated as being in a High Fire Hazard Severity Zone.

1. **Fire Hazard Severity Zones:** I am opposed to the proposed addition of a significant number of homes as a part of the “modifications of the High Fire Hazard Area” as presented in Section 4.2.1 and Figure 13 of this Draft CWPP.
  - a. Fire History: The Fire History Map (Figure 5) does not show any history of wildfire in the Coastal and Inland Coastal Areas. Designating the non-fire prone inland areas with the same designation as the foothill zones that are demonstrably fire prone, is not supported in this document.
  - b. Fire Codes: The City does not need the proposed hazard severity designations to adopt and enforce fire prevention measures, building codes and home construction/hardening requirements in these areas. The City Council can adopt ordinance independent of the State Fire Code
  - c. Insurance: A High Fire Hazard Severity Zone (HFHSZ) or Very High Fire Hazard Severity Zone (VHFHSZ) designation on a property can make it harder to secure good, affordable homeowner’s insurance.
  - d. Property Values: Mandatory Disclosure of a “High Fire Designation” at the time of a sale, and the inability to secure good, affordable homeowner’s insurance

can negatively affect property values and, consequently, tax revenue in the City. Designating these areas as HFHSZ or VHFHSZ will not benefit the property owners in those areas and would most instead make things worse for them. If this designation lowered property values, tax revenues and the city budget that includes SB City Fire, would be negatively affected.

- e. Consistency with Cal Fire: In discussions with Fire Department officials, I have been told that they need to bring the terminology of the City's Community Wildfire Protection Plan (CWPP) into conformity with Cal Fire. Using Bel Air Knolls and Vista del Campo as examples, Cal Fire has designated about one-fourth of the parcels as "Moderate" fire risk and the remainder as unzoned. Reclassifying these neighborhoods as "High Fire Severity Zones" is inconsistent with the Cal Fire designations and unwarranted.
- f. Fire Spread: The area to the north of Bel Air Knolls and behind Vista del Campo is Oak Forest. Per your report in section 2.5.2.3, "Oak trees are highly flame resistant as the leaves do not readily catch fire." A school yard of grass nearby forms a natural fire break, and a fire station is located at the bottom of the hill. All of these factors reduce the likelihood an out of control fire situation. I was also told that we could be in danger of embers from a fire that began in the forest, but those embers would have to fly over San Roque and Samarkand to get to us, and those areas are not being designated as High Fire.

- 2. **Housing**: As the consultants presented information about the scope of the Environmental Impact Report at the Planning Commission hearing on July 16<sup>th</sup>, they reported that Population/Housing was not a part of the scope of the EIR. The changes outlined in the CWPP will have direct and indirect effects on housing and should be considered. Even if it is not appropriate to have it be an official part of the EIR, all 7 Planning Commissioners asked that the effect on housing be included in the information that will go to the City Council.

- a. ADU's: Current law allows a City to prohibit the building of Accessory Dwelling Units (ADU's) in areas designated as High and Extreme High Fire Zones. By changing the designation of these areas that are either now unzoned or zoned as moderate would allow the City Council to take away the current property right of constructing an ADU that the owners in these areas currently have. Santa Barbara is in a HOUSING CRISIS and these new zones could eliminate the potential for additional affordable rental units.
- b. Loss of Value: As stated A High Fire Designation will cause loss of real value in the homes in the area. Additionally, we have real life examples of buyers backing out of transactions when a disclosure is given to them showing that the home they are trying to buy is locked in a High Fire Designated area (even if there has been no history of a wildfire in that area.)



In Summary, I applaud your efforts to make our community safer, but I also encourage you to keep your eye on the big picture. Does the benefit derived from these changes outweigh the damage done to the homeowners of these neighborhoods?

A handwritten signature in black ink, appearing to read "Bob Hef". The signature is written in a cursive, flowing style with a large initial "B" and a stylized "H".

**Notice of Completion & Environmental Document Transmittal**

Mail to: State Clearinghouse, P.O. Box 3044, Sacramento, CA 95812-3044 (916) 445-0613  
 For Hand Delivery/Street Address: 1400 Tenth Street, Sacramento, CA 95814

<b>SCH #</b>
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**Project Title:** City of Santa Barbara Community Wildfire Protection PlanLead Agency: City of Santa BarbaraContact Person: Amber AndersonMailing Address: 925 Chapala StreetPhone: 805-564-5720City: Santa BarbaraZip: 93101County: Santa Barbara**Project Location:** County: Santa BarbaraCity/Nearest Community: Santa BarbaraCross Streets: NAZip Code: NA

Longitude/Latitude (degrees, minutes and seconds): \_\_\_\_\_ ° \_\_\_\_\_ ' \_\_\_\_\_ " N / \_\_\_\_\_ ° \_\_\_\_\_ ' \_\_\_\_\_ " W Total Acres: \_\_\_\_\_

Assessor's Parcel No.: NA

Section: \_\_\_\_\_ Twp.: \_\_\_\_\_ Range: \_\_\_\_\_ Base: \_\_\_\_\_

Within 2 Miles: State Hwy #: 101Waterways: Pacific OceanAirports: Santa BarbaraRailways: UPRRSchools: Multiple**Document Type:**

CEQA: <input checked="" type="checkbox"/> NOP	<input type="checkbox"/> Draft EIR	NEPA: <input type="checkbox"/> NOI	Other: <input type="checkbox"/> Joint Document
<input type="checkbox"/> Early Cons	<input type="checkbox"/> Supplement/Subsequent EIR	<input type="checkbox"/> EA	<input type="checkbox"/> Final Document
<input type="checkbox"/> Neg Dec	(Prior SCH No.) _____	<input type="checkbox"/> Draft EIS	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Mit Neg Dec	Other: <u>Initial Study</u>	<input type="checkbox"/> FONSI	_____

**Local Action Type:**

<input type="checkbox"/> General Plan Update	<input type="checkbox"/> Specific Plan	<input type="checkbox"/> Rezone	<input type="checkbox"/> Annexation
<input type="checkbox"/> General Plan Amendment	<input type="checkbox"/> Master Plan	<input type="checkbox"/> Prezone	<input type="checkbox"/> Redevelopment
<input type="checkbox"/> General Plan Element	<input type="checkbox"/> Planned Unit Development	<input type="checkbox"/> Use Permit	<input type="checkbox"/> Coastal Permit
<input type="checkbox"/> Community Plan	<input type="checkbox"/> Site Plan	<input type="checkbox"/> Land Division (Subdivision, etc.)	<input checked="" type="checkbox"/> Other: <u>CWPP</u>

**Development Type:**

<input type="checkbox"/> Residential: Units _____ Acres _____	<input type="checkbox"/> Transportation: Type _____
<input type="checkbox"/> Office: Sq.ft. _____ Acres _____ Employees _____	<input type="checkbox"/> Mining: Mineral _____
<input type="checkbox"/> Commercial: Sq.ft. _____ Acres _____ Employees _____	<input type="checkbox"/> Power: Type _____ MW _____
<input type="checkbox"/> Industrial: Sq.ft. _____ Acres _____ Employees _____	<input type="checkbox"/> Waste Treatment: Type _____ MGD _____
<input type="checkbox"/> Educational: _____	<input type="checkbox"/> Hazardous Waste: Type _____
<input type="checkbox"/> Recreational: _____	<input checked="" type="checkbox"/> Other: <u>Community Wildfire Protection Plan</u>
<input type="checkbox"/> Water Facilities: Type _____ MGD _____	

**Project Issues Discussed in Document:**

<input checked="" type="checkbox"/> Aesthetic/Visual	<input type="checkbox"/> Fiscal	<input checked="" type="checkbox"/> Recreation/Parks	<input checked="" type="checkbox"/> Vegetation
<input checked="" type="checkbox"/> Agricultural Land	<input checked="" type="checkbox"/> Flood Plain/Flooding	<input checked="" type="checkbox"/> Schools/Universities	<input checked="" type="checkbox"/> Water Quality
<input checked="" type="checkbox"/> Air Quality	<input checked="" type="checkbox"/> Forest Land/Fire Hazard	<input checked="" type="checkbox"/> Septic Systems	<input checked="" type="checkbox"/> Water Supply/Groundwater
<input checked="" type="checkbox"/> Archeological/Historical	<input checked="" type="checkbox"/> Geologic/Seismic	<input checked="" type="checkbox"/> Sewer Capacity	<input checked="" type="checkbox"/> Wetland/Riparian
<input checked="" type="checkbox"/> Biological Resources	<input checked="" type="checkbox"/> Minerals	<input checked="" type="checkbox"/> Soil Erosion/Compaction/Grading	<input checked="" type="checkbox"/> Growth Inducement
<input checked="" type="checkbox"/> Coastal Zone	<input checked="" type="checkbox"/> Noise	<input checked="" type="checkbox"/> Solid Waste	<input checked="" type="checkbox"/> Land Use
<input checked="" type="checkbox"/> Drainage/Absorption	<input checked="" type="checkbox"/> Population/Housing Balance	<input checked="" type="checkbox"/> Toxic/Hazardous	<input checked="" type="checkbox"/> Cumulative Effects
<input type="checkbox"/> Economic/Jobs	<input checked="" type="checkbox"/> Public Services/Facilities	<input checked="" type="checkbox"/> Traffic/Circulation	<input type="checkbox"/> Other: _____

**Present Land Use/Zoning/General Plan Designation:**

Multiple land use designations and zoning throughout the City

**Project Description:** (please use a separate page if necessary)

The City of Santa Barbara Fire Department (SBFD) is proposing to implement a comprehensive, coordinated Community Wildfire Protection Plan (CWPP) to protect lives, property, and natural resources threatened by wildland fire. The proposed CWPP updates the City's 2004 Wildland Fire Plan consistent with the federal Healthy Forests Restoration Act passed in 2003 and subsequent guidance booklet Preparing a Community Wildfire Protection Plan; A Handbook for Wildland-Urban Interface Communities, "issued in 2004, accounting for changes in the City of Santa Barbara's (City's) fire environment and work completed under that 2004 Wildland Fire Plan. The proposed CWPP includes various goals, policies, and actions that represent a compilation of existing and newly proposed policies and actions related to codes and standards, funding, fire rehabilitation, evacuation, fire protection, vegetation/fuels management, and public education.

Note: The State Clearinghouse will assign identification numbers for all new projects. If a SCH number already exists for a project (e.g. Notice of Preparation or previous draft document) please fill in.

## Reviewing Agencies Checklist

Lead Agencies may recommend State Clearinghouse distribution by marking agencies below with an "X".  
If you have already sent your document to the agency please denote that with an "S".

<input checked="" type="checkbox"/> Air Resources Board	<input checked="" type="checkbox"/> Office of Historic Preservation
<input type="checkbox"/> Boating & Waterways, Department of	<input type="checkbox"/> Office of Public School Construction
<input checked="" type="checkbox"/> California Emergency Management Agency	<input checked="" type="checkbox"/> Parks & Recreation, Department of
<input checked="" type="checkbox"/> California Highway Patrol	<input type="checkbox"/> Pesticide Regulation, Department of
<input checked="" type="checkbox"/> Caltrans District # 5	<input type="checkbox"/> Public Utilities Commission
<input type="checkbox"/> Caltrans Division of Aeronautics	<input checked="" type="checkbox"/> Regional WQCB # 3
<input type="checkbox"/> Caltrans Planning	<input checked="" type="checkbox"/> Resources Agency
<input type="checkbox"/> Central Valley Flood Protection Board	<input type="checkbox"/> Resources Recycling and Recovery, Department of
<input type="checkbox"/> Coachella Valley Mtns. Conservancy	<input type="checkbox"/> S.F. Bay Conservation & Development Comm.
<input checked="" type="checkbox"/> Coastal Commission	<input type="checkbox"/> San Gabriel & Lower L.A. Rivers & Mtns. Conservancy
<input type="checkbox"/> Colorado River Board	<input type="checkbox"/> San Joaquin River Conservancy
<input checked="" type="checkbox"/> Conservation, Department of	<input type="checkbox"/> Santa Monica Mtns. Conservancy
<input type="checkbox"/> Corrections, Department of	<input type="checkbox"/> State Lands Commission
<input type="checkbox"/> Delta Protection Commission	<input type="checkbox"/> SWRCB: Clean Water Grants
<input type="checkbox"/> Education, Department of	<input checked="" type="checkbox"/> SWRCB: Water Quality
<input type="checkbox"/> Energy Commission	<input type="checkbox"/> SWRCB: Water Rights
<input checked="" type="checkbox"/> Fish & Game Region # 5	<input type="checkbox"/> Tahoe Regional Planning Agency
<input type="checkbox"/> Food & Agriculture, Department of	<input checked="" type="checkbox"/> Toxic Substances Control, Department of
<input checked="" type="checkbox"/> Forestry and Fire Protection, Department of	<input checked="" type="checkbox"/> Water Resources, Department of
<input type="checkbox"/> General Services, Department of	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Health Services, Department of	<input type="checkbox"/> Other: _____
<input type="checkbox"/> Housing & Community Development	
<input checked="" type="checkbox"/> Native American Heritage Commission	

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### Local Public Review Period (to be filled in by lead agency)

Starting Date July 2, 2020 Ending Date August 3, 2020

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### Lead Agency (Complete if applicable):

Consulting Firm: <u>Dudek</u>	Applicant: _____
Address: <u>621 Chapala Street</u>	Address: _____
City/State/Zip: <u>Santa Barbara, CA 93101</u>	City/State/Zip: _____
Contact: <u>Jessica Kinnahan, AICP</u>	Phone: _____
Phone: <u>805-280-2339</u>	

---

Signature of Lead Agency Representative: Allison DeBusk Date: 7/2/2020

Authority cited: Section 21083, Public Resources Code. Reference: Section 21161, Public Resources Code.



## Appendix B

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### Air Quality and Greenhouse Gases Emissions Calculations





# Table of Contents

Pile Burn Emissions	2
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**Pile Burn Emissions - Unmitigated**

VOC	Nox	CO	SOx	PM10	PM2.5	CO2	CH4	N2O	CO2e
lb/day									
240.14	0.00	3,552.23	0.00	1,045.57	910.66	115,661.41	221.26	31.03	130,439.67
ton/yr						MT/yr			
0.12	0.00	1.78	0.00	0.52	0.46	52.46	0.10	0.01	59.17

**Notes:** Assumes 40 piles per day over 2 acres, one day per year, with pile dimensions of 10'x10'x10'.

Consumed vegetation during pile burn estimated using the Piled Fuels Biomass and Emissions Calculator, US Forest Service 2014.

**Pile Burn Emissions - Mitigated**

VOC	Nox	CO	SOx	PM10	PM2.5	CO2	CH4	N2O	CO2e
lb/day									
16.18	0.00	239.35	0.00	70.45	61.36	7,793.29	14.91	2.09	8,789.05
ton/yr						MT/yr			
0.01	0.00	0.12	0.00	0.04	0.03	3.53	0.01	0.00	3.99

**Notes:** Assumes 22 piles per day over 2 acres, one day per year, with pile dimensions of 5'x5'x5'.

Consumed vegetation during pile burn estimated using the Piled Fuels Biomass and Emissions Calculator, US Forest Service 2014.

**Pile Burn Emission Factors**

VOC	Nox	CO	SOx	PM10	PM2.5	CO2	CH4	N2O
lb/ton								
3.56	0.00	52.66	0.00	15.50	13.50	1,714.62	3.28	0.46

**Source:** USDA, Estimating Volume, Biomass, and Potential Emissions of Hand-Piled Fuels, 2010.

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Annual

**Santa Barbara CWPP**  
**Santa Barbara County APCD Air District, Annual****1.0 Project Characteristics**

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**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Light Industry	1.00	1000sqft	0.02	1,000.00	0

**1.2 Other Project Characteristics**

Urbanization	Urban	Wind Speed (m/s)	2.9	Precipitation Freq (Days)	37
Climate Zone	8			Operational Year	2022
Utility Company	Southern California Edison				
CO2 Intensity (lb/MW hr)	702.44	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

**1.3 User Entered Comments & Non-Default Data**

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Project Characteristics -

Land Use - Land use is a surrogate.

Construction Phase - Based on City provided information.

Off-road Equipment - Based on City provided information.

Off-road Equipment - Based on City provided information.

Off-road Equipment - Based on City provided information.

Trips and VMT - Based on City provided information.

On-road Fugitive Dust - Assumed 1,000 feet of unpaved travel per trip.

Grading - CalEEMod defaults.

Vehicle Trips - Construction only.

Consumer Products - Construction only.

Area Coating - Construction only.

Landscape Equipment - Construction only.

Energy Use - Construction only.

Water And Wastewater - Construction only.

Solid Waste - Construction only.

Table Name	Column Name	Default Value	New Value
tblAreaCoating	ReapplicationRatePercent	10	0
tblConstDustMitigation	WaterUnpavedRoadMoistureContent	0	0.5
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	40
tblConstructionPhase	NumDays	1.00	20.00
tblConstructionPhase	NumDays	1.00	10.00
tblEnergyUse	LightingElect	2.99	0.00
tblEnergyUse	NT24E	3.83	0.00



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tblEnergyUse	NT24NG	6.86	0.00
tblEnergyUse	T24E	1.63	0.00
tblEnergyUse	T24NG	14.04	0.00
tblOffRoadEquipment	HorsePower	81.00	6.00
tblOffRoadEquipment	HorsePower	81.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	3.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	10.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	3.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	0.00	1.00
tblOffRoadEquipment	PhaseName		Mechanical Vegetation Treatment
tblOffRoadEquipment	PhaseName		Prescribed Burning
tblOffRoadEquipment	PhaseName		Mechanical Vegetation Treatment
tblOffRoadEquipment	PhaseName		Prescribed Burning
tblOffRoadEquipment	UsageHours	8.00	5.00
tblOnRoadDust	VendorPercentPave	100.00	1.00
tblOnRoadDust	VendorPercentPave	100.00	1.00
tblOnRoadDust	WorkerPercentPave	100.00	97.70
tblOnRoadDust	WorkerPercentPave	100.00	97.70
tblSolidWaste	SolidWasteGenerationRate	1.24	0.00
tblTripsAndVMT	VendorTripLength	6.40	20.00
tblTripsAndVMT	VendorTripLength	6.40	20.00
tblTripsAndVMT	VendorTripNumber	0.00	4.00
tblTripsAndVMT	VendorTripNumber	0.00	4.00

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tblTripsAndVMT	WorkerTripNumber	35.00	10.00
tblTripsAndVMT	WorkerTripNumber	10.00	12.00
tblVehicleTrips	ST_TR	1.32	0.00
tblVehicleTrips	SU_TR	0.68	0.00
tblVehicleTrips	WD_TR	6.97	0.00
tblWater	IndoorWaterUseRate	231,250.00	0.00

## 2.0 Emissions Summary

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Santa Barbara CWPP - Santa Barbara County APCD Air District, Annual

## 2.1 Overall Construction

### Unmitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.0102	0.0872	0.0987	1.8000e-004	1.6128	4.4900e-003	1.6173	0.1612	4.3200e-003	0.1655	0.0000	16.4676	16.4676	2.3900e-003	0.0000	16.5272
Maximum	0.0102	0.0872	0.0987	1.8000e-004	1.6128	4.4900e-003	1.6173	0.1612	4.3200e-003	0.1655	0.0000	16.4676	16.4676	2.3900e-003	0.0000	16.5272

### Mitigated Construction

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	tons/yr										MT/yr					
2021	0.0102	0.0872	0.0987	1.8000e-004	1.6128	4.4900e-003	1.6173	0.1612	4.3200e-003	0.1655	0.0000	16.4676	16.4676	2.3900e-003	0.0000	16.5272
Maximum	0.0102	0.0872	0.0987	1.8000e-004	1.6128	4.4900e-003	1.6173	0.1612	4.3200e-003	0.1655	0.0000	16.4676	16.4676	2.3900e-003	0.0000	16.5272

[illegible]

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Quarter	Start Date	End Date	Maximum Unmitigated ROG + NOX (tons/quarter)	Maximum Mitigated ROG + NOX (tons/quarter)
1	1-1-2021	3-31-2021	0.0972	0.0972
		Highest	0.0972	0.0972

## 2.2 Overall Operational

Unmitigated Operational

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	3.9100e-003	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Total	3.9100e-003	0.0000	1.0000e-005	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Annual

**2.2 Overall Operational****Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Area	3.9100e-003	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Waste						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Water						0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>	<b>3.9100e-003</b>	<b>0.0000</b>	<b>1.0000e-005</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>2.0000e-005</b>	<b>2.0000e-005</b>	<b>0.0000</b>	<b>0.0000</b>	<b>2.0000e-005</b>

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
<b>Percent Reduction</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>

**3.0 Construction Detail****Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Mechanical Vegetation Treatment	Site Preparation	1/1/2021	1/28/2021	5	20	
2	Prescribed Burning	Site Preparation	1/27/2021	2/9/2021	5	10	



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**Acres of Grading (Site Preparation Phase): 0****Acres of Grading (Grading Phase): 0****Acres of Paving: 0****Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)****OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Mechanical Vegetation Treatment	Concrete/Industrial Saws	10	8.00	6	0.73
Mechanical Vegetation Treatment	Crushing/Proc. Equipment	1	5.00	85	0.78
Mechanical Vegetation Treatment	Graders	0	8.00	187	0.41
Mechanical Vegetation Treatment	Tractors/Loaders/Backhoes	3	5.00	97	0.37
Prescribed Burning	Concrete/Industrial Saws	3	8.00	6	0.73
Prescribed Burning	Crushing/Proc. Equipment	1	8.00	85	0.78
Prescribed Burning	Graders	0	8.00	187	0.41
Prescribed Burning	Tractors/Loaders/Backhoes	0	8.00	97	0.37

**Trips and VMT**

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Mechanical Vegetation Treatment	14	10.00	4.00	0.00	8.30	20.00	20.00	LD_Mix	HDT_Mix	HHDT
Prescribed Burning	4	12.00	4.00	0.00	8.30	20.00	20.00	LD_Mix	HDT_Mix	HHDT

**3.1 Mitigation Measures Construction**

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**3.2 Mechanical Vegetation Treatment - 2021****Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	6.7100e-003	0.0574	0.0695	1.0000e-004		3.4000e-003	3.4000e-003		3.2300e-003	3.2300e-003	0.0000	8.8861	8.8861	1.9100e-003	0.0000	8.9339
<b>Total</b>	<b>6.7100e-003</b>	<b>0.0574</b>	<b>0.0695</b>	<b>1.0000e-004</b>	<b>0.0000</b>	<b>3.4000e-003</b>	<b>3.4000e-003</b>	<b>0.0000</b>	<b>3.2300e-003</b>	<b>3.2300e-003</b>	<b>0.0000</b>	<b>8.8861</b>	<b>8.8861</b>	<b>1.9100e-003</b>	<b>0.0000</b>	<b>8.9339</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.8000e-004	7.9300e-003	2.7300e-003	3.0000e-005	1.0476	3.0000e-005	1.0477	0.1046	3.0000e-005	0.1046	0.0000	2.5251	2.5251	1.6000e-004	0.0000	2.5291
Worker	3.0000e-004	2.4000e-004	2.1500e-003	1.0000e-005	0.0259	0.0000	0.0259	2.6800e-003	0.0000	2.6800e-003	0.0000	0.4873	0.4873	2.0000e-005	0.0000	0.4877
<b>Total</b>	<b>5.8000e-004</b>	<b>8.1700e-003</b>	<b>4.8800e-003</b>	<b>4.0000e-005</b>	<b>1.0735</b>	<b>3.0000e-005</b>	<b>1.0735</b>	<b>0.1073</b>	<b>3.0000e-005</b>	<b>0.1073</b>	<b>0.0000</b>	<b>3.0124</b>	<b>3.0124</b>	<b>1.8000e-004</b>	<b>0.0000</b>	<b>3.0168</b>

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**3.2 Mechanical Vegetation Treatment - 2021****Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	6.7100e-003	0.0574	0.0695	1.0000e-004		3.4000e-003	3.4000e-003		3.2300e-003	3.2300e-003	0.0000	8.8860	8.8860	1.9100e-003	0.0000	8.9339
<b>Total</b>	<b>6.7100e-003</b>	<b>0.0574</b>	<b>0.0695</b>	<b>1.0000e-004</b>	<b>0.0000</b>	<b>3.4000e-003</b>	<b>3.4000e-003</b>	<b>0.0000</b>	<b>3.2300e-003</b>	<b>3.2300e-003</b>	<b>0.0000</b>	<b>8.8860</b>	<b>8.8860</b>	<b>1.9100e-003</b>	<b>0.0000</b>	<b>8.9339</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	2.8000e-004	7.9300e-003	2.7300e-003	3.0000e-005	1.0476	3.0000e-005	1.0477	0.1046	3.0000e-005	0.1046	0.0000	2.5251	2.5251	1.6000e-004	0.0000	2.5291
Worker	3.0000e-004	2.4000e-004	2.1500e-003	1.0000e-005	0.0259	0.0000	0.0259	2.6800e-003	0.0000	2.6800e-003	0.0000	0.4873	0.4873	2.0000e-005	0.0000	0.4877
<b>Total</b>	<b>5.8000e-004</b>	<b>8.1700e-003</b>	<b>4.8800e-003</b>	<b>4.0000e-005</b>	<b>1.0735</b>	<b>3.0000e-005</b>	<b>1.0735</b>	<b>0.1073</b>	<b>3.0000e-005</b>	<b>0.1073</b>	<b>0.0000</b>	<b>3.0124</b>	<b>3.0124</b>	<b>1.8000e-004</b>	<b>0.0000</b>	<b>3.0168</b>

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**3.3 Prescribed Burning - 2021****Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.5600e-003	0.0175	0.0217	4.0000e-005		1.0400e-003	1.0400e-003		1.0400e-003	1.0400e-003	0.0000	3.0143	3.0143	2.1000e-004	0.0000	3.0194
<b>Total</b>	<b>2.5600e-003</b>	<b>0.0175</b>	<b>0.0217</b>	<b>4.0000e-005</b>	<b>0.0000</b>	<b>1.0400e-003</b>	<b>1.0400e-003</b>	<b>0.0000</b>	<b>1.0400e-003</b>	<b>1.0400e-003</b>	<b>0.0000</b>	<b>3.0143</b>	<b>3.0143</b>	<b>2.1000e-004</b>	<b>0.0000</b>	<b>3.0194</b>

**Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.4000e-004	3.9600e-003	1.3600e-003	1.0000e-005	0.5238	2.0000e-005	0.5238	0.0523	2.0000e-005	0.0523	0.0000	1.2625	1.2625	8.0000e-005	0.0000	1.2645
Worker	1.8000e-004	1.4000e-004	1.2900e-003	0.0000	0.0155	0.0000	0.0155	1.6100e-003	0.0000	1.6100e-003	0.0000	0.2924	0.2924	1.0000e-005	0.0000	0.2926
<b>Total</b>	<b>3.2000e-004</b>	<b>4.1000e-003</b>	<b>2.6500e-003</b>	<b>1.0000e-005</b>	<b>0.5393</b>	<b>2.0000e-005</b>	<b>0.5393</b>	<b>0.0539</b>	<b>2.0000e-005</b>	<b>0.0539</b>	<b>0.0000</b>	<b>1.5549</b>	<b>1.5549</b>	<b>9.0000e-005</b>	<b>0.0000</b>	<b>1.5572</b>

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**3.3 Prescribed Burning - 2021****Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Off-Road	2.5600e-003	0.0175	0.0217	4.0000e-005		1.0400e-003	1.0400e-003		1.0400e-003	1.0400e-003	0.0000	3.0143	3.0143	2.1000e-004	0.0000	3.0194
<b>Total</b>	<b>2.5600e-003</b>	<b>0.0175</b>	<b>0.0217</b>	<b>4.0000e-005</b>	<b>0.0000</b>	<b>1.0400e-003</b>	<b>1.0400e-003</b>	<b>0.0000</b>	<b>1.0400e-003</b>	<b>1.0400e-003</b>	<b>0.0000</b>	<b>3.0143</b>	<b>3.0143</b>	<b>2.1000e-004</b>	<b>0.0000</b>	<b>3.0194</b>

**Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Hauling	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Vendor	1.4000e-004	3.9600e-003	1.3600e-003	1.0000e-005	0.5238	2.0000e-005	0.5238	0.0523	2.0000e-005	0.0523	0.0000	1.2625	1.2625	8.0000e-005	0.0000	1.2645
Worker	1.8000e-004	1.4000e-004	1.2900e-003	0.0000	0.0155	0.0000	0.0155	1.6100e-003	0.0000	1.6100e-003	0.0000	0.2924	0.2924	1.0000e-005	0.0000	0.2926
<b>Total</b>	<b>3.2000e-004</b>	<b>4.1000e-003</b>	<b>2.6500e-003</b>	<b>1.0000e-005</b>	<b>0.5393</b>	<b>2.0000e-005</b>	<b>0.5393</b>	<b>0.0539</b>	<b>2.0000e-005</b>	<b>0.0539</b>	<b>0.0000</b>	<b>1.5549</b>	<b>1.5549</b>	<b>9.0000e-005</b>	<b>0.0000</b>	<b>1.5572</b>

**4.0 Operational Detail - Mobile**



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**4.1 Mitigation Measures Mobile**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000

**4.2 Trip Summary Information**

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Light Industry	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

**4.3 Trip Type Information**

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Light Industry	6.60	5.50	6.40	59.00	28.00	13.00	92	5	3

**4.4 Fleet Mix**

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Light Industry	0.563532	0.028682	0.205515	0.123285	0.020921	0.005572	0.017481	0.019425	0.002786	0.002265	0.006886	0.002647	0.001003

Santa Barbara CWPP - Santa Barbara County APCD Air District, Annual

## 5.0 Energy Detail

Historical Energy Use: N

## 5.1 Mitigation Measures Energy

[illegible]

Santa Barbara CWPP - Santa Barbara County APCD Air District, Annual

## 5.2 Energy by Land Use - NaturalGas

**Unmitigated**

[illegible]

**Mitigated**

[illegible]

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Annual

**5.3 Energy by Land Use - Electricity****Unmitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Light Industry	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated**

	Electricity Use	Total CO2	CH4	N2O	CO2e
Land Use	kWh/yr	MT/yr			
General Light Industry	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**6.0 Area Detail****6.1 Mitigation Measures Area**

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	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	tons/yr										MT/yr					
Mitigated	3.9100e-003	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005
Unmitigated	3.9100e-003	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005

## 6.2 Area by SubCategory

Unmitigated

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	3.9100e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005
<b>Total</b>	<b>3.9100e-003</b>	<b>0.0000</b>	<b>1.0000e-005</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>2.0000e-005</b>	<b>2.0000e-005</b>	<b>0.0000</b>	<b>0.0000</b>	<b>2.0000e-005</b>



## Santa Barbara CWPP - Santa Barbara County APCD Air District, Annual

**6.2 Area by SubCategory****Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	tons/yr										MT/yr					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Consumer Products	3.9100e-003					0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000
Landscaping	0.0000	0.0000	1.0000e-005	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	2.0000e-005	2.0000e-005	0.0000	0.0000	2.0000e-005
<b>Total</b>	<b>3.9100e-003</b>	<b>0.0000</b>	<b>1.0000e-005</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>2.0000e-005</b>	<b>2.0000e-005</b>	<b>0.0000</b>	<b>0.0000</b>	<b>2.0000e-005</b>

**7.0 Water Detail****7.1 Mitigation Measures Water**

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Annual

	Total CO2	CH4	N2O	CO2e
Category	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

**7.2 Water by Land Use****Unmitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Light Industry	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Annual

**7.2 Water by Land Use****Mitigated**

	Indoor/Outdoor Use	Total CO2	CH4	N2O	CO2e
Land Use	Mgal	MT/yr			
General Light Industry	0 / 0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**8.0 Waste Detail****8.1 Mitigation Measures Waste****Category/Year**

	Total CO2	CH4	N2O	CO2e
	MT/yr			
Mitigated	0.0000	0.0000	0.0000	0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Annual

**8.2 Waste by Land Use****Unmitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Light Industry	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**Mitigated**

	Waste Disposed	Total CO2	CH4	N2O	CO2e
Land Use	tons	MT/yr			
General Light Industry	0	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**9.0 Operational Offroad**

Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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## Santa Barbara CWPP - Santa Barbara County APCD Air District, Annual

## 10.0 Stationary Equipment

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### Fire Pumps and Emergency Generators

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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### Boilers

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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### User Defined Equipment

Equipment Type	Number
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## 11.0 Vegetation

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## Santa Barbara CWPP - Santa Barbara County APCD Air District, Summer

**Santa Barbara CWPP**  
**Santa Barbara County APCD Air District, Summer****1.0 Project Characteristics**

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**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Light Industry	1.00	1000sqft	0.02	1,000.00	0

**1.2 Other Project Characteristics**

Urbanization	Urban	Wind Speed (m/s)	2.9	Precipitation Freq (Days)	37
Climate Zone	8			Operational Year	2022
Utility Company	Southern California Edison				
CO2 Intensity (lb/MWhr)	702.44	CH4 Intensity (lb/MWhr)	0.029	N2O Intensity (lb/MWhr)	0.006

**1.3 User Entered Comments & Non-Default Data**

Santa Barbara CWPP - Santa Barbara County APCD Air District, Summer

Project Characteristics -

Land Use - Land use is a surrogate.

Construction Phase - Based on City provided information.

Off-road Equipment - Based on City provided information.

Off-road Equipment - Based on City provided information.

Off-road Equipment - Based on City provided information.

Trips and VMT - Based on City provided information.

On-road Fugitive Dust - Assumed 1,000 feet of unpaved travel per trip.

Grading - CalEEMod defaults.

Vehicle Trips - Construction only.

Consumer Products - Construction only.

Area Coating - Construction only.

Landscape Equipment - Construction only.

Energy Use - Construction only.

Water And Wastewater - Construction only.

Solid Waste - Construction only.

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Summer

Table Name	Column Name	Default Value	New Value
tblAreaCoating	ReapplicationRatePercent	10	0
tblConstDustMitigation	WaterUnpavedRoadMoistureContent	0	0.5
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	40
tblConstructionPhase	NumDays	1.00	3.00
tblEnergyUse	LightingElect	2.99	0.00
tblEnergyUse	NT24E	3.83	0.00
tblEnergyUse	NT24NG	6.86	0.00
tblEnergyUse	T24E	1.63	0.00
tblEnergyUse	T24NG	14.04	0.00
tblOffRoadEquipment	HorsePower	81.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOnRoadDust	HaulingPercentPave	100.00	99.10
tblOnRoadDust	HaulingPercentPave	100.00	99.10
tblOnRoadDust	WorkerPercentPave	100.00	97.70
tblOnRoadDust	WorkerPercentPave	100.00	97.70
tblSolidWaste	SolidWasteGenerationRate	1.24	0.00
tblTripsAndVMT	HaulingTripNumber	0.00	4.00
tblTripsAndVMT	HaulingTripNumber	0.00	4.00
tblTripsAndVMT	WorkerTripNumber	18.00	10.00
tblTripsAndVMT	WorkerTripNumber	0.00	12.00
tblVehicleTrips	ST_TR	1.32	0.00
tblVehicleTrips	SU_TR	0.68	0.00
tblVehicleTrips	WD_TR	6.97	0.00
tblWater	IndoorWaterUseRate	231,250.00	0.00

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Summer

**2.0 Emissions Summary****2.1 Overall Construction (Maximum Daily Emission)****Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	0.8036	6.9056	7.5131	0.0154	7.8218	0.3265	8.1483	0.8191	0.3173	1.1364	0.0000	1,543.247 3	1,543.247 3	0.1899	0.0000	1,547.994 6
<b>Maximum</b>	<b>0.8036</b>	<b>6.9056</b>	<b>7.5131</b>	<b>0.0154</b>	<b>7.8218</b>	<b>0.3265</b>	<b>8.1483</b>	<b>0.8191</b>	<b>0.3173</b>	<b>1.1364</b>	<b>0.0000</b>	<b>1,543.247 3</b>	<b>1,543.247 3</b>	<b>0.1899</b>	<b>0.0000</b>	<b>1,547.994 6</b>

**Mitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	0.8036	6.9056	7.5131	0.0154	7.8218	0.3265	8.1483	0.8191	0.3173	1.1364	0.0000	1,543.247 3	1,543.247 3	0.1899	0.0000	1,547.994 6
<b>Maximum</b>	<b>0.8036</b>	<b>6.9056</b>	<b>7.5131</b>	<b>0.0154</b>	<b>7.8218</b>	<b>0.3265</b>	<b>8.1483</b>	<b>0.8191</b>	<b>0.3173</b>	<b>1.1364</b>	<b>0.0000</b>	<b>1,543.247 3</b>	<b>1,543.247 3</b>	<b>0.1899</b>	<b>0.0000</b>	<b>1,547.994 6</b>

Santa Barbara CWPP - Santa Barbara County APCD Air District, Summer

[illegible]



## Santa Barbara CWPP - Santa Barbara County APCD Air District, Summer

**2.2 Overall Operational****Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.0214	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
<b>Total</b>	<b>0.0214</b>	<b>0.0000</b>	<b>1.0000e-004</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>2.2000e-004</b>	<b>2.2000e-004</b>	<b>0.0000</b>	<b>0.0000</b>	<b>2.3000e-004</b>

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.0214	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
<b>Total</b>	<b>0.0214</b>	<b>0.0000</b>	<b>1.0000e-004</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>2.2000e-004</b>	<b>2.2000e-004</b>	<b>0.0000</b>	<b>0.0000</b>	<b>2.3000e-004</b>

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

**3.0 Construction Detail****Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Mechanical Treatment	Site Preparation	1/1/2021	1/5/2021	5	3	
2	Prescribed Burn	Site Preparation	1/1/2021	1/1/2021	5	1	

**Acres of Grading (Site Preparation Phase): 0****Acres of Grading (Grading Phase): 0****Acres of Paving: 0****Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)****OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Mechanical Treatment	Concrete/Industrial Saws	5	8.00	6	0.73
Mechanical Treatment	Crushing/Proc. Equipment	1	8.00	85	0.78
Mechanical Treatment	Graders	0	8.00	187	0.41
Mechanical Treatment	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Prescribed Burn	Graders	0	8.00	187	0.41
Prescribed Burn	Tractors/Loaders/Backhoes	0	8.00	97	0.37

**Trips and VMT**

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Summer

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Mechanical Treatment	7	10.00	0.00	4.00	8.30	6.40	20.00	LD_Mix	HDT_Mix	HHDT
Prescribed Burn	0	12.00	0.00	4.00	8.30	6.40	20.00	LD_Mix	HDT_Mix	HHDT

**3.1 Mitigation Measures Construction****3.2 Mechanical Treatment - 2021****Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Off-Road	0.6994	5.3909	6.5996	0.0101		0.3199	0.3199		0.3110	0.3110		965.4302	965.4302	0.1429		969.0032
<b>Total</b>	<b>0.6994</b>	<b>5.3909</b>	<b>6.5996</b>	<b>0.0101</b>	<b>0.0000</b>	<b>0.3199</b>	<b>0.3199</b>	<b>0.0000</b>	<b>0.3110</b>	<b>0.3110</b>		<b>965.4302</b>	<b>965.4302</b>	<b>0.1429</b>		<b>969.0032</b>

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Summer

**3.2 Mechanical Treatment - 2021****Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0101	0.3668	0.1116	1.0200e-003	0.3762	1.4400e-003	0.3776	0.0415	1.3700e-003	0.0429		114.2525	114.2525	0.0108		114.5228
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0290	0.0216	0.2124	5.5000e-004	2.8713	3.9000e-004	2.8717	0.2968	3.6000e-004	0.2972		54.9124	54.9124	1.6900e-003		54.9546
<b>Total</b>	<b>0.0391</b>	<b>0.3884</b>	<b>0.3239</b>	<b>1.5700e-003</b>	<b>3.2475</b>	<b>1.8300e-003</b>	<b>3.2494</b>	<b>0.3383</b>	<b>1.7300e-003</b>	<b>0.3401</b>		<b>169.1649</b>	<b>169.1649</b>	<b>0.0125</b>		<b>169.4774</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Off-Road	0.6994	5.3909	6.5996	0.0101		0.3199	0.3199		0.3110	0.3110	0.0000	965.4302	965.4302	0.1429		969.0032
<b>Total</b>	<b>0.6994</b>	<b>5.3909</b>	<b>6.5996</b>	<b>0.0101</b>	<b>0.0000</b>	<b>0.3199</b>	<b>0.3199</b>	<b>0.0000</b>	<b>0.3110</b>	<b>0.3110</b>	<b>0.0000</b>	<b>965.4302</b>	<b>965.4302</b>	<b>0.1429</b>		<b>969.0032</b>

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Summer

**3.2 Mechanical Treatment - 2021****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0101	0.3668	0.1116	1.0200e-003	0.3762	1.4400e-003	0.3776	0.0415	1.3700e-003	0.0429		114.2525	114.2525	0.0108		114.5228
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0290	0.0216	0.2124	5.5000e-004	2.8713	3.9000e-004	2.8717	0.2968	3.6000e-004	0.2972		54.9124	54.9124	1.6900e-003		54.9546
<b>Total</b>	<b>0.0391</b>	<b>0.3884</b>	<b>0.3239</b>	<b>1.5700e-003</b>	<b>3.2475</b>	<b>1.8300e-003</b>	<b>3.2494</b>	<b>0.3383</b>	<b>1.7300e-003</b>	<b>0.3401</b>		<b>169.1649</b>	<b>169.1649</b>	<b>0.0125</b>		<b>169.4774</b>

**3.3 Prescribed Burn - 2021****Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>

Santa Barbara CWPP - Santa Barbara County APCD Air District, Summer

### 3.3 Prescribed Burn - 2021

### Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0303	1.1004	0.3347	3.0600e-003	1.1286	4.3100e-003	1.1329	0.1246	4.1200e-003	0.1288		342.7574	342.7574	0.0324		343.5684
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0348	0.0259	0.2548	6.6000e-004	3.4456	4.7000e-004	3.4461	0.3562	4.3000e-004	0.3566		65.8949	65.8949	2.0300e-003		65.9455
<b>Total</b>	<b>0.0651</b>	<b>1.1263</b>	<b>0.5895</b>	<b>3.7200e-003</b>	<b>4.5742</b>	<b>4.7800e-003</b>	<b>4.5790</b>	<b>0.4808</b>	<b>4.5500e-003</b>	<b>0.4853</b>		<b>408.6523</b>	<b>408.6523</b>	<b>0.0345</b>		<b>409.5140</b>

### Mitigated Construction On-Site

[illegible]



## Santa Barbara CWPP - Santa Barbara County APCD Air District, Summer

**3.3 Prescribed Burn - 2021****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0303	1.1004	0.3347	3.0600e-003	1.1286	4.3100e-003	1.1329	0.1246	4.1200e-003	0.1288		342.7574	342.7574	0.0324		343.5684
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0348	0.0259	0.2548	6.6000e-004	3.4456	4.7000e-004	3.4461	0.3562	4.3000e-004	0.3566		65.8949	65.8949	2.0300e-003		65.9455
<b>Total</b>	<b>0.0651</b>	<b>1.1263</b>	<b>0.5895</b>	<b>3.7200e-003</b>	<b>4.5742</b>	<b>4.7800e-003</b>	<b>4.5790</b>	<b>0.4808</b>	<b>4.5500e-003</b>	<b>0.4853</b>		<b>408.6523</b>	<b>408.6523</b>	<b>0.0345</b>		<b>409.5140</b>

**4.0 Operational Detail - Mobile****4.1 Mitigation Measures Mobile**

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Summer

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

## 4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Light Industry	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

## 4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Light Industry	6.60	5.50	6.40	59.00	28.00	13.00	92	5	3

## 4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Light Industry	0.563532	0.028682	0.205515	0.123285	0.020921	0.005572	0.017481	0.019425	0.002786	0.002265	0.006886	0.002647	0.001003

## 5.0 Energy Detail

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 Historical Energy Use: N

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Summer

**5.1 Mitigation Measures Energy**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

**5.2 Energy by Land Use - NaturalGas****Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Light Industry	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Summer

**5.2 Energy by Land Use - NaturalGas****Mitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Light Industry	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**6.0 Area Detail****6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0214	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Unmitigated	0.0214	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Summer

**6.2 Area by SubCategory****Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0214					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
<b>Total</b>	<b>0.0214</b>	<b>0.0000</b>	<b>1.0000e-004</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>2.2000e-004</b>	<b>2.2000e-004</b>	<b>0.0000</b>		<b>2.3000e-004</b>

**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0214					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
<b>Total</b>	<b>0.0214</b>	<b>0.0000</b>	<b>1.0000e-004</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>2.2000e-004</b>	<b>2.2000e-004</b>	<b>0.0000</b>		<b>2.3000e-004</b>

**7.0 Water Detail**

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Summer

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**7.1 Mitigation Measures Water**

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**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

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**9.0 Operational Offroad**

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Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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**10.0 Stationary Equipment****Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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**Boilers**

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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## Santa Barbara CWPP - Santa Barbara County APCD Air District, Winter

**Santa Barbara CWPP**  
**Santa Barbara County APCD Air District, Winter****1.0 Project Characteristics**

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**1.1 Land Usage**

Land Uses	Size	Metric	Lot Acreage	Floor Surface Area	Population
General Light Industry	1.00	1000sqft	0.02	1,000.00	0

**1.2 Other Project Characteristics**

Urbanization	Urban	Wind Speed (m/s)	2.9	Precipitation Freq (Days)	37
Climate Zone	8			Operational Year	2022
Utility Company	Southern California Edison				
CO2 Intensity (lb/MW hr)	702.44	CH4 Intensity (lb/MW hr)	0.029	N2O Intensity (lb/MW hr)	0.006

**1.3 User Entered Comments & Non-Default Data**

Santa Barbara CWPP - Santa Barbara County APCD Air District, Winter

Project Characteristics -

Land Use - Land use is a surrogate.

Construction Phase - Based on City provided information.

Off-road Equipment - Based on City provided information.

Off-road Equipment - Based on City provided information.

Off-road Equipment - Based on City provided information.

Trips and VMT - Based on City provided information.

On-road Fugitive Dust - Assumed 1,000 feet of unpaved travel per trip.

Grading - CalEEMod defaults.

Vehicle Trips - Construction only.

Consumer Products - Construction only.

Area Coating - Construction only.

Landscape Equipment - Construction only.

Energy Use - Construction only.

Water And Wastewater - Construction only.

Solid Waste - Construction only.

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Winter

Table Name	Column Name	Default Value	New Value
tblAreaCoating	ReapplicationRatePercent	10	0
tblConstDustMitigation	WaterUnpavedRoadMoistureContent	0	0.5
tblConstDustMitigation	WaterUnpavedRoadVehicleSpeed	0	40
tblConstructionPhase	NumDays	1.00	3.00
tblEnergyUse	LightingElect	2.99	0.00
tblEnergyUse	NT24E	3.83	0.00
tblEnergyUse	NT24NG	6.86	0.00
tblEnergyUse	T24E	1.63	0.00
tblEnergyUse	T24NG	14.04	0.00
tblOffRoadEquipment	HorsePower	81.00	6.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOffRoadEquipment	OffRoadEquipmentUnitAmount	1.00	0.00
tblOnRoadDust	HaulingPercentPave	100.00	99.10
tblOnRoadDust	HaulingPercentPave	100.00	99.10
tblOnRoadDust	WorkerPercentPave	100.00	97.70
tblOnRoadDust	WorkerPercentPave	100.00	97.70
tblSolidWaste	SolidWasteGenerationRate	1.24	0.00
tblTripsAndVMT	HaulingTripNumber	0.00	4.00
tblTripsAndVMT	HaulingTripNumber	0.00	4.00
tblTripsAndVMT	WorkerTripNumber	18.00	10.00
tblTripsAndVMT	WorkerTripNumber	0.00	12.00
tblVehicleTrips	ST_TR	1.32	0.00
tblVehicleTrips	SU_TR	0.68	0.00
tblVehicleTrips	WD_TR	6.97	0.00
tblWater	IndoorWaterUseRate	231,250.00	0.00

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Winter

**2.0 Emissions Summary****2.1 Overall Construction (Maximum Daily Emission)****Unmitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	0.8128	6.9205	7.5488	0.0153	7.8218	0.3267	8.1484	0.8191	0.3174	1.1365	0.0000	1,534.204 7	1,534.204 7	0.1907	0.0000	1,538.973 2
<b>Maximum</b>	<b>0.8128</b>	<b>6.9205</b>	<b>7.5488</b>	<b>0.0153</b>	<b>7.8218</b>	<b>0.3267</b>	<b>8.1484</b>	<b>0.8191</b>	<b>0.3174</b>	<b>1.1365</b>	<b>0.0000</b>	<b>1,534.204 7</b>	<b>1,534.204 7</b>	<b>0.1907</b>	<b>0.0000</b>	<b>1,538.973 2</b>

**Mitigated Construction**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Year	lb/day										lb/day					
2021	0.8128	6.9205	7.5488	0.0153	7.8218	0.3267	8.1484	0.8191	0.3174	1.1365	0.0000	1,534.204 7	1,534.204 7	0.1907	0.0000	1,538.973 2
<b>Maximum</b>	<b>0.8128</b>	<b>6.9205</b>	<b>7.5488</b>	<b>0.0153</b>	<b>7.8218</b>	<b>0.3267</b>	<b>8.1484</b>	<b>0.8191</b>	<b>0.3174</b>	<b>1.1365</b>	<b>0.0000</b>	<b>1,534.204 7</b>	<b>1,534.204 7</b>	<b>0.1907</b>	<b>0.0000</b>	<b>1,538.973 2</b>

Santa Barbara CWPP - Santa Barbara County APCD Air District, Winter

[illegible]

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Winter

**2.2 Overall Operational****Unmitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.0214	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
<b>Total</b>	<b>0.0214</b>	<b>0.0000</b>	<b>1.0000e-004</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>2.2000e-004</b>	<b>2.2000e-004</b>	<b>0.0000</b>	<b>0.0000</b>	<b>2.3000e-004</b>

**Mitigated Operational**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Area	0.0214	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Energy	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
Mobile	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
<b>Total</b>	<b>0.0214</b>	<b>0.0000</b>	<b>1.0000e-004</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>2.2000e-004</b>	<b>2.2000e-004</b>	<b>0.0000</b>	<b>0.0000</b>	<b>2.3000e-004</b>



## Santa Barbara CWPP - Santa Barbara County APCD Air District, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio-CO2	Total CO2	CH4	N2O	CO2e
Percent Reduction	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00	0.00

**3.0 Construction Detail****Construction Phase**

Phase Number	Phase Name	Phase Type	Start Date	End Date	Num Days Week	Num Days	Phase Description
1	Mechanical Treatment	Site Preparation	1/1/2021	1/5/2021	5	3	
2	Prescribed Burn	Site Preparation	1/1/2021	1/1/2021	5	1	

**Acres of Grading (Site Preparation Phase): 0****Acres of Grading (Grading Phase): 0****Acres of Paving: 0****Residential Indoor: 0; Residential Outdoor: 0; Non-Residential Indoor: 0; Non-Residential Outdoor: 0; Striped Parking Area: 0 (Architectural Coating – sqft)****OffRoad Equipment**

Phase Name	Offroad Equipment Type	Amount	Usage Hours	Horse Power	Load Factor
Mechanical Treatment	Concrete/Industrial Saws	5	8.00	6	0.73
Mechanical Treatment	Crushing/Proc. Equipment	1	8.00	85	0.78
Mechanical Treatment	Graders	0	8.00	187	0.41
Mechanical Treatment	Tractors/Loaders/Backhoes	1	8.00	97	0.37
Prescribed Burn	Graders	0	8.00	187	0.41
Prescribed Burn	Tractors/Loaders/Backhoes	0	8.00	97	0.37

**Trips and VMT**

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Winter

Phase Name	Offroad Equipment Count	Worker Trip Number	Vendor Trip Number	Hauling Trip Number	Worker Trip Length	Vendor Trip Length	Hauling Trip Length	Worker Vehicle Class	Vendor Vehicle Class	Hauling Vehicle Class
Mechanical Treatment	7	10.00	0.00	4.00	8.30	6.40	20.00	LD_Mix	HDT_Mix	HHDT
Prescribed Burn	0	12.00	0.00	4.00	8.30	6.40	20.00	LD_Mix	HDT_Mix	HHDT

**3.1 Mitigation Measures Construction****3.2 Mechanical Treatment - 2021****Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Off-Road	0.6994	5.3909	6.5996	0.0101		0.3199	0.3199		0.3110	0.3110		965.4302	965.4302	0.1429		969.0032
<b>Total</b>	<b>0.6994</b>	<b>5.3909</b>	<b>6.5996</b>	<b>0.0101</b>	<b>0.0000</b>	<b>0.3199</b>	<b>0.3199</b>	<b>0.0000</b>	<b>0.3110</b>	<b>0.3110</b>		<b>965.4302</b>	<b>965.4302</b>	<b>0.1429</b>		<b>969.0032</b>

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Winter

**3.2 Mechanical Treatment - 2021****Unmitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0104	0.3688	0.1163	1.0100e-003	0.3762	1.4700e-003	0.3777	0.0415	1.4100e-003	0.0430		112.6902	112.6902	0.0110		112.9658
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0327	0.0247	0.2201	5.4000e-004	2.8713	3.9000e-004	2.8717	0.2968	3.6000e-004	0.2972		53.6426	53.6426	1.6900e-003		53.6849
<b>Total</b>	<b>0.0431</b>	<b>0.3935</b>	<b>0.3363</b>	<b>1.5500e-003</b>	<b>3.2475</b>	<b>1.8600e-003</b>	<b>3.2494</b>	<b>0.3383</b>	<b>1.7700e-003</b>	<b>0.3401</b>		<b>166.3328</b>	<b>166.3328</b>	<b>0.0127</b>		<b>166.6507</b>

**Mitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Off-Road	0.6994	5.3909	6.5996	0.0101		0.3199	0.3199		0.3110	0.3110	0.0000	965.4302	965.4302	0.1429		969.0032
<b>Total</b>	<b>0.6994</b>	<b>5.3909</b>	<b>6.5996</b>	<b>0.0101</b>	<b>0.0000</b>	<b>0.3199</b>	<b>0.3199</b>	<b>0.0000</b>	<b>0.3110</b>	<b>0.3110</b>	<b>0.0000</b>	<b>965.4302</b>	<b>965.4302</b>	<b>0.1429</b>		<b>969.0032</b>

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Winter

**3.2 Mechanical Treatment - 2021****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0104	0.3688	0.1163	1.0100e-003	0.3762	1.4700e-003	0.3777	0.0415	1.4100e-003	0.0430		112.6902	112.6902	0.0110		112.9658
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0327	0.0247	0.2201	5.4000e-004	2.8713	3.9000e-004	2.8717	0.2968	3.6000e-004	0.2972		53.6426	53.6426	1.6900e-003		53.6849
<b>Total</b>	<b>0.0431</b>	<b>0.3935</b>	<b>0.3363</b>	<b>1.5500e-003</b>	<b>3.2475</b>	<b>1.8600e-003</b>	<b>3.2494</b>	<b>0.3383</b>	<b>1.7700e-003</b>	<b>0.3401</b>		<b>166.3328</b>	<b>166.3328</b>	<b>0.0127</b>		<b>166.6507</b>

**3.3 Prescribed Burn - 2021****Unmitigated Construction On-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Fugitive Dust					0.0000	0.0000	0.0000	0.0000	0.0000	0.0000			0.0000			0.0000
Off-Road	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
<b>Total</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>

Santa Barbara CWPP - Santa Barbara County APCD Air District, Winter

### 3.3 Prescribed Burn - 2021

### Unmitigated Construction Off-Site

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0311	1.1064	0.3488	3.0200e-003	1.1286	4.4200e-003	1.1330	0.1246	4.2300e-003	0.1289		338.0707	338.0707	0.0331		338.8975
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0392	0.0296	0.2641	6.5000e-004	3.4456	4.7000e-004	3.4461	0.3562	4.3000e-004	0.3566		64.3711	64.3711	2.0300e-003		64.4218
<b>Total</b>	<b>0.0703</b>	<b>1.1361</b>	<b>0.6129</b>	<b>3.6700e-003</b>	<b>4.5742</b>	<b>4.8900e-003</b>	<b>4.5791</b>	<b>0.4808</b>	<b>4.6600e-003</b>	<b>0.4854</b>		<b>402.4417</b>	<b>402.4417</b>	<b>0.0351</b>		<b>403.3193</b>

### Mitigated Construction On-Site

[illegible]

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Winter

**3.3 Prescribed Burn - 2021****Mitigated Construction Off-Site**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Hauling	0.0311	1.1064	0.3488	3.0200e-003	1.1286	4.4200e-003	1.1330	0.1246	4.2300e-003	0.1289		338.0707	338.0707	0.0331		338.8975
Vendor	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Worker	0.0392	0.0296	0.2641	6.5000e-004	3.4456	4.7000e-004	3.4461	0.3562	4.3000e-004	0.3566		64.3711	64.3711	2.0300e-003		64.4218
<b>Total</b>	<b>0.0703</b>	<b>1.1361</b>	<b>0.6129</b>	<b>3.6700e-003</b>	<b>4.5742</b>	<b>4.8900e-003</b>	<b>4.5791</b>	<b>0.4808</b>	<b>4.6600e-003</b>	<b>0.4854</b>		<b>402.4417</b>	<b>402.4417</b>	<b>0.0351</b>		<b>403.3193</b>

**4.0 Operational Detail - Mobile****4.1 Mitigation Measures Mobile**



## Santa Barbara CWPP - Santa Barbara County APCD Air District, Winter

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000
Unmitigated	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000	0.0000		0.0000

## 4.2 Trip Summary Information

Land Use	Average Daily Trip Rate			Unmitigated	Mitigated
	Weekday	Saturday	Sunday	Annual VMT	Annual VMT
General Light Industry	0.00	0.00	0.00		
Total	0.00	0.00	0.00		

## 4.3 Trip Type Information

Land Use	Miles			Trip %			Trip Purpose %		
	H-W or C-W	H-S or C-C	H-O or C-NW	H-W or C-W	H-S or C-C	H-O or C-NW	Primary	Diverted	Pass-by
General Light Industry	6.60	5.50	6.40	59.00	28.00	13.00	92	5	3

## 4.4 Fleet Mix

Land Use	LDA	LDT1	LDT2	MDV	LHD1	LHD2	MHD	HHD	OBUS	UBUS	MCY	SBUS	MH
General Light Industry	0.563532	0.028682	0.205515	0.123285	0.020921	0.005572	0.017481	0.019425	0.002786	0.002265	0.006886	0.002647	0.001003

## 5.0 Energy Detail

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Historical Energy Use: N

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Winter

**5.1 Mitigation Measures Energy**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
NaturalGas Mitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
NaturalGas Unmitigated	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000

**5.2 Energy by Land Use - NaturalGas****Unmitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Light Industry	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Winter

**5.2 Energy by Land Use - NaturalGas****Mitigated**

	NaturalGas Use	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Land Use	kBTU/yr	lb/day										lb/day					
General Light Industry	0	0.0000	0.0000	0.0000	0.0000		0.0000	0.0000		0.0000	0.0000		0.0000	0.0000	0.0000	0.0000	0.0000
<b>Total</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>	<b>0.0000</b>

**6.0 Area Detail****6.1 Mitigation Measures Area**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
Category	lb/day										lb/day					
Mitigated	0.0214	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
Unmitigated	0.0214	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Winter

**6.2 Area by SubCategory****Unmitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0214					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
<b>Total</b>	<b>0.0214</b>	<b>0.0000</b>	<b>1.0000e-004</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>2.2000e-004</b>	<b>2.2000e-004</b>	<b>0.0000</b>		<b>2.3000e-004</b>

**Mitigated**

	ROG	NOx	CO	SO2	Fugitive PM10	Exhaust PM10	PM10 Total	Fugitive PM2.5	Exhaust PM2.5	PM2.5 Total	Bio- CO2	NBio- CO2	Total CO2	CH4	N2O	CO2e
SubCategory	lb/day										lb/day					
Architectural Coating	0.0000					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Consumer Products	0.0214					0.0000	0.0000		0.0000	0.0000			0.0000			0.0000
Landscaping	1.0000e-005	0.0000	1.0000e-004	0.0000		0.0000	0.0000		0.0000	0.0000		2.2000e-004	2.2000e-004	0.0000		2.3000e-004
<b>Total</b>	<b>0.0214</b>	<b>0.0000</b>	<b>1.0000e-004</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>0.0000</b>	<b>0.0000</b>		<b>2.2000e-004</b>	<b>2.2000e-004</b>	<b>0.0000</b>		<b>2.3000e-004</b>

**7.0 Water Detail**

## Santa Barbara CWPP - Santa Barbara County APCD Air District, Winter

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**7.1 Mitigation Measures Water**

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**8.0 Waste Detail**

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**8.1 Mitigation Measures Waste**

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**9.0 Operational Offroad**

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Equipment Type	Number	Hours/Day	Days/Year	Horse Power	Load Factor	Fuel Type
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**10.0 Stationary Equipment****Fire Pumps and Emergency Generators**

Equipment Type	Number	Hours/Day	Hours/Year	Horse Power	Load Factor	Fuel Type
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**Boilers**

Equipment Type	Number	Heat Input/Day	Heat Input/Year	Boiler Rating	Fuel Type
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**User Defined Equipment**

Equipment Type	Number
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**11.0 Vegetation**

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# Appendix C

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## Special-Status Plants with Potential to Occur in the CWPP Area





# Appendix C

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## Special-Status Plants with Potential to Occur in the CWPP Area



Table 4.3-3. Special-Status Plants with Potential to Occur in the CWPP Area

Scientific Name	Common Name	Status (Federal/State/CRPR/local)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potentially Suitable Communities in CWPP Area	Potential to Occur
<i>Abronia maritima</i>	red sand-verbena	None/None/4.2/LR	Coastal dunes/ perennial herb/ Feb–Nov/ 0–330	coastal strand/beach	Present. Known from several historical occurrences along the beach in Santa Barbara and additional occurrences in the vicinity (Calflora 2020; CNPS 2020a).
<i>Amsinckia douglasiana</i>	Douglas' fiddleneck	None/None/4.2/None	Cismontane woodland, Valley and foothill grassland; Monterey shale, dry/ annual herb/ Mar–May/ 0–6,395	California annual grassland coastal perennial grassland southern oak woodland	Moderate potential to occur. The nearest occurrence is from approximately 3.0 miles west of the CWPP area (CNPS 2020a).
<i>Anemopsis californica</i>	Yerba mansa	None/None/None/LR	Wetland, riparian/ perennial herb/ Feb–Mar/ 0–6,560	riparian woodland/creek freshwater marsh	High potential to occur. Known from two historical occurrences near the waterfront in the CWPP area, and from a nearby recent occurrence less than 0.5 miles west of the CWPP area, along Modoc Road.
<i>Anomobryum julaceum</i>	slender silver moss	None/None/4.2/None	Broadleafed upland forest, Lower montane coniferous forest, North Coast coniferous forest; damp rock and soil on outcrops, usually on roadcuts/ moss/ N.A./ 325–3,280	southern oak woodland	Low potential to occur. The nearest CNDDB occurrences is from 7.0 miles northwest of the City, near the crest of the Santa Ynez Mountains (CDFW 2020).

Table 4.3-3. Special-Status Plants with Potential to Occur in the CWPP Area

Scientific Name	Common Name	Status (Federal/State/CRPR/local)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potentially Suitable Communities in CWPP Area	Potential to Occur
<i>Astragalus didymocarpus</i> var. <i>milesianus</i>	Miles' milk-vetch	None/None/1B.2/LR	Coastal scrub (clay)/ annual herb/ Mar-June/ 65-295	coastal sage scrub	Moderate potential to occur. The nearest CNDDB occurrences is approximately 4.6 miles northeast of the City, in the Santa Ynez Mountains (CDFW 2020).
<i>Atriplex coulteri</i>	Coulter's saltbush	None/None/1B.2/LR	Coastal bluff scrub, Coastal dunes, Coastal scrub, Valley and foothill grassland; alkaline or clay/ perennial herb/ Mar-Oct/ 5-1,505	California annual grassland coastal perennial grassland coastal sage scrub coastal bluff	Present. Known from a CNDDB occurrence in near Oak Park in 1956 and additional occurrences within 7.0 miles east and west of the City (CDFW 2020).
<i>Atriplex serenana</i> var. <i>davidsonii</i>	Davidson's saltscale	None/None/1B.2/LR	Coastal bluff scrub, Coastal scrub; alkaline/ annual herb/ Apr-Oct/ 30-655	coastal sage scrub coastal bluff	Moderate potential to occur. Known from a CNDDB occurrence near Hendry's Beach in 1947 and one additional occurrence approximately 5.0 miles west of the City (CDFW 2020).
<i>Bolboschoenus robustus</i>	sturdy bullrush (=big bulrush)	None/None/None/LR	Freshwater wetlands, coastal salt marsh, alkali sink, wetland-riparian/ perennial grass-like herb/ Aug-Sep/ ~0	freshwater marsh coastal saltmarsh	Low potential to occur. Known from two occurrences west of the CWPP area, including one at Goleta Slough approximately 5.0 miles west.

Table 4.3-3. Special-Status Plants with Potential to Occur in the CWPP Area

Scientific Name	Common Name	Status (Federal/State/CRPR/local)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potentially Suitable Communities in CWPP Area	Potential to Occur
<i>Calandrinia breweri</i>	Brewer's calandrinia	None/None/4.2/LR	Chaparral, Coastal scrub; sandy or loamy, disturbed sites and burns/ annual herb/ (Jan)Mar-June/ 30-4,000	chaparral coastal sage scrub	High potential to occur. Known from several historical occurrences within and adjacent to the northern part of the CWPP area (Calflora (2020)).
<i>Calochortus catalinae</i>	Catalina mariposa lily	None/None/4.2/None	Chaparral, Cismontane woodland, Coastal scrub, Valley and foothill grassland/ perennial bulbiferous herb/ (Feb)Mar-June/ 45-2,295	California annual grassland coastal perennial grassland chaparral coastal sage scrub southern oak woodland	Present. The City database includes three occurrences from the 1990s within or adjacent to the northern part of the City.
<i>Calochortus fimbriatus</i>	late-flowered mariposa lily	None/None/1B.3/LR	Chaparral, Cismontane woodland, Riparian woodland; often serpentinite/ perennial bulbiferous herb/ June-Aug/ 900-6,250	chaparral riparian woodland/creek southern oak woodland	High potential to occur. Known from historical occurrences from unknown locations along Mountain Drive and in Rattlesnake Canyon, as well as numerous occurrences in the Santa Ynez Mountains.
<i>Calystegia sepium</i> ssp. <i>binghamiae</i>	Santa Barbara morning-glory	None/None/1A/LR	Marshes and swamps (coastal)/ perennial rhizomatous herb/ Aug/ 15-15	freshwater marsh	Low potential to occur. CNDDB includes a historical occurrences from 1886 near De la Vina Street, but no other occurrences within 10.0 miles (CDFW 2020).



Table 4.3-3. Special-Status Plants with Potential to Occur in the CWPP Area

Scientific Name	Common Name	Status (Federal/State/CRPR/local)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potentially Suitable Communities in CWPP Area	Potential to Occur
<i>Centromadia parryi</i> ssp. <i>australis</i>	southern tarplant	None/None/1B.1/LR	Marshes and swamps (margins), Valley and foothill grassland (vernally mesic), Vernal pools/ annual herb/ May–Nov/ 0–1,570	California annual grassland coastal perennial grassland freshwater marsh	Moderate potential to occur. CNDDDB includes numerous occurrences from the Goleta area west of the City.
<i>Chloropyron maritimum</i> ssp. <i>maritimum</i>	salt marsh bird's-beak	FE/SE/1B.2/LR	Coastal dunes, Marshes and swamps (coastal salt)/ annual herb (hemiparasitic)/ May–Oct(Nov)/ 0–100	coastal strand/beach coastal saltmarsh	Low potential to occur. Known from several CNDDDB occurrences in Carpinteria, more than 5.0 miles east of the City (CDFW 2020).
<i>Chorizanthe palmeri</i>	Palmer's spineflower	None/None/4.2/LR	Chaparral, Cismontane woodland, Valley and foothill grassland; rocky, serpentinite/ annual herb/ Apr–Aug/ 180–3,100	California annual grassland coastal perennial grassland chaparral southern oak woodland	Low potential to occur. CNDDDB includes no occurrences within 10.0 miles of the City. Recorded once historically in the CWPP area (CNSP 2020a; Calflora 2020), but all other occurrences are more than 10 miles north (CDFW 2020).
<i>Clinopodium mimuloides</i>	monkey-flower savory	None/None/4.2/LR	Chaparral, North Coast coniferous forest; streambanks, mesic/ perennial herb/ June–Oct/ 1,000–5,905	Chaparral riparian woodland/creek	Low potential to occur. Known from several occurrences north of the Santa Ynez Mountains (CNPS 2020a). But the CWPP area is below the known elevation range of the species.

Table 4.3-3. Special-Status Plants with Potential to Occur in the CWPP Area

Scientific Name	Common Name	Status (Federal/State/CRPR/local)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potentially Suitable Communities in CWPP Area	Potential to Occur
<i>Convolvulus simulans</i>	small-flowered morning-glory	None/None/4.2/LR	Chaparral (openings), Coastal scrub, Valley and foothill grassland; clay, serpentinite seeps/ annual herb/ Mar–July/ 95–2,425	California annual grassland coastal perennial grassland chaparral coastal sage scrub	Moderate potential to occur. Known from one historical occurrence in the CWPP area (CNPS 2020a; Calflora 2020).
<i>Cryptantha rattanii</i>	Rattan's cryptantha	None/None/4.3/None	Cismontane woodland, Riparian woodland, Valley and foothill grassland/ annual herb/ Apr–July/ 800–3,000	California annual grassland coastal perennial grassland riparian woodland/creek southern oak woodland	Low potential to occur. The only occurrence within 10.0 miles is one 3.5 miles north of the CWPP area, in the Santa Ynez Mountains (CNPS 2020a; Calflora 2020).
<i>Deinandra paniculata</i>	paniculate tarplant	None/None/4.2/None	Coastal scrub, Valley and foothill grassland, Vernal pools; usually vernal mesic, sometimes sandy/ annual herb/ (Mar)Apr–Nov(Dec)/ 80–3,080	California annual grassland coastal perennial grassland coastal sage scrub	Moderate potential to occur. One occurrence within approximately 0.25 miles of the CWPP area, in Mission Canyon (CNPS 2020a; Calflora 2020).
<i>Delphinium umbraculorum</i>	umbrella larkspur	None/None/1B.3/LR	Chaparral, Cismontane woodland/ perennial herb/ Apr–June/ 1,310–5,245	chaparral southern oak woodland	Low potential to occur. The nearest CNDDB occurrence is from less than 1.0 mile north, in San Roque Canyon, and several additional occurrences are from the Santa Ynez Mountains within 10.0 miles of the City (CDFW 2020). But

Table 4.3-3. Special-Status Plants with Potential to Occur in the CWPP Area

Scientific Name	Common Name	Status (Federal/State/CRPR/local)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potentially Suitable Communities in CWPP Area	Potential to Occur
					the CWPP area is below the known elevation range of the species.
<i>Ehrendorferia ochroleuca</i> [= <i>Dicentra ochroleuca</i> ]	yellow bleeding heart (=yellow dicentra)	None/None/None/GP	Chaparral/ perennial herb/ May–July/ 0–3,600	chaparral	Low potential to occur. One 1891 occurrence from the CWPP area
<i>Echinodorus berteroi</i>	upright burhead	None/None/None/LR	Wetlands, freshwater marsh, riparian/ perennial herb/ NA/ up <3,600	riparian woodland/creek freshwater marsh	Moderate potential to occur. One historical occurrence within the Arroyo Burro Open Space (Calflora 2020) may have been generally mapped. All other nearby occurrences are in Santa Ynez Mountains.
<i>Eriogonum elegans</i>	elegant wild buckwheat	None/None/4.3/None	Cismontane woodland, Valley and foothill grassland; Usually sandy or gravelly, often washes, sometimes roadsides/ annual herb/ May–Nov/ 655–5,000	California annual grassland coastal perennial grassland	Moderate potential to occur. The nearest occurrence is from approximately 6.0 miles west of the site (CNPS 2020a; Calflora 2020).
<i>Fritillaria ojaiensis</i>	Ojai fritillary	None/None/1B.2/LR	Broadleaved upland forest (mesic), Chaparral, Cismontane woodland, Lower montane coniferous forest; rocky/ perennial bulbiferous herb/ Feb–May/ 735–3,270	chaparral riparian woodland/creek	Moderate potential to occur. CNDDDB includes an occurrence 2.6 miles to the north, in the Angostura Pass area of the Santa Ynez Mountains, and several additional occurrences within 10.0 miles (CDFW 2020).

Table 4.3-3. Special-Status Plants with Potential to Occur in the CWPP Area

Scientific Name	Common Name	Status (Federal/State/CRPR/local)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potentially Suitable Communities in CWPP Area	Potential to Occur
<i>Galium cliftonsmithii</i>	Santa Barbara bedstraw	None/None/4.3/None	Cismontane woodland/ perennial herb/ May–July/ 655–4,000	riparian woodland/creek	Moderate potential to occur. The City database includes an occurrence from Mission Canyon, less than 0.5 miles from the City.
<i>Hordeum intercedens</i>	vernal barley	None/None/3.2/LR	Coastal dunes, Coastal scrub, Valley and foothill grassland (saline flats and depressions), Vernal pools/ annual herb/ Mar–June/ 15–3,280	California annual grassland coastal perennial grassland coastal sage scrub coastal strand/beach	Moderate potential to occur. Known from one historical occurrence in the CWPP area (CDFW 2020a; Calflora 2020).
<i>Horkelia cuneata</i> var. <i>puberula</i>	mesa horkelia	None/None/1B.1/LR	Chaparral (maritime), Cismontane woodland, Coastal scrub; sandy or gravelly/ perennial herb/ Feb–July(Sep)/ 225–2,655	chaparral coastal sage scrub southern oak woodland	High potential to occur. Known from several occurrences from 1962 and earlier within and immediately adjacent to the City, and several more recent occurrences within 5.0 miles of the City (CDFW 2020).
<i>Juncus luciensis</i>	Santa Lucia dwarf rush	None/None/1B.2/LR	Chaparral, Great Basin scrub, Lower montane coniferous forest, Meadows and seeps, Vernal pools/ annual herb/ Apr–July/ 980–6,690	chaparral	Low potential to occur. The nearest CNDDDB occurrence is from approximately 5.0 miles northwest of the City, in the Santa Ynez Mountains (CDFW 2020). However, the CWPP area

Table 4.3-3. Special-Status Plants with Potential to Occur in the CWPP Area

Scientific Name	Common Name	Status (Federal/State/CRPR/local)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potentially Suitable Communities in CWPP Area	Potential to Occur
					is outside the known elevation range of the species.
<i>Lasthenia conjugens</i>	Contra Costa goldfields	FE/None/1B.1/LR	Cismontane woodland, Playas (alkaline), Valley and foothill grassland, Vernal pools; mesic/ annual herb/ Mar–June/ 0–1,540	California annual grassland coastal perennial grassland southern oak woodland	Low potential to occur. The nearest CNDDB occurrence is one believed to be extirpated, approximately 5.0 miles west of the City (CDFW 2020). The CWPP area may be outside the current range of the species.
<i>Lasthenia glabrata</i> ssp. <i>coulteri</i>	Coulter's goldfields	None/None/1B.1/LR	Marshes and swamps (coastal salt), Playas, Vernal pools/ annual herb/ Feb–June/ 0–4,000	coastal saltmarsh	Moderate potential to occur. The nearest recent occurrences are from Goleta Slough, approximately 5.0 miles west of the site. One historical occurrences from the CWPP area (CNPS 2020; Calflora 2020).
<i>Layia heterotricha</i>	pale-yellow layia	None/None/1B.1/LR	Cismontane woodland, Coastal scrub, Pinyon and juniper woodland, Valley and foothill grassland; alkaline or clay/ annual herb/ Mar–June/ 980–5,590	California annual grassland coastal perennial grassland coastal sage scrub southern oak woodland	Low potential to occur. The nearest CNDDB occurrences is from approximately 3.0 miles northwest of the City, in the Santa Ynez Mountains (CDFW 2020). The CWPP area is largely

Table 4.3-3. Special-Status Plants with Potential to Occur in the CWPP Area

Scientific Name	Common Name	Status (Federal/State/CRPR/local)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potentially Suitable Communities in CWPP Area	Potential to Occur
					outside the known elevation range of the species.
<i>Lonicera subspicata</i> var. <i>subspicata</i>	Santa Barbara honeysuckle	None/None/1B.2/LR	Chaparral, Cismontane woodland, Coastal scrub/ perennial evergreen shrub/ May-Aug(Dec-Feb)/ 30-3,280	chaparral coastal sage scrub southern oak woodland	Present. Known from several occurrences in the CWPP area and within 2.0 miles.
<i>Malacothrix saxatilis</i> var. <i>arachnoidea</i>	Carmel Valley malacothrix	None/None/1B.2/LR	Chaparral (rocky), Coastal scrub/ perennial rhizomatous herb/ (Mar)June-Dec/ 80-3,395	chaparral coastal sage scrub	Moderate potential to occur. The nearest CNDDDB occurrence is from approximately 8.0 miles north of the City, in the San Rafael Mountains (CDFW 2020).
<i>Malacothrix saxatilis</i> var. <i>saxatilis</i>	cliff malacothrix	None/None/4.2/None	Coastal bluff scrub, Coastal scrub/ perennial rhizomatous herb/ Mar-Sep/ 5-655	coastal sage scrub coastal bluff	Present. The City database includes several occurrences from the Hendry's Beach area.
<i>Monardella hypoleuca</i> ssp. <i>hypoleuca</i>	white-veined monardella	None/None/1B.3/None	Chaparral, Cismontane woodland/ perennial herb/ (Apr)May-Aug(Sep-Dec)/ 160-5,000	chaparral southern oak woodland	High potential to occur. Known from several occurrences in the Santa Ynez Mountain foothills near or within the City.
<i>Monardella sinuata</i> ssp. <i>sinuata</i>	southern curly-leaved monardella	None/None/1B.2/None	Chaparral, Cismontane woodland, Coastal dunes, Coastal scrub (openings); Sandy/ annual herb/ Apr-Sep/ 0-985	chaparral coastal sage scrub southern oak woodland	Moderate potential to occur. CNDDDB includes no occurrences within 10.0 miles of the City (CDFW 2020), but recorded historically within the

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Special-Status Plants with Potential to Occur in the CWPP Area

Table 4.3-3. Special-Status Plants with Potential to Occur in the CWPP Area

Scientific Name	Common Name	Status (Federal/State/CRPR/local)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potentially Suitable Communities in CWPP Area	Potential to Occur
					CWPP area (CNPS 2020a; Calflora 2020).
<i>Nasturtium gambelii</i>	Gambel's water cress	FE/ST/1B.1/LR	Marshes and swamps (freshwater or brackish)/ perennial rhizomatous herb/ Apr–Oct/ 15–1,080	freshwater marsh	Low potential to occur. Known from two historical occurrence, considered extirpated, within the City, but no other occurrences within 10.0 miles (CDFW 2020; CNPS 2020a).
<i>Navarretia ojaiensis</i>	Ojai navarretia	None/None/1B.1/None	Chaparral (openings), Coastal scrub (openings), Valley and foothill grassland/ annual herb/ May–July/ 900–2,030	California annual grassland coastal perennial grassland chaparral coastal sage scrub	Low potential to occur. Known from a historical occurrence within or adjacent to the CWPP area (CNPS 2020a). CNDDB includes no occurrences within 10.0 miles of the City (CDFW 2020).
<i>Phacelia hubbyi</i>	Hubby's phacelia	None/None/4.2/None	Chaparral, Coastal scrub, Valley and foothill grassland; gravelly, rocky, talus/ annual herb/ Apr–July/ 0–3,280	California annual grassland coastal perennial grassland chaparral coastal sage scrub	Moderate potential to occur. Several historical occurrences in the CWPP area, and several more in within 5.0 miles.



Table 4.3-3. Special-Status Plants with Potential to Occur in the CWPP Area

Scientific Name	Common Name	Status (Federal/State/CRPR/local)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potentially Suitable Communities in CWPP Area	Potential to Occur
<i>Phacelia ramosissima</i> var. <i>austrolitoralis</i>	south coast branching phacelia	None/None/3.2/None	Chaparral, Coastal dunes, Coastal scrub, Marshes and swamps (coastal salt); sandy, sometimes rocky/ perennial herb/ Mar-Aug/ 15-985	chaparral coastal sage scrub coastal saltmarsh	Moderate potential to occur. Several older occurrences within the CWPP area, and additional occurrences within 5.0 miles (CNPS 2020a; Calflora 2020).
<i>Phacelia viscida</i> var. <i>albiflora</i>	white-flowered sticky phacelia	None/None/None/LR	Coastal scrub, chaparral/ annual herb/ Mar-Jun/ 0-5,250	chaparral coastal sage scrub	High potential to occur. The City database includes several occurrences adjacent to the northern boundary of the City.
<i>Pholisma arenarium</i>	desert Christmas tree (=pholisma)	None/None/None/GP	Coastal Strand, coastal dunes, chaparral, creosote bush scrub, Joshua tree woodland/ perennial herb/ Apr-Jul/ 0-6,230	chaparral coastal strand/beach	Low potential to occur. Although included in the General Plan as a potentially occurring rare plant species, the standard sources do not include occurrences within 10.0 miles of the CWPP area.
<i>Quercus dumosa</i>	Nuttall's scrub oak	None/None/1B.1/LR	Closed-cone coniferous forest, Chaparral, Coastal scrub; sandy, clay loam/ perennial evergreen shrub/ Feb-Apr(May-Aug)/ 45-1,310	chaparral coastal sage scrub	Present. Known from several occurrences within and adjacent to the City.

Table 4.3-3. Special-Status Plants with Potential to Occur in the CWPP Area

Scientific Name	Common Name	Status (Federal/State/CRPR/local)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potentially Suitable Communities in CWPP Area	Potential to Occur
<i>Ribes amarum</i> var. <i>hoffmannii</i>	Hoffmann's bitter gooseberry	None/None/3/None	Chaparral, Riparian woodland/ perennial deciduous shrub/ Mar–Apr/ 15–3,900	chaparral riparian woodland/creek	Present. The City database includes several occurrences within and adjacent to the northeastern part of the City.
<i>Rubus parviflorus</i>	Thimbleberry	None/None/None/LR	Red fir forest, yellow pine forest, redwood forest, mixed evergreen forest, closed-cone pine forest, wetland-riparian/ vine or shrub/ Mar–May/ 65–8,200	riparian woodland/creek	Not expected to occur. A historical (1927) report from within the City was mapped generally. All other occurrences are from the San Marcos Pass area, where more suitable habitat occurs.
<i>Sanicula hoffmannii</i>	Hoffman's sanicle	None/None/None/LR	Chaparral, mixed evergreen forest, northern coastal scrub, coastal sage scrub/ perennial herb/ Mar–May/ 0–1,640	chaparral coastal sage scrub	High potential to occur. Known from two occurrences in Mission Canyon, adjacent to the CWPP area.
<i>Samolus parviflorus</i>	seaside brookweed (=water pimpernel)	None/None/None/LR	Coastal sage scrub, chaparral, wetland-riparian/ perennial herb/ spr-sum/ 0–4,260	coastal sage scrub chaparral riparian woodland/creek	Present. Known from Arroyo Burro and several additional locations within 10.0 miles of the CWPP area.

Table 4.3-3. Special-Status Plants with Potential to Occur in the CWPP Area

Scientific Name	Common Name	Status (Federal/State/CRPR/local)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potentially Suitable Communities in CWPP Area	Potential to Occur
<i>Scrophularia atrata</i>	black-flowered figwort	None/None/1B.2/None	Closed-cone coniferous forest, Chaparral, Coastal dunes, Coastal scrub, Riparian scrub/ perennial herb/ Mar–July/ 30–1,640	coastal sage scrub chaparral riparian woodland/creek coastal strand/beach	Moderate potential to occur. Known from several older (1971 and earlier) occurrences within or adjacent to the northern part of the City (CDFW 2020).
<i>Senecio astephanus</i>	San Gabriel ragwort	None/None/4.3/LR	Coastal bluff scrub, Chaparral; rocky slopes/ perennial herb/ May–July/ 1,310–4,920	chaparral coastal sage scrub coastal bluff	Low potential to occur. Known from one 1953 occurrence approximately 1.5 miles north of the CWPP area and additional older occurrences from the crest of the Santa Ynez Mountains (CNPS 2020a; Calflora 2020).
<i>Suaeda esteroa</i>	estuary seablite	None/None/1B.2/LR	Marshes and swamps (coastal salt)/ perennial herb/ (May)July–Oct(Jan)/ 0–15	coastal saltmarsh	Low potential to occur. The City database includes an occurrence from Goleta Slough, approximately 5.0 miles west of the City.
<i>Symphyotrichum subulatum</i> var. <i>parviflorum</i>	eastern annual saltmarsh aster (=slender aster)	None/None/None/LR	Wetlands/ perennial herb/ Jul–Oct/ 0–3,930	freshwater marsh coastal saltmarsh	High potential to occur. Known from historical occurrences near Pershing Park and the Andrée Clark Bird Refuge along the waterfront in the CWPP area, and from nearby occurrences at

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Special-Status Plants with Potential to Occur in the CWPP Area

Table 4.3-3. Special-Status Plants with Potential to Occur in the CWPP Area

Scientific Name	Common Name	Status (Federal/State/CRPR/local)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potentially Suitable Communities in CWPP Area	Potential to Occur
					Hope Ranch and in Goleta Slough (Calflora 2020).
<i>Thelypteris puberula</i> var. <i>sonorensis</i>	Sonoran maiden fern	None/None/2B.2/LR	Meadows and seeps (seeps and streams)/ perennial rhizomatous herb/ Jan-Sep/ 160–2,000	riparian woodland/creek	Moderate potential to occur. CNDDDB includes several historical occurrences within approximately 1.0 mile the City and several additional occurrences within 5.0 miles, in the Santa Ynez Mountains (CDFW 2020).
<i>Thermopsis macrophylla</i>	Santa Ynez false lupine	None/SR/1B.3/LR	Chaparral (sandy, granitic, disturbed areas)/ perennial rhizomatous herb/ Apr–June/ 1,390–4,590	chaparral	Moderate potential to occur. CNDDDB includes a 1955 occurrence from approximately 2.5 miles north of the City and several additional occurrences from the Santa Ynez Mountains within 5.0 miles (CDFW 2020).

**Status Legend:**

FE: Federally listed as endangered  
SE: State listed as endangered  
ST: State listed as threatened  
SR: State Rare  
CRPR 1A: Plants presumed extirpated in California and either rare or extinct elsewhere  
CRPR 1B: Plants rare, threatened, or endangered in California and elsewhere  
CRPR 2A: Plants presumed extirpated in California but common elsewhere  
CRPR 2B: Plants rare, threatened, or endangered in California but more common elsewhere

## Appendix C

### Special-Status Plants with Potential to Occur in the CWPP Area

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CRPR 3: Review List: Plants about which more information is needed

CRPR 4: Watch List: Plants of limited distribution

.1 Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)

.2 Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)

.3 Not very threatened in California (<20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

LR – locally rare (Wilken 2012)

GP – considered sensitive in General Plan, Environmental Resources Element (City of Santa Barbara 2011)

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## Appendix D

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### Special-Status Wildlife Species with Potential to Occur in the CWPP Area





# Appendix D

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Special-Status Wildlife Species  
with Potential to Occur in the CWPP Area



Appendix D  
Special-Status Wildlife Species with Potential to Occur in the CWPP Area

Table 4.3-4 Special-Status Wildlife Species with Potential to Occur in the CWPP Area

Scientific Name	Common Name	Status (Federal/State/ Local)	Habitat Associations	Potentially Suitable Communities in CWPP Area	Potential to Occur
<b>Invertebrates</b>					
<i>Bombus crotchii</i>	Crotch bumble bee	None/SC/None	Open grassland and scrub communities supporting suitable floral resources.	California annual grassland coastal perennial grassland coastal sage scrub	Moderate potential to occur. CNDDDB includes a historical occurrence from Skofield Park in 1972, and more recent occurrences less than 10 miles west, including one from approximately 8 miles west of the CWPP area in 2017 (CDFW 2020).
<i>Danaus plexippus</i>	monarch	None/None/LCP	Roosts located in wind-protected tree groves (eucalyptus, Monterey pine, cypress), with nectar and water sources nearby.	riparian woodland/creek eucalyptus woodland	Present. Winter or fall roosts are known from several locations in the City, including Hidden Valley Park, Mesa School Lane, La Mesa Park, lower Honda Valley adjacent to Santa Barbara City College, and the Montecito Country Club (CDFW 2020).
<b>Fishes</b>					
<i>Eucyclogobius newberryi</i>	tidewater goby	FE/SSC/LCP	Brackish water habitats along the California coast from Agua Hedionda Lagoon, San Diego County, to the mouth of the Smith River	coastal saltmarsh coastal strand/beach	Present. Known from the CWPP area from the lower reaches of Critical habitat occurs at lower Arroyo Burro and Mesa Creek, and at Mission Creek and the Laguna

Appendix D  
Special-Status Wildlife Species with Potential to Occur in the CWPP Area

Table 4.3-4 Special-Status Wildlife Species with Potential to Occur in the CWPP Area

Scientific Name	Common Name	Status (Federal/State/ Local)	Habitat Associations	Potentially Suitable Communities in CWPP Area	Potential to Occur
					Channel (78 FR 8746–8819). It has also been recorded at lower Sycamore Creek and the Andrée Clark Bird Refuge (CDFW 2020).
<i>Oncorhynchus mykiss</i> pop. 10	Steelhead – Southern California Distinct Population Segment (DPS)	FE/None/LCP	Clean, clear, cool, well-oxygenated streams; needs relatively deep pools in migration and gravelly substrate to spawn	coastal saltmarsh riparian woodland/creek	Present. Critical habitat occurs in the CWPP area along Arroyo Burro, Rattlesnake Creek, San Roque Creek, Mission Creek, and Sycamore Creek (70 FR 52488–52627).
<b>Amphibians</b>					
<i>Rana draytonii</i>	California red-legged frog	FT/SSC/None	Lowland streams, wetlands, riparian woodlands, livestock ponds; dense, shrubby or emergent vegetation associated with deep, still or slow-moving water; uses adjacent uplands	riparian woodland/creek	Low potential to occur. CNDDDB includes a 1914 occurrence generally mapped within the City, two recent occurrences (since 2000) in Montecito less than 0.5 miles to the east of the CWPP area, and additional occurrences from within 10.0 miles (CDFW 2020).
<i>Taricha torosa</i>	California newt	None/SSC/None	Wet forests, oak forests, chaparral, and rolling grassland	chaparral riparian woodland/creek southern oak woodland	Moderate potential to occur. Potential occurrence limited to northern part of CWPP area. CNDDDB includes a

Table 4.3-4 Special-Status Wildlife Species with Potential to Occur in the CWPP Area

Scientific Name	Common Name	Status (Federal/State/ Local)	Habitat Associations	Potentially Suitable Communities in CWPP Area	Potential to Occur
					historical occurrences mapped generally in the City and several more recent occurrences within 1.0 mile (CDFW). City data includes an occurrence at the northern boundary of the CWPP area.
<b>Reptiles</b>					
<i>Actinemys pallida</i>	southwestern pond turtle	None/SSC/LCP	Slow-moving permanent or intermittent streams, ponds, small lakes, and reservoirs with emergent basking sites; adjacent uplands used for nesting and during winter	riparian woodland/creek	Present. Known from the Santa Barbara waterfront and from several locations within 2.0 miles of the CWPP area (CDFW 2020).
<i>Anniella pulchra</i>	Northern California legless lizard	None/SSC/None	Coastal dunes, stabilized dunes, beaches, dry washes, valley-foothill, chaparral, and scrubs; pine, oak, and riparian woodlands; associated with sparse vegetation and sandy or loose, loamy soils	coastal sage scrub riparian woodland/creek southern oak woodland coastal strand/beach	Present. CNDDDB includes several occurrences from within the CWPP area, including a 1980 occurrence from the Elings Park VMU and a 2012 occurrence near the Campanil and Senda Verde VMUs.
<i>Phrynosoma blainvillii</i>	Blainville's horned lizard	None/SSC/None	Open areas of sandy soil in valleys, foothills, and semi-arid mountains including coastal scrub, chaparral, valley-foothill hardwood, conifer, riparian, pine-	California annual grassland coastal perennial grassland coastal sage scrub chaparral	Moderate potential to occur. CNDDDB includes a generally mapped 1941 occurrence in the CWPP area and a 1981 occurrence along Coyote

Appendix D  
Special-Status Wildlife Species with Potential to Occur in the CWPP Area

Table 4.3-4 Special-Status Wildlife Species with Potential to Occur in the CWPP Area

Scientific Name	Common Name	Status (Federal/State/ Local)	Habitat Associations	Potentially Suitable Communities in CWPP Area	Potential to Occur
			cypress, juniper, and annual grassland habitats		Drive 0.3 miles from the City. Potential occurrence probably limited to northern portions of the CWPP area.
<i>Salvadora hexalepis virgultea</i>	coast patch-nosed snake	None/SSC/None	Brushy or shrubby vegetation; requires small mammal burrows for refuge and overwintering sites	chaparral	Moderate potential to occur. CNDDDB includes a generally mapped 1939 occurrence from the CWPP area and several recent occurrences from the Santa Ynez Mountains within 3.0 miles. Potential occurrence probably limited to northern portions of the CWPP area.
<i>Thamnophis hammondii</i>	two-striped gartersnake	None/SSC/None	Streams, creeks, pools, streams with rocky beds, ponds, lakes, vernal pools	riparian woodland/creek	Moderate potential to occur. CNDDDB includes occurrences from Rattlensake Creek and Mission Creek in the 1980s, within 1.0 miles of the City. Potential occurrence may be limited to foothill canyons.



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Special-Status Wildlife Species with Potential to Occur in the CWPP Area

Table 4.3-4 Special-Status Wildlife Species with Potential to Occur in the CWPP Area

Scientific Name	Common Name	Status (Federal/State/ Local)	Habitat Associations	Potentially Suitable Communities in CWPP Area	Potential to Occur
<b>Birds</b>					
<i>Accipiter cooperii</i> (nesting)	Cooper's hawk	None/WL/None	Nests and forages in dense stands of live oak, riparian woodlands, or other woodland habitats often near water	riparian woodland/creek southern oak woodland eucalyptus woodland	Present. Nests uncommonly throughout the Santa Barbara area (Lehman 2020; SBAS 2020).
<i>Agelaius tricolor</i> (nesting colony)	tricolored blackbird	BCC/SSC, ST/None	Nests near freshwater, emergent wetland with cattails or tules, but also in Himalayan blackberry; forages in grasslands, woodland, and agriculture	California annual grassland coastal perennial grassland riparian woodland/creek	Low potential to occur (nesting). Nested in the Goleta area as recently as the 1970s, but no recent nesting records (CDFW 2020; Lehman 2020).
<i>Aimophila ruficeps canescens</i>	Southern California rufous-crowned sparrow	None/WL/None	Nests and forages in open coastal scrub and chaparral with low cover of scattered scrub interspersed with rocky and grassy patches	California annual grassland coastal perennial grassland coastal sage scrub chaparral	Present. Resident in the Santa Ynez Mountains, and known from the CWPP area from scattered occurrences of dispersing individuals (Lehman 2020; CDFW 2020). Potential breeding sites limited to foothills in northern part of the CWPP area.
<i>Ammodramus savannarum</i> (nesting)	grasshopper sparrow	None/SSC/None	Nests and forages in moderately open grassland with tall forbs or scattered shrubs used for perches	California annual grassland coastal perennial grassland	Low potential to occur (nesting). CNDDDB includes recent breeding season occurrences from the San Marcos Foothills Preserve approximately 0.5 miles northwest of the CWPP area and More Mesa

Appendix D  
Special-Status Wildlife Species with Potential to Occur in the CWPP Area

Table 4.3-4 Special-Status Wildlife Species with Potential to Occur in the CWPP Area

Scientific Name	Common Name	Status (Federal/State/ Local)	Habitat Associations	Potentially Suitable Communities in CWPP Area	Potential to Occur
					approximately 2.0 miles west. In winter, this species has occurred in the CWPP area at Elings Park (Lehman 2020). Very limited potential nesting habitat in the CWPP area.
<i>Athene cunicularia</i> (burrow sites and some wintering sites)	burrowing owl	BCC/SSC/None	Nests and forages in grassland, open scrub, and agriculture, particularly with ground squirrel burrows	California annual grassland coastal perennial grassland	Moderate potential to occur. All recent occurrences, including those in CNDDB, involve wintering individuals or migrants (CDFW 2020; Lehman 2020). The nearest recent wintering location (since 1980) is the San Marcos Foothills Preserve, 0.5 miles northwest of the CWPP area (Lehman 2020). Although not recorded in winter at Elings Park, wintering habitat in the CWPP area may be limited to that area.
<i>Charadrius nivosus</i> (nesting)	western snowy plover	FT, BCC/SSC/LCP	On coasts nests on sandy marine and estuarine shores; in the interior nests on sandy, barren or sparsely vegetated flats near saline or alkaline lakes, reservoirs, and ponds	coastal strand/beach	Present. Winters regularly at the harbor and Each Beach, where federal critical habitat occurs. Nested at the harbor sandspit in 2005 (Lehman 2020).

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Scientific Name	Common Name	Status (Federal/State/Local)	Habitat Associations	Potentially Suitable Communities in CWPP Area	Potential to Occur
<i>Contopus cooperi</i> (nesting)	olive-sided flycatcher	None/SSC/None	Nests in mixed-conifer, montane hardwood-conifer, Douglas-fir, redwood, red fir, and lodgepole pine habitats; usually close to water	southern oak woodland eucalyptus woodland	Moderate potential to occur. Not tracked in CNDDB (CDFW). Recent nesting-season reports from the Santa Barbara Botanical Garden (Lehman 2020).
<i>Elanus leucurus</i> (nesting)	white-tailed kite	None/FP/None	Nests in woodland, riparian, and individual trees near open lands; forages opportunistically in grassland, meadows, scrubs, agriculture, emergent wetland, savanna, and disturbed lands	California annual grassland coastal perennial grassland riparian woodland/creek southern oak woodland eucalyptus woodland	Present. Observed sporadically throughout the City, where it probably occurs most regularly at Elings Park (Las Positas Road VMU). Occurs more frequently at nearby San Marcos Foothills Preserve (Lehman 2020). Limited suitable habitat in the CWPP area.
<i>Eremophila alpestris actia</i>	California horned lark	None/WL/None	Nests and forages in grasslands, disturbed lands, agriculture, and beaches; nests in alpine fell fields of the Sierra Nevada	California annual grassland coastal perennial grassland	Present. One occurrence suggesting breeding at Elings Park (Las Positas Road VMU) in 2016, but otherwise not known to nest in the CWPP area (Lehman 2020). Very limited suitable habitat in the CWPP area.
<i>Falco columbarius</i> (wintering)	merlin	None/WL	Forages in semi-open areas, including coastline, grassland, agriculture, savanna, woodland, lakes, and wetlands.	California annual grassland coastal perennial grassland	Present. Several assumed to winter annually in the CWPP area and vicinity (Lehman

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Special-Status Wildlife Species with Potential to Occur in the CWPP Area

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Scientific Name	Common Name	Status (Federal/State/ Local)	Habitat Associations	Potentially Suitable Communities in CWPP Area	Potential to Occur
				southern oak woodland eucalyptus woodland	2020). Also occurs during fall and spring migration.
<i>Falco peregrinus anatum</i>	American peregrine falcon	FDL, BCC/FP, SDL/GP	Nests on cliffs, buildings, and bridges; forages in wetlands, riparian, meadows, croplands, especially where waterfowl are present	No nesting habitats present	Not expected to occur (nesting). Present for foraging. Nests in the Santa Ynez Mountains, and forages year-round in the Santa Barbara area, mostly along the waterfront (Lehman 2020).
<i>Haliaeetus leucocephalus</i>	Bald eagle	FDL, BCC/FP, SE/GP	Nests in forested areas adjacent to large bodies of water, including seacoasts, rivers, swamps, large lakes; winters near large bodies of water in lowlands and mountains.	No nesting habitats present	Not expected to occur (nesting). Not known to nest in southern Santa Barbara County, but occurs occasionally in winter and migration (Lehman 2020).
<i>Icteria virens</i> (nesting)	yellow-breasted chat	None/SSC/None	Nests and forages in dense, relatively wide riparian woodlands and thickets of willows, vine tangles, and dense brush	riparian woodland/creek	Moderate potential to occur (nesting). Occasionally recorded in breeding season in the City, including one that summered near Steven's Park (Lauro Canyon/ Arriba Way VMU) in 2014 (Lehman 2020). Arroyo Burro and San Roque Creek are among few suitable locations.

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Special-Status Wildlife Species with Potential to Occur in the CWPP Area

**Table 4.3-4 Special-Status Wildlife Species with Potential to Occur in the CWPP Area**

Scientific Name	Common Name	Status (Federal/State/ Local)	Habitat Associations	Potentially Suitable Communities in CWPP Area	Potential to Occur
<i>Ixobrychus exilis</i>	least bittern	None/SSC/None	Nests in freshwater and brackish marshes with dense, tall growth of aquatic and semi-aquatic vegetation.	freshwater marsh	Present. Known to occur occasionally at the Andrée Clark Bird Refuge, and nested there in 1982 (Lehman 2020).
<i>Lanius ludovicianus</i> (nesting)	loggerhead shrike	None/SSC/None	Nests and forages in open habitats with scattered shrubs, trees, or other perches.	California annual grassland coastal perennial grassland	Low potential to occur. Known to winter in the vicinity, but the only south coast nesting record east of Gaviota is from Carpinteria in 2004 (Lehman 2020).
<i>Laterallus jamaicensis coturniculus</i>	California black rail	BCC/FP, ST/GP	Tidal marshes, shallow freshwater margins, wet meadows, and flooded grassy vegetation; suitable habitats are often supplied by canal leakage in Sierra Nevada foothill populations	none	Not expected to occur. Not known to have occurred in the CWPP area since the 1930s (Lehman 2020; CDFW 2020).
<i>Pelecanus occidentalis californicus</i> (nesting colonies and communal roosts)	California brown pelican	FDL/FP, SDL/GP	Forages in warm coastal marine and estuarine environments; in California, nests on dry, rocky offshore islands	coastal strand/beach	Present (roosting only). Does not nest in mainland California, but roosts commonly along the Santa Barbara waterfront and forages in the Pacific Ocean (Lehman 2020). Not expected inland from the waterfront.
<i>Riparia riparia</i> (nesting)	bank swallow	None/ST/None	Nests in riparian, lacustrine, and coastal areas with vertical banks, bluffs, and	coastal bluff	Low potential to occur. Formerly nested in colonies along sea cliffs

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Special-Status Wildlife Species with Potential to Occur in the CWPP Area

Table 4.3-4 Special-Status Wildlife Species with Potential to Occur in the CWPP Area

Scientific Name	Common Name	Status (Federal/State/ Local)	Habitat Associations	Potentially Suitable Communities in CWPP Area	Potential to Occur
			cliffs with sandy soils; open country and water during migration		in the CWPP area, including at Hendry's Beach, but now occurs only as a rare migrant (CDFW 2020; Lehman 2020).
<i>Setophaga petechia</i> (nesting)	yellow warbler	BCC/SSC/None	Nests and forages in riparian and oak woodlands, montane chaparral, open ponderosa pine, and mixed-conifer habitats	riparian woodland/creek urban	Present. Nests in isolated locations in the Santa Barbara area (SBAS 2020), in riparian vegetation and in several non-riparian habitat areas with ornamental vegetation and irrigation (Lehman 2020).
<i>Sternula antillarum browni</i> (nesting colony)	California least tern	FE/FP, SE/GP	Forages in shallow estuaries and lagoons; nests on sandy beaches or exposed tidal flats	coastal strand/beach	Not expected to occur (nesting). Formerly nested along the Santa Barbara waterfront, but now occurs only during migration and dispersal (Lehman 2020).
<b>Mammals</b>					
<i>Antrozous pallidus</i>	pallid bat	None/SSC/None	Grasslands, shrublands, woodlands, forests; most common in open, dry habitats with rocky outcrops for roosting, but also roosts in human-made structures and trees	riparian woodland/creek southern oak woodland structures (roosting)	Moderate potential to occur. The nearest known occurrence is from approximately 6.0 miles west of the City, near Coal Oil Point.

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Special-Status Wildlife Species with Potential to Occur in the CWPP Area

**Table 4.3-4 Special-Status Wildlife Species with Potential to Occur in the CWPP Area**

Scientific Name	Common Name	Status (Federal/State/ Local)	Habitat Associations	Potentially Suitable Communities in CWPP Area	Potential to Occur
<i>Bassariscus astutus</i>	ringtail	None/FP/None	Mixed forests and shrublands near rocky areas or riparian habitats; forages near water and is seldom found more than 1 kilometer (0.62 mile) from a water source.	riparian woodland/creek southern oak woodland chaparral	Moderate potential to occur. The Santa Barbara Museum of Natural History houses several specimens collected north and northwest of the City (SBMHN 2020). Potential occurrence likely limited to the northern part of the CWPP area.
<i>Corynorhinus townsendii</i>	Townsend's big-eared bat	None/SSC/None	Mesic habitats characterized by coniferous and deciduous forests and riparian habitat, but also xeric areas; roosts in limestone caves and lava tubes, man-made structures, and tunnels	Structures (roosting)	Moderate potential to occur (roosting). Known from one occurrence in the northwestern part of the City and several more in the vicinity (CDFW 2020).
<i>Eumops perotis californicus</i>	western mastiff bat	None/SSC/None	Chaparral, coastal and desert scrub, coniferous and deciduous forest and woodland; roosts in crevices in rocky canyons and cliffs where the canyon or cliff is vertical or nearly vertical. May also roost under bridges with high vertical clearance below.	None (roosting)	Low potential to occur. Known from several occurrences west of the project area, in the More Mesa area (CDFW 2020). Suitable roosting habitat is likely absent in the CWPP area, although this species may roost nearby in the Santa Ynez Mountains.



**Table 4.3-4 Special-Status Wildlife Species with Potential to Occur in the CWPP Area**

Scientific Name	Common Name	Status (Federal/State/ Local)	Habitat Associations	Potentially Suitable Communities in CWPP Area	Potential to Occur
<i>Lasiurus blossevillii</i>	western red bat	None/SSC/None	Forest, woodland, riparian, mesquite bosque, and orchards, including fig, apricot, peach, pear, almond, walnut, and orange; roosts in tree canopy	riparian woodland/creek southern oak woodland orchard (roosting)	High potential to occur. Known from several occurrences in the vicinity, in the More Mesa and Atascadero Creek area west of the City (CDFW 2020). Likely roosts in riparian areas within the City.
<i>Neotoma lepida intermedia</i>	San Diego desert woodrat	None/SSC/None	Coastal scrub and chaparral, mostly in moderate to dense canopies. Particularly abundant in rock outcrops, rocky cliffs, and slopes.	coastal sage scrub chaparral	High potential to occur. The nearest CNDDB occurrence is from approximately 4.8 miles northwest of the plan area, but suitable habitat occurs throughout the south-facing slopes of the Santa Ynez Mountains.
<i>Nyctinomops macrotis</i>	big free-tailed bat	None/SSC/None	Rocky areas; roosts in caves, holes in trees, buildings, and crevices on cliffs and rocky outcrops; forages over water	structures riparian woodland/creeks southern oak woodland	Low potential to occur (migration only). CNDDB includes one occurrences mapped generally to Santa Barbara (CDFW 2020). However, this species likely occurs in California only rarely during migration or winter.

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Special-Status Wildlife Species with Potential to Occur in the CWPP Area

**Table 4.3-4 Special-Status Wildlife Species with Potential to Occur in the CWPP Area**

Scientific Name	Common Name	Status (Federal/State/ Local)	Habitat Associations	Potentially Suitable Communities in CWPP Area	Potential to Occur
<i>Puma concolor</i>	mountain lion – Southern California/Central California Evolutionary Significant Unit (ESU)	None/SC/None	Scrubs, chaparral, riparian, woodland, and forest; rests in rocky areas and on cliffs and ledges that provide cover; most abundant in riparian areas and brushy stages of most habitats throughout California, except deserts.	coastal sage scrub chaparral riparian woodland/creek southern oak woodland	High potential to occur during dispersal. Known to occur throughout the region, and most likely to occur on occasion in the northern portions of the CWPP area.

**Status Legend:**

FE: Federally Endangered  
 FT: Federally Threatened  
 FDL: Federally Delisted  
 BCC: U.S. Fish and Wildlife Service Bird of Conservation Concern  
 SSC: California Species of Special Concern  
 FP: California fully protected Species  
 WL: California Watch List Species  
 SE: State Endangered  
 ST: State Threatened  
 SC: State Candidate for listing  
 SDL: State Delisted  
 GP – considered sensitive in General Plan, Environmental Resources Element (City of Santa Barbara 2011)  
 LCP – considered sensitive under the Local Coastal Program

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# Appendix E

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Confidential

CHRIS Archaeological Records Search Results



# Appendix F

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**Confidential**

NAHC Sacred Lands Files Search Results and  
AB 52 Consultation Record

