



FINAL PROGRAM ENVIRONMENTAL IMPACT REPORT

SCH 2020070069



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Acronyms and Abbreviations

Acronym	Definition
AB	Assembly Bill
ADU	accessory dwelling unit
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CAP	Climate Action Plan
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CESA	California Endangered Species Act
CFTN	Community Fuels Treatment Network
CH ₄	methane
City	City of Santa Barbara
CNDDDB	California Natural Diversity Database
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
CRHR	California Register of Historical Reso
CWPP	Community Wildfire Protection Plan
EIR	Environmental Impact Report
ESA	federal Endangered Species Act
FHSZ	Fire Hazard Severity Zone
Findings	Findings of Fact
GHG	greenhouse gas
GR	Global Response
HFHA	High Fire Hazard Area
HFHSZ	High Fire Hazard Severity Zone
LSAA	Lake and Streambed Alteration Agreement
MLD	most likely descendant
MM	Mitigation Measure
MMRP	Mitigation Monitoring and Reporting Program
MT	metric ton
N ₂ O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NOP	Notice of Preparation
NRHP	National Register of Historic Places
PEIR	Program Environmental Impact Report
PM ₁₀	particulate matter less than or equal to 10 microns in diameter
PRC	California Public Resources Code
ROC	reactive organic compound
SAA	Streambed Alteration Agreement
SBAS	Santa Barbara Audubon Society
SBCAPCD	Santa Barbara County Air Pollution Control District

Acronym	Definition
SBFD	City of Santa Barbara Fire Department
SOI	Secretary of the Interior
TAC	toxic air contaminant
TCR	tribal cultural resource
VHFHSZ	Very High Fire Hazard Severity Zone
VMU	Vegetation Management Unit
WEAP	Workers Environmental Awareness Program
WFSAD	Wildland Fire Suppression Assessment District

1 Introduction to Final Program Environmental Impact Report

The City of Santa Barbara Fire Department (SBFD) is proposing to implement a comprehensive fire management program, called a Community Wildfire Protection Plan (CWPP), to protect lives, property, and natural resources threatened by wildland fire. The CWPP process is intended to provide the community with 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 at-risk values by the community strongly influences the potential wildfire hazard mitigation projects identified in the proposed CWPP.

The proposed CWPP updates the City of Santa Barbara's (City) 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's fire environment and work completed under the 2004 Plan. Current activities conducted by the SBFD under the 2004 Wildland Fire Plan were analyzed in the Final Program Environmental Impact Report (PEIR) for the 2004 Wildland Fire Plan (SBFD and CDD 2004), which is incorporated herein by reference. The updated Draft PEIR only addressed new proposed policies and actions that could result in impacts to the environment, which consist of the following categories:

- Proposed Modifications to the High Fire Hazard Area (HFHA)
- Proposed Modifications to the Vegetation Management Units (VMUs)
 - Defensible Space
 - Road Clearing
 - City Vegetation Management Units (VMUs)
 - Community Fuels Treatment Network (CFTN)
 - Neighboring Jurisdiction Vegetation Management Areas
- Proposed Modifications to the Vegetation Management Methods
- Community Facility Maintenance

The proposed CWPP also includes 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 equipment, and evacuation planning.

1.1 Introduction

The CWPP PEIR assesses the potentially significant environmental impacts of the proposed CWPP. As described in the California Environmental Quality Act (CEQA) statute and CEQA Guidelines, public agencies are charged with the duty to avoid or substantially lessen significant environmental effects, with consideration of other conditions, including economic, social, technological, legal, and other benefits. As required by CEQA, the PEIR assesses the significant direct and indirect environmental impacts of the proposed CWPP and the significant cumulative impacts that could occur from implementation of the proposed CWPP. The PEIR is an informational document only, the purpose of which is to identify the significant impacts of the proposed CWPP on the environment; to indicate how

those significant impacts could be avoided or significantly lessened, including feasible mitigation measures; to identify any significant and unavoidable adverse impacts that cannot be mitigated to less than significant; and to identify reasonable and feasible alternatives that would avoid or substantially lessen any significant adverse environmental impacts and achieve the fundamental objectives of the proposed CWPP.

The PEIR itself does not control how a project can be developed or constructed; rather, the governmental agency must respond to the information contained in the PEIR by one or more of the seven methods outlined in Section 15002(h) of the CEQA Guidelines:

1. Changing a proposed project.
2. Imposing conditions on the approval of the project.
3. Adopting plans or ordinances to control a broader class of projects to avoid the adverse changes.
4. Choosing an alternative way to meet the same need.
5. Disapproving the project.
6. Finding that changing or altering the project is not feasible.
7. Finding that the unavoidable significant environmental damage is acceptable as provided in Section 15093.

As defined by Section 15050 of the CEQA Guidelines, SBFD is serving as the lead agency for the proposed CWPP. The PEIR will be used by SBFD as an informational document. The purpose of this Final PEIR is to respond to all comments received by SBFD regarding environmental information and analyses contained in the Draft PEIR. Section 15132 of the CEQA Guidelines lists the required contents of the Final PEIR:

- (a) The Draft PEIR or a revision to the Draft PEIR.
- (b) Comments and recommendations received on the Draft PEIR either verbatim or in summary.
- (c) A list of persons, organizations, and public agencies commenting on the Draft PEIR.
- (d) The responses of the lead agency to significant environmental points raised in the review and consultation process.
- (e) Any other information added by the lead agency.

Chapter 2, Responses to Comments Received, of this Final PEIR, and provided appendices include copies of all the letters received during and after the close of the Draft PEIR public review period, as described further below, as well as responses to all comments received.

In addition to these responses to comments, this Final PEIR contains clarifications and corrections of minor revisions to the text, tables, figures, and appendices of the Draft PEIR. Chapter 3, Changes to the Draft Program Environmental Impact Report, of this Final PEIR, reflects these clarifications. This Final PEIR will be used by SBFD in the decision-making process for the proposed CWPP.

California Public Resources Code, Section 21081, and the CEQA Guidelines, Section 15091, require that the lead agency (in this case SBFD) prepare written findings for identified significant impacts, accompanied by a brief explanation of the rationale for each finding. Specifically, CEQA Guidelines, Section 15091, states the following:

- a) No public agency shall approve or carry out a project for which an EIR has been certified which identifies one or more significant environmental effects of the project unless the public agency

makes one or more written findings for each of those significant effects, accompanied by a brief explanation of the rationale for each finding. The possible findings are:

- 1) Changes or alterations have been required in, or incorporated into, the project which avoid or substantially lessen the significant environmental effect as identified in the final EIR.
- 2) Such changes or alterations are within the responsibility and jurisdiction of another public agency and not the agency making the finding. Such changes have been adopted by such other agency or can and should be adopted by such other agency.
- 3) Specific economic, legal, social, technological, or other considerations, including provision of employment opportunities for highly trained workers, make infeasible the mitigation measures or project alternatives identified in the final EIR.

SBFD has prepared *Findings of Fact in Support of the Proposed Project*, which provides the findings made pursuant to CEQA.

Section 15097 of the CEQA Guidelines states that the lead agency shall adopt a program for monitoring or reporting on the revisions that it has required for a project and the measures it has imposed to mitigate or avoid significant effects. The proposed CWPP's Mitigation Monitoring and Reporting Program (MMRP) describes the mitigation program to be implemented by SBFD for the proposed CWPP.

1.2 Contents and Organization of the Final PEIR

This Final PEIR, in compliance with the CEQA Guidelines, is organized as follows:

Chapter 1, Introduction to the Final Program Environmental Impact Report. This chapter provides general information on, and the procedural compliance of, the proposed CWPP and the Final PEIR.

Chapter 2, Responses to Comments Received. This chapter includes a list of those who provided comments on the Draft PEIR during the public review period. This chapter also includes the comments received on environmental issues raised during the public review process for the Draft PEIR, and SBFD's responses to these comments. Each comment letter is assigned a number, and comments within those letters are also numbered (e.g., 1-1, 1-2).

Chapter 3, Changes to the Draft Program Environmental Impact Report. This chapter contains a summary of changes made to the document since publication of the Draft PEIR as a result of comments received. Revisions were made to clarify information presented in the Draft PEIR; only minor changes or additions have been made. These changes and additions to the Draft PEIR do not raise important new issues related to significant effects on the environment, and are insignificant as the term is used in Section 15088.5(b) of the CEQA Guidelines. This chapter presents the textual changes made since public review of the Draft PEIR, signified by ~~strikeout~~ (i.e., ~~strikeout~~) where text was removed, and by underlined text (i.e., underline) where text was added.

Chapter 4, Mitigation Monitoring and Reporting Program. This chapter of the Final PEIR provides the MMRP for the proposed CWPP. The MMRP is presented in table format and identifies mitigation measures, the party responsible for implementing the mitigation measures, the timing of implementing the mitigation measures, and the monitoring and reporting procedures for each mitigation measure.

1.3 Environmental Review Process

Pursuant to Section 15082 of the CEQA Guidelines, a Notice of Preparation dated July 3, 2020, was circulated to interested agencies, organizations, and individuals. The Notice of Preparation was also sent to the State Clearinghouse at the California Governor’s Office of Planning and Research. The State Clearinghouse assigned a state identification number (SCH No. 2020070069) to the PEIR.

The SBFD held one scoping hearing on July 16, 2020, before the Santa Barbara Planning Commission during the Notice of Preparation review period to gather additional public input on the scope of the environmental document. Due to the COVID-19 pandemic, the meeting was held virtually. One individual provided public comment during the scoping hearing. Appendix A of this Final PEIR contains the scoping hearing minutes. Based on public comments received during the scoping period and at the scoping hearing, a population and housing section was incorporated into the Draft PEIR.

The 30-day public scoping period ended on August 3, 2020. All comments received during the Notice of Preparation public notice period were considered during preparation of the Draft PEIR. Chapter 2 this Final PEIR contains a summary table and copies of all comment letters received. Comment letters were provided by agencies, property owners, and other interested stakeholders and focused on a range of topic areas. Multiple stakeholders commented on concern about potential insurance increases due to being located within the CWPP High Fire Hazard Area. The Planning Commission also expressed concern about limitations on housing. As noted above, population and housing was considered in the Draft PEIR.

A Notice of Availability of the Draft PEIR was sent to agencies and interested parties on September 28, 2020, and posted with the Santa Barbara County Clerk and the State Clearinghouse. The Draft PEIR was circulated for a public review period from September 28, 2020 through November 13, 2020. An environmental hearing on the Draft PEIR was held virtually before the Santa Barbara Planning Commission on November 5, 2020. Four members of the public spoke at the environmental hearing on topics related to property insurance, the basis of the CWPP fire modeling and alignment of the proposed High Fire Hazard Area zones, use of building codes and other regulatory options to achieve fire protection, and potential fire hazards associated with wireless communication towers.

The SBFD received 30 comment letters during the public review period. A list of the comments received, copies of the comment letters received, and responses to comments are included in Chapter 2 of this Final PEIR. Chapter 2 will also be provided to public agencies and members of the public who commented on the Draft PEIR 10 days prior to the public hearing at which the Final PEIR on the proposed CWPP will be considered, per CEQA Guidelines Section 15088.

1.4 Final PEIR

The comments received during the public review period for the Draft PEIR resulted in minor clarifications and modifications in the text of the September 2020 Draft PEIR. In addition, minor editorial corrections have been made to sections of the Draft PEIR. These changes are included as part of this Final PEIR. This Final PEIR will be presented to the Santa Barbara City Council for certification as the environmental document for the proposed CWPP. Pursuant to CEQA Guidelines Section 15091, the SBFD finds that the inclusion of certain mitigation measures as part of CWPP approval will reduce all potentially significant effects to cultural resources, geology and soils, greenhouse gas emissions, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, population and housing, recreation, transportation, tribal cultural resources, public services and utilities, and wildfire to less than significant. The Draft PEIR identified significant and unavoidable impacts that could result from CWPP implementation related to aesthetics/visual resources, air quality, and biological resources. As such, the SBFD will provide a statement of overriding considerations prepared pursuant to CEQA Guidelines Section 15093.

1.5 Reference

SBFD and CDD (Santa Barbara Fire Department and Community Development Department). 2004. *Final Program Environmental Impact Report, Wildland Fire Plan*. SCH No. 2003041053. City of Santa Barbara Community Development Department and Fire Department. February 2004. <https://www.santabarbaraca.gov/civicax/filebank/blobdload.aspx?BlobID=14532>.

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2 Responses to Comments Received

2.1 Introduction

This chapter of the Final Program Environmental Impact Report (PEIR) includes a copy of all comment letters that were submitted to the City of Santa Barbara Fire Department (SBFD) during the 45-day public review period for the Draft PEIR for the proposed Community Wildfire Protection Plan (CWPP or proposed project), along with responses to comments in accordance with California Environmental Quality Act (CEQA) Guidelines Section 15088. The public review period for the Draft PEIR began on September 28, 2020, and ended on November 13, 2020. SBFD has provided written comments in response to comments received (see Section 2.2, Comment Letters and Responses).

All written comment letters received on the Draft PEIR have been coded with a number to facilitate identification and tracking (see Table 2-1). These comment letters were reviewed and divided into individual comments, with each comment containing a single theme, issue, or concern. Individual comments and the responses to them were assigned corresponding numbers (e.g., 1-1, 1-2). Each comment letter is the submittal of an individual, agency, or organization. To aid readers and commenters, electronically bracketed comments have been reproduced in this document, with the corresponding responses provided immediately following the comments. The interested parties listed in Table 2-1 submitted letters during the public review period for the Draft PEIR.

Table 2-1. Index of Commenters on the Draft PEIR

Comment Letter	Date of Letter	Commenter	Response Nos.
1	September 29, 2020	Robert A. Burtness	1-1 through 1-3
2	September 30, 2020	Fleurette Janigian	2-1
3	October 2, 2020	Rod Keller	3-1 through 3-2
4	October 2, 2020	John Jostes	4-1 through 4-4
5	October 5, 2020	David Trandal	5-1
6	October 3, 2020	Claudia Lapin	6-1 through 6-5
7	September 29, 2020	Michele Humboldt	7-1
8	September 29, 2020	Steve Forsell	8-1 through 8-2
9	September 29, 2020	Kate Samsa	9-1 through 9-2
10	October 12, 2020	Jorg Heinemann	10-1 through 10-2
11	October 12, 2020	Lawrence Thompson	11-1 through 11-4
12a	November 2, 2020	Santa Barbara Audubon Society (Katherine Emery, Ph.D.)	None
12b	November 10, 2020	Santa Barbara Audubon Society (Katherine Emery, Ph.D.)	12b-1 through 12b-36
13	October 20, 2020	Frances A. Kennett	13-1
14	November 6, 2020	Kemble White	14-1 through 14-5
15	November 6, 2020	Robert Perry	15-1 through 15-2
16	November 13, 2020	Santa Barbara Botanic Garden (Steve Windhager)	16-1 through 16-3
17a	November 13, 2020	Gail Osherenko	17a-1
17b	November 13, 2020	Gail Osherenko	17b-1 through 17b-7
18a	November 13, 2020	Robert Crippen	18a-1 through 18a-6

Table 2-1. Index of Commenters on the Draft PEIR

Comment Letter	Date of Letter	Commenter	Response Nos.
18b	November 13, 2020	Robert Crippen	18b-1
19	November 13, 2020	California Department of Fish and Wildlife	19-1 through 19-22
20	November 13, 2020	Chris and Susan Dahlstrom	20-1 through 20-3
21	November 13, 2020	California Department of Transportation	21-1 through 21-4
22	November 13, 2020	Skip Szymanski	22-1 through 22-6
23	November 13, 2020	Santa Barbara Association of Realtors	23-1 through 23-6
24	November 12, 2020	Lisa Burns	24-1 through 24-6
25	November 13, 2020	Safe Technology for Santa Barbara County (Miriam Lindbeck)	25-1 through 25-10
26	No Date	Elaine Jewell	26-1 through 26-3
27	November 10, 2020	Thomas Felkay	27-1

Comments that raise environmental issues have been thoroughly addressed in these responses. Comments that do not require a response include those that (1) do not address the adequacy or completeness of the Draft PEIR, (2) do not raise environmental issues, (3) do not address the proposed CWPP, or (4) require the incorporation of additional information not relevant to environmental issues.

Section 15088 of the CEQA Guidelines, Evaluation of and Response to Comments, states the following:

- (a) The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The lead agency shall respond to comments raising significant environmental issues received during the noticed comment period and any extensions and may respond to late comments.
- (b) The lead agency shall provide a written proposed response, either in a printed copy or in an electronic format, to a public agency on comments made by that public agency at least 10 days prior to certifying an environmental impact report.
- (c) The written response shall describe the disposition of significant environmental issues raised (e.g., revisions to the proposed project to mitigate anticipated impacts or objections). In particular, the major environmental issues raised when the lead agency’s position is at variance with recommendations and objections raised in the comments must be addressed in detail giving reasons why specific comments and suggestions were not accepted. There must be good faith, reasoned analysis in response. Conclusory statements unsupported by factual information will not suffice. The level of detail contained in the response, however, may correspond to the level of detail provided in the comment (i.e., responses to general comments may be general). A general response may be appropriate when a comment does not contain or specifically refer to readily available information, or does not explain the relevance of evidence submitted with the comment.
- (d) The response to comments may take the form of a revision to the draft EIR or may be a separate section in the final EIR. Where the response to comments makes important changes in the information contained in the text of the draft EIR, the lead agency should either:
 - (1) Revise the text in the body of the EIR, or
 - (2) Include marginal notes showing that the information is revised in the response to comments.

Revisions to the Draft PEIR have been prepared to make clarifications, corrections, or minor revisions to the text, tables, figures, and appendices in response to comments received or independently by SBFD. Therefore, this chapter, along with Chapter 3, Changes to the Draft Program Environmental Impact Report, are included in this Final PEIR for consideration by the Santa Barbara City Council.

Section 15088.5, Recirculation of an EIR Prior to Certification, of the CEQA Guidelines states the following:

- (a) A lead agency is required to recirculate an EIR when significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review under Section 15087 but before certification. As used in this section, the term “information” can include changes in the project or environmental setting as well as additional data or other information. New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:
 - (1) A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.
 - (2) A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.
 - (3) A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the environmental impacts of the project, but the project’s proponents decline to adopt it.
 - (4) The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded. (*Mountain Lion Coalition v. Fish and Game Com.* (1989) 214 Cal.App.3d 1043) (b)
- (b) Recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.
- (c) If the revision is limited to a few chapters or portions of the EIR, the lead agency need only recirculate the chapters or portions that have been modified.
- (d) Recirculation of an EIR requires notice pursuant to Section 15087, and consultation pursuant to Section 15086.
- (e) A decision not to recirculate an EIR must be supported by substantial evidence in the administrative record.
- (f) The lead agency shall evaluate and respond to comments as provided in Section 15088. Recirculating an EIR can result in the lead agency receiving more than one set of comments from reviewers. The following are two ways in which the lead agency may identify the set of comments to which it will respond. This dual approach avoids confusion over whether the lead agency must respond to comments which are duplicates or which are no longer pertinent due to revisions to the EIR. In no case shall the lead agency fail to respond to pertinent comments on significant environmental issues.
 - (1) When an EIR is substantially revised and the entire document is recirculated, the lead agency may require reviewers to submit new comments and, in such cases, need not respond to those comments received during the earlier circulation period. The lead agency shall advise reviewers, either in the text of the revised EIR or by an attachment to the revised EIR, that although part of the administrative record, the previous comments do not require a written response in the final EIR, and that new comments must be submitted for the revised EIR. The lead agency need only respond to those comments submitted in response to the recirculated revised EIR.

- (2) When the EIR is revised only in part and the lead agency is recirculating only the revised chapters or portions of the EIR, the lead agency may request that reviewers limit their comments to the revised chapters or portions of the recirculated EIR. The lead agency need only respond to (i) comments received during the initial circulation period that relate to chapters or portions of the document that were not revised and recirculated, and (ii) comments received during the recirculation period that relate to the chapters or portions of the earlier EIR that were revised and recirculated. The lead agency's request that reviewers limit the scope of their comments shall be included either within the text of the revised EIR or by an attachment to the revised EIR.
- (3) As part of providing notice of recirculation as required by Public Resources Code Section 21092.1, the lead agency shall send a notice of recirculation to every agency, person, or organization that commented on the prior EIR. The notice shall indicate, at a minimum, whether new comments may be submitted only on the recirculated portions of the EIR or on the entire EIR in order to be considered by the agency.
- (g) When recirculating a revised EIR, either in whole or in part, the lead agency shall, in the revised EIR or by an attachment to the revised EIR, summarize the revisions made to the previously circulated draft EIR.

The Draft PEIR revisions and information presented in the responses to comments do not result in any conditions set forth in Section 15088.5 of the CEQA Guidelines requiring that the PEIR be recirculated prior to its certification. Although CEQA requires recirculation of an Environmental Impact Report (EIR) when “new significant information is added to the EIR” after an EIR is circulated for public review and before it is certified, “new information” added to an EIR “is not significant unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement” (CEQA Guidelines Section 15088.5[a]; *Laurel Heights Improvement Assn. of San Francisco, Inc. v. Regents of the Univ. of Cal.* [1993] 6 Cal.4th 1112, 1129). Recirculation is not required when new information is added that “merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.” In response to comments received on the Draft PEIR, this Final PEIR includes additional information to clarify information or make minor modifications to the Draft PEIR only.

2.2 Comment Letters and Responses

The following section includes the comment letters regarding the Draft PEIR received by SBFD during the public review period from September 28, 2020 to November 13, 2020, and SBFD’s responses to each comment. Individual comments within the body of each letter have been numbered, and brackets delineating the individual comments have been added in the right margins of each letter. Responses to the bracketed comments are included on the page(s) following each comment letter.

Global responses (GRs) were prepared to address common issues that were repeatedly raised in the comment letters. These responses are provided below.

- GR-1 Justification and Rationale for High Fire Hazard Area Zones and Vegetation Management Units**
- GR-2 Community Wildfire Protection Plan’s Effects on Homeowner’s Insurance**
- GR-3 Use of a Program EIR**
- GR-4 Standards for Responses to Comments**
- GR-5 Determining the Significance of the Environmental Effect**

GR-1 Justification and Rationale for High Fire Hazard Area Zones and Vegetation Management Units. Wildfires are a regular and natural occurrence in most of California. Large wildfires have had, and continue to have, a substantial and recurring role in California landscapes (Keeley and Fotheringham 2003), in part because (1) California landscapes become highly flammable each fall; (2) the climate in the region has been characterized by fire climatologists as the worst fire climate in the United States (Keeley 2004), with foehn winds (e.g., Sundowner winds) occurring during autumn after a 6-month drought period each year; and (3) ignitions via anthropogenic sources have increased or are increasing in many wildland and Wildland-Urban Interface areas.

As noted by the Governor’s Office of Planning and Research in its Fire Hazard Technical Advisory, “The changing climate, specifically rising temperatures, shifting wind patterns, and increasing temporal variability of water availability, is substantially increasing wildfire risk across the state. The frequency of extreme fire weather during the Autumn months has more than doubled in California since the 1980s and, factoring in climate change, this frequency is projected to increase in the future (Goss et al. 2020). According to California’s Fourth Climate Change Assessment, if greenhouse gas emissions continue to rise, California is likely to see a 50% increase in fires larger than 25,000 acres as well as a potential 77% increase in average area burned by 2100. According to some experts, we are now entering an era of ‘mega-fires’ or ‘mega-disturbances’” (OPR 2020).

Fire protection and management requirements in California are established through several codes and regulations. Fire Hazard Severity Zones (FHSZs) are described in California Government Code Sections 51175 through 51189, which provide guidance for classifying lands as fire hazard areas and requirements for management of property within those lands. As noted by the Legislature, “The prevention of wildland fires is not a municipal affair...but is instead, a matter of statewide concern.” California Public Resources Code Section 4290 requires minimum fire safety standards related to defensible space that are applicable to residential, commercial, and industrial building construction in State Responsibility Area lands and lands classified and designated as Very High Fire Hazard Severity Zones (VHFHSZs).

A FHSZ is a mapped area that designates zones (based on factors such as fuel, slope, and fire weather) with varying degrees of fire hazard. Hazards are classified as moderate, high, and very high. FHSZ maps evaluate wildfire hazards, which are physical conditions that create a likelihood that an area will burn over a 30- to 50-year period. They do not take into account modifications such as fuel reduction efforts (California State Geoportal 2020).

The California Department of Forestry and Fire Protection (CAL FIRE) is responsible for enforcing California fire safety codes included in the California Government Code and California Public Resources Code, including classifying FHSZs based on statewide criteria. Local agencies, such as the City of Santa Barbara Fire Department (SBFD), must designate by ordinance FHSZs within their jurisdiction based on the recommendations of CAL FIRE. As directed by Government Code Sections 51175–51189 and California Public Resources Code Sections 4201–4204, in 2008, CAL FIRE mapped FHSZs for Santa Barbara’s Local Responsibility Area based on fuel loading, slope, fire history, weather, crown fire potential, and ember production.

In 2004, the SBFD adopted a Wildland Fire Plan and associated Program Environmental Impact Report (PEIR). The Wildland Fire Plan classified the High Fire Hazard Area into four separate zones (Extreme Foothill, Foothill, Coastal, and Coastal Interior) based on the results of the hazard and risk assessment. These findings are shown in Table 2 through Table 5 in the Wildland Fire Plan, and reproduced herein, below.

Wildland Fire Plan (2004) - Table 2: Risk - Extreme Foothill Zone	
RISK FACTOR	RISK FINDINGS
Roof Type	<ul style="list-style-type: none"> The risk of structures igniting as a result of roof type is low. Out of the 138 structures identified, only 1 has a combustible roof.
Proximity of Structures	<ul style="list-style-type: none"> The risk of structure loss due to the density of homes is considered low. The number of structures could increase if development continues in this zone.
Road Systems	<ul style="list-style-type: none"> The risk in this area related to road systems is considered high. The main roads within this zone met Fire Department access standards. Enough smaller residential roads, driveways, bridges, and addressing in this zone do not meet Fire Department access standards, especially in the Las Canoas area. The risk is increased along these residential roads due to vegetation encroachment that further narrows residential roads and drives.
Water Supply	<ul style="list-style-type: none"> Limited water supply in parts of this zone increase the risk in this area to high. 50 % of the existing fire hydrants in this area meet Fire Department Water Supply Standards of greater than 750 gpm. However, the fire hydrant system only covers portions of this zone. The City water line supplies adequate water supply to the upper San Roque area and areas along West Mountain Drive from Gibraltar Road, east to 1421 West Mountain Drive. City water is unavailable from 1421 West Mountain Drive, going east along West Mountain Drive to Coyote Road. Because of the lack of water supply, this area falls within the Fire Department's Fire Zone 2, which requires a minimum 5,000 gallon water tank be installed for each residential development. These water tank systems limit fire control to structure protection, not outside fire exposures. To reduce the fire risk a more stable water supply system is needed. Pump Stations – No pumps stations in this zone, water is gravity flow. Lauro Reservoir is located on the northwest portion of this zone and would be used for helicopter aerial operations.
Fire Response Times	<ul style="list-style-type: none"> This zone is considered at high risk related to fire response. Much of this zone is outside the Fire Department's 4 minute response time. During periods of high fire danger weather the risk of a large wildland fire becoming established is high. Mountain Drive Volunteer Fire Department is active in this area. The department has a Type 4 fire engine with not more than a 200-gallon tank capacity. Response times for the volunteer department will vary depending on the availability of volunteers.
Fire Ignitions	<ul style="list-style-type: none"> Historical fire ignitions within this zone are low. Two large historic fires started in this zone, the 1964 Coyote Fire, and the 1977 Sycamore Canyon Fire. Both fires started under down canyon wind conditions. Because of the combination of heavy fuels, long fire response times, and historic fire weather patterns that exist in this zone, it is considered an area at high risk of a large fire becoming established.

Wildland Fire Plan (2004) – Table 3: Risk – Foothill Zone	
RISK FACTOR	RISK FINDINGS
Roof Type	<ul style="list-style-type: none"> • The risk of structures igniting as a result of roof type is moderate. • Out of the 4,308 structures identified in this zone, 130 have combustible roofs. • Combustible roofs according to neighborhoods are: <ul style="list-style-type: none"> ○ Riviera - 2,823 structures identified / 70 with combustible roofs. ○ Eucalyptus Hills - 911 structures identified / 41 with combustible roofs. ○ Northridge/Santa Theresita/Ontare/Stevens Park - 574 structures identified / 19 with combustible roofs.
Density of Structures	<ul style="list-style-type: none"> • The risk of structure loss due to the density of homes in this zone is considered high. • Areas of highest density are: <ul style="list-style-type: none"> ○ Between Alamar Road and Laurel Canyon above Foothill Road ○ Area surrounding Stevens Park ○ Riviera area south of Alameda Padre Serra ○ Area directly along Alameda Padre Serra ○ Area surrounding the County Bowl ○ Area north of Alameda Padre Serra ○ West of Barker Pass Road ○ Westmont Road area • Many of these higher density areas are located on steep slopes that increase the potential for radiant heat exposure. • The remaining structures in the Foothill zone range from moderate to very low density.
Road Systems	<ul style="list-style-type: none"> • The risk in this area related to road systems is high. • The main roads are a mixture of conforming and existing non-conforming. • Many roads (both residential and main) are further narrowed due to vegetation encroachment and do not meet the Fire Department’s access standards. • Portions of this zone have long, steep, inadequately addressed driveways that pose a significant safety hazard, however, the majority of homes in this zone have adequate addressing. • Approximately 20 bridges exist throughout this zone, a number of these bridges are considered existing non-conforming due to weight limitations.
Water Supply	<ul style="list-style-type: none"> • Adequate water supply in this zone makes the risk in this area low. • Fire hydrants meet Fire Department Water Supply Standards. Fire hydrants within this zone are located every 500 feet and meet Fire Department standards. • Lauro Reservoir is located just north of this zone, but would be used for helicopter aerial operations.
Fire Response Times	<ul style="list-style-type: none"> • This zone is considered at moderate risk related to fire response. • The majority of areas within this zone are within the Fire Department’s 4-minute response time. • Two areas, Westmont Road, and the eastern area of Eucalyptus Hill area, are outside the 4-minute response time. • Montecito Fire Station 2 is located within a 4-minute response time to these areas and would respond under the City Mutual Aid Agreement to an emergency in this area.
Fire Ignitions	<ul style="list-style-type: none"> • Fire ignitions within this zone are low. • Because of the population density and diverse public uses in this zone, the risk of a large fire becoming established is moderate under high fire danger weather.

Wildland Fire Plan (2004) – Table 4: Risk – Coastal Zone	
RISK FACTOR	FINDINGS
Roof Type	<ul style="list-style-type: none"> • The risk of homes igniting as a result of roof type is moderate. • Out of the 570 structures identified in this zone, 29 have combustible roofs.
Proximity of Structures	<ul style="list-style-type: none"> • The risk of structure loss due to the density of homes in this zone is considered low. • One exception to this is the Alan Road area where the density of homes is high and the risk of structure loss is considered high.
Road Systems	<ul style="list-style-type: none"> • Road systems in this zone are considered low risk. • The majority of road systems meet Fire Department access standards. • No private bridges were identified in this zone.
Water Supply	<ul style="list-style-type: none"> • Adequate water supply in this zone makes the risk in this area low. • Fire hydrants meet Fire Department Water Supply Standards. Fire hydrants within this zone are located every 500 feet and meet Fire Department standards. • Lauro Reservoir is located on the northern boundary of the City, but would be used for helicopter aerial operations in this zone.
Fire Response Times	<ul style="list-style-type: none"> • This zone is considered at moderate risk related to fire response. • The majority of area is within the Fire Department's 4-minute response time. • The Campanil Hill and upper part of Sea Ranch Drive are outside the Fire Department's 4-minute response time.
Fire Ignitions	<ul style="list-style-type: none"> • Historic fire ignitions within this zone are low. • Because of the coastal weather influence in this zone the risk of a large fire becoming established is low.

Wildland Fire Plan (2004) – Table 5: Risk – Coastal Interior Zone	
RISK FACTOR	FINDINGS
Roof Type	<ul style="list-style-type: none"> • The risk of homes igniting as a result of roof types is high. • Out of the 365 structures identified in this zone, 65 have combustible roofs. • Many of these structures are adjacent to undeveloped lands or Open Space parcels that increase their exposure to fire brands igniting roof tops. • A high number of structures in the Bel Air Knolls area have combustible roofs. • Many structures directly adjacent to the proposed High Fire Hazard Zone, within the Bel Air Knolls area, have combustible roofs and are at high risk of burning from wind driven firebrands, igniting roof tops well ahead of the main fire.
Proximity of Structures	<ul style="list-style-type: none"> • The risk of structure loss due to the density of homes in this zone is considered high. • Many of these homes are adjacent to undeveloped lands or Open Space parcels that increase their exposure to radiant heat generated from burning vegetation.
Road Systems	<ul style="list-style-type: none"> • Road systems in this zone are considered low risk. • The majority of road systems meet Fire Department access standards. • No private bridges were identified in this zone.
Water Supply	<ul style="list-style-type: none"> • Adequate water supply in this zone makes the risk in this area low. • Fire hydrants meet Fire Department Water Supply Standards. Fire hydrants within this zone are located every 500 feet and meet Fire Department standards. • Lauro Reservoir is located on the northern boundary of the City but would be used for helicopter aerial operations in this zone.
Fire Response Times	<ul style="list-style-type: none"> • This zone is considered at moderate risk related to fire response. • All of this zone is within the Fire Department's 4-minute response time.

Wildland Fire Plan (2004) – Table 5: Risk – Coastal Interior Zone	
RISK FACTOR	FINDINGS
Fire Ignitions	<ul style="list-style-type: none"> • Historic fire ignitions within this zone are low. • Because of the coastal weather influence in this zone the risk of a large fire becoming established is low.

The CWPP is being updated to bring the plan into consistency with state mapping and criteria and to address changing wildfire patterns. As proposed in the Community Wildfire Protection Plan (CWPP), the Extreme Foothill and Foothill zones would be renamed VHFHSZs, and the Coastal and Coastal Interior would be renamed High Fire Hazard Severity Zones (HFHSZs). Many of the factors considered in the Wildland Fire Plan and its PEIR have been incorporated into the analysis considered in the proposed CWPP and its Draft PEIR.

As discussed in Section 4.16, Wildfire, of the Draft PEIR, fire environments are dynamic systems and are influenced by many types of environmental factors and site characteristics. Fires can occur in any environment where conditions are conducive to ignition and fire movement. The three major components of fire environment are vegetation (fuels), climate, and topography. The state of each of these components and their interactions with each other determine the potential characteristics and behavior of a wildfire. In addition, the type, location, and intensity of a wildfire can affect wildlife, vegetation, air quality, water quality, and slope stability to varying degrees.

The SBFDF built on the analysis contained within the 2004 Wildland Fire Plan and its PEIR, 16 years of additional data, and fire department experience in considering fire risk and management when developing the CWPP. As discussed in Section 4.1, Assessment Methods, of the CWPP, the SBFDF applied several methods, including the following:

Field Assessments: SBFDF staff and their consultant, Dudek, performed field assessments to evaluate existing fuel load conditions, gain an understanding of general fire hazard conditions in the City of Santa Barbara (City), and to better understand current vegetation management practices being conducted by SBFDF and other agencies (Santa Barbara County Fire Department, Montecito Fire Protection District) within and adjacent to the City. During field assessments, site conditions were documented via photographs and, in some cases, noted on digital or hard-copy field maps.

GIS Analysis: Various GIS datasets were analyzed for variables influencing wildfire hazard in the City, as follows:

- Fire history
- Vegetation management areas
- Boundaries
- Vegetation
- Terrain
- Roads
- Structure locations
- Fire station locations
- Evacuation blocks and routes
- Water infrastructure

Individual building footprint data was used to determine the proximity of structures to other structures. Areas with higher structure density are at greater risk of burning due to radiant heat exposure because buildings are closer together. The effect of radiant heat during wind-driven fires has been well documented (Cohen and Saveland 1997). Wind and slope can significantly increase

the radiant heat exposure to surrounding structures. The type of building construction and the amount and kind of vegetation between structures also play a role in the ability of a structure to withstand radiant heat exposure

Road network and fire station location data were used to evaluate the amount of travel time necessary to reach an individual parcel from existing fire station locations. During periods of high fire danger weather (low relative humidity, high winds, low fuel moisture, and high temperatures), the potential for large fires increases. Extended travel times increase the potential for a fire to escape initial control efforts and increase the risk to the surrounding area. SBFDF travel time was evaluated using the SBFDF's 4-minute standard.¹

Fire Behavior Modeling: Modeling of potential fire behavior was also conducted to support development of the CWPP. Specifically, the FlamMap software package was used to identify portions of the City that may be subject to extreme fire behavior, considering weather, fuels, and terrain variables. FlamMap (Version 5.0.3) is a GIS-driven computer program that incorporates fuel, weather, and topography data to generate static fire behavior outputs, including values associated with flame length and crown fire activity, among others (Finney et al. 2015). FlamMap incorporates LandFire (Landscape Fire and Resource Management Planning Tools) data, which is a shared program between the wildland fire management programs of the U.S. Department of Agriculture Forest Service and the U.S. Department of the Interior that provides landscape-scale geo-spatial products to support cross-boundary planning, management, and operations. The data is remotely sensed from satellites, which, at that scale, may result in ground-based inaccuracies that need to be reconciled. CAL FIRE's model also considers slope, fuel, and fire behavior outputs in a GIS format that is consistent with FlamMap.

The following are the basic assumptions and limitations of FlamMap:

- The model output files describe fire behavior only in the flaming front. The primary driving forces in the predictive calculations are the dead fuels less than 0.25 inches in diameter. These are the fine fuels that carry fire. Fuels greater than 1 inch in diameter have little effect in carrying fire, and fuels greater than 3 inches in diameter have no effect. While not contributing to the fire behavior calculation, larger fuels (1 inch and greater) are consumed by the fire and are components of the fuels being consumed. For example, the smaller portions (e.g., leaves, twigs, peeling bark) of a chaparral shrub will combust readily and affect fire behavior, while larger portions (e.g., trunk, main branches) do not affect fire behavior but are part of the overall fuel load and will combust after the flaming front has passed.
- The model bases calculations and descriptions on a wildfire spreading through surface fuels that are within 6 feet of the ground and contiguous to the ground. Surface fuels are classified as grass, brush, litter, or slash, which are general categories that are assigned to different vegetation types.
- The software assumes that fuel moisture conditions are uniform. However, because wildfires almost always burn under non-uniform conditions, length of projection period and choice of fuel must be carefully considered to obtain useful predictions.

¹ Travel time accounts only for drive time and excludes non-driving components of response time (e.g., turn out).

- WindNinja software (version 2.1.0), which is incorporated into FlamMap, allows for the generation and incorporation of gridded wind data in the FlamMap simulation. This approach is preferable because it allows the model to account for the effect of terrain on wind speed and direction at different locations throughout the modeling area, rather than relying on one single input value applied to the entire modeling area (e.g., the entire City).
- FlamMap was used to model flame length, crown fire activity, and spot fire potential for an area encompassing the entire City plus a buffer of approximately 5 miles. A detailed discussion of the FlamMap modeling process conducted for the CWPP is presented in Appendix D of the CWPP and incorporated herein by reference.

Clearly Defined Boundaries: Following modeling and analysis efforts, SBFD and the consultant team reviewed areas of the City that presented conditions that could support wildfire ignition and spread. Part of this review included careful scrutiny of the modeling results to address potential inaccuracies resulting from the landscape scale of the LANDFIRE data set used in fire modeling. Other data sets analyzed included terrain, vegetation, fire history, building density, and distance from fire stations. Additionally, SBFD’s robust knowledge of the City and its fire hazards was relied on to inform the decision-making process. This review effort resulted in some areas being added to the HFHSZs, VHFHSZs and Vegetation Management Units (VMUs). The resulting boundaries of the HFHSZs, VHFHSZs and VMUs were ultimately 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 such as streets or blocks. Streets and blocks were used as boundaries because these delineations are more functional from a tactical fire department response and enforcement perspective.

Table 2-2 summarizes the conditions applicable to the various areas proposed for addition to the City’s HFHSZs. Figure GR-1 identified the location of the areas identified in Table 2-2.

Table 2-2. Summary of Areas Proposed for Addition to the City’s HFHSZs

Area ID	Proposed Change to HFHSZ	Comments
1	Addition	<ul style="list-style-type: none"> • Fire behavior modeling indicates extreme fire behavior associated with Cieneguitas Creek vegetation. • 8 City fires within/adjacent to Area 1 (2004-2020). • 4 Santa Barbara County Fire ignitions adjacent to Area 1, associated with Foothill Road and Highway 154). • Slopes reach 30-percent on creek embankments. • Structure density is moderate to high. • Northern portion of Area 1 outside of SBFD 4-minute travel time standard. • Extension to Primavera Road provides a tactical boundary for SBFD.
2	Addition	<ul style="list-style-type: none"> • Fire behavior modeling indicates extreme fire behavior associated with San Roque Creek vegetation. • 6 City fires within Area 2 (2004-2020). • Slopes reach 37-percent on creek embankments. • Structure density is moderate to high. • 2009 Jesusita Fire pushed down San Roque Creek via strong Sundowner winds, stopped by suppression activities at Foothill Road. • Extension to N. Ontare Road and Chuparosa Drive provides a tactical boundary for SBFD.

Table 2-2. Summary of Areas Proposed for Addition to the City's HFHSZs

Area ID	Proposed Change to HFHSZ	Comments
3	Addition	<ul style="list-style-type: none"> • Fire behavior modeling indicates extreme fire behavior associated with lower Mission Canyon vegetation. • 11 City fires within/adjacent to Area 3 (2004-2020). • Slopes reach 70-percent on creek embankments. • Structure density is moderate to high. • Extension to State Street and E. Alamar Avenue provides a tactical boundary for SBFD.
4	Addition	<ul style="list-style-type: none"> • Area omitted from previous 2004 High Fire Hazard Area mapping effort as it was previously outside the City, though exists in CAL FIRE's Very High Fire Hazard Severity Zone.
5	Addition	<ul style="list-style-type: none"> • 5 City fires within/adjacent to Area 5 (2004-2020). • Slopes immediately north of Area 5 reach 60-percent. • Structure density is low to moderate. • Extension to Scenic Drive provides a tactical boundary for SBFD. • Western portion of Area 5 (11 individual parcels) omitted from previous 2004 High Fire Hazard Area mapping effort, though exists in CAL FIRE's Very High Fire Hazard Severity Zone.
6	Addition	<ul style="list-style-type: none"> • Fire behavior modeling indicates extreme fire behavior associated with on-site and adjacent vegetation to the north. • 2 City fires within/adjacent to Area 6 (2004-2020). • Slopes reach 25-percent. • Structure density is moderate to high. • Extension to Terrace Road, La Marina, and Cliff Drive provides a tactical boundary for SBFD.
7	Removal	<ul style="list-style-type: none"> • Road parcel removed from existing High Fire Hazard Area (paved).
8	Addition	<ul style="list-style-type: none"> • Fire behavior modeling indicates extreme fire behavior associated with adjacent vegetation to the west, south, and east. • 1 City fires within/adjacent to Area 8 (2004-2020). • Slopes reach 80-percent. • Structure density is moderate. • Extension to W. Figueroa Street provides a tactical boundary for SBFD.
9	Addition	<ul style="list-style-type: none"> • Fire behavior modeling indicates extreme fire behavior associated with adjacent vegetation to the south. • 1 City fires within/adjacent to Area 9 (2004-2020). • Slopes reach 50-percent on and immediately off-site. • Structure density is moderate to high. • Extension to Mountain Avenue, Clearview Road, and Calle Cerrito provides a tactical boundary for SBFD.
10	Addition	<ul style="list-style-type: none"> • Fire behavior modeling indicates extreme fire behavior associated with vegetation throughout Area 10. • 18 City fires within/adjacent to Area 10 (2004-2020). • Steep slopes throughout Area 10, reaching up to 48-percent. • Structure density is moderate to high. • Extension to W. Valerio Street, Hillside Road, Mountain Avenue, and Vista Del Campo provides a tactical boundary for SBFD.

Table 2-2. Summary of Areas Proposed for Addition to the City's HFHSZs

Area ID	Proposed Change to HFHSZ	Comments
11	Addition	<ul style="list-style-type: none"> • Fire behavior modeling indicates extreme fire behavior in adjacent park land. • Capacity for defensible space on parcels in this area is significantly reduced due to limited structure setbacks. • 4 City fires within/adjacent to Area 11 (2004-2020). • Slopes reach 40-percent on and immediately off-site. • Structure density is moderate.
12	Addition	<ul style="list-style-type: none"> • Fire behavior modeling indicates extreme fire behavior associated with vegetated slopes along west side of Area 12, and with vegetation in Arroyo Burro Creek. • 9 City fires within/adjacent to Area 12 (2004-2020). • Slopes reach 58-percent on-site. • Structure density is low to moderate.
13	Addition	<ul style="list-style-type: none"> • Fire behavior modeling indicates extreme fire behavior associated with vegetation throughout Area 13. • Capacity for defensible space on parcels along eastern edge of Area 13 is significantly reduced due to limited structure setbacks. • 9 City fires within/adjacent to Area 13 (2004-2020). • Steep slopes associated with Arroyo Burro Creek and sub-drainages reach 80-percent • Structure density is low to moderate.
14	Removal	<ul style="list-style-type: none"> • Parcels in County jurisdiction.
15	Removal	<ul style="list-style-type: none"> • Parcels in County jurisdiction.
16	Addition	<ul style="list-style-type: none"> • Parcel omitted from previous 2004 High Fire Hazard Area mapping effort as it was previously outside the City, though surrounded by CAL FIRE's Very High Fire Hazard Severity Zone and Santa Barbara County's High Fire Hazard Area.

Vegetation Management Units: Hazards include the potential for increased fire behavior and pose a challenge for fire protection because of heavy, flammable vegetation; lack of access due to topography and roads; and/or firefighter exposure. 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 because fuel loads would be low); and, in the case of private property, property owner permission (SBFD and CDD 2004). Although fire modeling is an important consideration, as noted above, VMUs are classified based on several factors, and all factors are not necessarily applicable to one particular VMU.

Commenters on the Draft PEIR also noted that, in recent times, no wildfire has occurred in the Bel Air Knolls or Campanil areas of the City that are proposed to be classified within an HFHSZ. The SBFD acknowledges and appreciates the local knowledge presented by residents. As discussed in Section 4.16, Wildfire, of the Draft PEIR, ignitions and small fires do occur in the coastal area of the City. The size of these fires is relatively small due to quick response and suppression actions taken by the SBFD and Santa Barbara County Fire Department. Such small fires are typically excluded from fire perimeter mapping databases. For example, fire perimeter data from CAL FIRE includes fires dating to the late 1800s, but only includes those larger than

10 acres (CAL FIRE 2020a). Although the fire history data presented in the CWPP does not include mapped fire perimeters for this area of the City, this can be attributed to a limitation in the perimeter mapping data set used. However, fires do occur in the coastal area of the City, which can ultimately result in wildfire ignition and spread if not suppressed quickly. An analysis of SBFD fire call and response data between 2004 and 2020 (including structure fires, vegetation fires, trash fires, and vehicle fires) (SBFD 2020a, SBFD 2020b) indicates that 725 fires have occurred within the coastal area of the City (south of Highway 101 and west of Castillo Street). Of these, 121 are within 200 feet of existing and proposed HFHSZs. The locations of these fires is presented in Figure GR-1. To date, successful SBFD response efforts have prevented these fires from becoming wildfires reaching sizes of 10 acres or more.

Based on the SBFD's in-depth knowledge of the City and comprehensive analysis performed as part of the CWPP and analyzed in the Draft PEIR using in-person field assessments; available GIS data, including structural density and fire response timeframes; industry-standard fire modeling; and baseline data from 2004 and 16 years' of additional data from firefighting within the City, the SBFD believes that the proposed HFHSZs, VHFHSZs, and VMUs have been properly evaluated and accurately mapped.

City of Santa Barbara Boundary
 Existing City High Fire Hazard

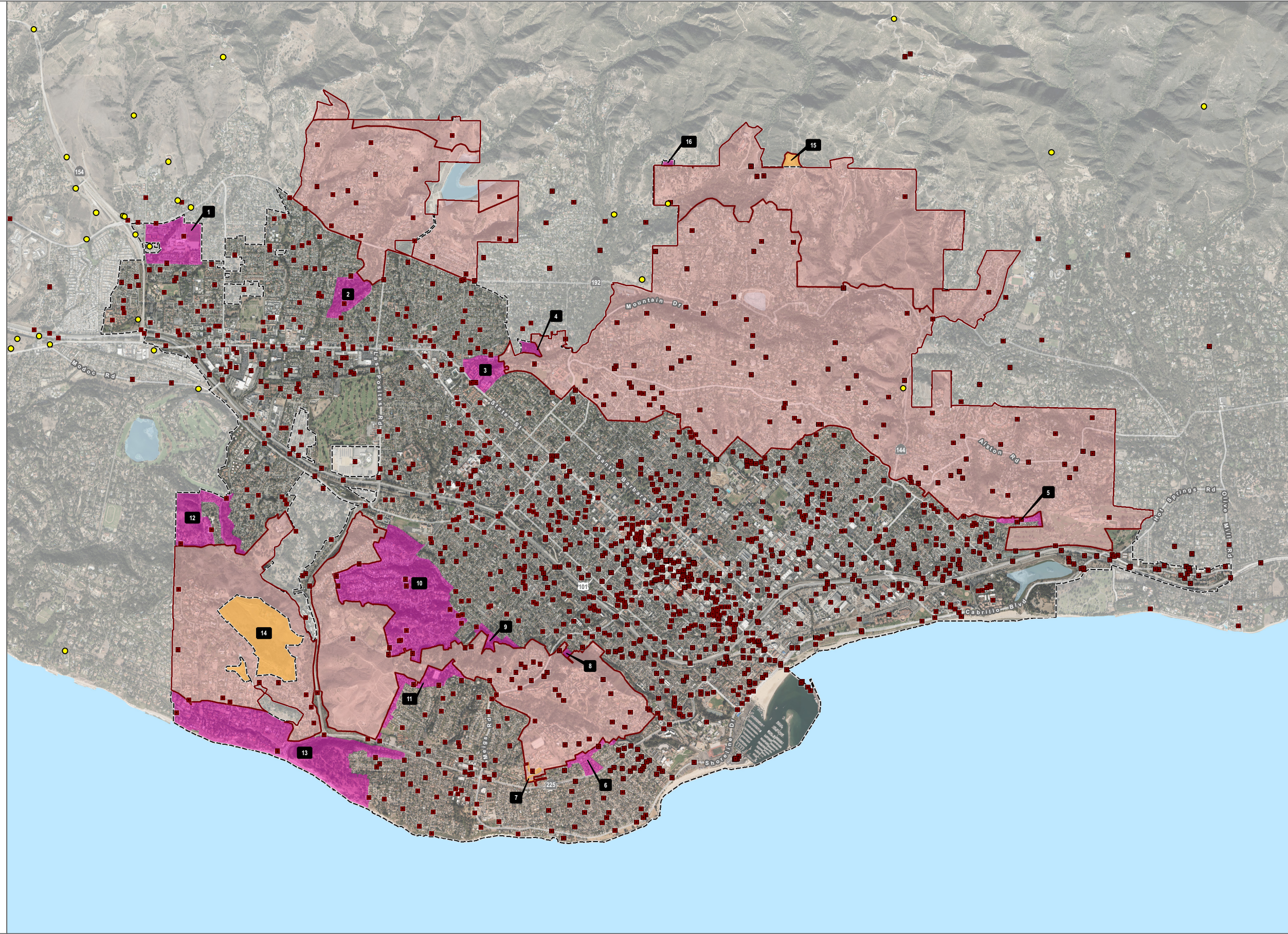
Fire Ignition Data

- City Fire (2004-2020) *
- County Fire (2007-2018)

Proposed Changes to City High Fire Hazard Areas

- Proposed
- Proposed Removals

* City Fire Ignitions occurring outside of the City Boundary are SBFDF responses made under mutual aid agreements with neighboring Fire Authorities Having Jurisdiction.



SOURCE: City of Santa Barbara Fire Department,
County of Santa Barbara Fire Department

FIGURE GR-1
Fire Ignition Data

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GR-2 Community Wildfire Protection Plan's Effects on Homeowner's Insurance. Several comments were raised related to the proposed Fire Hazard Severity Zone classification and the impact it may have on property homeowner's insurance. These comments do not pertain to the adequacy of the environmental analysis in this Program Environmental Impact Report (PEIR). The purpose of the PEIR, pursuant to CEQA, is to inform the public and governmental decision-makers of the significant environmental effects of the CWPP. As discussed in Section 4.11, Population and Housing, of the Draft PEIR, Public Resources Code Section 21080(e)(2) notes that "evidence of social or economic impacts that do not contribute to, or are not caused by, physical impacts on the environment" are not considered substantial evidence in determination of an environmental impact. Section 15064(e) of the California Environmental Quality Act (CEQA) Guidelines also provides that economic changes resulting from a project are not treated as significant effects on the environment, but may be used to determine if a physical change is significant. Courts have also held that CEQA properly considers physical environmental impacts. As decided in *City of Hayward v. Board of Trustees of the California State University* (2012), the First Appellate District held that CEQA considers physical impacts to the environment; economic impacts are not a CEQA consideration. Potential effects on property values need not be analyzed under CEQA, no matter how potentially severe (*Porterville Citizens for Responsible Hillside Development v. City of Porterville* [2007] 157 Cal. App. 4th 885, 903). There is no evidence that any change in insurance rates resulting from the proposed Community Wildfire Protection Plan will affect any physical change to the environment. Nevertheless, the commenters' concerns regarding homeowner insurance have been included in this Final PEIR and will be forwarded to City decision-makers as part of the PEIR record.

Insurance rates are determined by a variety of factors, including individual insurance company, risk assessment, property location, available infrastructure, and a myriad of other criteria set by insurers. As noted by journalist James Bikales in CAL MATTERS on December 9, 2020, California currently requires insurers to base rates on 20 years of historical data on both catastrophic and non-catastrophic losses. He further comments that "creating a successful risk mitigation program in California will require the buy-in of numerous parties, most importantly, the insurance companies and state regulators" (Bikales 2020a). In a separate article, Bikales states "premiums and nonrenewal rates have skyrocketed in California's fire-prone regions since 2015 as companies are loath to pay for damages wreaked by the state's increasingly devastating fires.... In 2019, insurers dropped 235,274 policies in California, a 61% increase from 2018, according to data Lara's [Ricardo Lara, Insurance Commissioner] office released in December. Sixty-five percent of those came in areas of moderate to high fire risk, and the state's 10 most fire-prone counties saw a 203% increase in nonrenewals.... Insurers say the market in some fire-prone regions simply isn't sustainable and they're facing their own challenges paying up to reinsurers, the companies that insure the insurance companies" (Bikales 2020b). "Insurers say it's simply too risky to write policies in these regions—payouts from the 2017 and 2018 fire seasons alone totaled \$24 billion, almost completely wiping out the industry's profits for the previous 16 years. It's likely some homeowners would choose to reduce their risk against fire—a practice known as home hardening—regardless of the insurance implications, but state regulators are increasingly eyeing the practice as a potential solution to the burgeoning insurance crisis. In fact, they're considering whether—and how—to institutionalize it" (Bikales 2020a). In response to these issues, Insurance Commissioner Lara enacted mandatory 1-year moratoriums in 2018, 2019, and 2020 to prohibit insurers from cancelling or non-renewing residential insurance policies in certain areas impacted by wildfires.

Given the increase in wildfire activity in California, homeowner's insurance is anticipated to remain a statewide concern, and it is anticipated that the State Legislature will introduce new legislation in 2021 to address insurance coverage issues in wildfire prone areas (Jergler 2020). In the event that a consumer would like to file a complaint because of unfair insurance practices, the California Department of Insurance can be reached at 800.927.4357.

GR-3 Use of a Program EIR. As provided in Section 15168 of the California Environmental Quality Act (CEQA) Guidelines, a Program Environmental Impact Report (PEIR) may be prepared on a series of actions that may be characterized as one large project, such as an operations and maintenance program. A PEIR is appropriate for the proposed Community Wildfire Protection Plan (CWPP) because it is a long-term comprehensive fire management program. The inclusion of details and scope of all individual projects under this program are either not available at this time or would be considered too speculative for evaluation at this time. The use of a PEIR is appropriate when the sequence of analysis will go from a program-level plan to a series of subsequent site-specific actions. Once a PEIR has been prepared, subsequent activities within the program must be individually evaluated to determine whether the activity has been adequately evaluated in the PEIR, is exempt under CEQA, or an additional CEQA document needs to be prepared. If the PEIR addresses the program's effects as specifically and comprehensively as possible, many subsequent activities could be found to be within the scope of the PEIR, and additional environmental review would not be required (CEQA Guidelines Section 15168[c]).

As funding becomes available and site-specific projects are proposed, the City of Santa Barbara Fire Department (SBFD) will review activities, where appropriate, to ensure consistency with state and federal environmental regulations. The internal review process includes evaluating the site and activity to determine whether the environmental effects of the action were covered in the PEIR (per Section 15618[c][4] of the CEQA Guidelines). When a PEIR is relied on for a subsequent activity, the lead agency must incorporate feasible and relevant mitigation measures and alternatives developed in the PEIR into the subsequent activities. Certain activities, such as routine maintenance, may be determined to be covered under the general rule that CEQA applies (Section 15061[b][3]) and would not require further evaluation.

If a future activity under the CWPP would have effects that were not examined in the PEIR, SBFD would conduct the required technical analysis, such as preparing a site-specific biological resources evaluation, to determine if the activity falls within an exemption class, or would prepare an Initial Study if the activity is not exempt. SBFD may determine that a project performed under the CWPP is exempt and file a Notice of Exemption with the State Clearinghouse. The Notice of Exemption would trigger a shorter legal statute of limitations and would be filed on a case-by-case basis as determined by SBFD.

If an activity does not qualify for an exemption, SBFD would prepare a Negative Declaration, Mitigated Negative Declaration, or Environmental Impact Report (EIR) (e.g., supplemental or subsequent) to evaluate that activity. As required by CEQA, SBFD would circulate the applicable document for public review and comment, and a Notice of Determination would be filed with the State Clearinghouse. In some cases, where the project-specific activity would require minor changes or additions, an Addendum to the PEIR may be appropriate, provided none of the conditions calling for preparation of a Supplemental or Subsequent EIR have been met (CEQA Guidelines Sections 15162, 15163, and 15164[a]). For those activities determined to be adequately evaluated under the PEIR, SBFD would file a Notice of Determination with the State Clearinghouse prior to commencing work.

Several comments suggested that mitigation measures in the Draft PEIR could result in deferral. CEQA Guidelines (Section 15126.4[a][1][B]) provide that specific details of mitigation measures may be developed after project approval “when it is impractical or infeasible to include those details during the project’s environmental review.” CEQA case law also supports the ability of a lead agency to defer certain details of exactly how mitigation will be achieved or implemented if the mitigation measures include specific performance criteria, and commit the agency to mitigate the impact (*Center for Biological Diversity v. Department of Fish and Wildlife* [2015] 234 Cal.App.4th 214). As noted in *Endangered Habitats League, Inc. v County of Orange* (2005) 131 Cal.App.4th 777, the Fourth District stated, “Deferral of the specifics of mitigation is permissible where the local entity commits itself to mitigation and lists the alternatives to be considered, analyzed, and possibly incorporated in the mitigation plan.” In *POET, LLC v. State Air Resources Bd.* (2013) 218 Cal.App.4th 681, the exception to the general rule against deferral was noted by stating, “the deferral of the formulation of mitigation measures requires the agency to commit itself to specific performance criteria for evaluating the efficacy of the measures implemented.” As described in *Center for Biological Diversity v. Department of Conservation* (2019) 36 Cal.App.5th 210, 239, deferral is permitted “when the agency has committed itself to specific performance criteria for evaluating the efficacy of the measures to be implemented in the future, and the future mitigation measures are formulated and operational before the project activity that they regulate begins.” The commitment to mitigate should be accompanied by a list of potential approaches to achieve the avoidance or lessening of the significant effect to demonstrate that the eventually selected measures are reasonably expected to be feasible and effective. The PEIR provides mitigation performance criteria for impacts that clearly establish how successful mitigation would be implemented for subsequent activities.

The CWPP is a living document intended to be in effect for many years. Consequently, an activity performed under the CWPP in 5 or 10 years would be evaluated based on site-specific conditions at that time. Several factors could modify or completely alter the characteristics of an area, such as wildfire, residential development, or installation of new roads or other infrastructure. A PEIR was prepared for the CWPP because a programmatic level of analysis is necessary due to the long-term, comprehensive nature of the CWPP. Subsequent activities proposed to implement the CWPP will be evaluated to determine whether the specific project components or sites were adequately addressed in the PEIR. If the subsequent activity was not adequately addressed at the program level, SBFD will determine if the activity is exempt, and if not, prepare an Initial Study, leading to a subsequent CEQA document to evaluate project-specific aspects of any such activities that were not previously identified or disclosed in the PEIR. This subsequent analysis could include, for example, site-specific surveys that address the area of potential disturbance. Because many of the proposed activities are not slated to move forward until a future date, project-level details, plans, and specificity are not currently available, making comprehensive, detailed surveys across the entire program area impractical. This approach is consistent with CEQA’s acknowledgment that the degree of specificity required in an EIR will correspond to the degree of specificity involved in the underlying activity described therein, and that the degree of specificity for an EIR on a comprehensive, long-range plan, like the CWPP, need not be as detailed as the CEQA documents for the projects that might follow (CEQA Guidelines Section 15146). This approach meets the “reasonableness” test of CEQA, which acknowledges that it is not practical or required that every possible study be prepared as part of the initial PEIR process, and provides flexibility to address changing conditions in the program area over time.

The Draft PEIR for the CWPP disclosed and evaluated all known impacts from proposed activities on all protected species. It did so comprehensively and specifically for each species. The courts have held that there is no need for a PEIR to contain a site-specific analysis for each contemplated future project (*Center for Biological Diversity v. Department of Fish and Wildlife* [2015] 234 Cal.App.4th 214). If additional CEQA analysis is required for future activities, site-specific surveys and analysis will be conducted, and supplemental CEQA review performed if new or more severe impacts beyond those identified in the PEIR are identified.

SBFD is aware that additional permitting for impacts to waters of the United States/state or take of federal or California Endangered Species Act protected species would require additional permits from regulatory agencies. The regulatory framework is provided in Section 4.3.2, Relevant Plans, Policies, and Ordinances, in Section 4.3, Biological Resources, of the Draft PEIR and addresses these permit requirements. It is not required to include the permitting requirements in the PEIR impacts analysis or mitigation measures. SBFD is also aware that the resource agencies may require additional surveys and mitigation as part of the regulatory permitting process. However, this information does not need to be part of the PEIR.

GR-4 Standards for Responses to Comments. This global response has been prepared in response to comments that provide conclusory statements without factual information or other evidence that might support such claims. Section 15088(c) of the California Environmental Quality Act (CEQA) Guidelines specifies that the focus of the responses to comments must be on the disposition of significant environmental issues. Where the City of Santa Barbara Fire Department's position is at variance with the recommendations and objections raised in a comment, the City of Santa Barbara Fire Department has provided, in detail, reasons why specific comments and suggestions were not accepted. However, Section 15088(c) of the CEQA Guidelines also specifies that the level of detail contained in the response may correspond to the level of detail provided in the comment. Conclusory statements unsupported by factual information will not suffice. A general response may be appropriate when a comment does not contain or specifically refer to readily available information, or does not explain the relevance of evidence submitted with the comment.

GR-5 Determining the Significance of the Environmental Effect. Section 15064 of the California Environmental Quality Act (CEQA) Guidelines provides guidance for determining whether a project may have a significant effect on the environment. Determining whether a project may have a significant impact on the environment is based on substantial evidence in light of the whole record. As noted in Section 15064 of the CEQA Guidelines, "substantial evidence" is defined as facts, reasonable assumptions predicated on facts, and expert opinion supported by facts. Argument, speculation, or unsubstantiated opinion or narrative does not constitute substantial evidence. Some comments assert or request that impacts be considered significant or that significance conclusions in the Draft Program Environmental Impact Report (PEIR) should be revised without supporting substantial evidence in support of the assertion. Where the commenter provides no facts or other substantial evidence to support an assertion that the physical environment could directly or indirectly be significantly impacted as a result of the proposed Community Wildfire Protection Plan, the Final PEIR is not required to consider those unsubstantiated comments. CEQA permits disagreement with respect to environmental issues addressed in an Environmental Impact Report (EIR). As Section 15151 of the CEQA Guidelines states, "[d]isagreement among experts does not make an EIR inadequate, but the EIR should summarize the main points of disagreement among experts. Perfection is not required, but the EIR must be adequate, complete and a good faith effort at full disclosure." Therefore, consistent with CEQA,

Chapter 4, Environmental Analysis, of the Draft PEIR provides an adequate, complete, and good faith effort at full disclosure of the physical environmental impacts based on substantial evidence in light of the whole record, which includes concerns raised during the Notice of Preparation scoping period. Comments made on the Draft PEIR that do not provide substantial evidence for impact conclusions different from those identified in the Draft PEIR will not be addressed further in this Final PEIR.

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Comment Letter 1

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

From: Bob Burtness [REDACTED]
Sent: Tuesday, September 29, 2020 3:14 PM
To: Community Wildfire Protection Plan <CWPP@SantaBarbaraCA.gov>
Subject: "Draft PEIR Comments: CWPP"

EXTERNAL

As a resident of a potentially high wildfire area in Santa Barbara, I am very interested in the proposed CWPP.

1-1

Any such plan must include a provision for prescribed burning. The Indians used it, and some years ago, federal agencies such as the U. S. Forest Service used it to help improve the overall health of our forests.

1-2

While the blame for record setting acreages burned by wildfires in recent years is often directed toward the so called global warming trend, it appears to me that the primary culprits are those individuals and groups against prescribed burning of any type, thus endangering the lives of all living organisms, especially those of our first responders, and property.

Firefighters need every tool available to protect our land, and themselves, from the increasing numbers and scope of these conflagrations. Let us see that they have them.

1-3

Robert A. Burtness
A Riviera Resident and Native Santa Barbaran

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Response to Comment Letter 1

Robert A. Burtness
September 29, 2020

- 1-1 The commenter states interest in the proposed Community Wildfire Protection Plan (CWPP or project) as a resident in a potentially high wildfire area. The comment is noted.
- 1-2 The commenter suggests that prescribed burning should be a component of the CWPP. As described in Chapter 3, Project Description, of the Draft Program Environmental Impact Report (PEIR), prescribed burning is one method that may be employed by the City of Santa Barbara Fire Department (SBFD) to manage fire risk and vegetation. Potential air quality impacts from prescribed burning are assessed in Section 4.2, Air Quality, of the Draft PEIR. Mitigation Measure (MM-)AQ-1 establishes a maximum pile burn size of 5 feet by 5 feet by 5 feet and a maximum of 22 piles of this size in any one day. MM-AQ-2 established requirements for the use of an air curtain burner if the SBFD should implement a prescribed burn.
- 1-3 The commenter states that firefighters need every tool to protect land and themselves. This comment is noted and has been forwarded to the lead agency for consideration. As stated on page 4.15-5 of Section 4.15, Public Services and Utilities, of the Draft PEIR, the CWPP Initial Study determined that implementation of the proposed project would result in less-than-significant impacts with regard to issue areas a, b, c, and f, which address impacts to fire protection. As such, these topics were eliminated from further analysis in the Draft PEIR.

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Comment Letter 2

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

From: Fleurette Janigian [REDACTED]
Sent: Wednesday, September 30, 2020 11:05 AM
To: Community Wildfire Protection Plan <CWPP@SantaBarbaraCA.gov>
Subject: Draft CWPP

EXTERNAL

Dear Ms. Anderson,

I am a homeowner in the riviera in SB and am concerned about the proposed CWPP. It seems that our area will now be labeled as Extremely high fire risk. Why is that? We are below Mission Ridge and just above APS. We have been here 14 years, no fire here. I am concerned about what this will do to our insurability.

Could you explain the reasoning or direct me to whom I may call?

Thank you.

Sincerely,

Flora

Sent from my iPhone

2-1

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Response to Comment Letter 2

Fleurette Janigian
September 30, 2020

- 2-1 The commenter expresses concern with the Community Wildfire Protection Plan's (CWPP) proposed changes to the High Fire Hazard Severity Zone (HFHSZ) designations and the effect on homeowner's insurance. Based on the commenter's property description being between Mission Ridge Road and Alameda Padre Serra, the property is located within the "Foothill" zone of the High Fire Hazard Area mapped under the 2004 Wildland Fire Plan. As described in Chapter 3, Project Description, of the Draft Program Environmental Impact Report (PEIR), the Extreme Foothill and Foothill zones would be renamed Very High Fire Hazard Severity Zones (VHFHSZs), and the Coastal and Coastal Interior would be renamed as HFHSZ. The proposed renaming is in alignment with the National Incident Management System (NIMS) and California Standard Emergency Management System (SEMS) 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). Many of the factors considered in the Wildland Fire Plan and its PEIR have been incorporated into the analysis considered in the proposed CWPP and its Draft PEIR. The proposed CWPP would involve a series of fire risk reduction methods to address development within the City of Santa Barbara, and especially within existing and proposed Fire Hazard Severity Zones. The commenter's property is already located within an area mapped with increased fire hazard risk (i.e., current Foothill zone). Additionally, there is no evidence that any change in insurance rates resulting from the proposed CWPP would affect any physical change to the environment. The California Department of Insurance provides information about insurance rates and can be reached at 800.927.4357.

Please refer to Global Responses GR-1 and GR-2.

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Comment Letter 3

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

From: Rod Keller [REDACTED]
Sent: Friday, October 2, 2020 12:07 PM
To: Community Wildfire Protection Plan <CWPP@SantaBarbaraCA.gov>
Cc: Karen Tyrrell [REDACTED]; John Jostes [REDACTED]; Kimon Rybnicek [REDACTED]; Ann McGorty [REDACTED]
Subject: Draft PEIR Comments: CWPP

EXTERNAL

Table 1-1 Summary of Project Impacts does not include potential financial impacts to families or individuals. Designating areas as High Fire Hazard has the potential of increasing insurance rates to homeowners and renters. Requirements for property and/or vegetation modifications has the potential for financial impacts. Costs to businesses has the potential to be passed on to customers. Costs to the city and/or county has the potential to be passed on to property owners via bond issues. All these potential financial impacts should be included in the PEIR.

3-1
3-2

--
Rod Keller [REDACTED]

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Response to Comment Letter 3

Rod Keller
October 3, 2020

- 3-1 The commenter notes that Table 1-1, Summary of Project Impacts, in Chapter 1, Executive Summary, of the Draft Program Environmental Impact Report does not include potential financial impacts to families or individuals from increased property insurance cost or to property owners and businesses to maintain vegetation on their property. Section 15064(e) of the California Environmental Quality Act Guidelines provides that economic changes resulting from a project are not treated as significant effects on the environment, but may be used to determine if a physical change is significant. There is no evidence that any change in insurance rates resulting from the proposed Community Wildfire Protection Plan would affect any physical change to the environment. See also Global Response GR-1 and Response to Comment 2-1 for responses related to insurance rates and fire hazard zones.
- 3-2 See Responses to Comments 2-1 and 3-1.

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Comment Letter 4

From: JOHN JOSTES [REDACTED]
Sent: Friday, October 2, 2020 2:07 PM
To: Rod Keller [REDACTED]
Cc: Community Wildfire Protection Plan <CWPP@SantaBarbaraCA.gov>; karen tyrrell [REDACTED]; Kimon Rybnicek [REDACTED]; Ann McGorty [REDACTED]
Subject: Re: Draft PEIR Comments: CWPP

EXTERNAL

Rod (and Others) - I agree with you that there will be potential financial impacts to property owners and renters, and possibly businesses as well. I have yet to review the draft PEIR, but plan to do so and circulate my comments to you and others.

4-1

You should also be aware that the City like most other municipalities throughout California do not consider economic or fiscal impacts, just environmental impacts. During my first career as an environmental consultant, I wrote literally hundreds of environmental documents for Santa Barbara, Carpinteria, Ojai, Ventura, and other jurisdictions and none of these agencies considers fiscal impacts in EIRs.

4-2

They do, however, come in to play when a project gets to decision makers such as the Planning Commission or City Council. I'll keep you posted when and after I review the PEIR.

4-3

John

John Jostes

[REDACTED]

On Oct 2, 2020, at 12:07 PM, Rod Keller [REDACTED] wrote:

Table 1-1 Summary of Project Impacts does not include potential financial impacts to families or individuals. Designating areas as High Fire Hazard has the potential of increasing insurance rates to homeowners and renters. Requirements for property and/or vegetation modifications has the potential for financial impacts. Costs to businesses has the potential to be passed on to customers. Costs to the city and/or county has the potential to be passed on to property owners via bond issues. All these potential financial impacts should be included in the PEIR.

4-4

--
Rod Keller [REDACTED]

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Response to Comment Letter 4

John Jostes
October 2, 2020

- 4-1 This comment is an introduction to comments to follow. No further response is required.
- 4-2 The commenter correctly states that the City of Santa Barbara Fire Department's environmental analysis does not contain an analysis of financial impacts. Section 4.11, Population and Housing, of the Draft Program Environmental Impact Report (PEIR) notes that there is no evidence that any change in insurance rates resulting from the proposed Community Wildfire Protection Plan will affect any physical change to the environment. Please refer to Global Response GR-2.
- 4-3 The commenter correctly notes that although financial considerations may not be a California Environmental Quality Act consideration, the City Planning Commission and City Council may consider additional factors when making a decision to approve a project.
- 4-4 The commenter states that the summary of project impacts outlined in Table 1-1, Summary of Project Impacts, in Chapter 1, Executive Summary, of the Draft PEIR does not include financial impacts. Please refer to Responses to Comments 3-1 and 4-2 and Global Response GR-2.

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Comment Letter 5

From: David Trandal [REDACTED]
Sent: Monday, October 5, 2020 2:09 PM
To: Community Wildfire Protection Plan <CWPP@SantaBarbaraCA.gov>
Subject: Re: CWPP Public Draft PEIR Now Available

EXTERNAL

Amber,

I was wondering if you could clear up a little confusion I had in reading the Environmental review report issued last week. In the review it appears that the Vegetation Management Unit (VMU) Alternative appears to be a superior alternative to the original proposal. With respect to the VMU proposal, the document states in the VMU alternative that "... the Foothill and Extreme Foothill Zones" would be renamed as the City's Very High Fire Hazard Severity Zone VHFHSZ." However, in the visual description shown in Figure 6-1 [page 525, section 6.4] the proposed "Foothill" VHFHSZ in the CWPP are not included in Figure 6-1. Can you explain this discrepancy? If this doesn't make sense, do you have a moment for a brief call?

5-1

Best Regards,

David Trandal

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Response to Comment Letter 5

David Trandal
October 5, 2020

- 5-1 The commenter notes that Figure 6-1, Vegetation Management Unit Alternative, in Chapter 6, Alternatives, of the Draft Program Environmental Impact Report (PEIR) includes the proposed vegetation management units but appears to be missing the proposed “Foothill” Very High Fire Hazard Severity Zone (VHFHSZ) on the figure. As discussed in Section 6.4, Alternatives Carried Forward for Consideration, of the Draft PEIR, the City of Santa Barbara Fire Department evaluated two alternatives: the No Project Alternative and the Vegetation Management Unit (VMU) Alternative. The VMU Alternative assumes that the existing City of Santa Barbara (City) High Fire Hazard Area (HFHA) would be consolidated and renamed such that the Foothill and Extreme Foothill Zones would be renamed as the City’s VHFHSZ, and the Coastal and Coastal Interior Zones would be renamed High Fire Hazard Severity Zone (HFHSZ). However, no expansion or other changes to the boundaries of the HFHA would occur. The VMU Alternative would also add new VMUs within the consolidated HFHA. No changes to the Community Fuels Treatment Network would be made under this alternative. Given that no expansion is proposed under the VMU Alternative, Figure 6-1 correctly shows only the existing Extreme Foothill, Foothill, Coastal, and Coastal Interior zones and proposed VMUs.

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Comment Letter 6

From: Claudia Lapin [REDACTED]
Sent: Saturday, October 3, 2020 12:47 PM
To: Community Wildfire Protection Plan <CWPP@SantaBarbaraCA.gov>
Subject: Draft PEIR Comments CWPP

EXTERNAL

I have a few concerns about the uneven application of the law concerning ADUs. I believe SB has overstepped its authority in an overt attempt to defeat the purpose of the state mandate to fast-track more housing. I filed a complaint in Sacramento at the Department of Housing so stating, and they have taken an interest in the outcome of my ADU permit, recently approved.

6-1

My neighbor and I are among the last to receive our permits in the newly-banned area. He does not have to widen his driveway, nor did he have to adhere to 500' from nearest fire hydrant. We are both building at the same level, one property apart. I had to widen my driveway to 16 feet and install a hydrant.

6-2

I continue to believe you have no right to the jurisdiction you claim over who may do what with his property: how do you differentiate between evacuating a large home with many bedrooms, or a smaller one with an ADU? What is the basis upon which you make your decrees?

6-3

The difficulty of building in SB is legendary. It's a system guaranteed to drive everyone crazy and prevent people from satisfying their proper desires to build or add on, not to mention it prevents more available rentals. And stops people from working.

6-4

Isn't it time the building process became more user-friendly? Shouldn't the city be more forward-thinking, like San Jose to the north, lending its constituents money to build???

6-5

Sincerely,

Claudia Lapin

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Response to Comment Letter 6

Claudia Lapin
October 3, 2020

- 6-1 The commenter states a concern that the City of Santa Barbara (City) is unevenly applying law related to accessory dwelling units (ADUs). In November 2020, City Council approved amendments to the ADU Ordinance to allow several specific types of ADUs,² described in Santa Barbara Municipal Code Title 30 as “Special” ADUs, in all areas of the City, including Fire Hazard Severity Zones. Larger detached ADUs and ADUs attached to the primary unit in the Foothill and Extreme Foothill areas (proposed Very High Fire Hazard Severity Zone), described in Title 30 as “Standard” ADUs, are prohibited, but all other “Special” ADUs are permitted consistent with state law. The applicable circumstances related to the permit process for the commenter’s ADU are outside the scope of this Final Program Environmental Impact Report (PEIR).
- 6-2 The commenter states that their proposed ADU required driveway widening and installation of a fire hydrant, but a neighbor was not subject to the same requirements. The applicable circumstances related to the permit process for the commenter’s ADU are outside the scope of this Final PEIR.
- 6-3 The comment states that the City is overreaching its jurisdiction with regard to property rights and ADUs. The City’s police powers are established by the California Constitution and applicable law. The comment is outside the scope of this Final PEIR.
- 6-4 The comment states that the City’s building permit process is challenging and obstructionist. The comment is outside the scope of this Final PEIR.
- 6-5 The comment encourages the City to make the building permit process more user-friendly. The comment is outside the scope of this Final PEIR.

² The ADUs allowed are a maximum of 800 square feet, 16 feet high for a detached unit or conversions of existing accessory structures to ADUs.

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Comment Letter 7

Living on Coyote Road, at the outer boundary of the city, I appreciate and participate in the city's annual brush clearing efforts. Being on the boundary line between the city and Montecito, it is clear the city programs encourage more brush clearing and participation in fire safety activities by residents. Sadly my Montecito neighbors' property rarely has trees trimmed or brush cleared.

7-1

Michele

[REDACTED]

Received 9/29/2020 through website

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Response to Comment Letter 7

Michele Humboldt
September 29, 2020

- 7-1 The commenter's property is located in an area in proximity to the County of Santa Barbara jurisdictional limits and within the Montecito Fire Department service area. The commenter expressed concern about neighboring property vegetation maintenance. Although the City of Santa Barbara Fire Department (SBFD) does not have authority outside of City of Santa Barbara boundaries, the SBFD maintains open communication and coordination with all adjacent fire management agencies. The commenter may wish to contact the Montecito Fire Department directly at 805.969.7762.

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Comment Letter 8

I cannot tell from your maps whether my house will be in a high fire danger area. On some maps Garden Street is not even shown. I am at [REDACTED] Garden Street

8-1

I am currently NOT in a high fire danger area

8-2

Will this change?

Steve Forsell

[REDACTED]

Received 9/29/2020 through website

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Response to Comment Letter 8

Steve Forsell
September 29, 2020

- 8-1 The commenter requests additional information to identify whether his home will be within a Fire Hazard Severity Zone (FHSZ). During development of the Community Wildfire Protection Plan (CWPP), the City of Santa Barbara Fire Department developed an online map so community members could determine whether their property is currently in an FHSZ or would be located in an area proposed to be added to an FHSZ. The map can be accessed via the CWPP website (<https://cwpp.santabarbaraca.gov/maps-and-downloads/>) and allows users to query a specific property address.
- 8-2 The address provided by the commenter is not currently within an FHSZ and is not within an area proposed to be added as an FHSZ.

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Comment Letter 9

I live in the interior coastal zone. 30 to 50 feet of brush clearance may be adequate. But what about trees. My property is surrounded on three sides by unkept, unmanaged huge old eucalyptus just outside the 50 feet boundary.

9-1
9-2

Eucalyptus represent a huge fire danger within the city- there is no plan to manage or eradicate them?

Kate Samsa



Received 9/29/2020 through website

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Response to Comment Letter 9

Kate Samsa
September 29, 2020

- 9-1 The commenter lives within an area currently designated as Coastal Interior Zone (proposed High Fire Hazard Severity Zone). The commenter expresses concerns about tree maintenance. The City of Santa Barbara Fire Department (SBFD) performs routine defensible space inspection at the request of a property owner. In the event that certain trees, such as eucalyptus, pose a potential fire hazard risk, the SBFD may require the property owner to address the potential fire hazard. All applicable laws and regulations would apply to individual property owners, such as the obligation to comply with the Migratory Bird Treaty Act and potentially conducting nesting bird surveys, among other biological resource evaluations.
- 9-2 The commenter notes that eucalyptus trees represent a fire danger within the City of Santa Barbara. The SBFD concurs that eucalyptus trees create additional fire risk if not properly maintained. The Community Wildfire Protection Plan and Draft Program Environmental Impact Report address defensible space management activities, which may include maintenance of eucalyptus trees. All maintenance activities performed by private property owners and the SBFD need to comply with applicable regulatory requirements, such as avoidance of nesting birds.

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Comment Letter 10

This looks like a thorough plan. However, the definition of the High Fire Hazard Area Zones seems overly conservative. Specifically, the expansion of the Foothill area to its current boundary below APS is no more a wildfire threat than all the way to State Street and makes no sense to me. Please move that back to its prior boundaries (above APS) so that we focus efforts where it's truly most important. The 2020 redrawing of the boundaries appears aimed at limiting ADU's rather than wildfire prevention which undermines the CWPP's credibility.

10-1
10-2

Jorg Heinemann



October 12, 2020

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Response to Comment Letter 10

Jorg Heinemann
October 12, 2020

- 10-1 The commenter provides feedback on the proposed Fire Hazard Severity Zone (FHSZ) boundaries and makes recommendations about where the boundaries should be delineated. Please refer to Global Response GR-1.
- 10-2 The commenter states that the FHSZ boundaries appear to be limiting accessory dwelling units (ADUs). In November 2020, the Santa Barbara City Council approved amendments to the ADU Ordinance to allow several specific types of ADUs,³ described in Santa Barbara Municipal Code Title 30 as “Special” ADUs, in all areas of the City of Santa Barbara, including FHSZs. Larger detached ADUs and ADUs attached to the primary unit in the Foothill and Extreme Foothill areas (proposed Very High Fire Hazard Severity Zone), described in Title 30 as “Standard” ADUs, are prohibited, but all other “Special” ADUs are permitted consistent with state law.

³ The ADUs allowed are a maximum of 800 square feet, 16 feet high for a detached unit or conversions of existing accessory structures to ADUs.

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Comment Letter 11

To effectively and more quickly respond to wildfires, a fire helicopter program must be established WITHIN THE SOUTHCOAST, without reliance on the operations in Santa Ynez, which take 30 minutes, including launch time, to arrive in Santa Barbara's South Coast. During the Jesusita Fire, helicopters did not arrive until 90 minutes after being alerted by local residents, due to operations needed simultaneously away from the South Coast. Once the helicopters did arrive, even from Camarillo as well, the wind speed had grown to over 50 miles per hour, preventing preventative action and enabling the destruction of almost seventy homes. The County does not have the funds for this separate service, yet an effort was made to raise TWO MILLION dollars each year to support a small experienced crew and a helicopter at a polo field in Summerland, to no avail, despite a letter permitting the project by then County Fire Chief Petersen. The Summerland operation would have had launch times within 4-5 minutes and could have been on the fires that caused the debris flows in Montecito in several minutes. Being committed only to the area where donation for the operation were derived, it could have been fully operational and in full service to the South Coast even while the Thomas Fire raged on.

11-1

This service is still available, yet requires an experience-ed fundraising program to pay for the program, unless public funding can support the County Fire Department in this program. Responding 20 minutes sooner to wildfires, then, can be delivered and can create a far more effective first strike on proper notification. One feature of operations would be a trailing truck with water to refill much closer to the site and save many more precious minutes for second and third strikes.

11-2

The bulk of property value and County population lies in the South Coast, making such a service to this area very crucial for the safety and protection, especially when fires are out of range of ground fire equipment and personnel. More is at stake here than money-it means time and inconvenience of many people being forced to live away from home while their homes are being repaired or rebuilt due to fire damage. It means the loss of irreplaceable family treasures, family history and letters, and the loss of loved ones, pets and prized animals.

11-3

For more information on this very strategic program, please contact Lawrence Thompson, Architect, at [REDACTED] or email [REDACTED]

11-4

Note: there re many other potential bases for such an operation.

10/12/2020

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Response to Comment Letter 11

Lawrence Thompson

October 12, 2020

11-1 The commenter notes that a fire helicopter program should be established on the South Coast, without relying on helicopter access in Santa Ynez, California, more than 30 minutes away when including launch time. The commenter also notes that there have been prior fundraising efforts to establish a helicopter crew based in Summerland, California, and that this crew would have been more readily available to respond to emergencies, such as the Thomas Fire and subsequent debris flow.

The City of Santa Barbara Fire Department (SBFD) acknowledges the importance of air operations in addressing a wildfire response. Historically, when a major wildfire occurs in the South Coast area, there are several agencies that respond in a coordinated effort, referred to as mutual aid. Under what is known as the California Master Mutual Aid Agreement, the California Department of Forestry and Fire Protection (CAL FIRE) assists other fire departments within the state when CAL FIRE resources are available, regardless of the type of disaster. In turn, CAL FIRE can access local government fire departments through the same agreement for assistance in wildland fire suppression (CAL FIRE 2020b). Santa Barbara County Fire Department acts as the Operational Area Coordinator for all fire agencies within Santa Barbara County. As the Operational Area Coordinator, the Santa Barbara County Fire Department is an extension of the California Office of Emergency Services and coordinates the statewide response through mutual aid resources, including activating a CAL FIRE response, to all hazards, emergencies, and disasters in cooperation with local, state, and federal fire and rescue agencies (SBCFD 2020).

CAL FIRE's fleet of airtankers, helicopters, and air tactical planes are strategically located at 13 air attack and nine helitack bases statewide, which enables aircraft to reach most fires within 20 minutes. The air tactical aircraft fly overhead and direct airtankers and helicopters to critical areas of the fire for retardant and water drops. Both airtankers and helicopters are equipped to carry fire retardant and water, but helicopters can also transport firefighters, equipment, and injured personnel (CAL FIRE 2017). During high fire activity, CAL FIRE may move aircraft to better provide statewide air support (CAL FIRE 2020b).

Aerial support for a wildfire in Santa Barbara can be mobilized from several locations, including the following:

- Santa Barbara Airport (SBA) provides aerial support by enabling access for helicopters and smaller aircraft.
- Santa Ynez Airport (IZA) is the Santa Barbara County aerial operations base and has two helicopter and small aircraft available. Additionally, the U.S. Forest Service staffs a seasonal wildland firefighting helicopter at this location.
- Santa Maria Airport (SMX) is a U.S. Forest Service Air Attack Base with fire retardant loading equipment and the capability to accommodate Very Large Air Tankers, Large Air Tankers, and Single Engine Air Tankers (NWCG 2020).
- Paso Robles Airport (PRB) is a CAL FIRE Air Attack Base with airtankers and helicopters and retardant fueling capabilities, and with capacity to allow large aircraft, such as a 747, to land and refuel.

The SBFD relies on the Santa Barbara County Fire Department and CAL FIRE for aerial response in an incident. Should funding become available, SBFD would evaluate the option of locating a helitack base in coordination with other fire management agencies and at the direction of the Santa Barbara City Council. This action is outside the scope of this Final Program Environmental Impact Report (PEIR).

11-2 The commenter notes that funding would be required to support an air response with the Santa Barbara County Fire Department to enable a response within 20 minutes. A closer fire operation would potentially enable water trucks to refill fire aircraft more quickly.

The SBFD supports allocating greater funding for aerial efforts. Such a decision would be made by the Santa Barbara City Council and is outside the scope of this Final PEIR.

11-3 The commenter states that the bulk of property value and population is located on the South Coast and therefore emphasizes the need for fire service. The commenter also notes the impact of fire evacuation on communities and loss of loved ones and property.

The SBFD acknowledges the significant hardship faced by those impacted by wildfires. The tragic loss of life from the Thomas Fire and 1/9 Debris Flow in 2018 are emblematic of the threat of wildfires to the community. As discussed in the Draft PEIR, the proposed Community Wildfire Protection Plan (CWPP) is a guidance document intended to provide a comprehensive wildfire management strategy. The SBFD's objectives for the CWPP are stated in Chapter 3, Project Description, of the Draft PEIR and include the following:

- 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 High Fire Hazard Area, 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 Area based on technical data and fire modeling.
- Consolidate and rename City High Fire Hazard Area and severity zones to be consistent with California Department of Forestry and Fire Protection.
- Provide guidance for future vegetation maintenance activities, future roadway access strategies, and development strategies, defensible space, and home hardening within the High Fire Hazard Area.
- Maintain consistency between the Community Wildfire Protection Plan 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 goals and policies of the proposed Community Wildfire Protection Plan.
- 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.

Through implementation of the CWPP, the SBF D seeks to minimize the community impacts due to wildfire noted by the commenter.

- 11-4 The SBF D acknowledges the commenter's contact information and opportunity to discuss a helicopter response program.

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Comment Letter 12a



**SANTA BARBARA
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November 2, 2020

City of Santa Barbara
Planning Commission
c/o Planning Commission Secretary
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PCSecretary@SantaBarbaraCA.gov

Ms. Amber Anderson
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The Santa Barbara Audubon Society (SBAS) would like to thank the City of Santa Barbara’s Fire Department and Planning Commission for this opportunity to comment on the Draft Programmatic Environmental Impact Report (hereafter PEIR) for the City of Santa Barbara’s updated Community Wildfire Protection Plan (hereafter CWPP).

12a-1

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.

SBAS appreciates the large amounts of time and effort that the City and its consultant (Dudek) have devoted to the development of the CWPP and draft PEIR. As noted in SBAS’s comments on the Notice of Preparation (NOP) for the PEIR and the Initial Study (IS), SBAS supports many aspects of the plan, including provisions for structure hardening, fire-resistant building codes, retrofit programs for non-conforming structures, constraints on further development in the Wildland-Urban Interface (WUI), prompt Fire Department responses, warning and evacuation procedures, defensible space standards, educational and outreach programs, reductions in invasive species, and vegetation clearances along roads. SBAS members also greatly appreciated the extensive maps and mitigation measures, particularly MM-BIO 1 – 5, that addressed many of our concerns about the environmental impacts of the proposed CWPP.

12a-2

Below, we provide a list of our suggestions, recommendations, and concerns about the PEIR. This is a summary list for consideration by the Planning Commission. We will send a more detailed letter elaborating on these points to the Santa Barbara Fire Department (SBFD) at a later date.

12a-3

SBAS suggestions, recommendations, and concerns pertinent to the Draft PEIR for the updated City of Santa Barbara CWPP

SBAS suggests that PEIR Sections 4.16 (Wildfire) and Section 4.9 (Land Use and Planning) be merged and moved to near the beginning of the PEIR to provide comprehensive background information and rationales for the CWPP and PEIR.

12a-4

Because the CWPP and its PEIR are updates of the City's 2004 Wildland Fire Plan (WFP) and its associated PEIR, the 2004 WFP and associated PEIR should be provided with the 2020 CWPP and PEIR, either as Appendices or on the 2020 CWPP/PEIR Web site.

12a-5

The PEIR should clarify that the environmental protections and new mitigation measures included in the PEIR apply to all Fire Department activities, including those covered by the 2004 WFP.

12a-6

The PEIR needs to clarify what CLUP provisions apply to areas outside the Coastal Zone. For example, the 2019 CLUP contains provisions for allowing fire management activities in sensitive habitat, but it is not clear if these special dispensations apply to areas outside the Coastal Zone.

12a-7

It is essential that the PEIR includes an evaluation of the environmental impacts of different vegetation management methods (manual, mechanical, grazing, prescribed fire) and best management practices (BMPs). The current PEIR does not include such an evaluation because it maintains these were addressed in the 2004 WFP/PEIR; however, some of these methods (mechanical, grazing) were not listed or covered in the 2004 WFP/PEIR. The exact methods used for vegetation management activities are critical in determining their environmental impacts.

12a-8

The PEIR notes that CWPP policies and actions and the mitigations outlined in the PEIR will cover many Santa Barbara Fire Department (SBFD) fire management activities into the future; however, they also note that specific vegetation management projects may require project-specific EIRs, depending on the nature of the project and the value and amount of natural resources affected. The PEIR should address criteria and protocols for determining if additional EIRs will be triggered by exact projects proposed for specific Vegetation Management Units.

12a-9

Several of the mitigation measures (e.g., MM-BIO 1, 2, and 4) entail conducting pre-work surveys for natural resources, then developing a Work Plan that avoids or minimizes damage to sensitive resources (special status species, riparian habitat, nesting birds). The PEIR should address uncertainties associated with the adequacy and accuracy of surveys (e.g., detection of cryptic species, completeness of inventory) and mitigation measures that not only mitigate impacts at the time of operations, but at other times when habitat alteration may impact migrating or other species. SBAS is concerned about vegetation management impacts on not only resident and nesting birds, but also migratory birds at other times of the year.

12a-10

Mitigation measures and other provisions sometimes include the word “feasible” (e.g., MM-BIO-2 a), such as avoiding sensitive habitat to the extent feasible. The PEIR should define “feasible” and describe the criteria, process, and personnel for determining feasibility.	12a-11
MM-BIO 2 could be reworded slightly to accommodate a nesting period that is slightly longer (beginning in January to include early-nesting raptors) and that standardizes nest avoidance buffers (300’ for passerines, 500’ for raptors).	12a-12
Because of concerns about the possible impacts of the creation and maintenance of defensible space on sensitive habitats and species, SBAS was gratified to see provisions (MM-BIO-3, CWPP action 11.2) for educating property owners about the protection of sensitive habitats and species, including bird protection laws and the need for California Department of Fish and Wildlife (CDFW) Lake and Streambed Alteration Agreements (LSAAs, 1602 permits) for any activity occurring in creeks, their riparian zones, or buffers.	12a-13
SBAS contends that the PEIR needs to address more thoroughly the impacts of noise, and visual and physical disturbance, associated with vegetation management activities on breeding and nesting birds and to propose appropriate mitigation measures for the impacts of these disturbances.	12a-14
Impacts on protected birds can be best effected by avoiding the bird breeding season, so the PEIR needs to more thoroughly assess the impacts of vegetation management activities that occur during the bird breeding and nesting season on birds. Although nesting bird surveys and nest avoidance procedures can ameliorate some of the damage accruing from vegetation management activities, they are not totally effective in mitigating vegetation management impacts on birds, so avoidance of the bird breeding season should be emphasized.	12a-15
The PEIR needs a more complete inventory of the native plant and wildlife species found within the City’s boundaries and there are many possible sources for such information. Effective management of natural resources can only be effected by having a complete inventory of the resources (habitats, species) that are present.	12a-16
Many of SBAS’s concerns revolve around the impacts of vegetation management activities associated with vegetation management units (VMUs) on <u>native</u> habitats, plants, and wildlife. Although we understand the CCWP measures and PEIR analyses associated with invasive annual grasslands and oak woodlands (provided native understory is preserved), we contend that the PEIR’s analysis of the CWPP’s impacts on native shrublands (chaparral, coastal sage scrub) is inadequate. Given their global and regional sensitivity, their support of many native wildlife species, and their importance in supporting the City’s biodiversity, the PEIR should include a much more comprehensive analysis of the impacts of, and mitigations for, CWPP actions in native shrublands.	12a-17
Given the high biological value of some VMUs, such as unit 28 at Parma Park and units 40 – 42 and 44 - 45 in and around Hidden Valley, Elings Park, and Arroyo Burro open space, SBAS	12a-18

questions if these units should be included in the CWPP. VMUs were selected primarily on the basis of fire modeling efforts and it is not clear if other fire management considerations (surrounding land use and defensible space, proximity to fire stations) or environmental values were considered in selecting VMUs. At the least, the exclusion of these VMUs should be considered as part of the Alternatives section of the PEIR. Further, actions in these specific VMUs could trigger project-specific EIRs.

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12a-18
Cont.

Although SBAS appreciates the detailed analysis of CWPP impacts on creeks, riparian zones, and riparian buffers, it is not clear why the PEIR chose a 25' setback from stream banks for analysis when the Santa Barbara Flood Control District (SBFCD) uses 50' setbacks for natural banks and a CDFW LSAA (1602) permit is triggered for activities within 50' of stream banks. The PEIR also provides almost no analysis of the downstream impacts of CWPP actions.

12a-19

The PEIR states that living native vegetation will not be disturbed in sensitive habitat, such as riparian zones, but that dead, dying, and exotic species will be removed. Although we applaud the removal of exotic species, we note that dead and dying vegetation in both riparian and upland areas fulfill important ecological functions, as roosting, resting, nesting, and foraging sites and as habitat for the prey of predatory birds and other wildlife. As a consequence, we recommend that the PEIR suggest using a qualified biologist to determine when and where dead, dying, and downed trees, shrubs, and understory vegetation are removed.

12a-20

The CWPP and PEIR focuses on actions and impacts that affect each major vegetation type separately. The PEIR needs to more thoroughly consider how different vegetation types are intertwined and integrated, so as to provide the critical resources needed by wildlife (e.g., raptors that nest and rest in trees, but forage in grasslands). Impact analysis and mitigation measures also need to determine how management activities in one habitat affect wildlife that use a variety of habitats.

12a-21

SBAS applauds CWPP and PEIR provisions that eschew the use of pesticides, that protect all oak life history stages, that remove or reduce invasive species, and that protect and preserve sensitive habitats and species, including those associated with creeks.

12a-22

Because a number of the VMUs are in or near City parks and open spaces, SBAS is concerned about the impacts of vegetation alteration on recreational activities, such as nature study, bird watching, hiking, walking, and aesthetic enjoyment. This is in addition to the concurrent impacts of vegetation management activities and associated disturbances (noise, physical disturbance, dust) on recreational activities (PEIR Section 4.12).

12a-23

The final discussion of significant and unavoidable biological impacts (Section 5.1) should be expanded, listing all significant and unavoidable impacts and thoroughly examining each in turn. Significant, unavoidable impacts on nesting birds (PEIR p. 4.3-73) need to be thoroughly examined.

12a-24

The alternative to the CWPP is not adequately described or analyzed (PEIR Section 6). The PEIR needs to include a table (e.g., an expansion of Table 3-8) showing exactly how the CWPP and alternative differ and needs to reconcile conflicting information (e.g., compare Tables 3-7 to 6-1). It is difficult to evaluate the relative impacts of the CWPP versus the alternative when the alternative is not clearly described. Further, it would appear that a more environmentally suitable alternative could have been described and evaluated, such as an alternative that excludes VMUs that affect native habitats and sensitive species (see above comments on VMU 28, 40 – 42, 44-45).

12a-25

The PEIR should describe training protocols and programs, and managerial oversight, for SBFDD field crews to insure they are aware of, and abide by, the provisions of the CWPP/PEIR.

12a-26

The PEIR should address post-fire management policies or practices and their impacts on natural resources. These actions could include attempts to replant areas, remove snags and debris, and stabilize slopes, and should include the activities of associated agencies, such as County Flood Control.

12a-27

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

Sincerely,



Katherine Emery, Ph.D.
Executive Director, Santa Barbara Audubon Society

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Response to Comment Letter 12a

Santa Barbara Audubon Society
Katherine Emery, Ph.D.
November 2, 2020

See responses to Comment Letter 12b.

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Comment Letter 12b



**SANTA BARBARA
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November 10, 2020

Ms. Amber Anderson
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The Santa Barbara Audubon Society (SBAS) would like to thank the City of Santa Barbara’s Fire Department (SBFD) for this opportunity to comment on the Draft Programmatic Environmental Impact Report (hereafter PEIR) for the City of Santa Barbara’s updated Community Wildfire Protection Plan (hereafter CWPP).

12b-1

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.

SBAS appreciates the large amounts of time and effort that the City and its consultant (Dudek) have devoted to the development of the CWPP and draft PEIR. As noted in SBAS’s comments on the Notice of Preparation (NOP) for the PEIR and the Initial Study (IS), SBAS supports many aspects of the plan, including provisions for structure hardening, fire-resistant building codes, retrofit programs for non-conforming structures, constraints on further development in the Wildland-Urban Interface (WUI), prompt Fire Department responses, warning and evacuation procedures, defensible space standards, educational and outreach programs, reductions in invasive species, and vegetation clearances along roads. SBAS members also greatly appreciated the extensive maps and mitigation measures, particularly MM-BIO 1 – 5, that addressed many of our concerns about the environmental impacts of the proposed CWPP.

12b-2

We sent a summary of our suggestions, recommendations, and concerns pertaining to the PEIR to the City of Santa Barbara Planning Commission and SBFD on Monday, November 2, 2020. In this letter, we elaborate on the points we broached in the Nov. 2 letter, as well as on other issues. This letter, then, constitutes SBAS’s formal comments on the Santa Barbara CWPP PEIR.

12b-3

Organization:

Move Sections 4.16 and 4.9 to near the beginning of the PEIR to provide context.

SBAS suggests that PEIR Section 4.16 (Wildfire) and Section 4.9 (Land Use and Planning) be merged and moved to near the beginning of the PEIR to provide comprehensive background information and rationales for the CWPP and PEIR. SBAS believes that much of the information providing the context and justification for the CWPP and its PEIR is scattered throughout the current PEIR, so the PEIR could be re-organized so that a stronger background for the problems, policies, regulations, ordinances, and laws addressed by the PEIR is provided. In short, we suggest that the introductory parts of Section 4.16 (Wildfire) and Section 4.9 (Land Use and Planning) be combined, then moved to the beginning of the PEIR. Section 4.16 is an excellent overview of current environmental and fire conditions in Santa Barbara, so provides a useful context for justifying an updated CWPP and PEIR, whereas Section 4.9 provides a useful summary of congruence of the proposed CWPP with applicable federal, state, and local laws, regulations, policies, guidelines, and ordinances dealing with fire safety and environmental protections. Together, these sections provide the necessary context, constraints, rules, and policies that guide the rest of the PEIR, so should come near the beginning of the PEIR. SBAS found Section 4.16 to constitute particularly useful background because it stressed the pervasiveness of fire in our local landscapes and the adaptation of native species to natural fire regimes, but then noted how human population expansion, development, and activity in Southern California, particularly at the wildland-urban interface (WUI), has increased fire ignitions and spread. This has led in some cases to shrubland conversion to flammable grasslands with many repercussions for the native fauna and flora.

12b-4

Vegetation management actions should be completed frequently in areas that have already been type-converted to flammable exotic vegetation (annual grassland, introduced weeds). The difference between wildfires versus fire and vegetation management actions is that the local fauna and flora are adapted to and recover from natural wildfire regimes, but their abundances and habitats are altered more-or-less permanently by fire and vegetation management practices. As a consequence, the PEIR needs to examine more thoroughly both the short- and long-term consequences of CWPP provisions and actions for both fire suppression and the protection of environmental values against a backdrop of changing climate.

12b-5

Add tables similar to Table 4.1-3 to all parts of Section 4. Section 4.1 on the aesthetics impacts of the CWPP includes a table (Table 4.1-3) that shows the CWPP's consistency with applicable regulations governing scenic quality. It would be useful and more clear if subsequent parts of Section 4 (4.2 – 4.15, except 4.9, which already addresses policy/regulation consistency with the CWPP) had similar tables. Although consistency with policies and regulations are addressed in the text, such tables would provide a succinct summary of the relevant policies and regulations for each part of Section 4, and discussion of the CWPP's consistency with those policies and regulations.

12b-6

Include the 2004 Wildland Fire Plan, its Appendices, and its PEIR in the materials for this CWPP/PEIR. The CWPP and PEIR state that this 2020 CWPP and associated PEIR are updates, expansions, and extensions of the City's 2004 Wildland Fire Plan (WFP, re-designated as the City's CWPP in 2011). As such, then, the package for the 2020 CWPP and PEIR should include the 2004 WFP, its Appendices, and its PEIR, either as Appendices or on the Web site for the 2020 CWPP.

12b-7

General Clarifications and Comments

Clarify that the mitigation measures and environmental safeguards included in the PEIR are applicable to all Fire Department vegetation management activities. The PEIR should clarify that the environmental safeguards and mitigation measures described in the PEIR are applicable to all Fire Department fire management activities, regardless if areas are covered by the 2004 WFP/PEIR or by this updated 2020 CWPP/PEIR. It would be difficult to conceive how the Fire Department would have one set of methods and mitigation measures for lands managed under the 2004 WFP and another set for those contained in the updated 2020 CWPP. For cohesive planning, actions, and communication, it is important that the 2004 WFP and 2020 CWPP are totally merged, and that any additional environmental protections and mitigations contained in the 2020 CWPP apply equally to lands managed under the 2004 WFP. The PEIR, itself, indicates that the 2020 CWPP and its EIR apply to all lands subjected to SBFD management activities as indicated by PEIR considerations of greenhouse gas emissions and tribal consultation dictated by new laws and policies, which would be applicable to all lands managed or affected by the SBFD. We assume that this issue is covered by MM-BIO-6 (CWPP Appendix E Update), but this and its applicability to other parts of Section 4 and to lands managed under the 2004 WFP, should be clarified.

12b-8

Clarify if the City's Coastal Land Use Plan (CLUP) applies to areas outside the Coastal Zone. For example, the CLUP includes special exceptions or dispensation to environmental protection policies for fire management activities in the Coastal Zone (CLUP 4.1.6 G, 4.1.17, 4.1-21); however, it is not clear if these exceptions apply outside of the Coastal Zone and the GP is largely silent about these special fire management dispensations. Table 4.9.4 should contain a list of all provisions that relate fire and vegetation management exceptions to environmental protections, such as the CLUP provisions listed above. In general, SBAS would like the PEIR to clarify how the City Local Coastal Program (Coastal Land Use Plan (CLUP)) and City General Plan (GP) provisions dovetail when it comes to fire safety and environmental protection policies. The PEIR flips back and forth between GP and CLUP provisions so it is difficult to tell which is applicable to a given situation. The PEIR needs to clarify the applicability of CLUP and GP policies to different areas and situations and indicate if City practice follows one set of plan policies when the other plan is silent about such policies.

12b-9

An evaluation of the environmental impacts of different vegetation management methods is essential. The current PEIR does not include such an evaluation because it maintains these methods were addressed in the 2004 WFP/PEIR. There are a number of problems, however,

12b-10

with this claim. First, the 2004 WFP and PEIR include sections on the use of pesticides in vegetation management, yet the 2020 CWPP eschews the use of pesticides in vegetation management, concordant with the City's Integrated Pest Management Strategy. This indicates that management methods are being reconsidered in this 2020 CWPP and PEIR. Second, the 2020 CWPP and PEIR list four vegetation management methods, including manual, mechanical (mowing, masticating, felling, yarding), biological (grazing), and prescribed fire methods; however, the 2004 WFP does not mention biological or many mechanical methods (e.g., mastication), focusing only on manual and prescribed fire methods. The methods used for vegetation management are critical in determining their environmental impacts, so the PEIR is inadequate if it does not reconsider vegetation management methods, as indicated in the letters on the NOP and IS submitted by the California Department of Fish and Wildlife (CDFW) and SBAS. SBAS's concerns in this realm relate to the environmental impacts of heavy machinery, such as masticators and bulldozers, which create and exacerbate environmental problems related to the exposure of soils, increased erosion, decreased shading, and habitat destruction with many effects on wildlife. SBAS also has concerns about grazing impacts on natural resources, but much depends on the identity, densities, rotations, durations, timing, monitoring, and oversight of grazing activities. Although the PEIR refers to best management practices (BMPs) for the use of heavy machinery (e.g., avoiding steep slopes and sensitive habitat) or grazing (e.g., fencing) for vegetation management, we could find no information on BMPs for these activities in the CWPP, its EIR, the 2004 WFP, or its associated EIR.

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12b-10
Cont.

It also is not clear why some heavy machinery methods, such as mastication, are listed in the CWPP and PEIR, because these appear to be seldom used by the SBFD. Grazing methods, associated BMPs, and their impacts have not been adequately evaluated in any of the CWPP or PEIR documents we have examined. Nevertheless, grazing activities are already occurring in or near Elings and Skofield Parks and in lower Rattlesnake Canyon, below St. Mary's Seminary. We are especially concerned about grazing impacts on sensitive habitat and species, such as impacts on riparian vegetation, creek beds, native understory vegetation, and shrublands (see Santa Barbara General Plan ER 12.4). Although the PEIR mentions using fencing to keep grazers (goats, sheep) out of sensitive areas, the protocols for determining if fencing is needed or not are not delineated. The PEIR needs to examine the use of grazing methods, their environmental impacts, and suggested mitigations or BMPs for their use.

Criteria, processes, and protocols for determining when project-specific CEQA reviews or EIRs are needed. 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. The PEIR does note that CWPP policies and actions and the mitigations outlined in the PEIR will cover many

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12b-11

SBFD fire management activities into the future; however, it also notes that specific vegetation management projects may trigger a project-specific CEQA review, depending on the nature of the project and the value and amount of natural resources affected. The PEIR should address criteria and protocols for determining if a detailed CEQA review will be triggered by specific projects proposed for specific Vegetation Management Units, particularly because the scope of the PEIR is not fully defined (i.e., does not entail the application of specific methods to an area with specific environmental characteristics).

12b-11
Cont.

Selection of, and justification for, new vegetation management units (VMUs) proposed in the CWPP. The selection of new VMUs was based primarily on FlamMap modeling and additional technical information, such as fire station response times (< or > 4 minutes). It is not clear whether other factors, such as surrounding land uses, the amounts of nearby private defensible space, and land use fragmentation, as well as the environmental values of lands affected by vegetation management actions, were considered in selecting and justifying new VMUs. Given the high biological value of some VMUs, such as unit 28 at Parma Park and units 40 – 42 and 44 - 45 in and around Hidden Valley, Elings Park, and the Arroyo Burro open space, SBAS questions if these units should be included in the CWPP. Even if we accept the results of the fire modeling efforts (Figure 12), it is not clear why some units (such as VMU 45 = Hidden Valley Park, part of 44, and 42) were included as new VMUs because the fire modeling maps indicate little fire risk in these areas. The fire modeling also used only a very restricted set of fire weather parameters, although wind patterns are a dominant driver of fire spread, and did not consider the continuity or contiguity of model grid cells in promoting fire spread. Finally, it is not clear why the fire modeling efforts were not extended to examine the effects of climate change on fire risk maps, particularly given the long life of this plan, or why fire modeling was not run to examine fire patterns with the proposed VMUs in place. In short, the selection and justification of new VMUs were based too narrowly on fire modeling efforts with many assumptions, some of the selected VMUs (e.g., 45) did not follow from the fire modeling efforts so probably should not have been selected, ecological values of parcels were not considered in selecting VMUs, and the City and its consultant could have used the fire models to predict the impacts of proposed vegetation management activities and the effects of climate change on fire risk. The PEIR also should address criteria and protocols for determining if additional EIRs will be triggered by exact projects proposed for specific VMUs.

12b-12

Evaluation of the adequacy and completeness of biological surveys and of the effectiveness of mitigation measures. Several of the mitigation measures (e.g., MM-BIO 1, 2, and 4) entail conducting pre-work surveys for natural resources, then developing a Work Plan that avoids, protects, or mitigates damage to sensitive habitats and species (special status species, riparian habitat, nesting birds). The PEIR should address uncertainties associated with the adequacy and accuracy of surveys (e.g., detection of cryptic species, completeness of inventory) and mitigation measures that not only mitigate impacts at the time of operations, but at other times when habitat alteration may affect migrating or other species. The effectiveness of this survey and work plan approach will depend on the intensity, duration and extent of pre-project

12b-13

surveys, the accuracy of such surveys in determining the presence of specific species, and the reliability of projected impacts of CWPP actions on species using an area now and in the future. SBAS is concerned about vegetation management impacts on not only resident and nesting birds, but also migratory birds at other times of the year. In some cases, given the limited or uncertain data or analyses, SBAS felt that the PEIR was remiss in concluding less than significant impacts on some environmental resources.

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12b-13
Cont.

Define and include criteria and processes for determining feasibility. Mitigation measures, the alternative programs, and other provisions sometimes include the word “feasible” (e.g., MM-BIO-2 a) or feasibility, such as ‘avoiding sensitive habitat to the extent feasible’. The PEIR should define “feasible” and describe the criteria, process, and personnel for determining feasibility.

12b-14

Bird protections

SBAS greatly appreciates that the PEIR comprehensively addresses both federal (the Migratory Bird Treaty Act, MBTA) and state [California Dept. of Fish and Wildlife (CDFW) Codes 3503, 3503.5, 3505, 3513] statutes that collectively protect migratory birds, raptors, their nests, and eggs. SBAS also was gratified to see provisions (MM-BIO-3, CWPP action 11.2) for educating property owners about the protection of sensitive habitats and species, including bird protection laws and the need for California Department of Fish and Wildlife (CDFW) Lake and Streambed Alteration Agreements (LSAAs, 1602 permits) for any activity occurring in creeks, their riparian zones, or buffers.

12b-15

Slight changes to MM BIO-4. Mitigation Measure (MM) BIO-4 includes a detailed protocol for addressing bird protection practices, including avoiding the nesting season (February 1 through August 31) and, if that cannot be accommodated, conducting timely professional surveys in areas 500 feet from vegetation management activities and avoiding nests when they are found. SBAS might offer a few minor suggestions about these protocols. First, as indicated in the NOP/IS letter from CDFW, raptors may nest as early as January so the breeding and nesting season may last from January to September. Secondly, if nests are found, MM BIO-4 states that the buffer around nests can be up to 300’ for passerines and up to 500’ for raptors; however, we recommend that the phrase “up to” be eliminated. This could be reworded as buffers around nests should be set at 300’ for passerines and 500’ for raptors, unless greater or lesser distances are deemed appropriate by a qualified biologist. In short, MM-BIO 4 could be reworded slightly to accommodate a nesting period that is slightly longer (beginning in January to include early-nesting raptors) and that standardizes nest avoidance buffers (300’ for passerines, 500’ for raptors).

12b-16

Analysis of, and mitigations for, the impacts of noise, visual stimuli, and physical disturbance on nesting birds. SBAS contends that the PEIR’s analysis of human activity and noise impacts on birds is inadequate. In this and other analyses, the PEIR assumes that the impacts of temporary vegetation management activities on birds or other wildlife will have no long-term effects,

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because these activities are very brief or conducted at times when birds or other wildlife are inactive. In fact, breeding and nesting birds are very sensitive to noise and physical disturbances, which may disrupt their breeding and nesting activities, sometimes causing them to abandon nests. As a consequence, special provisions must be enacted to prevent the disturbance of birds and wildlife by noise or physical interference, primarily by restricting any vegetation management activities to the non-breeding season, by installing temporary sound and visual barriers, and by adequately training crews to observe protocols that minimize noise and physical disturbance.

12b-17
Cont.

Need for professional experts, primacy of avoiding the bird breeding and nesting season, further analyses of vegetation management activities that coincide with the bird nesting season. Because bird nests are very difficult to locate, it is essential that any bird surveys be conducted by professional, qualified biologists. Even then, nests are sometimes missed. The safest bird protections, then, require restriction of vegetation management activities to the non-breeding season. What the PEIR does not adequately address, however, is management activities (e.g., grazing, mowing) that coincide with the bird breeding and nesting season and their impacts on birds. The pervasive influence of vegetation management activities on birds and their cryptic nests has resulted in the PEIR concluding that cumulative CWPP impacts on nesting birds will be significant and unavoidable. These significant, unavoidable impacts on nesting birds need to be thoroughly discussed.

12b-18

Complete inventory of the native plants and wildlife occurring within the City's boundaries. The PEIR needs a more complete inventory of the native plant and wildlife species found within the City's boundaries, not just special status species. Effective management of natural resources can only be achieved by having a complete inventory of the resources (habitats, species) that are present. Further, federal and state laws protect most native bird species, so a complete list of bird species is needed to inventory and protect them fully. In SBAS's comments on the NOP/IS, we suggested that the PEIR architects consult with local sources, such as 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 other local databases and literature (e.g., SBAS's Breeding Bird Study and UCSB's Cheadle Center for Biodiversity and Ecological Restoration records) in developing more complete lists of native species within the City's boundaries. It is surprising that the PEIR did not reference or use the plant and animal lists contained in the City's Creek Division's annual biomonitoring reports. The PEIR lists of sensitive species are incomplete and the PEIR contains no complete lists of native species. Given that the 2004 WFP and its PEIR are the foundation for this 2020 CWPP and PEIR, the 2004 WFP more completely lists sensitive species in numerous City locations, including within VMUs, compared to the 2020 PEIR. Further, SBAS members have, for example, recent records of California newts in City streams above Highway 192 and sightings of White-tailed Kites in Parma Park.

12b-19
12b-20

Ambiguities in the Wildlife Habitat Map and omissions in the Wildlife Movement Corridor Map. It is not clear what data or information were used to construct Figures 4.3-1 and 4.3-5 and what some of the designations in Fig. 4.3-1 mean. Figure 4.3-1 shows Important Wildlife Areas, Waterfowl and Woodland Birds, Aquatic Habitat, Shorebirds, and Riparian Bird Habitat Areas, but nowhere are these designations defined, explained, or discussed. Figure 4.3-5 omits important wildlife movement corridors, such as Parma Park itself.

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Impacts on habitat and migration corridors

SBAS contends that the protection of birds, other wildlife, their habitats, and their migration corridors depends critically 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. SBAS is concerned that the CWPP calls for adding 675 acres of new Vegetation Management Units (VMUs) to the previous WFP/CWPP.

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12b-21

Inadequate analysis of CWPP environmental impacts on native shrublands (chaparral, coastal sage scrub). Although we generally agree with the CWPP measures and PEIR analyses associated with invasive annual grasslands and oak woodlands (provided native understory is preserved), we contend that the PEIR’s analysis of the CWPP’s impacts on native shrublands (chaparral, coastal sage scrub) is inadequate. Coastal sage scrub is a rare and dwindling vegetation formation, which deserves special consideration in planning efforts. The City’s GP Policy ER12.4 states: “Protect and restore habitat areas for native flora and fauna, and wildlife corridors within the City, including for chaparral, oak woodland, and riparian areas.” SBAS contends that the removal and thinning of chaparral plants violates ER12.4. The PEIR’s Table 4.3-7 states that both chaparral and coastal sage scrub have the potential to be state or globally ranked sensitive communities. Although the PEIR maintains that chaparral and coastal sage scrub will only be considered sensitive communities if they contain sensitive species, overlaying PEIR maps of sensitive plant and wildlife species (Figs. 4.3-2 and 3) onto the vegetation community map (Fig. 4.3-7) indicates that there are a variety of sensitive species within these shrubland communities, which would make them sensitive communities. As a consequence, SBAS contends that the PEIR analysis of CWPP policies and actions pertinent to chaparral and coastal sage scrub, and all the plant and animal species they support, is inadequate. Although detailed vegetation management protocols prescribe a spacing of shrubs at two times their heights, it is not clear how this would affect the health and vigor of these vegetation formations, particularly because chaparral is dense and opening space in these shrublands may encourage the invasion of exotic weeds and grasses. The PEIR should include a much more comprehensive analysis of the impacts of, and mitigations for, CWPP actions in native shrublands, as well as their compliance with City GP policies (ER 12.4).

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12b-22

Tree Protection. The City’s General Plan appears to be internally inconsistent. Very strong tree protection policies are outlined in ER 11.1 and ER 12.4, and the CWPP and PEIR try to ensure that tree protections are integrated into vegetation management activities. As a consequence, GP policy and CWPP actions appear to avoid removal of native trees. On the other hand, GP

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Policy 4.3 (p. 4.1-35) states that any removed trees should be replaced at a minimum 1:1 ratio, but the CLUP indicates much larger ratios for tree replacement (e.g., 10:1 for oaks). The PEIR should reconcile these policies and actions and provide assurances that no native trees will be removed. If trees must be removed, then the PEIR needs to clarify and specify tree replacement ratios. Trees provide habitat and many resources to birds and other wildlife, so tree protection should be a priority. Further, we note that trees may take decades to reach maturity and large sizes, when they provide the greatest number of resources for birds and other wildlife. As a consequence, simply replacing mature trees with seeds, seedlings, or saplings is inadequate in replacing natural resource values. If adequate replacement ratios are observed, then any tree replacement projects must have performance standards to ensure they meet their resource objectives.

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Impacts on wildlife migration corridors. SBAS has concerns about the impacts of vegetation management activities on wildlife migration corridors, such as impacts on vegetation in terrestrial corridors (e.g., Parma Park) and that screens riparian corridors from adjacent human land uses. SBAS does not agree with the PEIR's contention that most wildlife movement occurs in streambeds. Camera trapping shows that wildlife movement occurs along creek beds, riparian zones, and vegetated buffers. SBAS is particularly concerned about restrictions on wildlife movement accruing from vegetation management activities along Arroyo Burro Creek, especially in the Hidden Valley area. We propose that the Hidden Valley VMU be dropped from the CWPP and that VMUs in Parma Park and near the Arroyo Burro Open Space be dropped from the VMU Alternative.

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12b-24

Stream bank setbacks. SBAS does appreciate the detailed analysis of the CWPP's impacts on creeks, riparian zones, and their buffers and the detailed mitigations outlined in MM-BIO-2. Protections of streams, their riparian zones, and buffers can actually constrain fire spread because of a high fuel moisture content. It is not clear why the PEIR specified that work would be avoided within 25' of stream banks, when the Santa Barbara Flood Control District recommends larger setbacks for natural banks (ER21.1c: 50' setbacks from the tops of natural banks) and CDFW LSAA (1602 permit) applications are triggered when work is proposed within 50' of stream banks. Inclusion of 21.5 A of riparian vegetation in VMUs would appear to violate GP and CLUP provisions for the protection and restoration of riparian zones (ER 12.4, ER 12.4d, ER 21).

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12b-25

Downstream impacts of CWPP. Although the PEIR addresses impacts and mitigations for possible CWPP impacts on creeks, their riparian zones, and buffers, little space was devoted to analyzing the downstream impacts of these activities, such as impacts on downstream reaches, wetlands, and estuaries. We assume that these downstream impacts will be analyzed as outlined in MM-BIO-5 (Jurisdictional Waters and Wetlands), although this should be clarified.

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12b-26

Removal of dead, dying, understory, and exotic species. The PEIR states that living native vegetation will not be disturbed in sensitive habitat, such as riparian zones, but that dead, dying, and exotic species will be removed. Although we applaud the removal of exotic species,

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we note that dead, dying, and downed vegetation in both riparian and upland areas fulfill important ecological functions, as roosting, resting, nesting, and foraging sites, as migration corridors, and as habitat and dispersal corridors for the prey of predatory birds and other wildlife. Many of these same considerations apply to native living understory vegetation and we note that GP ER 12.4.b. stipulates that impacts to understory vegetation, soils, and aquatic habitats underneath trees should be minimized. SBAS has concerns that removal of dead brush or snags and native living understory vegetation would have negative impacts on wildlife and their habitats. For assessments of tree health and mortality, we recommend that the PEIR discuss the importance of hiring an arborist for professional tree assessments. We also recommend that the PEIR consider recommending a qualified biologist to determine when and where dead, dying, and downed trees and shrubs, and living understory vegetation, should be removed, considering the impacts of these activities on native habitats and species.

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12b-28

Vegetation mosaics, importance of considering the mixing of vegetation types. The PEIR does not adequately consider the spatial arrangement and interspersions of different vegetation types in analyses, although such considerations are very important to wildlife that often use resources from a variety of habitats, such as raptors that use trees for roosting and nesting and grassland for foraging. The PEIR, then, concentrates too heavily on evaluating CWPP measures and impacts on each vegetation type separately, rather than considering the spatial arrangement, juxtaposition, and integration of different habitats in supporting wildlife populations and movement. The PEIR needs to consider more thoroughly how different vegetation types are intertwined and integrated, so as to provide the critical resources needed by wildlife, and should discuss how management activities in one habitat affect wildlife that use a variety of habitats.

12b-29

Prohibitions on pesticide use, protection of oaks, removal of exotic species, and protection and preservation of sensitive habitats and species. SBAS greatly appreciates that the CWPP and PEIR 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, when they are composed of invasive species. Although discussed above, we emphasize that the literature shows that use of heavy equipment, such as masticators or bulldozers in clearing vegetation and constructing fuel breaks, has negative long-term impacts on birds, other wildlife, and their habitats.

12b-30

CWPP impacts on recreation. Because a number of the VMUs are in or near City parks and open spaces, SBAS is concerned about the impacts of vegetation alteration on recreational activities. Although the PEIR concentrates on the short-term, direct impacts of vegetation management activities on recreation (PEIR Section 4.12), alteration of vegetation by vegetation management work can result in more sustained and long-term impacts on recreational use, including walking, hiking, bird watching, nature study, view sheds, and aesthetic enjoyment. As a consequence, we believe that the analysis of CWPP impacts on recreational activities is inadequate, because it does not consider the impacts of vegetation alteration on recreation.

12b-31

Significant and unavoidable biological impacts. The final discussion of cumulative significant and unavoidable biological impacts (Section 5.1) should be expanded, listing all significant and unavoidable impacts and thoroughly examining each in turn. Significant, unavoidable impacts on nesting birds (PEIR p. 4.3-73) need to be thoroughly explained and discussed.

12b-32

Alternatives (Section 6). The alternatives to the CWPP are not adequately described, justified, or analyzed (PEIR Section 6). CEQA protocols indicate that a range of alternative programs need to be considered and that the reasons for rejection of some alternatives need to be elucidated. The only “alternative program” that was rejected pertained to the use of pesticides, which is a method rather than a plan or action. Beyond the “no project” alternative, only one additional alternative, the VMU Alternative, was considered, which we contend does not represent a range of alternatives. SBAS recommends that the range of alternatives and their analyses need to be expanded, balancing fire risk (based on modeling) with environmental considerations. SBAS suggests that VMU units 28, 43, 44, and part of 40 be deleted from another alternative program beyond the VMU Alternative (see explanation above).

Even when dealing with the described VMU Alternative, the PEIR needs to describe, justify, and analyze the VMU Alternative more completely. The PEIR needs to include a table (e.g., an expansion of Table 3-8) showing exactly how the CWPP and VMU Alternative differ and needs to reconcile conflicting information (e.g., compare Table 3-7 to Table 6-1). The discrepancies in Tables 3-7 and 6-1 are troublesome. The first line (Existing VMU acreage) in both tables presumably refers to current VMUs and should be the same, but they differ in VHFHSZ VMU acreage. The second line represents proposed VMU acreage either under the CWPP (Table 3-7) or the VMU Alternative (Table 6-1), yet a comparison indicates that the proposed VMU acreage is greater under the alternative than under the CWPP, which contradicts what is written in the text and shown in Figure 6-1. Figure 6-1 could be improved greatly by indicating the CWPP VMU areas that are not covered by the VMU Alternative. It is difficult to evaluate the relative impacts of the CWPP versus the VMU Alternative when the alternative is not clearly described.

12b-33

Further, the VMU Alternative appears to primarily differ from the CWPP in that VMUs 42, 44, 45, and 46 in the CWPP were dropped from the VMU Alternative. Because some of these VMUs apparently contain areas at low fire risk based on modeling efforts, they probably should not have been proposed in the CWPP in the first place. Further, the elimination of these VMUs would appear to have little effect on meeting the program’s objectives and at the same time decrease the program’s environmental impacts. As a consequence, we disagree with the PEIR’s contention that because the “VMU Alternative would only partially meet the project objectives identified by the SBFD, it is environmentally inferior to the proposed CWPP”. On the other hand, we agree with the PEIR’s statement that the “VMU Alternative is considered to be the environmentally superior alternative”. SBAS contends that Section 6 on Alternatives is inadequate because it really only considers one alternative that is not adequately described, justified, or analyzed.

Monitoring. We believe that the CWPP and PEIR could be improved greatly by including post-project and post-fire monitoring programs. By monitoring vegetation and wildlife after a vegetation management project, then comparing the results with the pre-project environmental surveys, the City could ascertain if the project was effective and determine its environmental impacts, which also would allow the assessment of the effectiveness of mitigation measures. If any fires occur within the City, then the City could survey vegetation, human structures, and wildlife to determine if vegetation management actions worked as designed, as well as assess the impacts of wildfire on human and natural resources.

12b-34

Training and post-fire management. To ensure that the CWPP's environmental protections and vegetation management are implemented appropriately, the PEIR should describe training protocols and programs, and managerial oversight, for SBFD field crews to ensure they are aware of, and abide by, the provisions of the CWPP/PEIR.

12b-35

Post-fire management policies and practices. The PEIR should address post-fire management policies or practices and their impacts on natural resources. Although CWPP Policies 6.1 to 6.3 deal with post-fire rehabilitation guidelines and their dissemination, the PEIR does not address the environmental impacts of measures intended to prevent post-fire erosion and flooding. The PEIR should describe general post-fire guidelines, such as attempts to replant areas, remove snags and debris, and stabilize slopes, and analyze their environmental impacts, including the environmental impacts of associated agencies, such as County Flood Control.

12b-36

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

Sincerely,



Katherine Emery, Ph.D.

Executive Director, Santa Barbara Audubon Society

Response to Comment Letter 12b

Santa Barbara Audubon Society
Katherine Emery, Ph.D.
November 10, 2020

The Santa Barbara Audubon Society (SBAS) submitted a preliminary letter to the City of Santa Barbara Fire Department (SBFD) on November 2, 2020 (Comment Letter 12a), followed by a second letter on November 10, 2020 (Comment Letter 12b). The SBAS states in the November 10, 2020 letter that “this letter, then, constitutes SBAS’s formal comments on the Santa Barbara CWPP PEIR.” As such, this Response to Comment includes the SBAS November 2, 2020 letter for reference only and formally responds to comments in the November 10, 2020, letter, as directed by the SBAS.

SBFD staff (Amber Anderson) and consultant (Dudek staff Jessica Kinnahan and Scott Eckardt) also virtually met with members of the SBAS (Katherine Emery, Ph.D., and Scott Cooper, Ph.D.), on November 13, 2020, to discuss the November 10, 2020, comment letter.

12b-1 This comment is an introduction by the SBAS to the comments that follow. The comment also provides an overview of the SBAS and its mission. No further response is required.

12b-2 The SBAS acknowledged the effort of SBFD and consultant (Dudek) in development of the Program Environmental Impact Report (PEIR) for the Community Wildfire Protection Plan (CWPP), and supports many aspects of the CWPP, especially contained in MM-BIO-1 through MM-BIO-5 that address many concerns of the SBAS.

SBFD appreciates the acknowledgement and support by the SBAS and its careful consideration and comments on the Draft PEIR.

12b-3 The comment notes that the SBAS provided suggestions, recommendations, and concerns about the Draft PEIR on November 2, 2020, and that the SBAS’s formal comments are now contained in the November 10, 2020 letter.

SBFD appreciates the SBAS’s suggestions, recommendations, and concerns, and acknowledges the SBAS’s statement that the November 10, 2020, contains SBAS’s formal comments on the Draft PEIR. The SBAS’s November 2, 2020 letter (Comment Letter 12a) has been included for reference, and this Response to Comments addresses the formal comments contained in Comment Letter 12b.

12b-4 The commenter suggests that Draft PEIR Section 4.9, Land Use and Planning, and Section 4.16, Wildfire, be merged and moved to near the beginning of the PEIR to provide comprehensive background information and rationales for the CWPP and PEIR. This comment was further clarified in the meeting between the SBAS and SBFD on November 13, 2020, that the background information provided in Section 4.9 and Section 4.16 would be beneficial to incorporate earlier in the PEIR. As stated by the commenter, “SBAS found Section 4.16 to constitute particularly useful background because it stressed the pervasiveness of fire in our local landscapes and the adaptation of native species to natural fire regimes, but then noted how human population expansion, development, and activity in Southern California, particularly at the wildland-urban interface (WUI), has increased fire ignitions and spread.”

SBFD appreciates the positive feedback from the SBAS on the content of Section 4.9 and Section 4.16. As noted by the SBAS, information about background, policies and setting are discussed throughout the PEIR in the respective section applicable to that topic area. Section 4.9, Land Use and Planning, discusses land use consistency between the CWPP and existing General Plan and Coastal Land Use Plan policies. Section 4.16, Wildfire, describes the existing fire setting within the City of Santa Barbara (City) and vegetation types

SBFD has included additional information from Section 4.16 regarding the background and history of wildfire in the City in Global Response GR-1. SBFD believes that the discussion contained in Section 4.9 is adequate and appropriately contained in that section. Furthermore, the general organization of the Draft PEIR and the content within each section is consistent with California Environmental Quality Act (CEQA) Guidelines Appendix G.

12b-5 The commenter notes that vegetation management actions should be completed frequently in areas that already have been type-converted to flammable exotic vegetation (annual grassland, introduced weeds). The commenter states that flora and fauna are better adapted to naturally occurring wildfires rather than prescribed fire and vegetation management. The commenter states that the PEIR needs to examine more thoroughly the short- and long-term consequences of fire suppression and the protection of environmental values against the backdrop of changing climate.

SBFD agrees with the commenter that the effects of climate change are accelerating the frequency and intensity of wildfires. One of the stated objectives of the SBFD's proposed CWPP is to "reduce potential greenhouse gas emissions resulting from a wildfire by reducing vegetative fuel and structural ignition potential." As noted by the California Air Resources Board, "fire also impacts human health and safety, and releases greenhouse gas (GHG) emissions and other air pollutants. The GHGs emitted by fire are carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). Fire releases biomass carbon into the atmosphere in the form of CO₂. Methane is emitted due to incomplete combustion of biomass, and N₂O is a product of combustion. In recent years the frequency and magnitude of wildfires have been prolific across California" (CARB 2020). The California Air Resources Board prepared preliminary acreage estimates and preliminary emission estimates for 2000 through 2019, which are included in Appendix B of this Final PEIR. Based on California Air Resources Board's estimates, the largest amount of acreage burned as of 2019 occurred in 2018 and totaled 1.59 million acres with 45.5 million metric tons of CO₂, 598,000 short tons of PM₁₀, and 507,000 short tons of PM_{2.5} (Appendix B).

SBFD acknowledges that routine maintenance of flammable exotic vegetation should be completed frequently. As discussed in Section 3.4.2, Defensible Space, of the Draft PEIR and as outlined in Chapter 8.04 of the City of Santa Barbara Municipal Code (adopted by Ordinance #5920), all parcels in Fire Hazard Severity Zones (FHSZs) are required to meet City-defined defensible space requirements year-round. Vegetation within defensible space zones must be maintained to create an effective fuel break by thinning dense vegetation and removing dry brush, flammable vegetation, and combustible growth. Defensible space management must be performed by property owners in accordance with applicable regulatory requirements, such as conducting nesting bird surveys. Additionally, MM-BIO-3 requires that SBFD create property owner educational materials (in consultation with a City-qualified biologist) that will be available at the SBFD website and in a printable brochure that advises property owners about regulatory obligations with defensible space and specifying measures that owners should take, such as avoiding bird nests, when performing vegetation management.

SBFD performs vegetation management activities within Vegetation Management Units and City property based on SBFD priorities and available funding. Under the CWPP, activities performed by SBFD under the CWPP would comply with the Project Design Features and best management practices (BMPs) shown in Table 3-11 in Chapter 3, Project Description, of the Draft PEIR. A site-specific biological resources evaluation would be performed in advance of any work occurring, and the recommendations of the biologist would be incorporated into a Work Plan. SBFD would identify invasive exotic plants (such as pampas grass [*Cortaderia* 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 would preferentially remove exotic plants that pose a fire hazard, and generally remove exotic plants in the work area as the opportunity arises.

The SBAS requests consideration of short- and long-term effects related to the CWPP. As described above, SBFD will perform activities under the CWPP in accordance with the Project Design Features and BMPs shown in Table 3-11 of the Draft PEIR and as modified in Chapter 3, Corrections and Additions to the Draft PEIR, of this Final PEIR. These measures, in addition to mitigation measures MM-BIO-1 through MM-BIO-6, address potential short-term effects to flora and fauna. In consideration of long-term effects noted by the commenter, Table 3-11 (page 3-38) of the Draft PEIR has been revised by this Final PEIR to require that SBFD perform an after-action report documenting the site conditions after work is complete. The after-action report will be maintained in a publicly accessible database. Information from the database will be evaluated annually to determine native and non-native vegetation regrowth and measures that have the strongest success in reducing non-native plant regrowth to help inform future SBFD activities.

12b-6 The commenter suggests that a regulatory consistency table, similar to Table 4.1-3 in Section 4.1, Aesthetics, of the Draft PEIR, would be beneficial to add to each section contained within Chapter 4, Environmental Analysis. SBFD appreciates SBAS's input on Table 4.1-3, but as noted by the commenter, each section in the Draft PEIR summarizes the applicable regulations relevant to that particular topic area, and analysis of impacts is addressed in each respective section's Impact Analysis. SBFD, as the lead agency, has determined that the regulatory analysis contained in the Draft PEIR is sufficient.

12b-7 The commenter states that the 2004 Wildland Fire Plan, its appendices, and its PEIR should be incorporated into the materials for the CWPP and made available as an appendix or on the project website. As discussed in Chapter 3 of the Draft PEIR, current activities conducted by SBFD under the 2004 Wildland Fire Plan were analyzed in the PEIR for the 2004 Wildland Fire Plan and were incorporated by reference. The Wildland Fire Plan, its appendices, and its PEIR are available on the SBFD website (<https://www.santabarbaraca.gov/gov/depts/fire/fireplan.asp>). The SBFD concurs with the commenter's recommendation and has added a hyperlink to the CWPP website that connects to the SBFD Wildland Fire Plan website.

The commenter states that the CWPP PEIR should clarify that the environmental protections and new mitigation measures included in the CWPP PEIR apply to all SBFD activities, including those covered by the 2004 Wildland Fire Plan. The SBFD concurs with this comment that the proposed CWPP and its PEIR will supersede the 2004 Wildland Fire Plan and its PEIR. The Project Design Features, BMPs, and mitigation measures contained in the CWPP PEIR will be implemented by SBFD when performing activities subject to the CWPP.

12b-9 The commenter states that the Draft PEIR needs to clarify the applicability of the Coastal Land Use Plan and General Plan to the proposed CWPP and whether the Coastal Land Use Plan applies outside areas of the Coastal Zone.

The policies of the City's certified Coastal Land Use Plan and General Plan apply within the state-designated Coastal Zone boundary established by the California Coastal Commission. Within the Coastal Zone, if there are conflicts between Coastal Land Use Plan and General Plan policies, the policies of the Coastal Land Use Plan take precedence. Outside of the Coastal Zone, only the policies of the City's General Plan apply. The CWPP necessarily incorporates Project Design Features and BMPs within the Coastal Zone that comply with the policies of the Coastal Land Use Plan. The commenter correctly notes that there are differing regulatory requirements for properties within and outside of the Coastal Zone. The CWPP proposes Project Design Features and BMPs (contained in Table 3-11 of the Draft PEIR and as revised in Chapter 3 of this Final PEIR) that account for the regulatory differences between the Coastal Zone and non-Coastal Zone areas of the City.

12b-10 The commenter states that an evaluation of the different vegetation management methods should occur because the Draft PEIR incorrectly states that the 2004 Wildland Fire Plan and its PEIR address these methods. The commenter notes that CWPP and its Draft PEIR list four vegetation management methods—manual, mechanical (mowing, masticating, felling, yarding), biological (grazing), and prescribed fire methods—but that the 2004 Wildland Fire Plan does not mention biological or mechanical methods (e.g., mastication), focusing only on manual and prescribed fire methods. The methods used for vegetation management are critical in determining their environmental impacts, especially related to the use of heavy machinery and concerns about grazing impacts on natural resources. The commenter also states that grazing activities are occurring “in or near Elings and Skofield Parks and in lower Rattlesnake Canyon, below St. Mary's Seminary.”

The CWPP Draft PEIR considers the environmental baseline setting as those set forth in the 2004 Wildland Fire Plan and analyzed in the 2004 Wildland Fire Plan PEIR. According to Section 15125(a) of the CEQA Guidelines, an EIR must include a description of the existing physical environmental condition in the vicinity of a project as it exists at the time when the Notice of Preparation (NOP) is published. This “environmental setting” will normally constitute the baseline condition against which project-related impacts are compared. Therefore, the baseline conditions for the Draft PEIR, unless noted otherwise, are based on conditions that existed in July 2020, when the NOP was published. Additionally, since the NOP was published, no substantial landscape-level changes were found during the desktop analysis or the field work conducted after the NOP was published. SBFDF has been performing vegetation management activities for the past 16 years in accordance with the 2004 Wildland Fire Plan and its PEIR. Where methods differ between the 2004 Wildland Fire Plan and its PEIR and the 2020 CWPP, those impacts are appropriately disclosed and evaluated in the CWPP Draft PEIR.

With regard to the commenter's reference to the use of pesticides, although pesticide/herbicides were described as a potential vegetation management option in the 2004 Wildland Fire Plan and its PEIR, as stated in Chapter 3, Project Description, of the Draft PEIR, historically, SBFDF has not used herbicide for vegetation management. Chapter 6, Alternatives, of the Draft PEIR considered and dismissed the Use of Herbicide Alternative given its inconsistency with the City's Integrated Pest Management Strategy and the demonstrated ability of SBFDF to perform vegetation management without pesticide.

SBFD concurs with the commenter in noting that the CWPP includes four vegetation management methods—manual, mechanical (mowing, masticating, felling, yarding), biological (grazing), and prescribed fire methods—and also correctly notes that the 2004 Wildland Fire Plan did not include certain methods, such as mastication or grazing. SBFD included these vegetation management methods as part of the CWPP as additional strategic options for vegetation management. SBFD evaluates each site requiring vegetation management based on site-specific circumstances. In certain locations, large equipment, such as a masticator, may be the most appropriate method. In other locations, such as where sensitive biological resources may be present, hand tools or other less-intensive methods may be appropriate. In each case, SBFD will implement the Project Design Features and BMPs outlined in Table 3-11 of the Draft PEIR and modified in Chapter 3 of this Final PEIR. A site-specific biological resources evaluation would be performed in advance of any work occurring, and the recommendations of the biologist would be incorporated into a Work Plan. Given that the CWPP is anticipated to guide SBFD fire management activities for many years, and given that the availability of funding often drives how much vegetation management can be performed, it is not feasible for SBFD to determine every activity required or each specific location where activity will occur within this Final PEIR. As discussed in Global Response GR-3, the courts have held that there is no need for a PEIR to contain a site-specific analysis for each contemplated future project (Center for Biological Diversity v. Department of Fish and Wildlife [2015] 234 Cal.App.4th 214). Please also refer to Global Response GR-3.

The CWPP Appendix E, Vegetation Management Standards and Techniques, addresses grazing activities under Section 3.3, Biological. SBFD concurs with the commenter that these measures should be included in Table 3-11, Project Design Features and Best Management Practices, of the Draft PEIR, and has updated Table 3-11 in Chapter 3 of this Final PEIR.

Grazing activities may be regulated on federal land (e.g., Grazing Permits issued by the Bureau of Land Management) and state land (e.g., Permit for Excess Vegetation Removal [i.e., grazing] on State Wildlife Area) but generally not on private property. Grazing is not defined by the Santa Barbara Municipal Code; however, Section 30.185.070, Agriculture, establishes specific regulations for agriculture within the City. Section 30.185.070.G, Vegetation Removal, states that “A Vegetation Removal Permit may be required to prevent erosion damage, reservoir siltation, denuding, flood hazards, soil loss, and other dangers created by or increased by improper clearing activities, pursuant to Santa Barbara Municipal Code Chapter 22.10, Vegetation Removal.” The stated purpose of Chapter 22.10 is “to control the removal of vegetation from hillside areas of the City of Santa Barbara and areas designated as open space in the Open Space Element of the General Plan in order to prevent erosion damage, reservoir siltation, denuding, flood hazards, soil loss, and other dangers created by or increased by improper clearing activities; and to establish the administrative procedure for issuance of permits for vegetation removal (Ord. 4043, 1980; Ord. 3808 §1, 1975).” Section 22.10.040C exempts vegetation removal for fire prevention purposes, as follows:

C. The removal or destruction of vegetation performed, caused to be performed, required to be performed, or approved by a fire prevention agency having jurisdiction including but not limited to weed abatement, clearance around a building or structure, fuel breaks, fire breaks and controlled burns, except that when new construction is proposed in the Hillside Design District and clearance will be required around the new construction under the California Fire Code, a Vegetation Removal Permit shall be required unless the applicant can show that the vegetation removal meets the exception set forth in subsection B above.

The SBFD is aware of the Elings Park grazing activity noted by the commenter but as stated above, the City has no regulatory authority over the action. The SBFD is not aware of the activity performed in Rattlesnake Canyon and if on private property would also have no regulatory authority over the activity. In fall 2020, as noted by the commenter, the SBFD did perform fuels treatment within the Las Canoas Road Vegetation Management Unit at the southern portion of Skofield Park funded through the Wildland Fire Suppression Assessment District (WFSAD) as a maintenance project. Consistent with the 2004 WFP and PEIR, the SBFD performed a biological resources evaluation for the grazing activity. The report is included in Appendix C of this Final PEIR.

With regard to the commenter's statement that the PEIR needs to examine grazing, SBFD has thoroughly and adequately addressed potential impacts related to grazing. Section 4.3, Biological Resources, of the Draft PEIR provided a comprehensive overview of habitat, wildlife species, and plant species throughout the City, and Section 4.3.4, Impact Analysis, discussed potential impacts to habitat modification, and direct and indirect impacts to special-status plant and wildlife species. Additionally, MM-BIO-1 through MM-BIO-6 would reduce potential biological impacts. Notwithstanding, the Draft PEIR determined that these impacts would, over time, contribute to a cumulative impact from past, present, and future projects and actions by public and private parties that result in habitat removal and/or degradation. Most of the City has been developed, and native habitat occurs in fragments on steep slopes, in canyons, in several blocks of habitat in the northern part of the City, and along coastal bluffs and creek corridors. The 2004 Final PEIR (SBFD and CDD 2004) determined that "any future action that continues to reduce or otherwise degrade native habitat would contribute to a past and ongoing significant impact to the biological resources of the City." Therefore, the proposed CWPP would contribute to a past and ongoing cumulative impact to biological resources that would be significant and unavoidable.

- 12b-11 The commenter states that criteria and protocols should be established to determine when a detailed CEQA review will be required. The commenter expresses concern regarding the degree to which the CWPP creates a template for destroying or degrading native vegetation. The commenter notes that 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. The commenter requests that criteria and protocols be established to determine when a detailed CEQA review will be required

The CWPP is a guidance document intended to address the activities of the SBFD for many years. As discussed in Global Response GR-3 and consistent with Section 15168 of the CEQA Guidelines, a PEIR may be prepared on a series of actions that may be characterized as one large project, such as an operations and maintenance program. A PEIR is appropriate for the proposed CWPP because it is a long-term comprehensive fire management program.

As described in Chapter 3 of the Draft PEIR, SBFD will follow the Project Design Features and BMPs set forth in Table 3-11 of the Draft PEIR and as revised in Chapter 3 of this Final PEIR. SBFD will perform site-specific biological resources evaluations prior to performing vegetation management activities. The evaluation will address the occurrence or potential occurrence of sensitive vegetation communities, special-status species, aquatic resources, and nesting birds. Based on the result of the biological resources evaluation, a site-specific Work Plan will be developed. The Work Plan may include measures based on the recommendations of the biological resources evaluation. Furthermore, MM-BIO-1 through MM-BIO-6 address biological mitigation measures.

CEQA and the CEQA Guidelines clearly set forth the regulatory requirements for a lead agency, such as SBFD, to follow when determining the applicable level of environmental review for a project. Activities performed under the CWPP will be evaluated by SBFD, as lead agency, at the time the project is considered according to the PEIR and consistent with the CEQA Guidelines.

Please refer to Global Response GR-3.

- 12b-12 The commenter states that the Draft PEIR does not clearly state the rationale behind why new Vegetation Management Units (VMUs) were selected. The commenter questions if certain VMUs, such as Unit 28 at Parma Park and Units 40–42 and 44–45 in and around Hidden Valley, Elings Park, and the Arroyo Burro open space, should be included in the CWPP.

Please refer to Global Responses GR-1 and GR-3.

- 12b-13 The commenter questions the adequacy and completeness of biological surveys and of the mitigation measures as they relate to the intensity, duration, and extent of pre-project surveys. The commenter states that the PEIR should address uncertainties associated with the adequacy and accuracy of surveys (e.g., detection of cryptic species, completeness of inventory) and mitigation measures that not only mitigate impacts at the time of operations, but at other times when habitat alteration may affect migrating or other species. The commenter expresses concern about the reliability of projected impacts of CWPP actions on species using an area now and in the future.

SBFD acknowledges that there is inherently a degree of uncertainty when performing biological evaluations. Habitats and the wildlife dependent on them are constantly changing based on weather, precipitation, disturbance, human influence, and other factors. These factors are the reason why SBFD performs a site-specific biological resources evaluation prior to performing work, as set forth in Table 3-11, Project Design Features and Best Management Practices, of the Draft PEIR, and as revised in Chapter 3 of this Final PEIR. SBFD then develops a specific Work Plan that incorporates the results of the biological resources evaluation. Certain species, as identified in Section 4.3, Biological Resources, of the Draft PEIR, have been identified within areas of the CWPP, and protocol-level surveys would be required in advance of any work in those areas. Should the biological resources evaluation identify potential sensitive species that may not have already been identified, additional protocol surveys would be required.

The commenter expresses concern about the reliability of projected impacts of CWPP actions on species using an area now and in the future. The Draft PEIR adequately and thoroughly disclosed potential impacts associated with the CWPP. Given that the forecasted time horizon is several years, it is not feasible to address all future impacts and would be speculative to do so. The courts have held that there is no need for a PEIR to contain a site-specific analysis for each contemplated future project (*Center for Biological Diversity v. Department of Fish and Wildlife* [2015] 234 Cal.App.4th 214). If additional CEQA analysis is required for future activities, site-specific surveys and analysis will be conducted, and supplemental CEQA review performed if new or more severe impacts beyond those identified in the PEIR are identified. Please refer to Global Response GR-3.

SBFD concurs with the commenter that there is uncertainty about future impacts on biological resources. Even with implementation of the Project Design Features and BMPs, and application of MM-BIO-1 through MM-BIO-6, SBFD concluded that the CWPP would, over time, contribute to a cumulative

impact to biological resources that would be significant and unavoidable. Please also see Response to Comment 12b-17 and Global Response GR-3.

12b-14 The commenter states that the term “feasible” should be defined and criteria and processes included for determining feasibility with regard to mitigation measures. The commenter specifically refers to Draft PEIR MM-BIO-2a⁴ (the entirety of the mitigation measure which is provided below) regarding a determination of feasibility.

MM-BIO-2 Riparian Protection. Prior to conducting work in a creek, or within ~~25~~ 50 feet of the top of bank, the Sbfd shall consult with a City qualified biologist during the preparation of the site-specific Work Plan to identify methods to achieve the vegetation management without significant impacts to riparian resources. Based on this consultation, the Sbfd shall develop site-specific measures to avoid or reduce impacts to riparian resources. These measures shall include (among others) the following:

- a) **To the extent feasible**, all work near a creek shall be conducted when surface water is absent. *[emphasis added]*
- b) Vegetation shall not be thinned, removed, or pruned, nor shall dead wood be removed, within 25 feet of a creek channel when flowing water is present.
- c) The only plants that can be removed from a creek bed (that is, below the line of the ordinary high water mark) are live or dead eucalyptus trees and dead native shrubs/trees that are deemed to be a fire hazard, and invasive exotics (including, but not limited to giant reed).
- d) Cut stems, tree trunks or other vegetative debris shall not be dragged across a creek bed that contains riparian vegetation, wetlands, or surface water.
- e) No trees shall be felled across a creek while there is flowing water.
- f) No eucalyptus chipping or cut stems shall be left on the creek banks or any upper stream terrace, when present.
- g) Chipped native vegetation shall not be placed on creek banks, unless a qualified biologist determines that placement of the chipping would provide needed erosion protection without an adverse impact on aquatic habitats and water quality in the creek. Native plant chippings can be spread outside the top of bank.

As statutorily defined, “‘Feasible’ means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, social, and technological factors” (PRC Section 21061.1). The CEQA Guidelines further expand on the definition in Section 15364, stating, “‘Feasible’ means capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors” (AEP 2018). Courts have held that CEQA allows a public agency to approve a project with significant effects on the environment provided it finds that economic or other considerations make mitigation measures infeasible and the project’s specific benefits outweigh its environmental effects (see *San Diego Navy Broadway Complex Coalition v. California Coastal*

⁴ As discussed in Response to Comment 12b-31, Sbfd concurs with the commenter’s recommended creek setback of 50 feet, and has modified **Table 3-11**, Project Design Features and Best Management Practices, of the Draft PEIR and incorporated into Chapter 3 of this Final PEIR. MM-BIO-2 has also been modified above to reflect the 50-foot creek setback.

Commission, California Court of Appeal, Fourth Appellate District, Division One, Case No. D072568 [September 27, 2019]).

Out of necessity, SBFD may need to perform vegetation management within biologically sensitive areas to prevent or slow the spread of a wildfire. For example, a wildfire moving through the Santa Ynez Foothills could advance through the Los Padres National Forest and burn toward the City. The Community Fuels Treatment Network (CFTN) located along the northern portion of the Extreme Foothill Zone (proposed Very High Fire Hazard Severity Zone [VHFHSZ]) encompasses 242 acres and provides a break between continuous stands of chaparral fuel outside the City boundary. 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. As shown in Figure 4.3-4, Aquatic Resources, in Section 4.3, Biological Resources, of the Draft PEIR, a riparian corridor associated with San Roque Creek extends within the CFTN and VMUs 23 and 24 near the Lauro Reservoir. In 2009, the Jesusita Fire burned 8,733 acres and destroyed or damaged 80 structures within and near the CFTN and VMUs 23 and 24 (see also Table 3-1, History of Wildfires in the Santa Barbara Area, and Figure 3-2, Fire History in the Santa Barbara Area, in Chapter 3 of the Draft PEIR). Should a wildfire ignite and burn toward or within this area, SBFD may need to establish a fire break or clear vegetation that could be within the riparian corridor when water is present. In such instances, avoiding riparian vegetation when water is flowing would be infeasible. However, the CWPP's specific benefits of fire suppression would outweigh the environmental effects of isolated riparian impacts.

SBFD concurs with the commenter's recommendation to provide greater guidance on the feasibility of an action under the CWPP. Table 3-11, Project Design Features and Best Management Practices, of the Draft PEIR and incorporated into Chapter 3 of this Final PEIR has been modified to include the following Project Design Feature:

Project Design Feature – Feasibility Determination:

- The SBFD will evaluate an action proposed under the CWPP for feasibility at such time as the action is contemplated. Feasibility will be determined based on the ability of the SBFD to accomplish the action in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.

12b-15 The commenter expresses appreciation that the Draft PEIR comprehensively addresses both federal and state statutes that collectively protect migratory birds, raptors, and their nests and eggs; includes mitigation regarding property owner education; and permits for activities near creeks.

SBFD appreciates the acknowledgment from the SBAS.

12b-16 The commenter recommends certain modifications to MM-BIO-4 regarding nesting bird avoidance and survey timing. Specifically, the commenter recommends a nesting period starting in January and standardizing nest avoidance buffers.

SBFD concurs with the commenter's recommendations. Table 3-11 of the Draft PEIR (under the subheading "Nesting Bird Protection") has been revised in this Final PEIR to show the start of the nesting season to be in January (see Chapter 3 of this Final PEIR). MM-BIO-3 (page 4.3-77) of the Draft PEIR has been revised in this Final PEIR to reflect the nesting window from January through September (see Chapter 3 of this Final PEIR).

12b-17 The comment states that the Draft PEIR's analysis of human activity and noise impacts on birds is inadequate.

SBFD disagrees with the SBAS. Section 4.3, Biological Resources, of the Draft PEIR specifically discusses the potential effects of noise and physical disturbance from fuel modification activities, such as from chainsaws or heavy machinery, to disturb nesting special-status bird species, including the fully protected white-tailed kite (*Elanus leucurus*), potentially causing nest abandonment and failure. This mitigation measure has been amplified to also require biological resource evaluations completed in accordance with the CWPP to be available on the SBFD website. MM-BIO-4, Nesting Bird Avoidance, as modified by this Final PEIR (see Chapter 3), requires SBFD to avoid the migratory bird nesting season (typically January through September) to reduce any potentially significant impacts to birds that may be nesting near project sites. If construction activities must occur during the migratory bird nesting season, an avian nesting survey of the project site is required. At any one location, these actions are not expected to cause a significant impact to any biological resources based on the proposed vegetation management methods and BMPs incorporated in the proposed CWPP, and with the incorporation of MM-BIO-1 through MM-BIO-6. However, these impacts would, over time, contribute to a cumulative impact from past, present, and future projects and actions by public and private parties that result in habitat removal and/or degradation. The Draft PEIR concludes that the proposed CWPP would contribute to a past and ongoing cumulative impact to biological resources that would be significant and unavoidable.

MM-BIO-3, Property Owner Education Material, requires SBFD to create property owner educational materials (in consultation with a City-qualified biologist) that will be available on the SBFD website and in a printable brochure that educates property owners about protection measures they can take, such as avoiding bird nests, when performing defensible space and vegetation management.

12b-18 The commenter states that nesting bird surveys should be performed by a qualified biologist, vegetation management should avoid the bird nesting season, and that the pervasive management activities on birds and their nests have been determined by the Draft PEIR to be cumulatively significant and unavoidable and that impacts need to be thoroughly discussed.

SBFD concurs with the SBAS that nesting bird surveys should be performed by a qualified biologist. SBFD also concurs that vegetation management should avoid the bird nesting season. Under SBFD's current practice and consistent with the 2004 Wildland Fire Plan PEIR, a qualified biologist performs a site-specific biological resources evaluation. If nesting birds are observed, work is either delayed until the young have fledged or the biologist establishes appropriate nest buffers to avoid impacts to the birds. As discussed in Chapter 3 of the Draft PEIR and included in Table 3-11, Project Design Features and Best Management Practices, as modified in Chapter 3 of this Final PEIR, a biologist will perform a site-specific biological resources evaluation and develop a Work Plan to address nesting birds. The specific measures to protect nesting birds will be dependent on the species of bird and proximity to the work. Additionally, MM-BIO-4, Nesting Bird Avoidance, as modified in this Final PEIR (see Chapter 3), sets forth the requirements that SBFD must follow when performing vegetation management.

SBFD concurs with the SBAS that biological impacts are cumulatively significant and unavoidable. The Draft PEIR assesses impacts to nesting birds at a level of detail commensurate with a Program EIR. At any one location, actions are not expected to cause a significant impact to any biological resources based on the proposed vegetation management methods and BMPs incorporated into the proposed

CWPP, and with the incorporation of MM-BIO-1 through MM-BIO-6. However, noise and human activity associated with the CWPP will cause impacts that, over time, would contribute to a cumulative impact to biological resources, including nesting birds. The specific impacts to nesting birds will be dependent on the particular species of bird and the proximity to the activity. Given the programmatic nature of the CWPP and timeframe in which activities may occur, it is infeasible to identify specific impacts to nesting birds. Please also refer to Global Responses GR-3 and GR-5.

12b-19 The commenter states that the PEIR needs to include a complete inventory of native plants and wildlife occurring within the City's boundaries by consulting with local sources.

As discussed in Section 4.3.1, Existing Conditions, of the Draft PEIR, a variety of sources were consulted to develop an inventory of plants and wildlife in the City and the proposed CWPP area. These sources include vegetation data, databases of occurrences of special-status plants and special-status wildlife, databases on known aquatic resources, and a variety of Geographic Information System (GIS) data on biological resources maintained by the City. Other sources provided information on local occurrences and status of special-status species. City planning documents also provided information on biological resources in the City and their sensitivity. Among others, the following sources were consulted for describing the existing conditions and potentially occurring sensitive resources (see Section 4.3, Biological Resources, of the Draft PEIR for the full reference of the citations listed here):

- City of Santa Barbara Vegetation data (City of Santa Barbara 2008)
- California Manual of Vegetation Online (CNPS 2020a)
- General Plan, Environmental Resources Element (City of Santa Barbara 2011, which includes the 1979 Conservation Element)
- City of Santa Barbara Local Coastal Program/Coastal Land Use Plan (City of Santa Barbara 2019)
- California Natural Diversity Database (CNDDDB) (CDFW 2020)
- Inventory of Rare and Endangered Plants of California (CNPS 2020b)
- Rare Plants of Santa Barbara County (Wilken 2012)
- Information on Wild California Plants (Calflora 2020)
- National Wetlands Inventory (USFWS 2020)
- National Hydrography Dataset (USGS 2020)
- Birds of Santa Barbara County, California (Lehman 2020)
- Collections and Research Online Databases (SBMNH 2020)
- SBAS's Santa Barbara Breeding Bird Study

As described in Section 4.3.1.3, Sensitive Resources, the Draft PEIR considers sensitive resources to include those described below (see Section 4.3, Biological Resources, of the Draft PEIR for the full reference of the citations provided below):

Special-Status Plants

- Designated as threatened or endangered under the federal Endangered Species Act (ESA) or the California Endangered Species Act (CESA), or that are considered candidates or proposed for listing under the ESA or that are proposed for listing under CESA.

- Considered as candidates or proposed for listing under either the ESA or CESA.
- Designated as having a California Rare Plant Rank of 1, 2, 3, or 4 in the California Native Plant Society's Inventory of Rare and Endangered Plants of California (CNPS 2020b), classified as follows:
 - List 1A: plants presumed extinct in California
 - List 1B: plants rare, threatened, or endangered in California and elsewhere
 - List 2: plants rare, threatened, or endangered in California, but more common elsewhere
 - List 3: Plants about which we need more information – A review list
 - List 4: plants of limited distribution – a watch list
- Considered locally rare due to inclusion on the list in Rare Plants of Santa Barbara County (Wilken 2012).
- Additional species considered rare in the Environmental Resources Element of the General Plan (City of Santa Barbara 2011).

Special-Status Wildlife Species

- Designated as threatened or endangered under the ESA or the CESA, or that are considered candidates or proposed for listing under the ESA or that are proposed for listing under CESA.
- Considered as candidates or proposed for listing under either the ESA or CESA.
- Designated as California Species of Special Concern by the California Department of Fish and Wildlife (CDFW 2019b).
- Additional species considered rare in the Environmental Resources Element of the General Plan (City of Santa Barbara 2011).
- Vertebrate species described as Fully Protected species in the California Fish and Game Code.
- Included on the California Department of Fish and Wildlife Watch List for reptiles and amphibians or birds.
- Designated as Birds of Conservation Concern by the U.S. Fish and Wildlife Service.
- Considered sensitive under the City's General Plan Environmental Resources Element (City of Santa Barbara 2011) or the City's Local Coastal Program (City of Santa Barbara 2019).

Please also see Global Response GR-3.

12b-20 The commenter states that the 2004 Wildland Fire Plan and its PEIR are the foundation for the CWPP and its PEIR and that members of the SBAS have observed California newts and white-tailed kites within the City. The commenter also states that there are ambiguities in the Wildlife Habitat Map and omissions in the Wildlife Movement Corridor Map.

The 2004 Wildland Fire Plan and its PEIR are considered the environmental baseline for the analysis in the CWPP and Draft PEIR. According to Section 15125(a) of the CEQA Guidelines, an EIR must include a description of the existing physical environmental condition in the vicinity of the project as it exists at the time when the NOP is published. This "environmental setting" will normally constitute the baseline condition against which project-related impacts are compared. Therefore, the baseline conditions for the Draft PEIR, unless noted otherwise, are based on conditions that existed in July 2020, when the NOP was published. Additionally, since the NOP was published, no substantial landscape-level changes were found during the desktop analysis or the field work conducted. SBFD has been performing vegetation management activities

for the past 16 years in accordance with the 2004 Wildland Fire Plan and its PEIR. Where methods differ between the 2004 Wildland Fire Plan and its PEIR and this CWPP, those impacts are appropriately disclosed and evaluated in the Draft PEIR. Please refer to Response 12b-19.

- 12b-21 The commenter expressed concern that the CWPP calls for adding 675 acres of new VMUs to the previous Wildland Fire Plan boundaries and that the CWPP creates a template for destroying or degrading native vegetation.

Based on SBF D's in-depth knowledge of the City and comprehensive analysis performed as part of the CWPP and analyzed in the Draft PEIR using in-person field assessments; available GIS data, including structural density and fire response timeframes; industry-standard fire modeling; and baseline data from 2004 and 16 years of additional data from firefighting within the City, SBF D believes that the proposed Fire Hazard Severity Zones (FHSZs) and VMUs have been properly evaluated and accurately mapped. SBF D has incorporated all feasible mitigation measures to reduce potential environmental impacts. SBF D has determined, based on substantial evidence in light of the whole record, that the CWPP's specific benefits with regard to fire prevention and management outweigh its environmental effects. Please also see Response Global Response GR-1.

- 12b-22 The commenter contends that the Draft PEIR does not adequately address impacts on native shrublands (chaparral, coastal sage scrub) and is in conflict with City General Plan Policy ER12.4.

SBF D disagrees with the SBAS. As discussed in Global Response GR-3, SBF D's analysis of the CWPP is programmatic. Section 4.3.1.2, Vegetation Communities and Land Covers, in the Draft PEIR specifically addresses chaparral and coastal sage scrub communities. Furthermore, Table 4.3-1, Vegetation Communities and Land Cover Summaries, in the Draft PEIR provides a specific breakdown of anticipated acreage impacts within the High Fire Hazard Area and VMUs. The estimated total acreage within VMUs for coastal sage scrub is 532 acres and within chaparral is 118 acres (existing and proposed). The commenter states that it is not clear how vegetation management protocols would affect the health and vigor of these vegetation formations, particularly because chaparral is dense and opening space in these shrublands may encourage the invasion of exotic weeds and grasses. As discussed in Chapter 3 of the Draft PEIR and Table 3-11, Project Design Features and Best Management Practices, as modified in this Final PEIR, a site-specific biological resources evaluation would be performed and a Work Plan developed to address potential impacts. Removal of invasive exotic plants is a requirement of the Project Design Features and BMPs.

Finally, as discussed in Section 4.15, Public Services and Utilities, of the Draft PEIR, for VMUs and the CFTN, SBF D is limited in its ability to conduct vegetation management activities due to a number of factors that include physical topography (e.g., terrain and slope), the biological and cultural sensitivity of areas, funding, available work force, and existing workload. As a result, over the course of a 12-year period from 2008 through 2019, SBF D was only able to conduct vegetation management activities on an average of 19.37 acres per year (Anderson pers. comm. 2020) in these areas.

For defensible space within private property, SBF D maintains annual tracking data from 2008 through 2019 for the area of the City within the WFSAD. Available data includes road clearance and vegetation management. The WFSAD includes the Extreme Foothill and most of the Foothill area, which are generally larger lots with more vegetation.

Extrapolating and applying the data to the Coastal and Coastal Interior areas, where parcels are generally smaller and have greater lot coverage (e.g., structures, ornamental landscape, hardscape), the acreage for road clearance and defensible space is assumed to be 50% smaller than within the WFSAD (see Table 4.15-3, WFSAD Totals 2008–2019 and Extrapolated Coastal/Coastal Interior Totals, from the Draft PEIR and provided below for convenience).

Table 4.15-3. WFSAD Totals 2008–2019 and Extrapolated Coastal/Coastal Interior Totals

Category	Acres Total over 12 years	Approximate Annual Average over 12 years	Coastal/Coastal Interior Approximate Annual Average over 12 years (Assumed to be 50% Smaller than WFSAD)
Road Clearance	470	39	20
Defensible Space	163	14	7
Total (acres)	633	53	27

Source: Anderson, pers. comm. 2020

A total of 80 acres annually is assumed to be subject to defensible space or private roadway clearance management. These vegetation management estimates are for the entire CWPP area and could affect different habitat types depending on the location of the activity.

The Draft PEIR incorporates MM-BIO-1 through MM-BIO-6 to reduce project-specific impacts. However, as previously noted, cumulative impacts to biological resources were determined to be significant and unavoidable. Please refer to Response to Comment 12b-27 and Global Response GR-3.

12b-23 The commenter states that there are inconsistencies between the Coastal Land Use Plan and General Plan related to tree protection policies, and that tree replacement plans need to include ratios and performance standards that meet resource objectives.

As discussed in Response to Comment 12b-9, the City’s certified Coastal Land Use Plan and General Plan policies apply within the state-designated Coastal Zone boundary established by the California Coastal Commission. Outside of the Coastal Zone, only the City’s General Plan policies apply. The CWPP necessarily incorporates Project Design Features and BMPs within the Coastal Zone that comply with the Coastal Land Use Plan. Other areas within the City may have differing standards related to tree and vegetation protection due to a variety of factors, such as proximity to creeks and viewshed management. The Coastal Land Use Plan’s larger ratio for oak tree replacement was the result of extensive consultation with the California Coastal Commission for compliance with strong biological resource protection policies of the Coastal Act, and is specifically targeted for mitigation of impacts to Environmentally Sensitive Habitat Areas, wetlands, and creeks.

The commenter refers to the City General Plan Environmental Resources Element Biological Resources Policies ER.11.1, Tree Protection Ordinance, and ER12.4, Native Species Habitat Planning, and Policy 4.3 from the City’s 1979 Conservation Element Visual Resources section. These policies are “Possible Implementation Actions to be Considered,” meaning that they are unfunded future actions that the City may take to achieve its goals and policies.

ER.11.1 focuses on protection of native oaks and other native or exotic trees and preservation of mature healthy native and non-native trees to the maximum extent feasible. SBFDF rarely removes trees or directs trees to be removed, native or non-native, and only does so in circumstances where fire risk outweighs the biological and aesthetic value of the tree. For example, in December 2020, an SBFDF wildland fire specialist conducted a complaint inspection of two properties where mature, healthy non-native pine trees (*Pinus* sp.) were evaluated. In each case, the pine tree had been maintained in accordance with defensible space requirements, and SBFDF required no further action on the part of the homeowner (Anderson pers. comm. 2020).

ER 12.4, Native Species Habitat Planning, is a “Possible Implementation Action to be Considered,” meaning that it is an unfunded future action that the City may take to achieve its goals and policies. It specifically directs the City to consider creating land use/design guidelines for new development to protect wildlife corridors, ensure there is no net loss in riparian habitats, and increase riparian habitat. The City has not yet funded comprehensive native species habitat and wildlife corridor mapping and designation program or land use/design guidelines for new development. Proposed development is screened on a case-by-case basis using the Master Environmental Assessment biological resources map and other sources to evaluate the types of site-specific biological studies and protection measures that may be necessary. The Creeks Division implements the riparian protection and enhancement portion of this implementation action by completing creek restoration projects.

Conservation Element Implementation Action 4.3 focuses on protecting trees for aesthetic values, and directs that major trees removed as a result of development or other property improvement be replaced by specimen trees on a minimum one-for-one basis. Specimen trees are designated by a resolution of City Council. As noted above, SBFDF rarely removes trees or directs trees to be removed, native or non-native, and only does so in circumstances where fire risk outweighs the biological and aesthetic value of the tree.

SBFDF concurs with the commenter that trees provide habitat and aesthetic benefits to the City. As discussed in Global Response GR-3, the analysis provided in the Draft PEIR is programmatic. Site-specific biological resources evaluations will identify specific tree replacement measures for that particular project. A predetermined replacement ratio may not adequately offset the loss of a particular native tree in a certain location, which could be avoided through implementation of site-specific measures developed by the biological resources evaluation and implemented by the Work Plan.

12b-24 The commenter expresses concern with potential impacts on wildlife migration corridors and the loss of vegetation screening for migrating wildlife. The commenter requests removal of the Hidden Valley VMU from the CWPP and Parma Park and Arroyo Burro Open Space VMUs from the VMU Alternative.

Section 4.3.4 of the Draft PEIR discusses wildlife corridors and movement. The City has identified several wildlife movement corridors within the proposed CWPP area (Figure 4.3-5, Wildlife Movement Corridors). The majority of the areas identified as corridors are the major creeks in the proposed CWPP area: Sycamore Creek, Mission Creek, San Roque Creek, and Arroyo Burro. Several tributaries of these creeks in the northern part of the proposed CWPP area also provide wildlife movement opportunities, and portions of Cieneguitas Creek and Barger Canyon in the northwest do as well. Several features near the Pacific Ocean, Honda Valley in the Mesa area and Lighthouse Canyon in the La Mesa Park/Lighthouse Point area, provide wildlife habitat but are isolated from other habitats. Laguna Channel is connected with Mission Creek at East Beach, but is also more or less isolated from other

habitats. Functionally, the City's creeks provide relatively little opportunity for larger terrestrial animals to move between suitable habitat patches. They do provide habitat for medium-sized mammals that allows them to persist in urban parts of the City, and avenues for occasional access to northern parts of the proposed CWPP area for larger animals, such as coyotes (*Canis latrans*), bobcat (*Lynx rufus*), and mule deer (*Odocoileus hemionus*). Some of these species may also reach the more natural areas in the western part of the proposed CWPP area along Arroyo Burro and at Elings Park and the Douglas Family Preserve area. For animals that inhabit the City's creeks and access surrounding, more urban areas, as well as occasional pockets of natural habitats, these areas also provide genetic exchange that promotes healthy, genetically diverse populations. In addition, the intermittent aquatic habitats provide connectivity for aquatic and semi-aquatic species, including the federally endangered southern steelhead (*Oncorhynchus mykiss*), which uses Sycamore Creek, Mission Creek, and Arroyo Burro/San Roque Creek to move between spawning habitats and the Pacific Ocean (National Marine Fisheries Service; 70 FR 52488–52627).

As discussed in Global Response GR-1, the SBFDF carefully evaluated the proposed FHSZs and VMUs and determined that the fire reduction risk through strategic vegetation management is aligned with SBFDF's stated project objectives. The Draft PEIR requires the incorporation of MM-BIO-1 through MM-BIO-6. Notwithstanding, the Draft PEIR determined that cumulative impacts to biological resources would be significant and unavoidable.

12b-25 The commenter states that the 25-foot riparian setback provided by the CWPP may be inconsistent with Santa Barbara County Flood Control District setback requirements, which call for 50 feet from the top of bank.

SBFDF concurs with the commenter's recommendation and has modified Table 3-11, Project Design Features and Best Management Practices, of the Draft PEIR and MM-BIO-2 to incorporate a setback of 50 feet from the designated top of bank of a creek (see Chapter 3 of this Final PEIR).

12b-26 The commenter requests consideration of downstream impacts of activities near creeks and associated riparian zones, and assumes that impacts will be analyzed as outlined in MM-BIO-5 (Jurisdictional Waters and Wetlands).

SBFDF concurs with the commenter's statement that downstream impacts associated with a specific project will be assessed in accordance with MM-BIO-5.

12b-27 The commenter expresses concern about the removal of dead, dying, and downed vegetation, as they fulfill important ecological functions. Implementation of the Project Design Features and BMPs will require a site-specific biological resources evaluation. As noted by the commenter, a biologist will review the project site. If, in the expert opinion of the biologist, there is dead, dying, and downed vegetation that fulfills important ecological functions, the biologist will make recommendations to avoid or minimize removal in accordance with the site-specific Work Plan. SBFDF concurs with the recommendation to have a licensed arborist perform a tree assessment, and has modified Table 3-11, Project Design Features and Best Management Practices, accordingly (see Chapter 3 of this Final PEIR).

12b-28 The commenter recommends hiring an arborist for professional tree assessments and using a biologist to assess the value of dead, dying, and downed vegetation.

SBFD concurs with the commenter. Please see Response to Comment 12b-33.

- 12b-29 The commenter states that the Draft PEIR concentrates too heavily on evaluating CWPP measures and impacts on each vegetation type separately, rather than considering the spatial arrangement, juxtaposition, and integration of different habitats in supporting wildlife populations and movement.

SBFD disagrees with the comment. As discussed throughout Section 4.3, Biological Resources, the Draft PEIR provides a thorough analysis and description of the biological setting within the City and the effects of the CWPP on wildlife populations and movement throughout the City. Wildlife corridors and movement are addressed in Section 4.3.1.3. The Draft PEIR includes a description of vegetation communities and land covers (Section 4.3.1.2) and sensitive resources (Section 4.3.1.3), consistent with the level of detail appropriate for a Program EIR (see Global Response GR-3). Additionally, the 2004 Wildland Fire Plan and consistent with SBFD practice, a mosaic pattern of vegetation management is recommended (pages v-vii of the 2004 WFP).

- 12b-30 The commenter states appreciation for SBFD's decision to eschew pesticide and manual vegetation removal. The commenter reiterates their concern about the use of heavy equipment.

Please see Response to Comment 12b-12.

- 12b-31 The commenter expresses concern about CWPP activities and impacts on recreation, especially in City parks. The commenter also states that the cumulatively significant unavoidable impacts discussion should be expanded, and nesting birds impacts thoroughly explained.

Section 4.12, Recreation, of the Draft PEIR discusses recreational resources within the City and the potential impacts related to the CWPP. As noted in Section 4.12.1, the City's park system is extremely diverse and includes undeveloped parkland, hiking and riding trails, small neighborhood parks, and the broad expanses of open beach and parkland along the City's waterfront. The General Plan identifies eight classifications of park and recreation facilities: neighborhood parks, community parks, regional parks, special use facilities, golf courses, riding and hiking trails, beaches, and bikeways (City of Santa Barbara 2011a). According to the Parks and Recreation Department Resources Inventory, the City contains 60 parks and sports facilities, 1,808 acres of park land, 23,600 street trees, 9,300 trees in parks, and 30,000 trees in open space, in addition to a variety of recreational opportunities such as playgrounds, swimming pools, and beaches (City of Santa Barbara 2017).

The addition of the proposed HFHA and VMUs is based on hazard assessments that identified areas of significant fire hazards based on fuels, terrain, weather, and other relevant factors, as well fire behavior modeling. Since recreational areas in the City consist of a variety of parks, open space areas, hiking trails, creeks, and other natural areas, the presence of flammable vegetation in such areas is not unexpected. The physical effects of the designation of additional HFHA and VMUs that could impact parks and recreational areas are related to vegetation management, such as defensible space, road clearance, and vegetation thinning and removal. The establishment of defensible space on private property would not impact access to recreational areas. Rather, vegetation management in public spaces, such as proposed by the VMUs, would have the greatest potential to impact access to parks and recreation.

However, vegetation management activities would be temporary, and would be repeated periodically when determined necessary by SBF. During ongoing vegetation management activities, the availability of recreational opportunities would be temporarily reduced, and recreation activities would be disturbed in the areas where vegetation management is being conducted. In addition, management 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 recreational areas, such as parks and public trail facilities. However, since vegetation management activities would be temporary, lasting only as long as the vegetation management activities are being conducted, the CWPP would not result in a permanent impact on the availability of parks or recreational areas. Although vegetation management activities would be implemented in some parks and open space areas, it is anticipated that vegetation management would improve park quality and create safer recreational spaces by reducing the risk of wildfire. The occurrence of wildfire in these areas would be detrimental to the availability of park and recreation space.

With implementation of MM-REC-1 (see Section 4.12, Recreation, of the Draft PEIR), vegetation management would not be conducted simultaneously in nearby parks and trails to ensure that at least some recreational opportunities would remain available throughout management activities.

12b-32 The commenter states that the final discussion of cumulative significant and unavoidable biological impacts (Section 5.1, Significant Unavoidable Environmental Impacts, of the Draft PEIR) should be expanded, listing all significant and unavoidable impacts and thoroughly examining each in turn.

The SBF concurs with the commenter that cumulative impacts to biological resources were determined to be significant and unavoidable. The proposed CWPP would result in increases to the FHSZs and VMUs within which defensible space and road clearance would be created and where vegetation management would be conducted. Within these areas, the proposed CWPP would affect vegetation communities and biological habitats (special-status species habitats, wetlands) by thinning native vegetation, pruning oak and other trees, and removing understory plants. At any one location, these actions are not expected to cause a significant impact to any biological resources based on the proposed vegetation management methods and BMPs incorporated in the proposed CWPP, and with the incorporation of MM-BIO-1 through MM-BIO-6. However, these impacts would, over time, contribute to a cumulative impact from past, present, and future projects and actions by public and private parties that result in habitat removal and/or degradation. Most of the City has been developed, and native habitat occurs in fragments on steep slopes, in canyons, in several blocks of habitat in the northern part of the City, and along creek corridors. The 2004 Final PEIR (SBF and CDD 2004) determined that “any future action that continues to reduce or otherwise degrade native habitat would contribute to a past and ongoing significant impact to the biological resources of the City.” Therefore, the proposed CWPP would contribute to a past and ongoing cumulative impact to biological resources that would be significant and unavoidable

With regard to the commenter’s statement that significant unavoidable impacts need to be thoroughly explained and discussed, the Draft PEIR Section 4.3.4, Impact Analysis, evaluates the CWPP based on species guild and habitat type. Vegetation management in privately managed defensible space, roadway clearance within the HFHA, and other activities such as equipment maintenance could potentially impact fish, semi-aquatic reptile and amphibian guild, terrestrial reptile guild, and nesting birds. However, with implementation of MM-BIO-1 through MM-BIO-3, impacts would be reduced to less than significant. However, even with the incorporation of mitigation measures, impacts to nesting

special-status birds would remain cumulatively significant unavoidable, and there are no other feasible mitigation measures. Vegetation management in City-managed VMUs and other activities, such as equipment maintenance, could potentially impact fish, semi-aquatic reptile and amphibian guild, terrestrial reptile guild, and nesting birds. However, with implementation of MM-BIO-1 through MM-BIO-3, impacts would be reduced to less than significant for special-status wildlife species. However, even with incorporation of mitigation measures, impacts to fish, semi-aquatic reptile and amphibian guild, nesting special-status birds, and tree-nesting and roosting raptor guild would remain cumulatively significant unavoidable, and there are no other feasible mitigation measures.

As discussed in Section 4.3.4, Impact Analysis, of the Draft PEIR, biological impacts associated with the proposed CWPP have been analyzed at a programmatic level consistent with CEQA.

12b-33 The commenter states that the alternatives to the CWPP are not adequately described, justified, or analyzed. SBAS recommends a range of alternatives, including one that would eliminate VMUs 28, 43, and 44, and part of 40.

As discussed in Chapter 6, Alternatives, of the Draft PEIR, the CEQA Guidelines direct that the selection of alternatives be governed by “a rule of reason” and that a “reasonable range” of feasible “build” alternatives be evaluated (CEQA Guidelines Section 15126.6[e]). The alternatives selected for detailed review in an EIR may be limited to those that “would avoid or substantially lessen one or more of the significant effects of the project” and would “feasibly attain most of the basic objectives of the project.” Of those alternatives, an EIR need examine in detail only the ones that the lead agency determines could feasibly attain most of the basic objectives of the project (Section 15126.6[f]). Although EIRs must contain a discussion of “potentially feasible” alternatives, the ultimate determination as to whether an alternative is feasible or infeasible is made by lead agency’s decision-making body (see PRC Section 21081[a][3]).

SBFD considered and dismissed one alternative. The Use of Pesticide Alternative could reduce the need to remove vegetation using mechanized equipment and hand-held power tools by limiting plant growth and thereby limiting mowing, felling, masticating, and other mechanical means. It could also reduce the need for follow-up maintenance of treated vegetation using mechanized equipment and hand-held power tools (e.g., chainsaws). The reduction of mechanized equipment would result in fewer air emissions and lower potential for a spill of fuel (e.g., gasoline or diesel). However, this alternative was rejected due to incompatibility with the City’s Integrated Pest Management Strategy and based on prior SBFD practices. Existing vegetation management practices under the 2004 Wildland Fire Plan do not rely on pesticide use. As such, this alternative was rejected.

SBFD evaluated two alternatives in the Draft PEIR, as described below:

No Project Alternative assumes that SBFD would continue to implement fire management practices consistent with the existing 2004 Wildland Fire Plan. There would be no changes to the existing names or boundaries of the High Fire Hazard Area (HFHA). The current quantity, location, and extent of VMUs and the CFTN would remain, and vegetation management activities would continue consistent with the 2004 Wildland Fire Plan.

The No Project Alternative would have fewer impacts in five resource areas: aesthetics, air quality, biological resources, noise, and recreation. The No Project Alternative would have similar impacts in

eight resource areas: cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use, population and housing, transportation, and public services and utilities. The No Project Alternative would have greater impacts in three resource areas: GHG emissions, tribal cultural resources, and wildfire.

The No Project Alternative would only partially meet the objectives set by SBFD. The No Project Alternative would not add or remove any part of the HFHA based on technical data and fire modeling, and would therefore not reduce wildfire risk in this area or in the City; it would not rename the current Extreme Foothill, Foothill, Coastal, and Coastal Interior zones, creating better consistency across emergency response organizations; it would not eliminate confusion when referring to Coastal and Coastal Interior Zones in the context of the State Coastal Zone, the General Plan, and Coastal Land Use Plan where the Coastal Zone is a regulatory boundary established by the state; and it would not reduce the potential for release of GHG emissions by reducing vegetative fuel and structural ignition potential.

Vegetation Management Unit (VMU) Alternative assumes that the existing City HFHA would be consolidated and renamed such that the Foothill and Extreme Foothill Zones would be renamed as the City's Very High Fire Hazard Severity Zone (VHFHSZ), and the Coastal and Coastal Interior Zones would be renamed High Fire Hazard Severity Zone (HFHSZ). No expansion or other changes to the boundaries of the HFHA would occur. This alternative would also add new VMUs within the consolidated HFHA. No changes to the CFTN would be made under this alternative. This alternative is shown in Figure 6-1 in Chapter 6 of the Draft PEIR.

The VMU Alternative would have fewer impacts in five resource areas: aesthetics, air quality, biological resources, noise, and recreation. The VMU Alternative would have similar impacts in nine resource areas: cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, land use, population and housing, transportation, tribal cultural resources, and public services and utilities. The VMU Alternative would have greater impacts in two resource areas: GHG emissions and wildfire.

The VMU Alternative would not add or remove any part of the HFHA based on technical data or fire modeling, and would therefore not reduce wildfire risk in this area or in the City, and it would not reduce the potential for release of GHG emissions by reducing vegetative fuel and structural ignition potential. Therefore, because the VMU Alternative would only partially meet the project objectives identified by the SBFD, this alternative was rejected.

The proposed CWPP achieves all objectives set forth by SBFD, and would achieve reductions in GHG emissions and wildfire beyond both alternatives analyzed. As such, SBFD as lead agency evaluated the alternatives that could feasibly attain most of the basic objectives of the project (Section 15126.6[f]), and no further response or revisions to the Draft PEIR are required.

Please also see Global Response GR-1.

- 12b-34 The commenter recommends including a requirement for post-project and post-fire monitoring programs. SBFD concurs and already does perform post-activity monitoring and photo-documentation in accordance with the 2004 Wildland Fire Plan and its PEIR. Project Design Features and BMPs shown in Table 3-11 of the Draft PEIR and as modified in Chapter 3, Corrections and Additions to the Draft PEIR, have been incorporated into this Final PEIR.

12b-35 The commenter recommends that the PEIR include training protocols and managerial oversight for SBFD field crews.

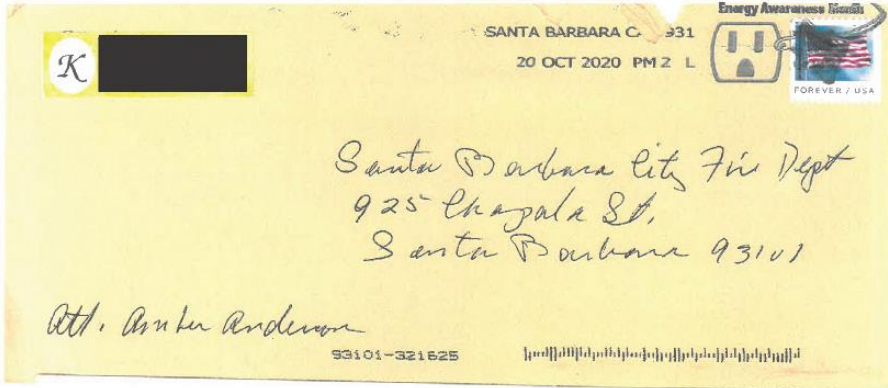
SBFD currently provides field crew training regarding safety and environmental protection. Additionally, Project Design Features and BMPs shown in Table 3-11 of the Draft PEIR and as modified in Chapter 3, Corrections and Additions to the Draft PEIR, have been incorporated into this Final PEIR.

12b-36 The commenter states that post-fire management policies and practices should be documented, including SBFD measures to plant and restore areas.

SBFD concurs with this comment as it is in alignment with current practices. Additionally, Project Design Features and BMPs, shown in Table 3-11 of the Draft PEIR and as modified in Chapter 3, Corrections and Additions to the Draft PEIR, have been incorporated into this Final PEIR.

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Comment Letter 13



COMMUNITYWILDFIRE
 CITY OF SANTA BARBARA PROTECTION PLAN

Standard
 US Postage
 #102
 Santa Barbara, CA
 Permit No. 806

Clean up our ~~Forest~~ Forests!!

13-1

The City of Santa Barbara
 CWPP Draft Programmatic
 Environmental Impact
 Report (PEIR) is available for
 public review
<https://cwpp.santabarbara.gov/peir/>



Comments are due by
 Friday, November 13, 2020

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Response to Comment Letter 13

Frances A. Kennett

October 20, 2020

- 13-1 The commenter requests that the City of Santa Barbara Fire Department clean up forests. The proposed boundaries of the Community Wildfire Protection Plan do not include any federally or state-managed forest land. However, the City of Santa Barbara Fire Department acknowledges the goal to manage vegetation in a manner to minimize wildfire risk, and works closely with partnership agencies, such as the Los Padres National Forest, the Santa Ynez Band of Chumash Indians, the Santa Barbara County Fire Department, and the Montecito Fire Department, to address fire hazards within and outside City of Santa Barbara boundaries.

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Comment Letter 14

From: kemblewhite [REDACTED]
Sent: Friday, November 6, 2020 8:34 AM
To: Community Wildfire Protection Plan <CWPP@SantaBarbaraCA.gov>
Subject: Fire Protection

EXTERNAL

Fire departments need to have police power to inspect properties to identify and correct problems and particularly to compel protectible space. Inspections should be done with property owners who should be sold on the need and given a date for completion. If the work is not done by the property owner, the municipal government needs authority to do the work and lien the property for the cost.

14-1

Building codes need to require use of fire resistant materials.

14-2

My house at [REDACTED] had 3 fences between us and the next property. The fences had many years of tinder dry growth. This was a fire hazard and rats nest that I have removed. What other hazards may there be that I do not know about? A properly designed inspection might turn up other things. If they are there, I would like to know about them.

14-3

Your work needs coordination with all area governments.

14-4

Funding. The fire department has a staff with a lot of down time waiting for the next fire. Get them out in the field. Cross train police officers and make this a community policing activity.

14-5

KW

Kemble White, [REDACTED]
[REDACTED]
[REDACTED]

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Response to Comment Letter 14

Kemble White
November 6, 2020

- 14-1 The commenter notes that the City of Santa Barbara Fire Department (SBFD) should have police power to inspect properties to address fire management concerns. The commenter suggests that property owners need to be convinced of the need for defensible space and given a deadline for completion. As discussed in Section 4.16, Wildfire, of the Draft Program Environmental Impact Report (PEIR), SBFD does have authority granted through statute to mitigate hazardous vegetation and enforce defensible space requirements. SBFD employs two individuals who are responsible for inspection and enforcement activities. SBFD acknowledges the recommendation to perform maintenance activities at the property owner's cost if they do not comply by the deadline. Such a decision would be made by the Santa Barbara City Council and is outside the scope of the PEIR.
- 14-2 The commenter notes that building codes should require the use of fire-resistant materials. SBFD strongly supports code updates that enable "home hardening" to address fire risk.
- Current California Building, Residential, and Fire Codes, as adopted by the Santa Barbara Municipal Code, include several requirements with regard to building materials, systems, and/or assemblies, including defensible space, to reduce fire risk to a home.
- 14-3 The commenter identifies concerns about fire hazards on properties and requests identification of and notification about additional risks. SBFD employs two fire inspectors who perform property inspections upon request. The commenter is advised to contact SBFD to request such an inspection.
- 14-4 The commenter notes that SBFD activities should be coordinated with all area governments. As discussed in Section 3.2.2, Regional Fire Management, of the Draft PEIR, SBFD is actively engaged with other fire management agencies, such as the Santa Barbara County Fire Department, Montecito Fire Protection District, Santa Ynez Band of Chumash Indians, and Los Padres National Forest.
- 14-5 The commenter suggests that SBFD staff could be out in the field more to make use of funding and to engage the police department to cross-train. SBFD acknowledges the challenges with regard to agency funding. SBFD's primary purpose is to respond to fires and emergencies, and as such, must maintain staffing at fire stations to readily respond in an emergency. SBFD welcomes cross-training opportunities and supports interdepartmental coordination with the Santa Barbara Police Department.

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Comment Letter 15

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

From: Robert Perry [REDACTED]
Sent: Friday, November 6, 2020 12:53 PM
To: Community Wildfire Protection Plan <CWPP@SantaBarbaraCA.gov>
Subject: Comments on Draft CWPP

EXTERNAL

Living in a high fire hazard area (Mission Creek between the Natural History Museum and State Street), we receive every May from the Santa Barbara City Fire Department the Notice to Comply with Defensible Space Requirements. Given the proposed expansion of the high fire hazard areas under CWPP, it is more important than ever for everyone to comply with these requirements. One of the shortcomings of the requirements is that it specifies that flammable vegetation within 100 feet of any structure need to be thinned and pruned. There are numerous large, old Eucalyptus trees on private properties along Mission Creek that are not within 100 feet of any structure, but present a significant risk to all neighboring properties in the event of fire. We have had our Eucalyptus tree trimmed, but not everyone is so diligent. Property owners in a high fire hazard area should be required to trim and prune such trees that are well known to be highly flammable in order to reduce the risk of fire rapidly spreading. Please consider revising the High Fire Hazard Area Foothill Zone Defensible Space Requirements to address this issue.

15-1
15-2

Robert Perry
[REDACTED]

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Response to Comment Letter 15

Robert Perry
November 6, 2020

- 15-1 The commenter notes that defensible space requirements are important to observe. The City of Santa Barbara Fire Department concurs with the commenter that defensible space maintenance is an essential component of fire risk management.
- 15-2 The commenter notes that eucalyptus trees in his neighborhood present a fire risk and should be maintained and incorporated into defensible space requirements. The City of Santa Barbara Fire Department concurs that unmaintained eucalyptus trees present an increased fire risk and applauds property owners who maintain eucalyptus trees on their property in accordance with defensible space requirements. SBFDF recommends contacting the SBFDF Wildland Fire Specialist to assess the hazard posed by vegetation located outside any designated defensible space or proposed VMU boundary.

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Comment Letter 16

From: Steve Windhager [mailto:swindhager@sbbg.org]
Sent: Friday, November 13, 2020 1:16 PM
To: Community Wildfire Protection Plan <CWPP@SantaBarbaraCA.gov>; Amber Anderson <aanderson@SantaBarbaraCA.gov>
Cc: Josie Lesage <jlesage@sbbg.org>; Denise Knapp <DKnapp@sbbg.org>
Subject: Feedback on City of SB CWPP

EXTERNAL

Dear Amber,

I want to applaud you on your herculean effort to develop this plan in the midst of a public pandemic. Great work! Overall the Garden is supportive of the plan but would like to both emphasize some things that are already in the plan, and also raise some things to consider.

16-1

The plan calls for vegetation management in areas surrounding residences and into the Wildland/Urban Interface with a goal of reducing fuels to 50-70% of their standing vegetation after thinning. Your specific guidance on how to do this in ways that would not further spread invasive species (associated with chipping and equipment cleaning), to reduce fuel in priority (dead plant material, dying plant material, invasive species, and native species last), and retention of roots for removed material to reduce soil erosion. These are excellent guidelines and we hope that they will be strictly followed.

16-2

It is worth noting that a reduction of fuel loads by this amount could increase invasive grass dominance – particularly in areas of intact chaparral – and could be counterproductive. We recommend crafting a well designed study to look at vegetation composition pre- and post-vegetation removal to better assess this and to provide more guidance for future management activities. Additionally, the why that vegetation is thinned will also lead to difference in habitat quality after thinning. Having an upper limit of 8 foot diameter groupings of shrubs might not offer adequate cover and should be reconsidered. If a larger grouping of shrubs is also surrounded by a larger bare area, is there actually greater risk? Again, this would be an excellent area for further study.

16-3

Thank you for the opportunity to provide comment and for all of the hard work that went into the CWPP.

Sincerely,

Steve

Steve Windhager, Ph.D.
Executive Director
Santa Barbara Botanic Garden
1212 Mission Canyon Road
Santa Barbara, CA 93105
(805) 690-1123

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Response to Comment Letter 16

Steve Windhager/Santa Barbara Botanic Garden

November 13, 2020

- 16-1 This comment provides supportive statements about the proposed Community Wildfire Protection Plan (CWPP). This comment does not raise an issue pertinent to the content or adequacy of the Draft Program Environmental Impact Report (PEIR), and no further response is required or necessary.
- 16-2 This comment notes concerns about the spread of invasive plant species and supports the City of Santa Barbara Fire Department's (SBFD) approach to reduce the spread of invasive plant species. SBFD appreciates the Santa Barbara Botanic Garden's concurrence with the guidelines proposed in the CWPP. Invasive species management is discussed in Section 4.3, Biological Resources, of the Draft PEIR.
- 16-3 This comment notes that a reduction in fuel loads could increase invasive grass dominance, particularly in areas of intact chaparral. The commenter recommends conducting a well-designed study to address vegetation composition pre- and post-vegetation removal.

As outlined in Chapter 3, Project Description, of the Draft PEIR, SBFD will perform site-specific biological resources evaluations, including a reconnaissance site visit by a City of Santa Barbara qualified biologist, not more than 2 weeks prior to CWPP activities. The evaluation will address the occurrence or potential occurrence of sensitive vegetation communities, special-status species, aquatic resources, and nesting birds. Based on the results of the biological evaluation, SBFD will develop a site-specific Work Plan that will incorporate the results of the biological evaluation. The Work Plan will be finalized not more than 5 days prior to the start of CWPP activities. The Work Plan may include measures related to special-status species avoidance, additional site surveys/documentation, and minimizing impacts to riparian habitat and sensitive vegetation communities. The data collected by SBFD during the initial biological evaluation will be maintained by SBFD and will be available for public review upon request, as shown in the Project Design Features and BMPs provided in Table 3-11 of the Draft PEIR and as modified in Chapter 3, Corrections and Additions to the Draft PEIR, of this Final PEIR.

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Comment Letter 17a

From: Gail Osherenko [REDACTED]
Sent: Friday, November 13, 2020 1:52 PM
To: Steve Windhager <swindhager@sbbg.org>
Cc: Community Wildfire Protection Plan <CWPP@SantaBarbaraCA.gov>; Denise Knapp <DKnapp@sbbg.org>; Josie Lesage <jlesage@sbbg.org>; Amber Anderson <aanderson@SantaBarbaraCA.gov>
Subject: Re: Feedback on City of SB CWPP

EXTERNAL

Steve,
Good comment letter!
Gail

On Fri, Nov 13, 2020 at 1:16 PM Steve Windhager <swindhager@sbbg.org> wrote:

Dear Amber,

I want to applaud you on your herculean effort to develop this plan in the midst of a public pandemic. Great work! Overall the Garden is supportive of the plan but would like to both emphasize some things that are already in the plan, and also raise some things to consider.

17a-1

The plan calls for vegetation management in areas surrounding residences and into the Wildland/Urban Interface with a goal of reducing fuels to 50-70% of their standing vegetation after thinning. Your specific guidance on how to do this in ways that would not further spread invasive species (associated with chipping and equipment cleaning), to reduce fuel in priority (dead plant material, dying plant material, invasive species, and native species last), and retention of roots for removed material to reduce soil erosion. These are excellent guidelines and we hope that they will be strictly followed.

17a-2

It is worth noting that a reduction of fuel loads by this amount could increase invasive grass dominance – particularly in areas of intact chaparral – and could be counterproductive. We recommend crafting a well designed study to look at vegetation composition pre- and post-vegetation removal to better assess this and to provide more guidance for future management activities. Additionally, the why that vegetation is thinned will also lead to difference in habitat quality after thinning. Having an upper limit of 8 foot diameter groupings of shrubs might not offer adequate cover and should be reconsidered. If a larger grouping of shrubs is also surrounded by a larger bare area, is there actually greater risk? Again, this would be an excellent area for further study.

17a-3
17a-4

Thank you for the opportunity to provide comment and for all of the hard work that went into the CWPP.

Sincerely,
Steve
Steve Windhager, Ph.D.
Executive Director
Santa Barbara Botanic Garden
[1212 Mission Canyon Road](https://www.sbbg.org/1212-Mission-Canyon-Road)
[Santa Barbara, CA 93105](https://www.sbbg.org/Santa-Barbara-CA-93105)
(805) 690-1123

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Response to Comment Letter 17a

Gail Osherenko
November 13, 2020

- 17a-1 The commenter responded to a comment letter submitted by Steve Windhager from the Santa Barbara Botanic Garden, which is contained herein as Comment Letter 16 and compliments the responder. Detailed responses to Comment Letter 17a are provided in Comments 16-1, 16-2, and 16-3.

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Comment Letter 17b

From: Gail Osherenko [REDACTED]
Sent: Friday, November 13, 2020 9:48 AM
To: Community Wildfire Protection Plan <CWPP@SantaBarbaraCA.gov>
Subject: Comments on SB City Wildfire Protection Plan

EXTERNAL

Thank you for the opportunity to comment on the proposed Santa Barbara City Wildfire Protection Plan (CWPP). It is a good start toward developing a comprehensive plan. It addresses defensible space, road clearing, city vegetation management, Community Fuels Treatment Network (CFTN), and neighboring jurisdiction vegetation management as well as public education, interagency coordination, funding, data gathering, acquisition of firefighting equipment and evacuation planning.

17b-1

Geographically the City borders Los Padres National Forest and the unincorporated areas of Montecito, Mission Canyon, Hope Ranch and Eastern Goleta Valley. For effective management and protection, the plan for areas within the City’s jurisdiction should smoothly transition into the wilder areas at our borders. I was surprised not to see input or comments from the Santa Barbara Botanic Garden, Los Padres Forest Watch, Citizen’s Planning Association or others with extensive knowledge regarding land use planning and natural resources protection. Efforts to include more expertise in planning should extend to engagement with groups that have experience in protecting native vegetation and wildlife habitat.

17b-2

Thankfully, Santa Barbara Audubon Society (SBAS) provided detailed comments on November 10 addressing the organization and clarification of material in the lengthy CWPP. Their comments also addressed specifics. For example, SBAS recommends clearer protections for nesting birds:

17b-3

- Buffer areas around nests should be set at 300’ for passerines and 500’ for raptors, unless qualified biologists determine that greater or lesser buffers are appropriate
- The protocol for identifying and protecting nesting birds needs to begin in January and continue to September.

I urge you to study and respond to all of SBAS’s comments.

17b-4

Thank you for the opportunity to comment on the proposed Santa Barbara City Wildfire Protection Plan (CWPP). It is a good start toward developing a comprehensive plan. It addresses defensible space, road clearing, city vegetation management, Community Fuels Treatment Network (CFTN), and neighboring jurisdiction vegetation management as well as public education, interagency coordination, funding, data gathering, acquisition of firefighting equipment and evacuation planning.

Duplicated Text

Geographically the City borders Los Padres National Forest and the unincorporated areas of Montecito, Mission Canyon, Hope Ranch and Eastern Goleta Valley. For effective management and protection, the plan for areas within the City’s jurisdiction should smoothly transition into the wilder areas at our borders. I was surprised not to see input or comments from the Santa

Barbara Botanic Garden, Los Padres Forest Watch, Citizen’s Planning Association or others with extensive knowledge regarding land use planning and natural resources protection. Efforts to include more expertise in planning should extend to engagement with groups that have experience in protecting native vegetation and wildlife habitat.

Thankfully, Santa Barbara Audubon Society (SBAS) provided detailed comments on November 10 addressing the organization and clarification of material in the lengthy CWPP. Their comments also addressed specifics. For example, SBAS recommends clearer protections for nesting birds:

- Buffer areas around nests should be set at 300’ for passerines and 500’ for raptors, unless qualified biologists determine that greater or lesser buffers are appropriate
- The protocol for identifying and protecting nesting birds needs to begin in January and continue to September.

I urge you to study and respond to all of SBAS’s comments.

The objectives of the CWPP include

- Reduce potential greenhouse gas emissions resulting from a wildfire by reducing vegetative fuel and structural ignition potential, and
- Balance fire mitigation with maintaining vibrant economy, protecting natural resources, historic resources and community character.

The problem embedded in that first objective is that reducing vegetative fuel often results in increasing ignition potential. When native vegetation including chaparral and scrubland are removed (and much destruction has already occurred due to development and population expansion into the wildland/urban interface), the native vegetation gets converted to more flammable grasslands. So efforts to make our city safer by removing vegetation, creating firebreaks, and using heavy equipment, increase the introduction and spread of invasive grasses and vegetation that ignite more readily. This is a difficult but real problem that could be explained more emphatically and clearly in the plan. We are told that we need to “reduce fuel load” but we are not told that the actions to do this could increase the rate and number of fires.

As SBAS points out there is only one alternative to the CWPP (other than no project). The Plan needs to offer a range of alternatives that better address the need for protection from the ignition of fire and protect natural resources, wildlife and their habitat.

Thank you for this opportunity to comment.

Gail Osherenko

Resident, City of Santa Barbara

↑
Duplicated
Text (Cont.)

17b-5

17b-6

17b-7

Response to Comment Letter 17b

Gail Osherenko
November 13, 2020

17b-1 This comment is an introductory comment regarding the opportunity to comment and summarized the contents of the Community Wildfire Protection Plan (CWPP). No further response is required.

17b-2 The commenter describes the areas adjacent to the City of Santa Barbara (City) and emphasizes the importance of smooth transitions between wilder areas at the borders of the City and the City. The commenter also notes that there was not input or comments from the Santa Barbara Botanic Garden, Los Padres Forest Watch, Citizen's Planning Association, or others with extensive knowledge protecting native vegetation and wildlife. As discussed in Section 3.2.2, Regional Fire Management, of the Draft Program Environmental Impact Report (PEIR), the City of Santa Barbara Fire Department (SBFD) coordinates with adjacent fire management agencies, including the County of Santa Barbara, Montecito Fire Department, Chumash Fire Department, and Los Padres National Forest. Additionally, as discussed at the Planning Commission hearing for the CWPP on November 5, 2020, Wildland Fire Specialist Amber Anderson provided a comprehensive summary of SBFD coordination efforts with adjacent agencies. Meeting minutes are included in Appendix A of this Final PEIR. Over 80 agencies, organizations and key stakeholders throughout Santa Barbara and surrounding jurisdictions were personally invited to participate in the CWPP update.

SBFD has performed the following actions with regard to public outreach and engagement:

- Two public community workshops on the CWPP occurred: one on February 20, 2020 at Adams Elementary School and one virtually via Zoom on April 1, 2020.
- The Draft PEIR Notice of Availability/Notice of Completion was filed with the State Clearinghouse and made available to the public on September 28, 2020.
- The Notice of Availability was filed with the Santa Barbara County Clerk of the Board on September 28, 2020, at 3:55 p.m.
- The City sent the Notice of Availability via certified mail to the City's standard environmental document distribution list.
- SBFD posted information about the availability of the Draft PEIR on Facebook, Instagram, and Twitter.
- Notification was posted to all City of Santa Barbara Nextdoor subscribers.
- Postcards were mailed by the City to all property owners in the existing and proposed High Fire Hazard Area.
- A public notice ad ran in the Santa Barbara News Press on September 25, 2020.
- A half-page color ad ran in the Santa Barbara Independent on October 1, 2020.
- Subscribers who signed up on the CWPP website are automatically added to the CWPP/PEIR distribution email list and receive email notifications about updates in the process.
- There was opportunity to attend and comment at the virtual Planning Commission hearing on November 5, 2020.
- There was opportunity to submit written feedback to the CWPP website, via email, or in standard mail.

The Santa Barbara Botanic Gardens provided a comment letter on the Draft PEIR, as reflected in Comment Letter 16. Responses to Comment Letter 16 are included in Responses to Comments 16-1, 16-2, and 16-3. SBFD believes it has made every reasonable effort to engage the public and encourage participation in the CWPP and PEIR process.

17b-3 The commenter notes that the Santa Barbara Audubon Society (SBAS) provided comments and requests clearer protections for nesting birds. The SBAS comment letter is included in this Final PEIR as Comment Letter 12b. Responses to comments raised in the SBAS letter, including providing clearer protection for nesting birds, are provided in the responses to Comment Letter 12b.

17b-4 The commenter urges SBFD to study and consider all of SBAS's comments. As noted in Response to Comment 17b-3, responses to SBAS's comment letter are provided in Comment Letter 12b.

17b-5 The commenter states that the objectives of the CWPP include the following:

- Reduce potential greenhouse gas emissions resulting from a wildfire by reducing vegetative fuel and structural ignition potential.
- Balance fire mitigation strategies with the City's goals of maintaining a vibrant economy and protecting natural resources, historic resources, and community character.

SBFD acknowledges the comment and concurs that the objectives are stated accurately.

17b-6 The comment states that SBFD's stated objectives regarding the reduction in vegetative fuel may increase ignition potential. The loss of native vegetation, including chaparral and scrubland, often results in the conversion of this habitat to more flammable grassland. The commenter states that the removal of vegetation, creation of firebreaks, and using heavy equipment may increase the introduction and spread of invasive grasses. The commenter states that this could be explained more clearly in the CWPP.

SBFD concurs with the commenter's statement that vegetation management activities may spread invasive grasses, and SBFD has included several Project Design Features and best management practices, as described in Table 3-11, Project Design Features and Best Management Practices, in Chapter 3 of the Draft PEIR, to address this potential impact. SBFD will perform site-specific biological resources evaluations prior to performing vegetation management activities. Based on the result of the biological resources evaluation, a site-specific Work Plan will be developed. The Work Plan may include measures at the recommendation of the biologist to remove invasive exotic plants. Specifically, the following measures may be recommended:

Project Design Feature – Removal of Invasive Exotic Plants

- During the site-specific biological resources evaluation, SBFD would identify invasive exotic plants (such as Pampas grass [*Cortaderia* 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 would preferentially remove exotic plants that pose a fire hazard, and generally remove exotic plants in the work area as the opportunity arises.

Project Design Feature – Sensitive Habitat

- Vehicles and equipment should arrive at the treatment area clean and weed-free as verified by SBFD.
- The spread of invasive plants and pathogens would be minimized through the use of quarantine periods; holding areas; clean stock water; and personnel, equipment, and vehicle sanitation.

Project Design Feature – Worker Training Safety

- As necessary, tools would be sanitized between project areas to prevent the spread of pathogens.

The inclusion of the Project Design Features and best management practices reduces potential spread of invasive grasses and requires SBFD to perform vegetation management in accordance with the recommendations of the biological resources evaluation.

17b-7 The commenter states that the Draft PEIR only presents two alternatives (i.e., No Project Alternative and Vegetation Management Unit Alternative) and that the CWPP should offer a range of alternatives that provides better protection of natural resources, wildlife, and habitat, and protect from fire ignition.

Please refer to Response to Comment 12b-38.

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Comment Letter 18a

From: Bob Bizness [REDACTED]
Sent: Friday, November 13, 2020 12:42 PM
To: Community Wildfire Protection Plan <CWPP@SantaBarbaraCA.gov>
Subject: Santa Barbara CWPP-PEIR Public Comment

EXTERNAL

TO: Amber Anderson
Wildfire Fire Specialist
City of Santa Barbara Fire Department
CWPP@SantaBarbaraCA.gov

RE: Community Wildfire Protection Plan and PEIR

Dear Ms. Anderson,

I appreciate our previous discussions of the following CWPP topics and the inclusion of Dudek staff in our recent meeting. After some refinement, I am submitting those topics here for written response and public discussion. They all address fire hazard zone mapping and its consequences. Obviously, any mapping change in the CWPP (extent and/or designation) will also have a direct impact on PEIR issues.

18a-1

(1)
Greater justification needs to be provided for expansion of the fire hazard zones in Santa Barbara (CWPP Figure 13). For example, in the northwest corner of the city (La Colina, area "I"), the fire modeling (Figure 12) results are simply wrong. Apartment buildings and the junior high school have been erroneously mapped as "wildland grasses and trees" rather than as "urban". A few words (Table 6) mention the trees along Cieneguitas Creek, but after the adjacent erroneous hazard mapping is removed should the entire 54+ acre La Colina neighborhood be doomed to enter California's Very High Fire Hazard Severity Zone (VHFHSZ) without a full paragraph explaining why and acknowledging the errors of the modeling?

18a-2

(2)
The largest change in Santa Barbara's wildfire zoning, via the CWPP, is the addition of the Bel Air neighborhood. Yet there is not a paragraph, nor even a full sentence, justifying this addition anywhere in the CWPP. Table 6 simply says: "added due to extreme fire behavior". However, "extreme fire behavior" (undefined but presumably 11-foot flame lengths) was also widely modeled (Figure 12) in the Upper Mesa (west of Meigs and north of Cliff), the Samarkand neighborhood (between Las Positas and Mission Creek), and even along upper Santa Barbara Avenue (Micheltorena to Mission), and those areas were not added to the fire hazard zoning. The CWPP needs a descriptive explanation of why Bel Air was added to the hazard zoning while these other areas were not added. If modeling errors in those other areas are the reason, then are you sure that such errors do not also occur in Bel Air?

18a-3

(3)
Very High Fire Hazard Severity Zones (VHFHSZ) in the Local Responsibility Area (LRA) are whatever the State Director of Forestry and Fire Protection says they are based on "consistent [but undefined in scale] statewide criteria" (California Government Code 51177-51178). "High" and "Moderate" LRA fire hazard zones (used in many CWPPs, such as Montecito's CWPP) appear to be not regulated by the state but are instead defined by the LRA agency (e.g. city). Santa Barbara is designating all of its "not-Very-High" zones as "High" and not "Moderate". Based on what definitions and scales of criteria (fuel loads, topographic slope, etc.) are none of Santa Barbara's fire hazard zones considered to be "Moderate"? Is "High" versus "Moderate" simply subject to the judgment of the analyst?

18a-4

(4)
Most of Montecito was originally (pre-2016) mapped by CAL FIRE as "Moderate" fire hazard. The Montecito Fire Department thereafter designated most of the community as "High" fire hazard in their

18a-5

2016 CWPP map. CAL FIRE then (post-2016) re-designated exactly all of Montecito's "High" zone to be a "Very High" fire hazard zone (leaving none as "High").

This "hazard inflation" (Moderate becoming High and then becoming Very High) should be of concern to Santa Barbara as it newly designates its "Coastal" fire hazard zones as "High" hazard. Our fire history indicates that the Coastal areas have a far, far lower fire hazard than the Foothill areas. All of the large named fires have occurred in the foothills. None have occurred in the coastal areas. Might CAL FIRE do to Santa Barbara what it has already done to Montecito? And what can Santa Barbara do to prevent that?

↑
18a-5
Cont.

(5)
The CWPP does not mention (but should mention) that under California Senate Bill (S.B.) 1260, enacted in 2018, the re-zoning in this CWPP, to be effective in 2021, may be completely superseded by CAL FIRE mapping just months later in 2021. Acceptance of CAL FIRE mapping by Santa Barbara is mandatory. The only hint of the possibly ephemeral status Santa Barbara's CWPP fire hazard mapping is a future "action" item on CWPP page 86 (Item 1.6), which says: "Revise the boundary of the City's HFHSZs and VHFHSZs to be consistent with CAL FIRE's VHFHSZ update when available." It should be made clear in the CWPP that, under S.B. 1260, many (if not all) specifics of the fire hazard zoning in this CWPP could last less than a year.

↑
18a-6

Once again, I appreciate the vast effort required to generate the CWPP and its associated PEIR. I note that there will be more than 1000 pages in these reports and appendices.

Sincerely,

Robert E. (Bob) Crippen, Ph.D. (Earth Science)

[Redacted Signature]

for the
Runyan Subdivision HOA (upper Nirvana Road)

Response to Comment Letter 18a

Robert Crippen
November 13, 2020

City of Santa Barbara Fire Department (SBFD) staff (Amber Anderson) and consultant (Dudek staff Jessica Kinnahan and Scott Eckardt) also virtually met with Dr. Robert Crippen on November 11, 2020, to review his preliminary comments on the Community Wildfire Protection Plan (CWPP) and Draft Program Environmental Impact Report.

- 18a-1 The commenter acknowledges meeting with the SBFD representative and SBFD's consultant to discuss the CWPP. This comment is an introduction to comments to follow. No further response is required.
- 18a-2 The commenter states that greater justification needs to be provided for expansion of the fire hazard zones, and provides an example of La Colina Junior High School. The commenter notes that the fire modeling results are wrong, stating that apartment buildings and the junior high school have been erroneously mapped as "wildland grasses and trees" rather than as "urban." The commenter notes that there are trees along Cieneguitas Creek, but there should be greater clarity as to why this area would remain as Very High Fire Hazard Severity Zone (VHFHSZ) and acknowledgment of the errors of the model. SBFD acknowledges that, as with any modeling program, there are certain assumptions built into the model that may yield inaccurate results. To address this, SBFD and the consultant team carefully scrutinized the modeling results to address potential inaccuracies resulting from the landscape scale of the LANDFIRE data set used in fire modeling. The fire hazard in this area is associated with the vegetation along Cieneguitas Creek, which was mapped as a mixture of grass, brush, and tree understory fuels. Mapping of landscape vegetation intermixed with structures (e.g., apartments) was considered in the analysis of modeling results. The recommended classification of much of this area is due to the large size of parcels. As proposed VHFHSZs were done at the parcel level, the entirety of the junior high school (28+ acres) and apartment building (10+ acres) properties were included. Please also refer to Global Response GR-1.
- 18a-3 The commenter states that the largest addition to the Fire Hazard Severity Zone (FHSZ) is the Bel Air Knolls neighborhood, but that the analysis does not support the inclusion of this area or the explanation provided of "extreme fire behavior," which the commenter assumes is due to 11-foot flame lengths. Additionally, the commenter notes that similar fire conditions exist in other areas of the City of Santa Barbara (City), such as the Upper Mesa, Samarkand, and Santa Barbara Avenue (Street), and states that if modeling errors are the reason, then Bel Air Knolls may also have been mapped in error. Although flame length is an important criterion, several other factors were included in the analysis and determination of FHSZs. SBFD considered slope, water availability, structure density, vegetation coverage, fire response times, fire behavior modeling, fire and ignition history, and SBFD expertise fighting fires in this area. The Bel Air Knolls area exhibits extreme fire behavior potential in the vegetation intermixed with structures, has steep slopes throughout (with gradients reaching 48-percent), has moderate to high structure density, and has experienced 18 fires responded to by SBFD between 2004 and 2020 (SBFD 2020a, SBFD 2020b). Due to prompt SBFD response and suppression actions, these fires did not grow into large, damaging wildfires. The extension of this area to bounding streets (West Valerio Street, Hillside Road, Mountain Avenue, and Vista Del Campo) also provides a tactical boundary for SBFD. Please also refer to Global Response GR-1.

18a-4 The commenter states that the California Government Code sets forth the requirements for Local Responsibility Areas and consistency with the State Director of Forestry and Fire Protection. The commenter notes that the City is only proposing VHFHSZs and High FHSZs without any areas categorized as Moderate. The commenter asks what the definition and the criteria are (e.g., fuel loads, topographic slope) to determine High and Moderate FHSZs. Moderate, High, and Very High Fire Hazard Severity Zones were mapped at a state level by CAL FIRE in 2007. Mapping utilized a modeling approach that considered vegetation, topography, weather, crown fire potential, ember production and movement, and likelihood of burning. Classification of zones as Moderate, High or Very High was based on a combination of how a fire would behave and the probability of flames and embers threatening buildings. Each map area received a score for flame length, embers, and the likelihood of the area burning. The scores were then averaged and the zone class (moderate, high and very high) was based on the averaged score for the zone (CAL FIRE 2007). Only lands zoned VHFHSZ are identified in incorporated cities, like Santa Barbara (local responsibility areas). The Fire Hazard Severity Zone maps were intended to be used for implementing defensible space and building development standards to reduce wildfire risk. Such standards are applicable across all zone types. Please also refer to Global Response GR-1.

18a-5 The commenter states that the Montecito area was mapped by the California Department of Forestry and Fire Protection (CAL FIRE) as a Moderate Fire Hazard prior to 2016. Subsequent changes by the Montecito Fire Department reclassified the area as a High Fire Hazard Severity Zone (HFHSZ) in 2016. CAL FIRE then updated maps to reclassify Montecito as a VHFHSZ. The commenter expresses concern about “hazard inflation,” despite the fact that large wildfires have occurred in the foothills.

California Government Code Sections 51175 through 51189 provide guidance for classifying lands in California as fire hazard areas and provide requirements for management of property within those lands. CAL FIRE is responsible for classifying FHSZs based on statewide criteria, and makes the information available for public review. Further, local agencies must designate, by ordinance, VHFHSZs within their jurisdiction based on the recommendations of CAL FIRE. Local agencies may adopt more stringent requirements based on the agency’s own fire hazard assessment. Given that SBFD is not the agency having jurisdiction over Montecito (the Montecito Fire Protection District is the agency having jurisdiction), SBFD was not involved in the modification or implementation of the FHSZ designation.

SBFD acknowledges the commenter’s concern with regard to “hazard inflation.” SBFD has made every reasonable effort to engage CAL FIRE as a part of the CWPP process to align proposed FHSZ maps with CAL FIRE. CAL FIRE has not set a date for the expected release of updated statewide fire hazard maps. Notwithstanding, SBFD conducted a robust analysis, as described in Global Response GR-1, to determine FHSZs proposed by the CWPP. SBFD will continue to coordinate with CAL FIRE with regard to FHSZ mapping.

18a-6 The commenter notes that under California Senate Bill 1260, enacted in 2018, the re-zoning in this CWPP, to be effective in 2021, may be completely superseded by CAL FIRE mapping just months later in 2021. Acceptance of CAL FIRE mapping by Santa Barbara is mandatory. The commenter states that the CWPP should note that under Senate Bill 1260, many (if not all) specifics of the fire hazard zoning in the CWPP could last less than a year. The SBFD acknowledges the timing of CAL FIRE mapping. As discussed in Response to Comment 18a-5, SBFD has made every reasonable effort to engage CAL FIRE in an attempt to obtain the anticipated mapping for the City. CAL FIRE’s timeframe for release of the data has been changed multiple times (originally scheduled for late fall 2020 to spring 2021 and, as of the writing of the document, is estimated to be released in late 2022), and as such, SBFD is proceeding with the proposed CWPP based on the best available data, as described in Global Response GR-1.

Comment Letter 18b

From: Bob Bizness [REDACTED]
Sent: Friday, November 13, 2020 12:28 PM
To: Amber Anderson <aanderson@SantaBarbaraCA.gov>
Subject: Lingering Typo in the CWPP: Sycamore Fire

EXTERNAL

Minor Typo in the CWPP: Sycamore Fire

Sycamore Fire: Was 1977, not 1979 (on Page 8, PDF Page 18)

It is correct in Table 5. (Page 29, PDF Page 39).

"Google" gives references.

18b-1

Bob Crippen

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Response to Comment Letter 18b

Robert Crippen
November 13, 2020

18b-1 The commenter notes that there is a minor error in the Community Wildfire Protection Plan (CWPP) document with regard to the date of the Sycamore Fire.

Although the date is incorrect in the CWPP document, Table 3-1 in Chapter 3, Project Description, of the Draft Program Environmental Impact Report (PEIR) does correctly state the date as July 1977. No update to the Draft PEIR is required. The City of Santa Barbara Fire Department acknowledges the comment and will address the oversight in the final CWPP.

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Comment Letter 19

From: Kelly, Audrey@Wildlife [<mailto:Audrey.Kelly@Wildlife.ca.gov>]
Sent: Friday, November 13, 2020 3:26 PM
To: Community Wildfire Protection Plan <CWPP@SantaBarbaraCA.gov>
Cc: Amber Anderson <aanderson@SantaBarbaraCA.gov>; Gibson, Steve@Wildlife <Steve.Gibson@wildlife.ca.gov>; Wilson-Olgin, Erinn@Wildlife <Erinn.Wilson-Olgin@wildlife.ca.gov>; Ludovissy, Jennifer@Wildlife <Jennifer.Ludovissy@Wildlife.ca.gov>; Schmoker, Kelly@Wildlife <Kelly.Schmoker@wildlife.ca.gov>; OPR State Clearinghouse <State.Clearinghouse@opr.ca.gov>
Subject: Comment Letter for the Santa Barbara Community Wildlife Protection Plan PEIR

EXTERNAL

Dear Ms. Anderson,
Please see the CDFW's comments on the Santa Barbara Community Wildlife Protection Plan PEIR (SCH# 2020070069). If you have any questions feel free to contact me. We look forward to working with you on this project!

19-1

Thank you,

Audrey Kelly
Environmental Scientist
California Department of Fish and Wildlife – South Coast Region
Temporary line: (805)861-8475

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

GAVIN NEWSOM, Governor
CHARLTON H. BONHAM, Director



November 13, 2020

Amber Anderson
Wildland Fire Specialist
City of Santa Barbara Fire Department
925 Chapala Street
Santa Barbara, CA 93101
cwpp@SantaBarbaraCA.gov

Subject: City of Santa Barbara Community Wildlife Protection Plan (Project) Draft
Program Environmental Impact Report (DPIER) SCH #2020070069

Dear Ms. Anderson:

The California Department of Fish and Wildlife (CDFW) received a Notice of Availability of a DPEIR from the Santa Barbara Fire Department (SBFD) for the Project pursuant the California Environmental Quality Act (CEQA) and CEQA Guidelines. CDFW previously submitted comments in response to the Notice of Preparation of the DPEIR.

19-2

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

19-3

CDFW is also submitting comments as a **Responsible Agency** under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381.) CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority. (Fish & G. 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 & G. Code, § 2050 et seq.), the project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

Proponent: Santa Barbara Fire Department

Objective: The proposed Project is the result of implementation of the updated Community Wildfire Protection Plan, a community planning document 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 objective of the DPEIR is to cover the aspects in the Community Wildfire Protection Plan (CWPP) that propose management activities that may result in physical changes to the environment.

19-4

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

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Amber Anderson, Wildland Fire Specialist
City of Santa Barbara Fire Department
November 13, 2020
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severity (HFSZ or VHFSZ). 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.

Locations where vegetation management activities for the purpose of defensible space and roadside clearance are herein collectively referred to as High Fire Hazard Areas (HFHA's).

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).

Specific management objectives include:

- Grassland Habitats (California annual grassland, coastal perennial grassland): Mowing or grazing of grasses to no more than 4 inches; retention of oak saplings and seedlings; removal of dead ground cover; removal of dead limbs, branches, and twigs in shrub overstory.
- Scrub Habitats (coastal sage scrub, chaparral): Increasing spacing between shrubs by twice the height of the shrubs; increasing vertical spacing between shrubs and trees to create at least 8 feet of space beneath the tree canopy.
- Woodland Habitats (including southern oak woodland): Increasing vertical spacing between canopies and shrub and grasses below; removing dead and dying trees; no removal of oaks 4 inches or more in diameter at 4 feet, 6 inches above the ground; prioritizing the retention of healthy native understory shrubs; removing limbs less than 6 feet above the ground; creating at least 8 feet of vertical space underneath the tree canopy and above understory shrubs.
- Eucalyptus Stands: Canopy thinning from selective removal of trees; thinning from removal of trees below the canopy; thinning of stands supporting 10 to 16 trees per 1,000 square feet; prioritizing retention of healthy trees and removal of trees less than 8 inches in diameter; removal of loose, stringy bark.

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.

Timeframe: The DPEIR does not specify start and end dates. The DPEIR is an update to the original 2004 CWPP. The updated plan and its associated Programmatic Environmental Report will likely be in place until conditions change, warranting future updates.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the SBFDF in adequately identifying and/or mitigating the Project's significant, or potentially significant, direct and indirect impacts on fish and wildlife (biological) resources. Editorial comments or other suggestions may also be included to improve the document. Based on the potential for the Project to have a significant impact on biological resources, CDFW concludes that a Program Environmental Impact Report is appropriate for the Project.

COMMENT #1: Best Management Practices, Biological Resources Evaluation and MM-BIO-1

Issue: Reliance on pre-construction surveys may result in sensitive biological resource going undetected, resulting in undisclosed impacts.

Specific Impact: Depending on seasonality of the pre-Project survey, as described in MM-BIO-1 and the Best Management Practice (BMP) related to biological resource evaluations, special status species may be undetectable, unidentifiable, or absent from the site during that specific season,

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19-5
19-6

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Amber Anderson, Wildland Fire Specialist
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however, impacts from vegetation management activities could result loss of foraging, nesting or breeding features which are important for the long term stability of the population.

Why impact would occur: If special status species or sensitive natural communities utilize a project-level Project site, but go undetected, direct impacts to species, or indirect impacts due to loss of habitat features result in undisclosed impacts.

In the absence of additional mitigation measures, such implementation exclusion fencing and avoidance buffers or seasonal work periods, there may be loss of individual species or local populations or sensitive species.

Evidence impact would be significant: CEQA Guidelines §15070 and §15071 require the document to analyze if the Project may have a significant effect on the environment as well as review if the Project will 'avoid the effect or mitigate to a point where clearly no significant effects would occur'. Relying on pre-project surveys, the preparation of future management plans, or mitigating by obtaining permits from CDFW are considered deferred mitigation under CEQA. In order to analyze if a project may have a significant effect on the environment, the Project related impacts, including survey results for species that occur in the entire Project footprint, need to be disclosed in for the public comment period in subsequent, project-level, CEQA review. This information is necessary to allow CDFW to comment on alternatives to avoid impacts, as well as to assess the significance of the specific impact relative to the species (e.g., current range, distribution, population trends, and connectivity).

The DPEIR defers impact assessment and disclosure to pre-construction botanical and wildlife surveys. Absent survey data during the project-level CEQA review period, CDFW and the public are unable to determine the extent of impacts or to provide meaningful avoidance, minimization, or mitigation measures related to biological resources.

Impacts to rare species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Inadequate avoidance, minimization, and mitigation measures for impacts to these sensitive species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative 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 CDFW or United States Fish and Wildlife Service.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure #1: In the Final PEIR, BMP's and MM-BIO-1 should be revised to indicate that appropriate surveys shall be conducted to document the presence/absence of rare species prior to project-level CEQA review. Based on the survey results, the final project-level CEQA document should propose avoidance and specific mitigation for Project impacts to rare species. For animal species, available protocols should be used to guide survey efforts. Surveys should be timed during the appropriate season for maximum detection of sensitive wildlife species. Additional survey protocols are listed in comments below.

COMMENT #2: Direct and Indirect Impacts to Special Status Plant Species

Issue: Page 4.3-39 of the DPEIR includes a discussion of the potential impacts to special status plant species from proposed modifications from creation of defensible space in High Fire Hazard Areas (HFHA) and vegetation management in designated VMU's. While the DPEIR recognizes the potential impacts to special status plant species, it states that impacts to special status plant species would be less than significant. CDFW is concerned that the proposed mitigation measures are inadequate to reduce potential impacts to less than significant.

Specific impact: Consistent with the DPEIR, CDFW agrees that Project related activities could result in adverse impacts to individuals or populations of special status plants. Direct impacts to plants may result from mowing of annual special status species prior to seed dehiscence, soil compaction from use of heavy machinery in VMU's, or trampling of special status plants by grazing livestock. Direct impacts could result in direct removal of individual plants or impacts to plants or populations that reduce the viable seed bank. Alteration of microclimatic conditions or introduction of invasive plant species which may outcompete special status plant species as a result of Project-related activities may indirectly impact special status species. Unmitigated impacts resulting in a decline in existing special status plant species would be considered a significant impact.

Why impact would occur: The proposed MM-BIO-1 states that pre-Project surveys no more than 10 days prior to initiation of activities would be conducted by a City qualified biologist to determine if suitable habitat is present, and if suitable habitat is determined to be present, that additional focused surveys will be conducted. While CDFW agrees that surveys for special status plant

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species should be conducted prior to Project-related activities involving vegetation alterations. MM-BIO-1 does not acknowledge that accurate survey data collection must account for the phenology of potential special status species.

CDFW advises against reliance on pre-Project surveys for special status plant species completed immediately before (or within 10 days of) initiation of Project related activities. Depending on seasonality of the pre-Project survey, special status plant species may be undetectable (but present in the seed bank) or unidentifiable due to lack of adequate flowering specimens, leading to undisclosed impacts on special status plant species.

If special status plant species are determined to be present, in the absence of additional mitigation measures, such implementation occurrence flagging and avoidance buffers or seasonal work periods, there may be loss of individual plants or local occurrences.

Evidence impact would be significant: The 52 plant species which may occur within the project site, listed in Table 3.4-5, meet the definition of Rare or Endangered under CEQA Guidelines §15125 (c) and/or §15380 (referred to as special status plant species in this Comment Letter). Given the limited range and small population sizes of special status plant species within California and elsewhere, CDFW would consider population reduction and habitat loss which may result from Project activities would be a significant impact.

Recommended Potentially Feasible Mitigation Measure(s):

Mitigation Measure # 1: In order to adequately address special status plant species, prior to implementation of Project activities in site specific locations, a qualified biologist should conduct botanical surveys for special status plant species, including those listed by the California Native Plant Society (<http://www.cnps.org/cnps/rareplants/inventory/>), during the blooming period for all sensitive plant species potentially occurring within the Project area. Page 4.3-40 states that "*habitat for several special-status plant species potentially occurs in all of the vegetation communities in the VMUs*" on page 4.3-40, and lists species with potential to occur based off of vegetative community type in Table 4.3-5 (pgs. 4.3-41-43). CDFW recommends that each Project specific analysis utilize Table 4.3-5 to generate a scoping list of potential special status plant species that may be present in the Project area.

Mitigation Measure #2: If special status plant species are identified within or adjacent to the Project area, species specific avoidance and minimization measures should be developed to avoid impacts to special status plants. Avoidance and minimization measures may include measures such as: seasonal work periods to avoid blooming season, use of hand tools avoid soil compaction from heavy machinery, flagging of no-work buffers of an appropriate distance to avoid impacts to a specific population or individual, maintaining a biological monitor on site to ensure that design elements are effective at providing the intended protection. Survey results and avoidance plan should be submitted to CDFW for review and comment. If State or federally listed plant species are identified, consultation with the relevant agency to ensure full avoidance or mitigation is recommended. CDFW protocols for surveying and evaluating impacts to rare plants available at: <https://www.wildlife.ca.gov/Conservation/Plants>.

Mitigation Measure #3: If avoidance is not feasible, CDFW recommends a ratio of no less than 4:1 for both the acreage and number of plants impacted. Any mitigation for impacts to special status plant species should include specific measurable criteria for success. Monitoring for these of mitigation areas should occur for a sufficient period to allow trends to be analyzed and demonstrate the occurrence is stable over time. No negative trend in plant individuals (counted separately as flowering, seed set and non-flowering individuals), and no positive trend in non-native plant cover should occur over the monitoring period.

Mitigation Measure #4: For species that are determined to be present and unavoidable in a Project work site, CDFW recommends a Documented Conservation Seed Collection of the impacted rare plant species be deposited at either Santa Barbara Botanic Garden or the California Botanic Garden (formerly known as Rancho Santa Ana Botanic Garden). A Documented Conservation Seed Collection is when seed from a special status plant species is collected and stored as part of a permanent genetic collection in a protected location. This collection preserves the genome, and any unique alleles that are present in any given occurrence, for future study and reintroduction projects. Funding should be provided to maintain the collection, as well as conduct periodic germination and viability tests, in perpetuity. Documented conservation collections (long-term storage) are important for conserving rare, gene pool representative germplasm designated for long-term storage to provide protection against extinction and as a source material for future restoration and recovery.

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Recommendation #1: CDFW recommends MM-BIO-1 be split into separate, "species guild" and/or species-specific mitigation measures (e.g. plants, amphibians and reptiles, fish, mammals, birds). CDFW recommends that the proposed mitigation measures under Comment # 2 be adopted as measures to avoid impacts to special status plant species.

COMMENT #3: Direct and Indirect Impacts to Invertebrate Special Status Species

Issue: The DPEIR states that the Crotch bumble bee is not documented in the proposed CWPP area, and that potential for it to occur is low, however, there are 17 records listed in the CNDDDB index of Crotch bumble bee within Santa Barbara County. Records include an occurrence within Skofield Park, an undeveloped area with suitable habitat for Crotch bumble bee within the CWPP Project area. The location of the occurrence is defined as a VHSFZ which would be subject to fuel modifications. Additional, more recent occurrences (2000 and 2017), are documented in the neighboring city of Goleta, which has similar habitat types and climactic conditions as the Project Area. Due to documentation of Crotch bumble bee within and adjacent to the Project area, CDFW would consider impacts to the species potentially significant.

CDFW is concerned that MM-BIO-1 relies on site evaluations beginning 10 days prior to initiation of vegetation management activities and lacks specific details on survey methodology for Crotch bumble bee if suitable habitat is identified. Additionally, it is not clear that the proposed BMP's, including "ensuring heavy equipment is not placed in ecologically sensitive areas" and "limiting the size and quantity of heavy machinery" (see page 4.3-54), would be implemented adequately to avoid impacts to Crotch bumble bee.

Specific Impact: Page 4.3-48, and 4.3-54 of the DPEIR discusses the potential impacts to the species. CDFW agrees that potential activities proposed including but not limited to mowing, and grazing, removal of dead limbs, branches, and twigs, or prescribed fire could result in disturbance or take of Crotch bumble bee ground nests or overwintering queens.

Why Impact Would Occur: The DPEIR does not provide adequate avoidance and minimization measures for Crotch bumble bee. Flight season, between February-October (peak season between March-September for drones). Crotch bumble bee needs adequate flowering vegetation to sustain the annual colonies (Thorpe et al., 1983). Wide scale vegetation management to thin shrubs and remove annual herbaceous ground cover could result in a reduction of nectar sources for foraging bees which could negatively impact existing Crotch bumble bee populations. Mated queens overwintering sites and annual nesting colonies may be located just under the surface of loose soil, or under the cover of underground abandoned rodent nests, empty hollow logs, under rocks, or under dense grass. Near surface disturbances because of mowing or grazing could result in disturbance or take of nest.

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Evidence Impact Would Be Significant: On June 12, 2019, CDFW accepted a petition for Crotch bumble bee as a candidate species for listing under CESA. As a CESA candidate, the species is granted full protection of a threatened or endangered species under CESA. Inadequate presence or absence surveys, or inadequate avoidance and minimization measures if the species is reduced present, could result in significant degradation or reduction of available habitat, reductions of long-term population viability of the species, or direct take.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Project Description and Related Impact Shortcoming)

Mitigation Measure #1: Due to suitable habitat within the Project site, within one year prior to vegetation alterations, a qualified entomologist familiar with the species behavior and life history should conduct surveys to determine the presence/absence of Crotch's bumble bee. Surveys should be conducted during flying season when the species is most likely to be detected above ground, between March 1 to September 1 (Thorpe et al. 1983). Survey results including negative findings should be submitted to CDFW prior to initiation of Project activities. If "take" or adverse impacts to Crotch's bumble bee cannot be avoided either during Project activities or over the life of the Project, SBFDF must consult CDFW to determine if a CESA incidental take permit is required (pursuant to Fish & Game Code, § 2080 et seq.).

Mitigation Measure #2: Plan mowing activities outside of crotch bumble bee flight season (March 1-September 1). Mowing activities should be completed at the highest cutting height possible, or at a minimum of 12 inches, to prevent disturbance of established nests or overwintering queen hibernacula.

Mitigation Measure #3: To maintain a sustained nectar source for foraging bees, leave one or more patches (as large as possible) of meadow, lawn, or edge habitat unmowed for the entire year

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in order to create a mosaic of patches with structurally different vegetation. Management plans should be sent to CDFW for review and comment.

Recommendation #1: CDFW recommends MM-BIO-1 be split into separate, "species guild" and/or species-specific mitigation measures (e.g. plants, amphibians and reptiles, fish, mammals, birds) and adopt mitigation measures 1-3, as provided in this comment, as measures to avoid impacts to Crotch Bumble bee. Additionally, the BMP's included on page 4.3-54 could be incorporated and expanded upon in the mitigation measures section to specifically address how ensuring heavy equipment is not placed in ecologically sensitive areas and limiting the size and quantity of heavy machinery will be implemented to avoid impacts to Crotch bumble bee.

COMMENT #4: Direct and Indirect Impacts to Special Status Fish Species

Issue: Page 4.3-48 of the DPEIR states that southern steelhead are present in several major creeks in the CWPP area, including zones F, G, H, and R (Mission Creek, San Roque Creek, and Arroyo Burro Creek, see Figure 3-4 of the DPEIR). Page 4.3-55 states that Steelhead critical habitat occurs in VMUs 27, 28, 43, and 45, and rearing habitat occurs in VMUs 27 and 28. Vegetation alterations adjacent to steelhead occupied streams could degrade the quality of habitat available for fish. MM-BIO-1 does not provide adequate detail to ensure surveys will be effective to identify presence or absence of steelhead. The DPEIR does not specify mitigation measures adequate to reduce the potential impact to less than significant.

Specific impact: Alterations of vegetation associated with a streambed area may result in increased sedimentation, impacting water quality. Livestock grazing activities near the streambed area could result in nutrient deposits impacting water quality. Clearance of overhanging vegetation may reduce shading over the streambed area, resulting in changes to water temperature. Removal of vegetation associated with the stream bank could reduce insect populations, which is an important source of food for juveniles.

Why impact would occur: Steelhead spawn in cool, clear, well-oxygenated streams with suitable gravel size (Reiser et. al, 1979). The egg incubation and larval development stage, success is dependent of water temperature, dissolved oxygen, and suspended sediment deposition (Stoecker and Conception Coast, 2002). Vegetation alterations within or adjacent to the streambed area may adversely effect habitat directly or indirectly.

Clearance of vegetation within or adjacent to steelhead occupied streambed areas may cause temporary or long-term increases in sedimentation deposition into the water. Adverse effects from increased sedimentation in the streambed area could reduce the salmonid carrying capacity of the stream through smothering of eggs, and alteration of sheltering habitat for emerging fry. Increased sedimentation in the streambed area could reduce the salmonid carrying capacity of the stream through smothering of eggs, the life stage when southern steelhead are most vulnerable to mortality.

Vegetation removal could cause a reduction in canopy cover over the streambed area, reducing shading effects and impacting water temperatures. Increasing water temperatures of streams that can slow growth, increase predation risk, and increase susceptibility to disease (Stoecker and Conception Coast, 2002).

Vegetation alterations along the stream bank could reduce the abundance of terrestrial and aquatic insects, an important food source for juvenile steelhead (Stoecker and Conception Coast, 2002).

Evidence impact would be significant: Population of southern steelhead trout have declined throughout its range and is listed as federally endangered by the National Marine Fisheries Service (NOAA Fisheries). Improvements to Mission Creek, including the removal of fish barriers at Tallant Road Bridge and the Upper and Lower Caltrans Channels, have increased the range and available habitat for southern steelhead. Project activities causing adverse impacts to water quality, temperature, or other factors that could impact southern steelhead populations (at current levels or future levels) or undermine active restoration efforts would be considered significant.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Project Description and Related Impact Shortcoming)

Mitigation Measure #1: CDFW has concluded that the Project may result in the alteration of streams. For any such activities, the Project applicant (or "entity") must provide notification to CDFW pursuant to Fish and Game Code, section 1600 et seq. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSAA) with the applicant is required prior to conducting the proposed activities. Please visit CDFW's [Lake and Streambed Alteration Program](#) webpage to for information about LSAA notification and online

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submission through the Environmental Permit Information Management System (EPIMS) Permitting Portal (CDFW 2020b).

CDFW's issuance of an LSAA for a Project that is subject to CEQA will require CEQA compliance actions by CDFW as a Responsible Agency. As a Responsible Agency, CDFW may consider the CEQA document from the County for the Project. To minimize additional requirements by CDFW pursuant to Fish and Game Code, section 1600 et seq. and/or under CEQA, the CEQA document 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.

Any LSAA permit issued for the Project by CDFW may include additional measures protective of streambeds on and downstream of the Project site. The LSAA may include further erosion and pollution control measures. To compensate for any on-site and off-site impacts to aquatic resources, additional mitigation conditioned in any LSAA may include the following: avoidance of resources, on-site or off-site creation, enhancement or restoration, and/or protection, and management of mitigation lands in perpetuity.

Mitigation Measure #3: Adult steelhead are expected to be in the area during periods of high flow (January 1st to March 31st) and smolt are likely to be in the area during periods of receding flows (March 1st to July 31st). No work should occur in or adjacent to the stream during these times unless permitted by National Marine Fisheries Service (NMFS), and consultation with CDFW has occurred. CDFW and the NMFS should be contacted to coordinate additional fish salvage and avoidance measures.

Mitigation Measure #4: Precautions to minimize turbidity/siltation may require the placement of silt fencing, coir logs, coir rolls, straw bale dikes, or other siltation barriers so that silt and/or other deleterious materials are not allowed to pass to downstream reaches. Materials composing the silt barrier shall not pose an entanglement risk to fish or wildlife.

Mitigation Measure #5: Vegetation that is removed during Project activities should not be stockpiled in or near a stream channel, or in areas where it has the potential to enter a stream channel or drainage. Native vegetation stockpiling may occur in upland and open space areas, where it will not impact native vegetation, and where wildlife can utilize these materials. Non-native vegetation shall be disposed of properly and not stockpiled.

Mitigation Measure #6: No vegetation trimming in excess of what is necessary to allow the level of access needed to complete the Project activities to meet the stated objectives of the Project. Native vegetation shall not be trimmed or removed for purposes of aesthetics or recreational access, and work shall only be performed with hand tools.

Recommendation #1: CDFW recommends that the measures included in MM-BIO-1 addressing steelhead be split into a standalone mitigation measure(s). The condition(s) should include additional details on survey methodology including seasonal survey windows. CDFW recommends BMP's included on page 4.3-55 be incorporated and expanded upon in the mitigation measures section to specifically address how proposed measures will be implemented to avoid impacts to southern steelhead, other aquatic organisms, and their habitat.

COMMENT #5: Direct and Indirect Impacts to Special-Status and Common Bird Species

Issue: The DPEIR states that impacts to nesting special status birds from defensible space creation, activities in vegetation management units, would be cumulatively significant and unavoidable (see page 3.4-53, 58, & 73), however the DPEIR has not exhausted all mitigation possibilities.

Specific impact: The DPEIR separates special status bird species into three guilds, tree nesting and roosting raptor guild, riparian guild, and other upland guild birds. Table 1 summarizes the species with potential to occur within the Project area, with habitat suitability specifics included:

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Table 1 – Special Status Bird Species with Potential to Occur in the Project Area

Guild	Common name	Species	Status	Habitat type, CWPP Zone, or CWPP VMU
Tree nesting and roosting raptor guild	Coopers hawk	<i>Accipiter cooperii</i>	SSC	riparian woodland/creek, southern oak woodland, and eucalyptus woodland, oak woodlands near Elings Park, where suitable foraging habitat occurs
Tree nesting and roosting raptor guild	White-tailed kite	<i>Elanus leucurus</i>	FP	riparian woodland/creek, southern oak woodland, and eucalyptus woodland, oak woodlands near Elings Park, where suitable foraging habitat occurs
Tree nesting and roosting raptor guild	Merlin	<i>Falco columbarius</i>		riparian woodland/creek, southern oak woodland, and eucalyptus woodland
Riparian bird guild	Yellow warbler	<i>Setophaga petechia</i>	SSC	F, G, H, I, and R, and VMU's near creeks in northern and southwestern parts of the CWPP area
Riparian bird guild	Yellow breasted chat	<i>Icteria virens</i>		Suitable breeding habitat in F, G, H, I, and R (most likely in Arroyo Burrow and zone R), and VMU's near creeks in northern and southwestern parts of the CWPP area
Other upland bird guild	Southern California rufous crowned sparrow	<i>Aimophila ruficeps canescens</i>		grassland and open scrub habitats,
Other upland bird guild	Grasshopper sparrow	<i>Ammodramus savannarum</i>	SSC	grassland and open scrub habitats,
Other upland bird guild	Burrowing owl	<i>Athene cunicularia</i>	SSC	grassland and open scrub habitats,
Other upland bird guild	California horned lark	<i>Eremophila alpestris actia</i>		grassland and open scrub habitats,
Other upland bird guild	Loggerhead shrike	<i>Lanius ludovicianus</i>	SSC	grassland and open scrub habitats,
Other upland bird guild	Olive-sided flycatcher	<i>Cortopus cooperi</i>	SSC	Woodland habitat with mature trees

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Riparian Bird Guild

The DPEIR states that for yellow-breasted chat and yellow warbler, and other species within the riparian bird guild that *“direct habitat impacts to these species would be limited by the relatively low potential for these species to occur”* (see page 4.3-52) and for yellow-breasted chat, yellow warbler, because these species are not known to breed in the proposed HFHA, and because highly suitable habitat is limited, impacts to yellow-breasted chat and yellow warbler from proposed modifications in the HFHA would be less than significant (see page 4.3-51). CDFW considers direct impacts to these special status bird species, if present, to be a significant impact with potential to reduce or eliminate already limited local populations.

Other Upland Bird Guild

The DPEIR states that burrowing owls have a small potential to nest in the Project area. Burrowing owls have been known to use highly degraded and marginal habitat where existing burrows or stem pipes are available. Nest and roost burrows of the burrowing owl are most commonly dug by ground squirrels, but they have also been known to use a variety of other species dens or holes (Gervais, et al., 2008). Impacts to burrowing owl (as well as other ground nesting species such as rufous-crowned sparrow, grasshopper sparrow, and California lark) could result from vegetation clearing and other ground disturbing activities. Project disturbance activities may result in crushing or filling of active owl burrows, causing the death or injury of adults, eggs, and young. In addition, the Project will remove burrowing owl foraging habitat by eliminating native vegetation that supports essential rodent, insect, and reptile that are prey for burrowing owl.

Additionally, large scale vegetation management may have significant negative effects on local populations of special status and common species for all guild classifications.

Why impact would occur: Impacts may occur due to direct impacts to nests and nesting birds, or adverse impacts to available nesting habitat.

Direct impacts to active nests:

MM-BIO-4 allows for Project-related activities to be completed in nesting season, which is between February 1- September 15 for this bioregion (and as early as January 1 for raptors). Animal population samples have a tendency for animal counts to underrepresent the true numbers of animals present in the survey area due to incomplete detectability of cryptic individuals and variable detectability over space and (Williams et al., 2002). Native bird species and their nests are cryptic in nature, and nesting bird surveys may be prone to human error, resulting in potential for take of nests that have gone undetected.

Impacts to ground and underground species (rufous-crowned sparrow, grasshopper sparrow, and California lark and burrowing owl respectively) and their juveniles may be injured or crushed by use of heavy machinery used in VMU areas. If prescribed fire is used, nests and juveniles may be subject to disturbance or mortality.

MM-BIO-4 requires up to a 300-foot buffer for passerine species and up to a 500-foot buffer for raptors. Use of heavy machinery and powered hand tools to complete removal and mastication may cause noise disturbances in which a 300-foot or 500-foot buffer may be inadequate to mitigate from impacts to active nests. Noise has also been shown to reduce the density of nesting birds (Francis et al. 2009) and cause increased stress that results in decreased immune responses (Kight et al., 2011). Anthropogenic noise can disrupt the communication of many wildlife species including frogs, birds, and bats (Sun et al., 2005, Patricelli et al, 2006, Gillam et al., 2007, Slabbekoom et al., 2008).

Impacts to available nesting and foraging habitat:

Vegetation management activities and implementation of defensible space will result in removal of native vegetation, downed logs, and standing dead trees, reducing the available foraging and nesting habitat for special status and common species of birds.

Evidence impact would be significant: Migratory nongame native bird species and their nests are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R., § 10.13). Sections 3503, 3503.5, 3011, and 3513 of the California Fish and Game Code prohibit take of all birds and their nests including raptors and other migratory nongame birds (as listed under the Federal MBTA). Many species of special concern are afforded extra protections because they meet the definition for Rare or Endangered under CEQA Guidelines §15125 (c) and/or §15380.

The Project area which supports white-tailed kite, a fully protected species in the State of California and may not be taken or possessed at any time (Fish & Game Code, § 3511). A metadata analysis of avifauna abundance in North America from 1970-2018 suggests a 29% decline in the abundance of avifauna, noting marked declines in special status and common species (Rosenberg



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et al., 2019). Fuel modification activities could lead to the direct mortality of common and sensitive avian species. The loss of occupied habitat could yield a loss of foraging potential, nesting sites, or refugia and would constitute a significant impact absent appropriate mitigation.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact Shortcoming)

Mitigation Measure #1: The SBFDF should revise of MM-BIO-4 and the BMP related to Nesting Bird Protection (see page 3-38) to avoid all Project-related vegetation management activities during nesting bird season, which is between February 1 and September 15 for the bioregion of the Project area.

Mitigation Measure #2: CDFW recommends that the SBFDF identify habitat of similar or greater habitat value at a ratio of no less than 1:1 for common native bird species and 2:1 for if special status bird species are known to inhabit the area prior to initiation of project-level activities. Any mitigation proposed as mitigation lands should be protected in perpetuity with a conservation easement, financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code section 65967, the lead agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.

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Mitigation Measure #3: If the SBFDF can demonstrate why it is not feasible for specific vegetation management activities to be conducted outside of nesting bird season, CDFW recommends the SBFDF specify that nesting bird surveys will be conducted by a designated biologist no more than 5 days prior to initiation of vegetation removal (when weather conditions are conducive to bird activity and visual detection). The designated biologist should document the presence of any bird species utilizing the project-level Project sites. The survey area should cover habitat that will be directly affected, plus up to a 300-foot buffer for non-special-status birds and up to a 500-foot buffer for raptors and other special status species. If the project is in a relatively remote area, the access road leading to/from the project-level Project site, the designated biologist should survey vegetation that overlaps the roadway, plus a 100-foot buffer.

If species specific protocol surveys are available, those should be used in lieu of the survey methodology above. To reduce impacts to burrowing owl, CDFW recommends that the Project adhere to CDFW's March 7, 2012, *Staff Report on Burrowing Owl Mitigation*. All survey efforts should be conducted prior to any Project activities that could result in habitat disturbance to soil, vegetation or other sheltering habitat for burrowing owl.

Mitigation Measure #4: CDFW recommends that the designated biologist document the presence of and species found to be used to incorporate species specific mitigation measures with specific performance criteria, that appropriately offset detrimental impacts to into the site-specific plan. Site specific measures should include designating a minimum 300-foot minimum avoidance buffers for all non-special status passerine birds and 500-foot minimum avoidance buffer for all special status passerine and raptor species until the nest becomes inactive or the young have fledged and will no longer be impacted by the Project.

Mitigation Measure #5: CDFW recommends that the SBFDF identify replacement habitat of similar or greater habitat value to the species present at the project-level Project site at a ratio of no less than 2:1 for common native bird species and 3:1 for special status bird species prior to initiation of project-level activities. Any mitigation proposed as mitigation lands should be protected in perpetuity with a conservation easement, financial assurance and dedicated to a qualified entity for long-term management and monitoring. Under Government Code section 65967, the lead agency must exercise due diligence in reviewing the qualifications of a governmental entity, special district, or nonprofit organization to effectively manage and steward land, water, or natural resources on mitigation lands it approves.

Recommendation #1: CDFW recommends the SBFDF separate MM-BIO-1 into category specific mitigation measures and adopt Mitigation Measures 1-5 of this comment as measures to reduce impacts to special-status and common bird species.

COMMENT #6: Impacts to Natural Communities and Sensitive Natural Communities

Issue: The DPEIR uses 2011 GIS data from the City of Santa Barbara to map generalized vegetative communities across the Project area. The communities mapped include coastal bluff, chaparral, coastal strand/beach, California annual grassland, Coastal perennial grassland, California annual grassland, coastal perennial grassland, riparian woodland, coastal sage scrub,

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and southern oak woodland. Table 4.3-7 and Table 4.3-9, included on page 4.3-60 and 43-64 through 4.3-65, notes that within each generalized vegetation classification listed, there may be sensitive natural communities that consist of vegetative alliances and/or associations that are considered rare or unique that are included in HFHA or VMU's. CDFW is concerned that vegetation alteration activities, which have expanded in scope with the current edition of the CWPP, may result in degradation or type conversion of natural communities and sensitive natural communities.

Specific impact: Disturbance can play a large role in influencing invasion of non-native and invasive species (Keeley, et al., 2005). In a case study of recently burned coastal sage scrub and chaparral communities in southern California, woody canopy closure and alien seed banks were found to directly influence the dominance of non-native species after 5 years of recovery (Keeley, et al., 2005). Changing the frequency of disturbance to chaparral or coastal sage scrub vegetative communities with regular vegetation management activities may alter selection regime, making conditions favorable for nonnative or invasive species.

Why impact would occur:

Coastal Sage Scrub:

Coastal sage scrub communities are the most widespread within the greater Project area, with 231.3 acres of coastal sage scrub in proposed VMU units. The average historical fire return interval for southern California coastal sage scrub communities (*Artemisia californica* alliance) is between 72-120 years (Fire Effects Information Systems, USDA, 2012). Case studies measuring the recovery response to disturbances suggest that reduced recovery time has contributed to the spread of invasive species in coastal sage scrub environments including *Artemisia californica* dominant alliances (Malanson et al., 1985, Keeley et al., 2012, Diffendorfer et al., 2002).

Chaparral:

The DPEIR states that "the proposed VMUs support approximately 32.8 acres of chaparral, most of which (26.9 acres) occurs in Unit 28, in the northeastern extreme of the proposed CWPP area (Table 4.3-9). As Unit 28 is within the existing HFHA, significant parts of it are already subject to defensible space requirements". The DPEIR also states that there is a possibility for sensitive natural communities to be present (presence/absence will be evaluated for project-level Project documentation).

Chaparral species have adapted a variety of methods for postfire regeneration, including postfire reseeders and postfire resprouters. In obligate reseeders such as *Ceanothus* species (often a keystone genus in chaparral habitats), mature plants are killed by fire and the seed bank is activated by the heat from fire activity, resulting new individuals sprouting. For many chaparral species, long fire free periods are required for many species to properly regenerate. When keystone, obligate seeders suffer closely spaced fires, their populations may be replaced with resprouter-dominated chaparral, resulting in a loss in species and structural diversity of the habitat (Zedler et al., 1983).

Resprouting vegetation may still be negatively impacted by decreasing fire return intervals. The average historical fire return interval for chamise California chaparral communities (*Adenostoma fasciculatum* alliance) is between 33-120 years (Fire Effects Information Systems, USDA, 2018). Case studies measuring the response to shortened intervals in chamise California chaparral communities have marked significant changes in density and composition (Zedler et al., 1983).

Evidence impact would be significant: Habitat loss and invasive plant invasions are a leading causes of native biodiversity loss. Removal of vegetation could result in direct loss of habitat supporting common and special status species who depend on that vegetation for nesting and foraging. Fuel modification activities may contribute to increases in both population numbers and distribution of invasive plant species. Invasive plant species spread quickly and can displace native plants, prevent native plant growth, and reduce native plant species diversity. The creation of new fire breaks or fuel modifications zones serve as conduits for the introduction of nonnative and invasive plant species into adjacent, previously undisturbed areas (Zink et al., 1995). Unintended introduction of invasive plant species as a result of this Project could cause habitat degradation within and adjacent to the Project site, impacting the common and special status species who depend on the vegetation as nesting and foraging habitat.

The Project is increasing the scope of defensible space modification in HFHA's from 4,776.78 acres to 5,323.96 acres (see Table 3-2), increasing the scope of operations by 547.18 acres. The Project is increasing the vegetation management units from 1,201.68 acres to 1876.59 acres (See Table 3-7), increasing the scope of operations by 674.91 acres. The net increase of managed land is 1,222.09 acres. Within those areas, coastal sage scrub composes of 223 acres of VMU's and 41.5 acres of HFHA's subject to fuel modification zones. Chaparral composes 32.8 acres of VMU's. Widespread vegetation management, which increases the frequency of disturbance to a level outside natural fire return intervals and alters the selective regime for native species could lead to



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widespread habitat degradation, of both sensitive and common natural communities, that would be significant.

Recommended Potentially Feasible Mitigation Measure(s) (Regarding Environmental Setting and Related Impact Shortcoming)

Mitigation Measure #1: A specific vegetative management plan should be created, considering factors such as, existing vegetation communities using the Manual of California Vegetation or association-based classification to determine the rarity of the ranking (S1-S3), time since previous treatment, existing shrub canopy cover, distance from non-native species, prevalence of non-native species in and adjacent to the Project area, species specific regeneration methods, and presence or absence of special status species. Risk for negative impacts to existing habitat should be carefully considered prior to site-specific project initiation. Where invasive species like Mediterranean annual grasses and forbs are present near proposed treatments, CDFW recommends treatments in intact habitats adjoining areas supporting these species be minimized. CDFW recommends post-treatment follow-up monitoring at years 1, 5, and 10, to identify and address changed conditions stemming from fuel modifications. An adaptive management plan should be developed and funded to effectively control and remove noxious and problematic weeds in post treatment years.

Mitigation Measure #2: To minimize potentially significant impacts from invasive plant introduction or type conversion, CDFW recommends scheduling repeat maintenance activities based on species specific fire regime adaptations. The United States Forest Service has created the Fire Effects Information System (FEIS), which is a database with useful information on native species fire regime and other species information to help inform management best practices. The FEIS can be reached at: <https://www.feis-crs.org/feis/faces/SearchByOther.xhtml>.

Mitigation Measure #3: If avoidance is not possible, CDFW recommends that impacts to sensitive natural communities be offset by no less than a 5:1 mitigation ratio (or higher depending on community rarity ranking) of preserved land of similar habitat in a condition of equal or higher value. If the SBFD can demonstrate why vegetation management activities must be conducted more frequently than is necessary to maintain natural patterns of disturbance frequency (see Mitigation Measure #2), offsite mitigation at a ratio of no less than 2:1 should be identified and secured prior to initiation of site-specific projects.

If part of mitigation includes site enhancement or restoration, CDFW recommends any revegetation plan proposed for mitigation for special status plant communities be submitted to CDFW for review and comment. The mitigation for unavoidable impacts to sensitive natural communities should strive to develop a more superior habitat quality and quantity than that which was impacted by any anthropogenic modifications to offset the temporal loss of several growing seasons that would likely occur while achieving any revegetation success criteria. This should include higher mitigation ratios of areas occupied by targeted special status plant communities and increased level of protection of revegetated areas to prohibit human-caused degradation.

All lands counting toward avoidance and preservation in the DEIR should be placed under a conservation easement with an appropriate non-wasting endowment for management in perpetuity. All revegetation/restoration areas that will serve as mitigation should include preparation of a separate restoration plan, to be approved by USFWS and CDFW prior to any ground disturbance. The restoration plan should include restoration and monitoring methods; annual success criteria; contingency actions should success criteria not be met; long-term management and maintenance goals; and, a funding mechanism to assure in perpetuity management and reporting. Areas proposed as mitigation should have a recorded conservation easement and be dedicated to an entity which has been approved to hold/manage lands (AB 1094; Government Code, §§65965-65968).

Mitigation should not substitute for implementation of an alternative that would completely avoid impacts to very sensitive habitats. Completely avoiding impacts to very sensitive habitats would significantly reduce adverse impacts of any development on these sensitive habitats.

Recommendation #1: CDFW recommends the SBFD separate MM-BIO-1 into category specific mitigation measures, including a measure(s) to evaluate any site-specific project plan for specific vegetative alliances and adopt Mitigation Measures 1-3 of this comment as measures to reduce impacts to natural communities and sensitive natural communities.

Editorial Comments and/or Suggestions

Comment #7: Section 3.4 under the Fish Guild subheading on page 4.3-55 states that "Avoidance measures noted in Appendix E and Section 3 would be specifically identified in the Work Plan.



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Section 3 of Appendix E further states that entry into streambeds shall not be authorized, and that treatment within 25 feet of the top of the bank shall be limited to easily accessible dead brush, which may only be conducted if the work will not damage the bank structure.”, however, MM-BIO-2 is contradictory to this statement, setting guidelines for working within the creek or 25 foot buffer area. CDFW requests the SBFD clarify if Project activities will require entry to the streambed area. If Project-related activities are planned within a streambed area, consistent with MM-BIO-5, CDFW would require a Lake and Streambed Alteration notification be submitted.

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Comment #8: The DPEIR states that the current vegetation management activities within and near stream channels are conducted with an existing 2015 LSAA (Agreement number not provided). A standard LSAA has an expiration date of 5 years. CDFW requests that the SBFD consult with CDFW to ensure the LSAA has not expired and/or is not in need of an extension, and to confirm that the actions described in the CWPP are consistent with the covered activities of the LSAA. CDFW recommends the SBFD initiate consultation prior to issuance of the Final PEIR, and that resolutions made between the two parties can be incorporated into the document.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB field survey form can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/pdfs/CNDDDB_FieldSurveyForm.pdf. The completed form can be mailed electronically to CNDDDB at the following email address: CNDDDB@wildlife.ca.gov. The types of information reported to CNDDDB can be found at the following link: http://www.dfg.ca.gov/biogeodata/cnddb/plants_and_animals.asp.

19-14

FILING FEES

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

CONCLUSION

CDFW appreciates the opportunity to comment on the DPEIR to assist the SBFD in identifying and mitigating Project impacts on biological resources.

Questions regarding this letter or further coordination should be directed to Audrey Kelly, Environmental Scientist at (805) 861-8475 or Audrey.Kelly@wildlife.ca.gov.

Sincerely,
DocuSigned by:
Erinn Wilson-Olgin
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Erinn Wilson-Olgin
Environmental Programs Manager I

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Ec: California Department of Fish and Wildlife – South Coast Region

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Response to Comment Letter 19

California Department of Fish and Wildlife
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- 19-1 This comment is an introduction by the California Department of Fish and Wildlife (CDFW) to comments to follow. No further response is required.
- 19-2 The commenter states that CDFW reviewed the Draft Program Environmental Impact Report (PEIR) and associated biological appendices for the Community Wildfire Protection Plan (CWPP), and they appreciate the opportunity to provide comments and recommendations. The City of Santa Barbara Fire Department (SBFD) acknowledges this comment.
- 19-3 The commenter describes CDFW's role as a trustee agency under the California Environmental Quality Act (CEQA) for fish and wildlife. The commenter also states that CDFW is submitting comments as a responsible agency under CEQA.
- 19-4 The commenter correctly summarizes the project description described in Chapter 3 of the Draft PEIR.
- 19-5 The commenter states that CDFW is offering comments and recommendations on biological resources to assist SBFD. The commenter recommends that CDFW's suggested revisions be included in the Final PEIR. SBFD appreciates the recommendations provided by CDFW and as discussed below, incorporated certain recommendations, including breaking MM-BIO-1 into subheadings.
- 19-6 CDFW Comment #1: Best Management Practices, Biological Resources Evaluation, and MM-BIO-1.
- The commenter states that the process of relying on pre-construction surveys may result in sensitive biological resources going undetected, resulting in undisclosed impacts. Depending on seasonality of the pre-project survey, as described in Mitigation Measure MM-BIO-1 and the best management practice (BMP) related to biological resource evaluations, special-status species may be undetectable, unidentifiable, or absent from the site during that specific season, and impacts from vegetation management activities could result loss of foraging, nesting, and/or breeding features that are important for the long-term stability of a population.
- The commenter incorrectly characterizes the biological resources evaluation described in Chapter 3, Project Description, of the Draft PEIR as pre-construction surveys. The biological resources evaluation is intended to assess a particular project site prior to an activity under the CWPP, and identify the appropriate actions to take. In the event that a special-status species is identified by the City of Santa Barbara (City) qualified biologist, additional protocol-level surveys may be required to assess the resources at that particular location, as required by MM-BIO-1. These actions would be specified in the project-specific Work Plan. SBFD concurs with CDFW that these actions would occur prior to the project-specific CEQA review. MM-BIO-1 has been revised, as shown in Chapter 3 of this Final PEIR. SBFD also agrees with CDFW's recommendation to break MM-BIO-1 into guild-specific mitigation, and has added letters to these, as shown in Chapter 3 of this Final PEIR. Please also see Global Response GR-3.
- 19-7 CDFW Comment #2: Direct and Indirect Impacts to Special Status Plant Species.

The commenter states that the Draft PEIR includes a discussion of the potential impacts to special-status plant species from proposed modifications due to creation of defensible space in the High Fire Hazard Area (HFHA) and vegetation management in designated Vegetation Management Units (VMUs). Although the Draft PEIR recognizes the potential impacts to special-status plant species, it states that impacts to special-status plant species would be less than significant. CDFW is concerned that the proposed mitigation measures are inadequate to reduce potential impacts to less than significant. CDFW recommends that a qualified biologist conduct botanical surveys for special-status plant species, including those listed by the California Native Plant Society, during the blooming period for all sensitive plant species potentially occurring within the project area.

The commenter incorrectly characterizes the biological resources evaluation described in Chapter 3, Project Description, of the Draft PEIR as pre-construction surveys. Rather, the biological resources evaluation is intended to identify potential sensitive species and habitat, and if warranted based on the site-specific circumstances, perform additional protocol-level surveys to locate and identify sensitive resources. Protocol-level surveys will account for California Native Plant Society species-specific blooming periods, and incorporate measures to reduce or avoid impacts. Furthermore, as noted in Response to Comment 19-6, these surveys would be performed prior to project-specific CEQA review. If sensitive species are identified, an Initial Study would be prepared to evaluate the impact and determine the appropriate level of environmental review. SBFDF concurs with CDFW's recommendation to modify MM-BIO-1, Special Status Species Surveys and Mitigation, to amplify special-status plant mitigation by stating the requirement for protocol surveys; developing avoidance and minimization measures, including mitigation ratios that are roughly proportionate to the impact; and depositing a documented conservation seed collection of the impacted rare plant species at either the Santa Barbara Botanic Garden or the California Botanic Garden (formerly known as Rancho Santa Ana Botanic Garden). Please also see Global Response GR-3.

19-8 CDFW Comment #3: Direct and Indirect Impacts to Invertebrate Special Status Species.

The commenter states CDFW is concerned that MM-BIO-1 relies on site evaluations beginning 10 days prior to initiation of vegetation management activities and lacks specific details on survey methodology for Crotch bumble bee if suitable habitat is identified, and that the Draft PEIR does not provide adequate avoidance and minimization measures for Crotch bumble bee.

As previously stated, the commenter incorrectly characterizes the biological resources evaluation described in Chapter 3, Project Description, of the Draft PEIR as pre-construction surveys. Rather, the biological resources evaluation is intended to identify potential sensitive species and habitat, and if warranted based on the site-specific circumstances, perform additional protocol-level surveys to locate and identify sensitive resources. The commenter states that "Wide scale vegetation management to thin shrubs and remove annual herbaceous ground cover could result in a reduction of nectar sources for foraging bees which could negatively impact existing Crotch bumble bee populations." As discussed in Section 4.15, Public Services and Utilities, of the Draft PEIR, for VMUs and the Community Fuels Treatment Network, SBFDF is limited in its ability to conduct vegetation management activities due to a number of factors that include physical topography (e.g., terrain and slope), the biological and cultural sensitivity of areas, funding, available work force, and existing workload. As a result, over the course of a 12-year period from 2008 to 2019, SBFDF was only able to conduct vegetation management activities on an average of 19.37 acres per year (Anderson pers. comm. 2020) in these areas. In accordance with the biological resources evaluation, if Crotch bumble bee habitat is present within a work site,

additional protocol-level surveys would be performed, and if needed, avoidance of work during certain time periods would occur, such as during the flight season, which is February through October (peak season March through September for drones).

As discussed in Section 4.3.4, Impact Analysis, of the Draft PEIR, although vegetation management within the proposed VMUs could result in removal of shrubs and mowing, grazing, or burning of grasses within Crotch bumble bee habitat, removal of live vegetation itself would not modify habitat structure in a way that would make it unsuitable for Crotch bumble bee, which prefers open habitats. However, these activities could result in removal of debris that could be suitable for Crotch bumble bee nesting or overwintering. Although bumble bees are highly maneuverable and able to avoid slow-moving machinery used in clearing and mowing vegetation, use of mechanical means to remove brush and maintain grasses in the VMUs could result in crushing debris or loose soils where Crotch bumble bees have established nests. Use of heavy machinery from late fall to mid-winter could result in collapsing small mammal burrows potentially occupied by Crotch bumble bee females. Use of prescribed fire could also result in destruction of nests. Hand removal of dead material or other debris also could result in nest destruction, on very rare occasions. Any loss of queens, nests, or wintering females could severely impact the potential for this species to persist in occupied habitats. As discussed in Chapter 3 of the Draft PEIR, SBFD would perform a site-specific biological evaluation, including a reconnaissance survey, prior to implementation of a Work Plan. Additionally, MM-BIO-1 requires species-specific focused surveys and development of measures to avoid and minimize impacts to sensitive resources identified in the survey; these measures would reduce impacts to Crotch bumble bee individuals. Other BMPs that would also reduce this impact include the following:

- Ensure that heavy equipment is not placed in sensitive habitat areas.
- Limit the size and quantity of heavy machinery.

Ultimately, the CWPP is a fire management plan intended to reduce the overall risk of fire within the community. Although SBFD appreciates the careful consideration and comments provided by CDFW, ultimately a wildfire within Crotch bumble bee habitat would have a far greater impact on the species than limited brush clearance activities. SBFD will take every reasonable measure to perform biological surveys in advance of performing work, but in the event of a wildfire, immediate action may be essential to reduce the potential loss of property and life. As such, SBFD disagrees with CDFW's recommendation to perform presence/absence surveys 1 year prior to vegetation alteration. Notwithstanding, SBFD has amplified MM-BIO-1 to include additional provisions related to the Crotch bumble bee; see Chapter 3 of this Final PEIR. Please also refer to Global Response GR-3.

19-9 CDFW Comment #4: Direct and Indirect Impacts to Special Status Fish Species.

The commenter states that CDFW is concerned vegetation alterations adjacent to steelhead-occupied streams could degrade the quality of habitat available for fish. CDFW requires that for any activities that may alter a stream, the project applicant (or "entity") must provide notification to CDFW pursuant to California Fish and Game Code Section 1600 et seq. Based on this notification and other information, CDFW determines whether a Lake and Streambed Alteration Agreement (LSAA) is required prior to conducting the proposed activities.

SBFD acknowledges the requirement to obtain an LSAA consistent with Section 1600 et seq. SBFD has a programmatic LSAA issued by CDFW for vegetation treatment activities (Notification No. 1600-2014-0160-R5), which remains in effect until December 1, 2024 (see Appendix D of this Final PEIR). Furthermore, Table 3-11 includes Project Design Features and BMPs that dictate where vegetation may be stockpiled in relationship to a project site and may not occur within a riparian area and as such, the recommended mitigation measure suggested by the commenter is redundant and therefore not warranted. Vegetation management performed by a private property owner within a riparian area may also require an LSAA. MM-BIO-2, Riparian Protection, has been revised to state the regulatory requirement to obtain an LSAA (see Chapter 3 of this Final PEIR). Additionally, MM-BIO-3, Property Owner Educational Material, requires SBFD to create property owner educational materials in consultation with a City-qualified biologist that will be available on the SBFD website and in a printable brochure that advises property owners about regulatory obligations with defensible space and specifying measures that owners can take when performing vegetation management.

As noted in Response to Comment 19-8, the CWPP is a fire management plan intended to reduce the overall risk of fire within the community. SBFD will take every reasonable measure to perform biological surveys in advance of performing work, but in the event of a wildfire, immediate action may be essential to reduce the potential loss of property and life. As such, SBFD disagrees with CDFW's recommendation stated under the commenter's Mitigation Measure #3 to avoid work during periods of high flow (January 1 through March 31) and when smolt may be present during periods of receding flows (March 1 through July 31). As shown in Table 3-1, History of Wildfires in the Santa Barbara Area, and Figure 3-2, Fire History in the Santa Barbara Area, in Chapter 3 of the Draft PEIR, several fires have occurred within this time period, and SBFD may need to act immediately to respond to wildfire threat. SBFD also disagrees with the commenter's Mitigation Measures #4, #5, and #6 because Project Design Features and BMPs (shown in Table 3-11 of the Draft PEIR and as modified in this Final PEIR) already include BMPs that address the timing and placement of vegetation trimming, minimizing sedimentation and placement of spoils outside of the 50-foot creek setback, and avoiding work when water is present. Additionally, SBFD believes that MM-BIO-1 addresses the appropriate details on survey methodology, including timing.

19-10 CDFW Comment #5: Direct and Indirect Impacts to Special Status and Common Bird Species.

The commenter states that CDFW is concerned that nesting special-status birds from defensible space creation and activities in vegetation management units would be cumulatively significant and unavoidable, and that the Draft PEIR has not exhausted all mitigation possibilities. The Draft PEIR separates special-status bird species into three guilds: tree nesting and roosting raptor guild, riparian guild, and other upland guild birds. The commenter states a specific concern regarding the Riparian Bird Guild (yellow-breasted chat and yellow warbler) and Other Upland Bird Guild (burrowing owls), and the project area that supports white-tailed kite, a fully protected species in California that may not be taken or possessed at any time (California Fish and Game Code, Section 3511). The commenter states that impacts may occur due to direct impacts to nests and nesting birds, or adverse impacts to available nesting habitat. CDFW recommends complete avoidance of the nesting bird season (Mitigation Measure #1) or dedication of mitigation land protected in perpetuity through a conservation easement. CDFW also recommends that SBFD specify that nesting bird surveys will be conducted by a designated biologist no more than 5 days prior to initiation of vegetation removal (when weather conditions are conducive to bird activity and visual detection) (Mitigation Measure #3); incorporating 300-foot minimum avoidance nest buffers for all non-special-status passerine birds, and 500-foot minimum nest

avoidance buffers for all special-status passerine and raptor species until the nest becomes inactive or the young have fledged (Mitigation Measure #4); and identifying replacement habitat at a ratio of no less than 2:1 for common native bird species and 3:1 for special-status bird species prior to initiation of project-level activities (Mitigation Measure #5).

SBFD believes that the Draft PEIR MM-BIO-4, Nesting Bird Avoidance, as modified in Chapter 3 of this Final PEIR, adequately addresses nesting bird protection. The CWPP is a fire management plan intended to reduce the overall risk of fire within the community. A wildfire has significantly greater impact on nesting birds than the limited vegetation management activities contemplated by the CWPP. From December 4, 2017 through January 10, 2018, when the fire was fully contained, the Thomas Fire, which burned through Ventura and Santa Barbara Counties, charred 281,893 acres. The cause of the fire was line slap (power lines coming into contact) that ignited vegetation (VCFD 2020). Routine vegetation maintenance near and under the power lines could have lessened the extent of that fire.

SBFD will take every reasonable measure to perform biological surveys in advance of performing work, but in the event of a wildfire, immediate action may be essential to reduce the potential loss of life, property, and wildland habitat. SBFD's stated objectives in Section 3.2 of the Draft PEIR clearly note that the CWPP is intended to "Develop a comprehensive plan that incorporates procedures and programs to mitigate wildfire risks to the City," and although SBFD also seeks to "Balance fire mitigation strategies with the City's goals of maintaining a vibrant economy and protecting natural resources, historic resources, and community character" (Section 3.2, Purpose, Need, and Objectives), fire protection is paramount. SBFD is constrained by limited funding to perform vegetation management and other fire mitigation strategies. Establishing conservation easements using limited City public funds, primarily for VMUs that are already within City parks, provides little to no species benefit above the avoidance measures already included in MM-BIO-4 and as modified in Chapter 3 of this Final PEIR. Nesting birds will be identified by site-specific biological resources evaluations and a Work Plan. The Work Plan will account for any bird nesting buffers required by MM-BIO-4. Defensible space management is the responsibility of the property owner, and as such, the owner has the regulatory obligation to seek permits from CDFW, as required.

Long-term dedication of land within the City in a conservation easement would be in direct conflict with the specific purpose and objectives of the CWPP to reduce fire risk. Vegetation, regardless of whether in a conservation easement or not, may still present a considerable fire hazard to the City and may require routine vegetation management to reduce fire hazards. As discussed in Section 4.12 Recreation, of the Draft PEIR, the City enjoys a considerable amount of natural and open space already within City-managed parks. According to the Parks and Recreation Department Resources Inventory, the City contains 60 parks and sports facilities, and 1,808 acres of park land (City of Santa Barbara 2017). The City incorporated in 1850 and, as noted by the City's General Plan Land Use Element, "Santa Barbara is now largely a built-out city, with well established neighborhoods, relatively few vacant parcels, and a set of height restrictions and design review requirements that maintain the City's distinct architectural character" (City of Santa Barbara 2011b). The ability to add mitigation land through conservation easements, open space, or park land is not feasible nor roughly proportionate to the impacts, given the limited amount of vegetation management activities proposed as part of the CWPP.

19-11 CDFW Comment #6: Impacts to Natural Communities and Sensitive Natural Communities.

The commenter states that CDFW is concerned that vegetation alteration activities, which have expanded in scope with the current edition of the CWPP, may result in degradation or type conversion of natural communities and sensitive natural communities; habitat loss and invasive plant invasions are a leading causes of native biodiversity loss. Removal of vegetation could result in direct loss of habitat supporting common and special-status species that depend on that vegetation for nesting and foraging. Fuel modification activities may contribute to increases in both population numbers and distribution of invasive plant species. The CWPP is increasing the scope of defensible space modification in the HFHA from 4,776.78 acres to 5,323.96 acres, increasing the scope of operations by 547.18 acres. The CWPP is increasing the VMUs from 1,201.68 acres to 1876.59 acres (see Table 3-7 of the Draft PEIR), increasing the scope of operations by 674.91 acres. The net increase of managed land is 1,222.09 acres. Widespread vegetation management, which increases the frequency of disturbance to a level outside natural fire return intervals and alters the selective regime for native species, could lead to widespread habitat degradation of both sensitive and common natural communities that would be significant. CDFW recommends creation of a vegetation management plan and long-term monitoring incorporating adaptive management. Additionally, CDFW recommends scheduling fire maintenance based on species-specific fire regime adaptations or mitigating at a 5:1 ratio.

SBFD concurs with the commenter's statement that additional acreage is being added to the FHSZs and VMUs. As discussed in Global Response GR-1, based on SBFD's in-depth knowledge of the City and comprehensive analysis performed as part of the CWPP and analyzed in the Draft PEIR using in-person field assessments; available GIS data, including structural density and fire response timeframes; industry-standard fire modeling; and baseline data from 2004 and 16 years' of additional data from firefighting within the City, SBFD believes that the proposed HFHSZs, VHFHSZs, and VMUs have been properly evaluated and accurately mapped. SBFD's vegetation management activities have been constrained by funding, and as a result, over the course of a 12-year period from 2008 through 2019, SBFD was only able to conduct vegetation management activities on an average of 19.37 acres per year (Anderson pers. comm. 2020) within VMUs and the Community Fuels Treatment Network. A total of 80 acres annually is assumed to be subject to defensible space or private roadway clearance management. These vegetation management estimates are for the entire CWPP area and could affect different habitat types depending on the location of the activity.

The commenter expresses concern for the gradual conversion of natural communities through increased non-native exotic plant invasion. SBFD acknowledges this concern and, consistent with current practices and as proposed as part of the CWPP (see Table 3-11, Project Design Features and Best Management Practices, as modified in this Final PEIR), the SBFD incorporates several measures to reduce the likelihood of invasive exotics dominating an area after activities occur. Specifically, the following measures are incorporated:

Project Design Feature – Removal of Invasive Exotic Plants

- During the site-specific biological resources evaluation, SBFD would identify invasive exotic plants (such as Pampas grass [*Cortaderia* 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 would preferentially remove exotic plants that pose a fire hazard, and generally remove exotic plants in the work area as the opportunity arises.

Project Design Feature – Sensitive Habitats

- Vehicles and equipment should arrive at the treatment area clean and weed-free as verified by the SBFD.

Project Design Feature – Work Plan

- SBFD will develop a site specific Work Plan that will incorporate the results of the biological evaluation. The Work Plan shall be finalized not more than five days prior to the start of operations. The Work Plan may include measures related to special status species avoidance, additional site surveys/documentation and minimizing impacts to riparian habitat and sensitive vegetation communities. The SBFD will perform an after-action report documenting the site conditions after work is complete. The after action report will be maintained in a publicly accessible database. Information from the database shall be evaluated annually to determine native and nonnative vegetation regrowth and measures that have the strongest success in reducing nonnative plant regrowth to help inform future SBFD activities.

The Draft PEIR incorporates MM-BIO-1 through MM-BIO-6 to reduce project-specific impacts. However, as previously noted, cumulative impacts to biological resources were determined to be significant and unavoidable. The recommended mitigation ratios and establishment of a conservation easement are not warranted nor feasible based on the stated objectives of SBFD for the CWPP.

19-12 CDFW recommends SBFD separate MM-BIO-1 into category specific mitigation measures. SBFD concurs and has separated MM-BIO-1 into specific groupings as reflected in Section 3.

19-13 CDFW Comment #7: The commenter identifies an internal inconsistency between Project Design Features and MM-BIO-2 and MM-BIO-5.

CDFW Comment #8: The commenter states that work should be performed in accordance with a CDFW LSAA, and the SBFD should confirm that the existing LSAA is still in effect and would cover the activities within the CWPP.

SBFD has a programmatic LSAA issued by CDFW for vegetation treatment activities (Notification No. 1600-2014-0160-R5), which remains in effect until December 1, 2024 (Appendix D). SBFD has reviewed the LSAA and determined that the activities proposed in the CWPP are consistent with the LSAA and no further review is required or necessary. SBFD concurs with the commenter and has modified the Project Design Features to include the City’s current LSAA (Appendix D of this Final PEIR). MM-BIO-2 has also been revised to reflect a 50-foot setback rather than a 25-foot setback (see Chapter 3 of this Final PEIR).

19-14 The commenter states that any special-status species and natural communities that are detected should be reported to the California Natural Diversity Database (CNDDDB) in accordance with the CNDDDB field survey form.

SBFD acknowledges this comment and will file the form as required.

19-15 The commenter states that filing fees shall be due upon filing the Notice of Determination by the lead agency.

The SBFD acknowledges this comment and will submit the appropriate fees at the timing of filing the Notice of Determination.

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Comment Letter 20

On Nov 13, 2020, at 4:55 PM, Chris Dahlstrom [REDACTED] wrote:

EXTERNAL

Subject: Extend and Postpone Comment period

Thank you for opportunity to review and provide first-time comments to the City’s CWPP PEIR.

The first comment is a global in nature and specific to the public’s opportunity to have input and involvement in this CWPP environmental review process during the COVID-19 pandemic and a local epidemic. Because of this serious crisis and extraordinary health risk, every person is impacted in many different and unique ways; direct and indirect health impacts, employment loss, economic effects, and mental issues. This crisis has resulted in mandated restrictions on every sector of social structure including government, private corporate enterprises, local businesses, agriculture and the general public and caused significant changes in the public’s behavior, the opportunities for engaging in social and business actions including the City’s governmental and daily public service business. Restrictions are in place that sequester the ability and availability to engage in open and public civic activities such as staff meetings, scoping meetings, workshops, and hearings.

20-1

Because of COVID-19 and the public risk, the City has not had the open, in-person meetings nor will the City have those open and public hearings in the immediate future that allow the public and those residents directly impacted by the draft CWPP terms and conditions to have meaningful interaction with City officials. COVID-19 and all of the restrictive measures and mandates as well as public safety actions, prohibit many public agencies and the public from gathering or convening open meetings. We, as the public are restricted by the City to meet as a group in public parks (City signs posted) to discuss this PEIR. There is no justification for the City to move forward with such a broad reaching Plan during this crisis event and in the midst of this pandemic?

20-2

These are the very reasons to postpone and delay any significant review and actions on this important CWPP PEIR and policy documentation.

It is incumbent on the City not only to take every action to assure public input but also to consider this serious crisis as a deterrent for the public to engage in this process when health is a priority and so much more important than the designation of a zone. This is not the time for business-as-usual for agencies because life is not life-as-usual for the public.

20-3

We again the City to defer or extend the CWPP PEIR review period to a time after the COVID-19 Pandemic and local epidemic is over as determined by the State of California and the CDC in conjunction to the Federal government.

Thank you.

Chris and Susan Dahlstrom
[REDACTED]

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Response to Comment Letter 20

Chris and Susan Dahlstrom

November 13, 2020

20-1 The commenter notes that the COVID-19 pandemic may have restricted the public's opportunity for input and involvement on the Community Wildfire Protection Plan (CWPP) and Draft Program Environmental Impact Report (PEIR). The City of Santa Barbara Fire Department (SBFD) acknowledges the significant impact that the pandemic has placed on the Santa Barbara community. SBFD has made every reasonable accommodation to engage the public in the PEIR process in spite of the pandemic. SBFD performed the following actions with regard to public outreach and engagement:

- Two public community workshops on the CWPP occurred: one on February 20, 2020 at Adams Elementary School, and one virtually via Zoom on April 1, 2020.
- The Draft PEIR Notice of Availability/Notice of Completion was filed with the State Clearinghouse and made available to the public on September 28, 2020.
- The Notice of Availability was filed with the Santa Barbara County Clerk of the Board on September 28, 2020, at 3:55 p.m.
- The City sent the Notice of Availability via certified mail to the City of Santa Barbara's (City) standard environmental document distribution list.
- SBFD posted information about the availability of the Draft PEIR on Facebook, Instagram, and Twitter.
- Notification was posted to all City of Santa Barbara Nextdoor subscribers.
- Postcards were mailed by the City to all property owners in the existing and proposed high fire hazard areas.
- A public notice ad ran in the Santa Barbara News Press on September 25, 2020.
- A half-page color ad ran in the Santa Barbara Independent on October 1, 2020.
- Subscribers who signed up on the CWPP website are automatically added to the CWPP/PEIR distribution email list and receive email notifications about updates in the process.
- There was an opportunity to attend and comment at the virtual Planning Commission hearing on November 5, 2020.
- There was an opportunity to submit written feedback to the CWPP website or via email or standard mail.

In each instance, the public was encouraged to view the CWPP website, submit comments if desired, and contact SBFD staff lead Amber Anderson with further questions. The City Planning Commission also held a virtual meeting, consistent with the procedures in place for the City and with Governor Newsom's Executive Order N-33-20, which states that most City government activities are considered to be essential services. As such, these services can continue with appropriate safety measures in place, such as conducting virtual meetings.

- 20-2 The commenter suggests that postponing action on the CWPP and Draft PEIR would be appropriate in light of the pandemic. Although the pandemic has unquestionably affected most aspects of daily life, wildfire risk within the City (and entire state) persists. CAL FIRE's incident archive recorded 9,279 incidents in 2020, tragically including the loss of 31 individuals, 10,488 structures, and 4,197,628 acres burned (CAL FIRE 2020). Fire management activities must continue regardless of the pandemic. SBFD has made every reasonable effort to engage the public in the CWPP and Draft PEIR process so that the pandemic does not unduly restrict the public's opportunity for participation in the process. Please refer to Response to Comment 20-1.
- 20-3 The commenter requests postponement of consideration of the CWPP and Draft PEIR. Please refer to Responses to Comments 20-1 and 20-2.

Comment Letter 21

From: Mcroberts, Ingrid@DOT [<mailto:Ingrid.Mcroberts@dot.ca.gov>]
Sent: Friday, November 13, 2020 2:43 PM
To: Amber Anderson <aanderson@SantaBarbaraCA.gov>
Subject: CWPP_Draft PEIR_Comment Letter

EXTERNAL

Hello Ms. Anderson,

Please accept the attached comment letter for the City of Santa Barbara Community Wildfire Protection Plan Project for the draft PEIR. A hard copy is also being mailed to your office.

Thank you
Ingrid McRoberts
Associate Transportation Planner
IGR-Santa Barbara County
District 5 ATP Project Lead
Caltrans, District 5
Please note new number: (805) 835-6555

21-1

STATE OF CALIFORNIA—CALIFORNIA STATE TRANSPORTATION AGENCY

Gavin Newsom, Governor

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/



November 13, 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 DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE CITY OF SANTA BARBARA COMMUNITY WILDFIRE PROTECTION PLAN PROJECT

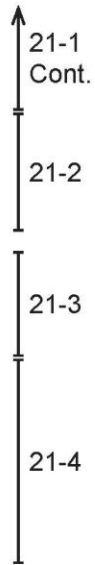
Dear Ms. Anderson:

The California Department of Transportation (Caltrans) thanks you for the opportunity to review the Draft 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 request early joint coordination on this project particularly related to permits, hydraulics, and aesthetics. We anticipate providing additional comments regarding this project. No future projects should direct any drainage flow toward the State Highway System (SHS).

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>.



"Provide a safe, sustainable, integrated and efficient transportation system to enhance California's economy and livability"

Ms. Amber Anderson
November 13, 2020
Page 2

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 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.

21-5

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.

21-6

Sincerely,



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

*"Provide a safe, sustainable, integrated and efficient transportation system
to enhance California's economy and livability"*

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Response to Comment Letter 21

California Department of Transportation
November 13, 2020

- 21-1 This comment is an introduction by the California Department of Transportation (Caltrans) to comments to follow. No further response is required.
- 21-2 The commenter supports local efforts and goals by working with local jurisdictions to achieve common transportation goals. The City of Santa Barbara Fire Department (SBFD) acknowledges and appreciates Caltrans' commitment to partnerships to achieve local and state goals.
- 21-3 The commenter requests early communication and coordination between Caltrans and SBFD. The commenter also states that no drainage flow should be directed to the State Highway System. SBFD also supports early and open communication with Caltrans. The Community Wildfire Protection Plan is a guidance document, and as discussed in Section 4.8, Hydrology and Water Quality, of the Draft Program Environmental Impact Report, mitigation measures MM-GEO-1, Erosion Control, and MM-HYDRO-1, Sedimentation Control, have been incorporated into the Community Wildfire Protection Plan to address stormwater and erosion control.
- 21-4 This comment notes that any work within the state's right-of-way will require a permit from Caltrans. All construction in a Caltrans right-of-way must conform to Caltrans policies, procedures, and standards, and proposed designs must be submitted to Caltrans for review and comment for compliance. SBFD acknowledges this comment and intends to obtain an encroachment permit as necessary.

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Comment Letter 22

From: [REDACTED]
Sent: Friday, November 13, 2020 12:20 PM
To: Community Wildfire Protection Plan <CWPP@SantaBarbaraCA.gov>
Cc: Allison DeBusk <ADeusk@SantaBarbaraCA.gov>
Subject: CWPP IS Comment

EXTERNAL

Dear Amber,

I once again, 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.

22-1

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.

22-2

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. If there is any consideration to the zoning, the specific properties with several large oak trees should be considered for this zone and not their neighbors. All of the homes that front Mountain Avenue should be excluded from this zoning.

22-3

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.

22-4

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.

22-5

As a side note, I did not comment on the November 5, 2020 Planning Commission hearing for this matter. I sent this email separately to the online contact for the Planning Commission in the event there is consideration for this matter in the future.

22-6

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

Thank you.

Skip Szymanski
[REDACTED]

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Response to Comment Letter 22

Skip Szymanski

November 13, 2020

- 22-1 The commenter expresses concern about the Westside/Bel Air Knolls neighborhood being placed within a High Fire Hazard Severity Zone (HFHSZ) and the use of streets as defining boundaries of HFHSZs. The City of Santa Barbara Fire Department (SBFD) carefully assessed many factors when determining HFHSZ boundaries. These factors included slope, vegetation, water availability, fire response time, structural density, fire behavior modeling, and SBFD experience. Management of defensible space between properties can be challenging when there is no clear boundary or physical barrier between properties. As discussed in the Community Wildfire Protection Plan (CWPP) and Draft Program Environmental Impact Report (PEIR), the use of City of Santa Barbara (City) parcel boundaries, streets, or blocks provides clear understanding to property owners and to SBFD about what areas are subject to defensible space requirements. Please refer to Global Response GR-1.
- 22-2 The commenter has lived on Mountain Avenue since 1977 and has not experienced vegetation fires in the area nor have other long-time residents. The commenter also states that the modeled flame lengths of the Coastal Interior Zone (proposed HFHSZ) are the same as those in the downtown corridor. SBFD acknowledges and appreciates the local knowledge of property owners. Flame length is one of many factors that SBFD considered when delineating HFHSZs. Please refer to Global Response GR-1.
- 22-3 The commenter states that the CWPP is proposed by SBFD to enhance vegetation management on private properties and to receive additional funding. The commenter also expresses concern about the delineation of the HFHSZ boundaries.

SBFD's objectives of the CWPP are stated in Section 3.2, Purpose, Need, and Objectives, of the Draft PEIR and include the following:

- 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 High Fire Hazard Area, 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 Area based on technical data and fire modeling.
- Consolidate and rename City High Fire Hazard Area and severity zones to be consistent with California Department of Forestry and Fire Protection.
- Provide guidance for future vegetation maintenance activities, future roadway access strategies, and development strategies, defensible space, and home hardening within the High Fire Hazard Area.
- Maintain consistency between the Community Wildfire Protection Plan 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 goals and policies of the proposed Community Wildfire Protection Plan.
- 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.

Please refer to Global Response GR-1 with regard to HFHSZ boundaries

22-4 The commenter expresses concern regarding the effect of the CWPP HFHSZs on property insurance rates and the delineation of the HFHSZ boundaries. SBFD acknowledges property owner concerns with regard to insurance rates and notes that this is a concern statewide. Please refer to Global Response GR-1 with regard to HFHSZ boundaries and Global Response GR-2 with regard to insurance.

22-5 The commenter notes that the Initial Study prepared for the CWPP dismissed population and housing from further consideration and is unclear as to the reason. The commenter also states that the record should reflect concerns expressed. As discussed in Section 4.11, Population and Housing, of the Draft PEIR, impacts associated with population and housing were determined to be less than significant in the CWPP Initial Study. However, based on public comments received during the scoping period, which ran from July 3, 2020 through August 3, 2020, and at the Scoping Hearing held on July 16, 2020, this topic area was included in the Draft PEIR.

Comments received by the public at the Scoping Hearing were read into the record by the Planning Commission and are reflected in the Planning Commission meeting minutes, included as Appendix A of this Final PEIR. Additionally, this Final PEIR includes a formal response to comments received by SBFD during the Draft PEIR public comment period extending from September 28, 2020 through November 13, 2020.

22-6 The commenter provided comments to the Planning Commission directly. Meeting minutes reflecting the public comments received and discussion are included as Appendix A of this Final PEIR.

Comment Letter 23

From: Krista Pleiser [REDACTED]
Sent: Friday, November 13, 2020 9:55 AM
To: Amber Anderson <aanderson@SantaBarbaraCA.gov>; Community Wildfire Protection Plan <CWPP@SantaBarbaraCA.gov>; Joe Poire <JPoire@SantaBarbaraCA.gov>
Subject: SBAOR Comment re: Draft CWPP PEIR

EXTERNAL

Greetings,

Attached is the Santa Barbara Association of REALTORS® comments in response to the PEIR. If you have any questions, please do not hesitate to contact us. Thank you!

23-1

Krista Pleiser, MPP, RCE

[REDACTED]



November 13, 2020

Amber Anderson
Wildland Fire Specialist – Project Manager
Santa Barbara Fire Department
925 Chapala Street
Santa Barbara, CA 93101

RE: Community Wildfire Protection Plan Draft Program Environmental Impact Report (PEIR)

Dear Ms. Anderson,

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. We have some comments and concerns on some of the policy actions, however these comments do not specifically address the PEIR.

23-2

SBAOR is very concerned with merging the Coastal and Coastal Interior Zones and renamed 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**.

23-3

We have met with fire officials and were told that one reason for the designation is to align the City's zones with those of Cal Fire. However, when we reviewed the available Cal Fire maps, these areas are not designated as having any threat level. We have reviewed the fire history maps in the CWPP draft, read the report about how the Oaks (which line the hills below Bel Air Knolls) are resistant to Fire Spread, and we cannot see how the Fire Department came to the conclusion that Coastal/Inlands areas are at any greater risk of wildfire than the rest of the urban area of Santa Barbara. Designating the non-fire prone inland areas with the same designation as the foothill zones that are demonstrably fire prone, is **not** supported in the CWPP document.

23-4

We are concerned with the decrease of property values and increased 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.

23-5

Having a property in the HFHSZ or VHFHSZ areas can affect Fire Insurance availability, cost, and can reduce the value of the homes in the eyes of buyers once the disclosure of the HFHSZ is disclosed (as is legally required). Within the last couple of weeks one of our members told us that she was representing a buyer of a home in Montecito that was near Coast Village Road. Since most of Montecito has been designated as "High Fire," a disclosure was made. The buyer immediately canceled saying that they would not live in a high fire zone even though they were shown on a map how far they were from the foothills. We are sure that they are not the only buyers that feel this way. Limiting the number of prospective buyers will negatively affect home values.

23-6

Should you have any questions regarding our comments, please contact Bob Hart, at bhart@sbaor.com or (805) 884-8607. Thank you.

Sincerely,

Staci Caplan
2020 President

Santa Barbara Association of REALTORS® | 1415 Chapala Street | Santa Barbara, CA 93101

(805) 963-3787 | (805) 966-9664 FAX | www.sbaor.com



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Response to Comment Letter 23

Santa Barbara Association of Realtors

November 13, 2020

23-1 The commenter notes that the complete comments on the Draft Program Environmental Impact Report (PEIR) are attached. This comment is noted.

23-2 This comment introduces the Santa Barbara Association of Realtors (SBAOR) and states that the SBAORs presents roughly 1,300 realtors throughout the south coast. This comment is an introductory comment. No further response is required.

23-3 The commenter expresses concern about merging and renaming the Coastal and Coastal Interior Zones as a High Fire Hazard Severity Zone (HFHSZ), although supports the merger in the spirit of simplification, and states that the change would be disastrous for homeowners.

The City of Santa Barbara Fire Department (SBFD) acknowledges and appreciates the SBAOR's statement regarding the SBFD's objective to consolidate the HFHSZs to be consistent with CAL FIRE. The commenter expressed concern about the proposed boundary changes being disastrous to homeowners. Further response is provided in additional responses below.

23-4 The commenter states that based on meetings with fire officials, the commenter understood that a reason to change the City of Santa Barbara's (City) fire hazard areas is to align with CAL FIRE mapping, but that the CAL FIRE maps do not show the Bel Air Knolls area as having any fire threat. The commenter questions SBFD's conclusion that the Coastal/Coastal Interior areas are at any greater risk of wildfire than the urban areas of Santa Barbara, and states that designating the non-fire-prone inland areas with the same designation as the Foothill zones is not supported by the Community Wildfire Protection Plan document.

As stated in Chapter 3, Project Description, of the Draft PEIR, SBFD's stated objectives include the following:

- 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 High Fire Hazard Area, 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 Area based on technical data and fire modeling.
- Consolidate and rename City High Fire Hazard Area and severity zones to be consistent with California Department of Forestry and Fire Protection.
- Provide guidance for future vegetation maintenance activities, future roadway access strategies, and development strategies, defensible space, and home hardening within the High Fire Hazard Area.
- Maintain consistency between the Community Wildfire Protection Plan 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 goals and policies of the proposed Community Wildfire Protection Plan.
- 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.

SBFD seeks to align its nomenclature with CAL FIRE’s. The current nomenclature leads to confusion in many ways. The Coastal Zone as designated by the California Coastal Commission has a different purpose and intent than the City’s Coastal and Coastal Interior High Fire Hazard areas. Outside of the City, the terms “Foothill” and “Extreme Foothill” are unknown to other agencies. As noted in Response to Comment 11-1, fire response is often performed under mutual aid and may involve emergency responders from outside of the City. As noted in Section 3.3.2, Proposed High Fire Hazard Area, of the Draft PEIR, the proposed renaming is in alignment with the National Incident Management System (NIMS) and California Standard Emergency Management System (SEMS) 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).

As discussed in Section 4.16, Wildfire, of the Draft PEIR, California Government Code Sections 51175 through 51189 provide guidance for classifying lands in California as fire hazard areas, and provide requirements for management of property within those lands. CAL FIRE is responsible for classifying Fire Hazard Severity Zones (FHSZs) based on statewide criteria, and makes the information available for public review. Further, local agencies must designate, by ordinance, Very High Fire Hazard Severity Zones (VHFHSZs) within their jurisdiction based on the recommendations of CAL FIRE. SBFD has been coordinating with CAL FIRE to align proposed FHSZs with state recommendations; however, CAL FIRE is in the process of updating its statewide maps, and an exact date for publication is anticipated to be within the next 1 to 2 years. As discussed in Global Response GR-1, SBFD has conducted a robust analysis and developed the proposed FHSZs based on that analysis.

Given the results of the comprehensive fire analysis, SBFD determined that the Coastal and Coastal Interior have less fire hazard risk than the foothill area of the City, and as such, are proposed to be classified as High Fire Hazard Severity Zone (HFHSZ) rather than VHFHSZ (currently Extreme Foothill and Foothill). As noted by the commenter, the urban areas of Santa Barbara, specifically the downtown area, are not mapped in an FHSZ due to several factors, including low slope, minimal vegetation, urban grid roadway system, readily available pressurized water supply, proximity to fire stations, and historical wildfire data.

23-5 The commenter states a concern with the decrease of property values and increased costs associated with insurance and landscape/remodeling this mapping could cause. Please refer to Global Responses GR-1 and GR-2.

23-6 The commenter states that having a property in the HFHSZ or VHFHSZ can affect fire insurance availability and cost, and can reduce the value of the homes in the eyes of buyers. Please refer to Global Responses GR-1 and GR-2.

Comment Letter 24

From: Lisa Burns [REDACTED]
Sent: Thursday, November 12, 2020 9:41 PM
To: Community Wildfire Protection Plan <CWPP@SantaBarbaraCA.gov>
Subject: CWPP Draft Program EIR

EXTERNAL

Dear Ms. Anderson, Please see attached letter & County Assessor's Parcel Page exhibit. Thank you for the opportunity to comment.

24-1

Lisa Knox Burns

November 12, 2020

Santa Barbara City Fire Department

Attn: Amber Anderson, Wildland Fire Specialist

Subject: City of Santa Barbara Community Wildfire Protection Plan (CWPP) Proposed Foothill VHFHSZ Addition "F"

Dear Ms. Anderson,

This letter expands on the public comment I made at the City Planning Commission hearing on the proposed Draft Programmatic Environmental Impact Report (DPEIR) on the Community Wildfire Protection Plan (CWPP), November 5, 2020. It clarifies my request that the Final PEIR provide clear guidance to property owners on how to meet the objectives of the CWPP, specifically in proposed area "F" related to fire-prone vegetation along Mission Creek.

Some Upper East neighbors on Constance Lane are concerned about the risk posed by warming fires along Mission Creek this winter. Therefore, they requested a meeting with Ms. Anderson to address how to remove fire-prone vegetation. The attached assessors parcel page (051-14) shows private properties, including the Santa Barbara County Flood Control easement along Mission Creek, located east of State Street and Constance Avenue, proposed to be added to the "Foothill" Very High Fire Hazard Severity Zone (VHFHSZ) area, designated as "F" in Figure 3-4 of the DPEIR. The CWPP states that parcels were added because fire behavior modeling indicates extreme fire behavior associated with lower Mission Canyon Southern Oak Woodland & Riparian vegetation.

The utility of the Final PEIR would be enhanced by providing property owners guidance on how to remove fire "ladder fuels", such as eucalyptus trees and associated vegetative litter to create defensible space. One of the stated project objectives of the CWPP is:

Provide guidance for future vegetation maintenance activities, future roadway access strategies; and, development strategies, defensible space and home hardening within the High Fire Hazard Area.

Please verify and/or correct the following steps that property owners would need to take to remove the most fire-prone vegetation.

Step 1. Property owner(s) abutting Mission Creek would contact Santa Barbara Fire Department (SBFD) Wildfire Specialist, Ms. Anderson, with a proposal to trim and/or remove potential fire fuels associated with Mission Canyon vegetation on their property. Landowner permission for access would be obtained.

Step 2. Ms. Anderson (SBFD) may submit this request to California Department of Fish & Wildlife (CDFW) as the umbrella agency for Army Corps of Engineers (ACOE) and California Regional Water Quality Control Board (CRWQCB).

24-2

24-3

24-4

Step 3. Before commencing work, SBFD would develop 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.

Step 4. Depending on the outcome of SBFD review, treatment area identification and vegetation management methods may be informed by a site-specific biological evaluation conducted prior to operations.

Step 5. Manual or hand labor would be the preferred method for pruning, cutting, or removal of trees or other vegetation using hand-held equipment. 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. Please note that two access points to Mission Creek below Constance Avenue exist: a paved, 10' wide sloped access (APN 051-141-051); and a tennis court at 221 E. Constance Avenue where tree trimming equipment could be staged. Access by permission is also potentially available from Miradero Drive.

↑
24-4
Cont.

Potential Mitigation measure. If CDFW determines that habitat mitigation is required, the potential exists to mitigate through a CDFW-approved mitigation bank. For Santa Barbara County, CDFW identifies the Santa Paula Creek Mitigation Bank for riparian impacts as the appropriate entity. Should you wish to verify this information, please contact Richard Lyons

Santa Paula Creek Mitigation Bank	Richard Lyons SPCMB P.O. Box 808 Santa Paula, CA 93061 Office Phone: (805) 525-2508 rl@spcmb.com	Ventura, Santa Barbara & Los Angeles	Wetlands; Coastal sage scrub; Floodplain scrub; Chaparral; Riparian woodland; Upland woodland
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24-5

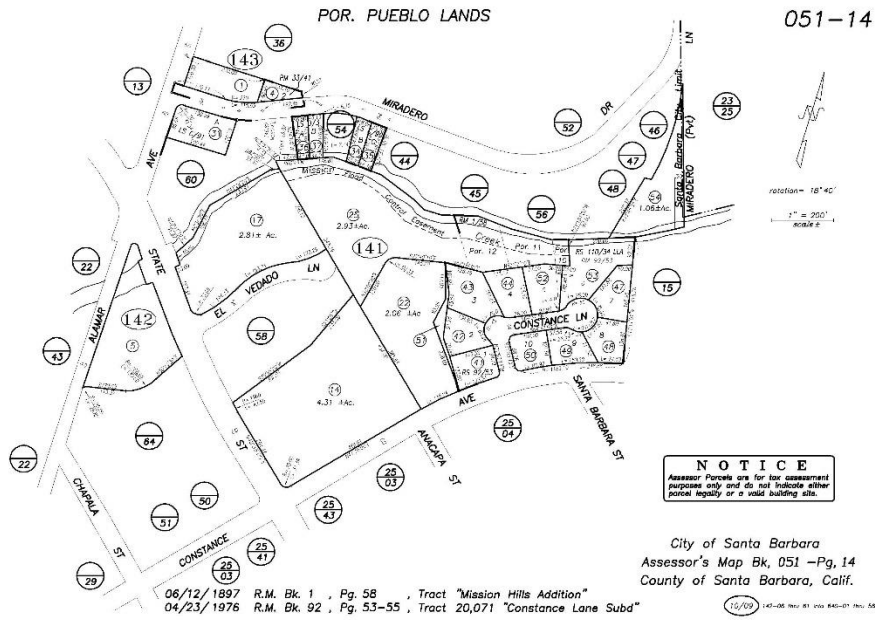
The Upper East neighborhood looks forward to SBFD guidance on how and when fire-prone vegetation can be removed within Proposed Foothill VHFHSZ Addition "F" to create defensible space consistent with PEIR mitigations. If property owners create defensible space, SBFD should provide verification that homeowners can show to their insurance companies on compliance.

24-6

Lisa Knox Burns



C: Richard Lyons



Response to Comment Letter 24

Lisa Burns

November 12, 2020

24-1 This comment is an introductory comment and notes that the comment letter and Assessor Parcel page is attached. No further response is required.

24-2 The commenter states that the comment letter expands upon comments made at the Planning Commission hearing on November 5, 2020, and requests that clear guidance be provided to homeowners, specifically within Area F near Mission Creek. Minutes from the Planning Commission hearing on November 5, 2020, are included as Appendix A of this Final Program Environmental Impact Report (PEIR). As discussed in Chapter 3, Project Description, and shown in Figure 3-4, of the Draft PEIR, Area F is proposed to be added to the Very High Fire Hazard Severity Zone (VHFHSZ).

One of the primary obligations of homeowners within Fire Hazard Severity Zones (FHSZs) is the maintenance of defensible space. Defensible space is an area around a building or structure where 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. As discussed within Section 3.4.2, Defensible Space, of the Draft PEIR, the Community Wildfire Protection Plan (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 generally remain the same as discussed in the 2004 Wildland Fire Plan and its PEIR. The proposed VHFHSZs would require 100 feet to 150 feet from a building or structure. Within any FHSZ, 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 Coastal Zone would need to be consistent with the City of Santa Barbara’s (City) certified Coastal Land Use Plan. A summary of existing and proposed defensible space requirements is provided in Table 3-6, below, which is reproduced from Table 3-6 in Chapter 3 of the Draft PEIR. Based on site-specific circumstances, the Fire Marshal has the authority to determine the appropriate defensible space based on these standards.

Table 3-6. Defensible Space Requirement

Existing		Proposed	
<i>Classification</i>	<i>Distance (feet)</i>	<i>Classification</i>	<i>Distance (feet)*</i>
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		

Source: SBFD and CDD 2004.

Note:

* 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%.

Additionally, mitigation measure MM-BIO-3, Property Owner Education Material, requires the City of Santa Barbara Fire Department (SBFD) to develop property owner education materials that will be available on the City website and in brochure format to assist property owners’ understanding of the responsibilities and obligations under the CWPP.

24-3 The commenter states that homeowners near Mission Creek and within proposed Area F are concerned about warming fires and requested a meeting with SBF Wildland Fire Specialist Amber Anderson. Ms. Anderson received the commenter's request and replied via email to the commenter on November 13, 2020. In her email, Ms. Anderson stated the following:

Thank you Ms. Burns for submitting comments on the Draft PEIR for our CWPP update project as we appreciate your input and continued involvement. I have forwarded your letter and the County Assessor's Parcel Page exhibit to our project consultants.

I do read in the letter that I was requested to meet with some Upper East neighbors on Constance Lane about removing fire-prone vegetation. I am scheduled to meet with a single individual property owner on Constance this next week to discuss defensible space, our fuels treatment projects and what effect changes in the proposed CWPP could mean for his property. If you've made an inquiry for a separate meeting would you let me know as I am unaware of any neighborhood-wide request and would be happy to schedule a meeting to take a broader look.

Your summary that fire department would provide property owners guidance on defensible space and how to achieve it is in line with current practices. We meet with properties owners, as requested for voluntary defensible space evaluations including defensible space guidance as it relates to their insurance requirements. A majority of the vegetation in your neighborhood along Mission Creek is within defensible space for properties located in both the current and proposed high fire hazard area and is the responsibility of each individual property owner. How this will look, and what it means for your neighborhood, specifically, would be determined and developed under the assumption that the PEIR is certified and that the CWPP is adopted by City Council this spring. Once adopted, we look forward to implanting [sic] the objectives of the plan to ensure our community, and your neighborhood, is as wildfire safe as possible.

Ms. Anderson met with the commenter and another individual at the requested location on Constance Avenue on November 10, 2020. During that meeting general discussion of defensible space, vegetation management/fuels reduction projects, environmental consideration in and around Mission Creek, coordination with other agencies (e.g., Santa Barbara Flood Control), and access via private properties to conduct fuels reduction work were discussed as both current practice and within the realm of the CWPP update for both those properties within the existing and proposed High Fire Hazard Area.

24-4 The commenter requests additional information on how to remove ladder fuels and requests that SBF verify the process to remove fire-prone vegetation. As noted in Response to Comment 24-3, the commenter's summary of the steps to remove vegetation is consistent with SBF practice. Several brochures regarding property owner defensible space management, home hardening, wildfire preparedness, and the Ready, Set, Go! program are available on the City of Santa Barbara website (<https://www.SantaBarbaraCA.gov/wildland>). Additionally, site-specific methods for removing fire ladders were discussed in person during the meeting held on November 10, 2020, as noted in Response to Comment 24-3.

- 24-5 The commenter notes that should habitat mitigation be required for vegetation removal, the property owner may be able to mitigate through the California Department of Fish and Wildlife Santa Paula Creek Mitigation Bank. The commenter provides the contact information of Richard Lyons with the Santa Paula Creek Mitigation Bank (P.O. Box 808, Santa Paula, CA 93061; Office Phone: 805.525.2508; rl@spcmb.com). SBFD acknowledges and appreciates the commenter sharing the Santa Paula Creek Mitigation Bank information, and encourages property owners performing defensible space management who may have questions or wish to request a defensible space evaluation to contact SBFD at 805.965.5254.
- 24-6 The commenter reiterates the request to have SBFD provide guidance on how and when fire-prone vegetation within Area F may occur. The commenter states that SBFD should provide verification of a property owner's defensible space management so that the owner may provide this information to their insurance company. Please refer to Responses to Comments 24-3 and 24-4. SBFD will evaluate the ability to provide verification for property owners when defensible space maintenance is performed. This is a procedural issue rather than a physical environmental impact, and therefore no further response is required.

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Comment Letter 25

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

From: Miriam Lindbeck [REDACTED]
Sent: Friday, November 13, 2020 10:14 PM
To: Community Wildfire Protection Plan <CWPP@SantaBarbaraCA.gov>
Subject: Public comment submission

EXTERNAL

Dear Amber:

I apologize for this late submission but due to illness and scheduling, this was the best we could do. We hope you consider it for inclusion in the PEIR.

25-1

Thank you.

Miriam Lindbeck

DATE: 11/13/20

FROM: SAFE TECHNOLOGY FOR SANTA BARBARA COUNTY (STSBC)
TO: CWPP@SANTABARBARACA.GOV

Dear CWPP:

First, we want to extend our gratitude and acknowledgement to all of you for the immensely critical and extraordinary service you provide our city and county. All of us owe you for what you do to save our lives.

This program is also crucial and extremely timely and we appreciate the opportunity to make public comment.

We present our information and serious commitment to safety in all due respect to you. We can only assume you know this information already, but the general public does not necessarily. We will put forth our comments in the spirit of supporting your goals. If we provide any new information for your cause, then we have more than realized our goal.

25-2

Who We Are

Safe Technology for Santa Barbara County (STSBC) is a California Unincorporated Association based in the city of Santa Barbara working with the city on a Wireless Communications Regulatory Ordinance and making public comment with the County urging them to draft a more stringent Wireless Communications Regulatory Ordinance. We love technology, but we want it safe, secure, unhackable and safe for people, the environment and all living forms.

25-3

Fire Informaation

You are well aware of the fire ignition sources from poorly maintained utilities equipment and that utility caused fires are on the rise. STSBC would like to add to this category the "small" Wireless Telecommunications equipment installed on poles and wireless antennas installed near and/or on buildings and residences.

Research shows that the average length of a wildfire season is 105 days longer today than in the 1970's and the average of acres burned increased from less than 1/2 million to over 2 million. The IQAir AirVisual 2019 World Air Quality Report found that because of severe wildfires, several California suburbs occupied 25 out of 30 spots in the most polluted regional cities for 2019.

25-4

As you know, the Santa Barbara County Fire Department reported that in 2019 we saw a 50% increase in electrically caused fires. On Jan 28, 2019, the LA times reported, "Equipment owned by California's three largest utilities ignited more than 2,000 fires in three and a half years — a timespan in which state regulators cited and fined the companies nine times for electrical safety violations." In the 2007 fire in Malibu, not only was Edison's equipment at cause, so was the equipment of 3 cellular companies.

25-5

The California Public Utilities Commission, Director of Safety and Enforcement stated in the LA Times, "They (CPUC) review an average of 120 incidents a year of potential violations by various types of utilities, and not just electrical. (2017). **They failed in thousands of instances over a 5-year period to conduct timely inspections and repairs.**"

These smaller yet very powerful cell towers now being installed across our city and county can spontaneously catch fire and combust. Though not as many cases exist at this moment over macro cell tower fires, it doesn't mean with their densely increased presence in close proximity to homes in all areas, the same status would hold. This is due to modulation. Modulation is all about the size of the band and how data is loaded on one end and unloaded on the other end. The way they are going to do this with the new network OFDM and DFT-OFTM aka SC-FDMA that in turn will use Quadrature Amplitude Modulation, will be so fast and carry such massive amounts of data on multiple frequencies at once, that it requires enormous power to run these towers. Power translates to heating up and this translates to dehydrating trees, cooling system failures, spontaneous combustion and an over-all fire hazard, let alone energy consumption.

25-6

And because of the Joint Pole Association standards, which allows heavy colocation, the fire hazard is increased. Also the towers are vulnerable to high winds, heavy rains, lightning strikes, arcing if near power lines, and exploding upon vehicular collision.

We want our first responders to receive as much support as they can from wireless services which can be impressive in the near future, yet we are most concerned about these cell towers, which if allowed to proliferate as telecom envisions, will pepper our residential streets, school areas, parks and playgrounds with towers every 8-12 homes, or every 1000 feet.

25-7

We put forth to this special fire protection program the possibilities of several safety measures beyond defensible space.

25-8

First, to keep cell towers out of residential areas of all fire hazard areas, except where first responders have their stations. The additional small wireless facilities are not essential to personal wireless services. In the words of Scott McCullough, telecom lawyer: "...What industry does not tell the public is that – at least in the beginning – the 5G business case centers on "corporate" and government, and depends on models that give rise to significant individual privacy concerns. For example (industry talks about) "streaming video" but somehow omits that a very large amount of that will be surveillance video from wireless cameras in public areas that silently capture every move and record faces and license plates for future identification. The network will also have advanced capabilities that precisely identify and record the location of every user device (including privately-owned IoT devices in refrigerators and children's toys), and capture immense amounts of "transactional" data (and sometimes even content) from each device. All this personal information will be available for correlation, identification and sale to third parties, including the government. 5G will lead to more intrusive tracking and private data exploitation by large and mostly-unseen companies and the government. The early money for 5G will come from surveillance and the sale of people's private information, not revenue earned from voice, texts or push-to-talk capability.

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25-8
Cont.

We want to emphasize an important legal issue: while a 5G small cell can be used to support traditional mobile service, 5G small cells mostly exist to support services, features and functions other than those protected by state and federal preemptive provisions."

Thus we present you with possible requirements, all of and more are in the city of Encinitas ordinance, and were approved by their fire chief. Several California cities have taken action to protect their residents. City ordinances with fire hazard safety requirements for cellular telecom equipment exist for Sebastopol, Encinitas, San Clemente, Berkeley and Monterey. Encinitas has the most comprehensive fire safety sections and Sebastopol's is also strong. Encinitas and San Clemente policies includes the very high fire hazard zones as a restricted area from small cell wireless installations. **Similar fire safety protections should be included in every city's wireless ordinance.** STSBC feels this is an imperative.

25-9

The requirements include:

Remotely monitored 24/7 automatic fire notification and extinguishing systems for all wireless facilities approved by the Fire Chief or fire specialist. This is especially urgent in the high fire risk zones of the city.

25-10
↓

Oversight Authority: Designating the Fire Prevention Department, Fire Chief or a Fire Specialist to determine Fire Safety Protocols and to oversee, examine and approve or disapprove any small wireless facility applications and permits and their locations to which applicants must comply;

Continued Monitoring: The Fire Chief will continue to monitor the safety of wireless facilities in the City;

Investigations: The Fire Chief shall receive and investigate any credible fire safety complaint made by a resident of the City regarding a wireless facility in the City. Cost of such investigation shall be borne by the permittee.

That no small Wireless Telecom Facilities be installed in our High Fire Areas or Zones, or our less preferred and vulnerable areas, except where First Responders Stations and Units are located.

That in the High and Very High Fire Areas and Zones, that Fiber Optic To The Premises be installed to every home which will avert fire hazards related to Personal Communications Services:

Fire Retardant materials be used in all wireless sites that are already installed and those that will be in the future, such that they will not burn for at least an hour;

In closing, we thank you for all that do. Without you, the safety of our lives and land would perish.

Respectfully,

Safe Technology for Santa Barbara County:

Miriam Lindbeck, President
Sandra Castellino, Secretary/Treasurer
Katie Mickey, Chair Public Comment
Lesley Weinstock, Coordinator/Scheduler
Kimi Vandyk, Website Design, Media, PR
Kent Epperson, Campaign Manager
Dr. Connie Stomper, Core Committee
Julia Barbosa, Core Committee
Sean Mortland, Core Committee

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25-10
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Response to Comment Letter 25

Miriam Lindbeck/Safe Technology for Santa Barbara County
November 13, 2020

- 25-1 The commenter notes that the submittal of comments was later than the November 13, 2020, at 5 p.m. PST deadline, but the City of Santa Barbara Fire Department (SBFD) accepted the comment letter.
- 25-2 The commenter expresses gratitude and acknowledgment to the SBFD and support of the Community Wildfire Protection Plan (CWPP) and commitment to safety. This comment does not specifically raise an issue pertinent to the content or adequacy of the Draft Program Environmental Impact Report (PEIR), and no further response is required.
- 25-3 This comment summarizes information about Safe Technology for Santa Barbara County and the organization's goal to implement a more stringent Santa Barbara County ordinance regarding wireless communication. This comment does not specifically raise an issue pertinent to the content or adequacy of the Draft PEIR, and no further response is required.
- 25-4 The commenter states that poorly maintained utilities are a known fire ignition source. The Safe Technology for Santa Barbara County also believes that small wireless telecommunication equipment installed on poles and wireless antennas installed near buildings or residences can pose a fire threat. The commenter also notes that air quality has been affected in several California suburbs due to wildfire.

SBFD concurs with the commenter that wildfires do contribute to poor air quality and health concerns. As stated in SBFD's objectives in Chapter 3, Project Description, of the Draft PEIR, SBFD seeks to reduce greenhouse gas emissions and maintain consistency with existing City of Santa Barbara (City) plans, including its General Plan and Climate Action Plan.

In response to the comment regarding cell towers and fire ignition, desktop research was performed to assess the relationship between wildfires and wireless communication facilities. Federal and state sources, such as the Environmental Protection Agency, International Association of Fire Fighters, and CAL FIRE, were consulted. Based on the literature review, there has been considerable amount of research and analysis regarding the loss of cellular communication facilities as a consequence of a wildfire and how to harden the communication system. Cellular service has a number of vulnerabilities that can cause it to falter during an emergency. During wildfires, one of the key risks for wireless infrastructure is physical damage and burning of underground and pole-mounted fiber lines. Gaps in cellular service can prevent residents from being able to reach 911 or receive crucial emergency notifications. This disruption of service is particularly dangerous in the face of a rapidly moving wildfire (National Law Review 2019). However, no studies linking cellular towers to fire ignition were located. One journal article was located regarding a cell tower fire likely caused by maintenance welding activities (Matula 2015). Although research did not yield a correlation between wireless facilities and fire ignition, this topic may not have yet been studied thoroughly to draw a conclusion. As such, this comment is noted.

As discussed in Section 3.9, Communications, of the Draft PEIR, over the life of the CWPP, SBFD may replace or modify existing communication infrastructure. Maintenance activities would generally be limited to a specialized work truck and two maintenance workers. Staging of equipment would occur on the pad of the communication equipment or on already disturbed and/or paved areas. As with

vegetation maintenance activities, SBFD would develop a Work Plan that identifies the specific areas to be affected, the best methods to be used based on site-specific circumstances, and any subsequent monitoring. Funding for communication upgrades is not available at this time; however, it could be secured during the forecasted life of the proposed CWPP.

- 25-5 The commenter notes that electrical-caused wildfires have risen significantly, and that utilities have failed to routinely maintain infrastructure. The California Public Utilities Commission regulates electric, natural gas, telecommunications, water, railroad, rail transit, and passenger transportation companies. SBFD does not have jurisdiction over these service providers. However, SBFD does perform routine maintenance inspections of City-owned and managed assets, and will perform inspection of a homeowner's property. If hazardous conditions are observed, SBFD can provide input to the homeowner about action items that could be conveyed to the utility company to reduce risk.
- 25-6 The commenter notes that smaller wireless towers installed across the City may spontaneously catch fire and combust. Newer technology enables towers to carry massive amounts of data requiring enormous power. The power demand increases heat output. As noted in Response to Comment 25-4, no studies were identified linking wildfire to wireless communication infrastructure.
- 25-7 The commenter supports enhanced wireless services for first responders, but expresses concerns regarding the potential proliferation of cell towers throughout residential neighborhoods, parks, and playgrounds. SBFD supports the availability of adequate communication facilities in emergency response efforts. As discussed in Section 3.9 of the Draft PEIR and in Response to Comment 25-4, over the life of the CWPP, SBFD may replace or modify existing communication infrastructure. The future location and siting of wireless communication facilities is outside the scope of this PEIR.
- 25-8 The commenter expresses concerns about the placement of new cell towers in residential neighborhoods and that the use of data collected by these wireless facilities will violate personal privacy and enable tracking and data exploitation. Wireless data collection and privacy concerns are outside the scope of this PEIR.
- 25-9 The commenter recommends reviewing wireless ordinances from several other jurisdictions, including Encinitas and San Clemente, which prohibit small wireless installations in Very High Fire Hazard Severity Zones. The CWPP is a guidance document and does not propose any ordinance amendments at this time. SBFD acknowledges the commenter's recommendation to consider Encinitas and San Clemente ordinances when evaluating new wireless ordinances within the City of Santa Barbara.
- 25-10 The commenter feels that it is imperative that fire safety protections be incorporated into any City wireless ordinance, and specifically, that all wireless facilities be remotely monitored 24/7 with fire notification and extinguishing systems, especially in High Fire Hazard Severity Zones. Additionally, any new ordinance should obligate the fire chief to monitor the wireless facility and investigate safety complaints, prohibit new small wireless telecom facilities except when at first responder locations, obligate that fiber-optic cable be installed, and obligate that fire retardant materials be used.

The CWPP is a guidance document and does not propose any ordinance amendments at this time. New wireless communication facilities are required to be constructed in accordance with the City Municipal Code. The future location and siting of wireless communication facilities is outside the scope of this PEIR. SBFD acknowledges the commenter's recommendations to obligate the fire chief to monitor the wireless facility and investigate safety complaints; prohibit new small wireless telecom facilities except when at first responder locations; install fiber optic cable; and use fire retardant materials.

Comment Letter 26

Dear Committee,

How can this committee possibly reach so far as to include a property constructed in 1979 which has not been involved in a wildfire in forty one (41) years to include it in a High Fire District? By your own determination this property is covered by ten (10) of the criteria you, yourself, use to be **Eliminated** from that designation.

26-1

How can this committee in good conscience include *this area* when it is located across town from the fire prone area of the Foot hills often affected when **none of the area in-between is included** in the High Fire District? With this *thinking* then the entire town including the Samarkand area, the school district and the fire department on Modoc should be included as they would burn long before the fire would reach VDC.

26-2

We are extremely disappointed in the inclusion of the Vista Del Campo designation and request the removal from the High Fire District.

Do any of the houses the committee own have as many of the Elimination criteria as Vista Del Campo? Are they included in the High Fire Designation?

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 located on the grounds of the same Middle School thus are 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
10. Houses are located a substantial distance a part (13 on 11 acres)

26-3

Regards,
Elaine Jewell
Treasurer Vista Del Campo.

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Response to Comment Letter 26

Elaine Jewell

26-1 Although no specific address is included, the commenter makes reference to the Vista del Campo neighborhood (near La Cumbre Junior High School), which is proposed to be incorporated into Area M of the High Fire Hazard Severity Zone (HFHSZ). The commenter states that the property in question was constructed in 1979 and has not been impacted by wildfire. The commenter notes that the property should be excluded from the HFHSZ based on 10 criteria that were used in other locations to remove properties from the HFHSZ.

Please refer to Global Response GR-1.

26-2 The commenter notes that the Vista del Campo neighborhood is separated from the fire-prone foothill area of the City of Santa Barbara (City), and that a wildfire would burn through several areas of the City before reaching this neighborhood.

The City of Santa Barbara Fire Department (SBFD) acknowledges that wildfires in the City historically occurred in foothills of Santa Barbara and spread downslope. 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 1990 Painted Cave Fire, 2008 Tea Fire, 2009 Jesusita Fire, and 2017 Thomas Fire. Area M is proposed for inclusion into the HFHSZ due to characteristics including slope, vegetation, and clearly defined boundaries.

Please also refer to Global Response GR-1.

26-3 The commenter provides 10 considerations for supporting the removal of property in the Vista del Campo area from the HFHSZ. SBFD acknowledges the commenter's considerations, but based on SBFD's analysis contained in the Community Wildfire Protection Plan and Draft Program Environmental Impact Report, SBFD disagrees with the commenter's assessment.

Please also refer to Global Response GR-1.

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Comment Letter 27

The length and complexity of the City's Wildfire Protection Plan renders it virtually useless to property owners who might be impacted. Unless there is a way to enter a property address to find out specifically how a parcel will be affected, and what actions need to be taken , this document will create an impenetrable barrier for individual stakeholders.

27-1

Thomas Felkay



Website comment received 11/10/2020

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Response to Comment Letter 27

Thomas Felkay
November 10, 2020

- 27-1 The commenter notes that the length and complexity of the Community Wildfire Protection Plan (CWPP) is difficult for property owners to understand and that the opportunity to enter in an address to query the effect on a parcel would be useful. A mapping tool enabling an interested party to enter an address to determine whether the property is located within a High Fire Hazard Severity Zone or vegetation management unit is accessible on the CWPP website: <https://cwpp.santabarbaraca.gov/maps-and-downloads/>. Additionally, mitigation measure MM-BIO-3, Property Owner Education Material, requires the City of Santa Barbara Fire Department to develop property owner education materials that will be available on the City of Santa Barbara's website, and will be provided in brochure format to assist property owner understanding of the responsibilities and obligations under the CWPP.

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3 Corrections and Additions to the Draft PEIR

3.1 Introduction

As provided in Section 15088(d) of the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.), responses to comments may take the form of a revision to a Draft Environmental Impact Report (EIR) or may be a separate section in a Final EIR. This section complies with the latter and provides changes to the Draft Program EIR (PEIR) for the Community Wildfire Protection Plan (CWPP), presented in strikethrough text (~~strikethrough~~) signifying deletions and underline text (underline) signifying additions. These notations are meant to provide clarification, corrections, or minor revisions as a result of public comments or because of changes in the proposed CWPP since the release of the Draft PEIR, as required by Section 15132 of the CEQA Guidelines. None of the corrections or additions constitute significant new information or substantial changes requiring recirculation of the PEIR as defined by Section 15088.5 of the CEQA Guidelines.

3.2 Changes to the Draft Program Environmental Impact Report

Changes to the Draft PEIR are provided in this section. Page numbers correspond to the Draft PEIR. After the location or locations of the changes (by page number), a brief explanation of the nature of the change is provided, followed by the text from the Draft PEIR with changes shown in ~~strikethrough~~ and underline.

Page 3-37: Table 3-11, Project Design Features and Best Management Practices

In response to the Santa Barbara Audubon Society (SBAS) (Comment Letter 12b) and California Department of Fish and Wildlife (CDFW) (Comment Letter 19), several Project Design Features and best management practices (BMPs), shown in Table 3-11 of the Draft PEIR, have been modified (shown below in ~~strikethrough~~/underline). The measures include arborist review for mature trees; follow-up by the City of Santa Barbara Fire Department (SBFD) on monitoring of vegetation management activities through an after-action report; update of the nesting bird season; update to a 50-foot riparian setback; requiring compliance with the City of Santa Barbara’s (City) Lake and Streambed Alteration Agreement (LSAA); added grazing management measures; and added environmental awareness training for field crews.

Table 3-11. Project Design Features and Best Management Practices

Resource Area	Focus	CWPP Proposed Best Management Practices
Air Quality	Public Notifications for Prescribed Burning:	<ul style="list-style-type: none">One to three days prior to the commencement of prescribed burning operations, the project proponent would:<ol style="list-style-type: none">Post signs along the closest public roadway to the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or smoke concerns.

Table 3-11. Project Design Features and Best Management Practices

Resource Area	Focus	CWPP Proposed Best Management Practices
		<p>(2) Publish a public interest notification in a local newspapers or other widely distributed media source describing the activity, timing, and contact information.</p> <p>(3) Send the local county supervisor and county administrative officer (or equivalent official responsible for distribution of public information) a notification letter describing the activity, its necessity, timing, and measures being taken to protect the environment and prevent prescribed burn escape.</p> <p>This PDF applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.</p>
Air Quality	Comply with Air Quality Regulations:	<ul style="list-style-type: none"> The project proponent would comply with the applicable air quality requirements of the SBCAPCD as set forth in Rule 401. This PDF applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.
Air Quality	Submit Smoke Management Plan	<ul style="list-style-type: none"> The project proponent would submit a smoke management plan for all prescribed burns, in accordance with SBCAPCD rules and regulations, and in accordance with 17 CCR Section 80160. Burning will only be conducted in compliance with the burn authorization program of the SBCAPCD. This PDF applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.
Air Quality	Create Burn Plan	<ul style="list-style-type: none"> The project proponent would create a burn plan using the CAL FIRE burn plan template for all prescribed burns. The burn plan will include a fire behavior model output of First Order Fire Effects Model and BEHAVE or other fire behavior modeling simulation and that is performed by a qualified fire behavior technical specialist that predicts fire behavior and calculates consumption of fuels, tree mortality, predicted emissions, greenhouse gas emissions, and soil heating. The project proponent would minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. The burn plan would be created with input from a qualified technician or certified state burn boss. This PDF applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.
Air Quality	Avoid Naturally Occurring Asbestos	<ul style="list-style-type: none"> The project proponent would avoid ground-disturbing treatment activities in areas identified as likely to contain naturally occurring asbestos (NOA) per maps and guidance published by the California Geological Survey, unless an Asbestos Dust Control Plan (17 CCR Section 93105) is prepared and approved by the SBCAPCD. Any NOA-related guidance provided by the SBCAPCD will be followed. This PDF applies to all treatment activities and treatment types, including treatment maintenance.
Air Quality	Prescribed Burn Safety Procedures	<ul style="list-style-type: none"> Prescribed burns planned and managed by non-CAL FIRE crews would follow all safety procedures required of CAL FIRE crew, including the implementation of an approved Incident Action Plan (IAP). The IAP would include the burn dates, burn hours, weather limitations, the specific burn prescription, a communications plan, a medical plan, a traffic plan, and special instructions such as minimizing smoke impacts to specific local roadways. The IAP would also assign responsibilities for coordination with the appropriate air district, such as conducting on-site briefings, posting notifications, weather

Table 3-11. Project Design Features and Best Management Practices

Resource Area	Focus	CWPP Proposed Best Management Practices
		monitoring during burning, and other burn-related preparations. This PDF applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance.
Biological	Biological Resources Evaluation	<ul style="list-style-type: none"> SBFD will perform a site-specific biological evaluation including a reconnaissance site visit by a City qualified biologist not more than two weeks prior to operations. <u>When mature trees may be affected, a City qualified arborist may also be consulted.</u> The evaluation will address the occurrence or potential occurrence of sensitive vegetation communities, special-status species, aquatic resources, and nesting birds. If any creeks occur within the work area, the biologist will map the top of bank.
Biological	Work Plan	<ul style="list-style-type: none"> SBFD will develop a site specific Work Plan that will incorporate the results of the biological evaluation. The Work Plan shall be finalized not more than five days prior to the start of operations. The Work Plan may include measures related to special status species avoidance, additional site surveys/documentation and minimizing impacts to riparian habitat and sensitive vegetation communities. <u>The SBFD will perform an after-action report documenting the site conditions after work is complete. The after-action report will be maintained in a publicly accessible database. Information from the database shall be evaluated annually to determine native and nonnative vegetation regrowth and measures that have the strongest success in reducing nonnative plant regrowth to help inform future SBFD activities.</u>
Biological	Removal of Invasive Exotic Plants	<ul style="list-style-type: none"> During the site-specific biological evaluation, the SBFD would 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 would preferentially remove exotic 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"> Vegetation management work would be completed outside of the defined nesting season for birds (i.e., before February 1 <u>January</u> and after August 31) <u>unless</u> vegetation management work must occur within the project areas during the breeding season (April 1 to July 30). <u>If so</u>, a site survey would be conducted by a qualified wildlife biologist to determine any presence of nesting birds. The qualified biologist will establish a no-disturbance buffer around any nest located during the survey. The extent of the buffer will be determined based on the natural history traits of the nesting species, at the biologist’s discretion. Vegetation management activities will not occur within the buffer while the nest remains active.
Biological	Oak Tree Protection	<ul style="list-style-type: none"> Vegetation management within 50 feet from the outer edge of the tree canopy would be the minimum necessary to meet SBFD requirements and would be designed to minimize erosion and impacts on habitat values. No coast live oak trees with one trunk larger than 4 inches in diameter at 4 feet, 6 inches in height above grade will be removed. Oak saplings less than 4 inches in diameter at 4 feet, 6 inches in height above grade will be protected from damage or cutting during the work.

Table 3-11. Project Design Features and Best Management Practices

Resource Area	Focus	CWPP Proposed Best Management Practices
		<ul style="list-style-type: none"> • To the extent feasible, other healthy native understory components such as toyon, lemonade berry and currant will be retained within oak woodlands, as long as they do not create fire ladders. • Lower oak branches (up to 6 feet above grade in height) of oaks should be thinned to eliminate potential fire ladders. • Dried non-native grasses, dead branches, and non-native resinous woody species should be removed in oak tree understory. • Wood chips should not be spread more than 6 to 8 inches in depth, and all chip piles shall be kept at least 5 feet from the outer edge of the tree canopy. • Removed oak limbs should be clean-cut, using the best industry standard practices.
Biological	Sensitive Habitat	<ul style="list-style-type: none"> • Within the Coastal Zone, vegetation treatment within environmentally sensitive habitat areas (ESHAs), wetlands, and creeks, and within ESHA, wetland, and creek buffers shall be avoided, and where full avoidance is not possible, shall minimize impacts to ESHAs to the extent feasible consistent with Policy 4.1-21 of the Coastal Land Use Plan. • Vegetation treatment within City-designated creek channels outside of the Coastal Zone should be limited to the removal of dead brush that is easily accessible and the removal of exotic or invasive species within a 25-50-foot buffer along the top of banks, as long as the work does not cause damage to the bank structure. • 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 should be prepared by a qualified biologist and peer reviewed by the City Parks Division. • No placement of cut vegetation should occur within a 25-50-foot buffer along the top of banks. The top of bank should be defined by the first bank out from the present, active stream channel (denoted by an incised bank and cobble bed). The 25-50-foot buffer should 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. • Equipment should not be placed within sensitive habitat areas. • Vehicles and equipment should arrive at the treatment area clean and weed-free as verified by the SBFDF. • Trees should be pruned according to International Society of Arboriculture and American National Standards Institute A300 standards. • Retained trees and vegetation should be protected from tool and equipment damage. • Tools should 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. • All refuse, litter, trash, and non-vegetative debris resulting from vegetation treatment operations, and other activity in connection with vegetation treatment operations should be removed from the treatment area and properly disposed of.

Table 3-11. Project Design Features and Best Management Practices

Resource Area	Focus	CWPP Proposed Best Management Practices
		<ul style="list-style-type: none"> • Chipped material should not be placed or deposited into any streambeds. • Prior to turn-out, streams and watercourses in potential grazing areas should be identified and assessed, and exclusionary fencing should be installed where necessary. • Grazing activities should be monitored in riparian areas to minimize the potential for stream bank damage, soil compaction, and soil deposition into streams and watercourses. • Prior to grazing in riparian areas, thresholds should be identified that would trigger a cessation of grazing activity. • Grazing in unstable slope areas or implement measures should be avoided to minimize impacts to slope stability (e.g., reducing herd size to retain vegetation, avoiding grazing where saturated soil conditions exist). • The timing and level of grazing practices should be considered to promote plant recruitment (e.g., timing prior to seed set of annual grasses to promote perennial species establishment). • The spread of invasive plants and pathogens should be minimized through the use of quarantine periods; holding areas; clean stock water; and personnel, equipment, and vehicle sanitation. • Retained trees and vegetation should be protected from tool and equipment damage.
<u>Biological</u>	<u>Lake and Streambed Alteration Agreement</u>	<ul style="list-style-type: none"> • <u>The SBFD shall perform work within 50 feet of the top of bank of a creek in accordance with the CDFW approved Lake and Streambed Alteration Agreement Notification No. 1600-2014-0160-R5.</u>
<u>Biological</u>	<u>Grazing Management</u>	<ul style="list-style-type: none"> • <u>Identify and assess streams and watercourses in potential grazing areas prior to turn-out and install exclusionary fencing where necessary.</u> • <u>Routinely monitor grazing activities in riparian areas to minimize the potential for stream bank damage, soil compaction, and soil deposition into streams and watercourses.</u> • <u>Prior to grazing in riparian areas, identify thresholds that would trigger a cessation of grazing activity.</u> • <u>Avoid grazing in unstable slope areas or implement measures to minimize impacts to slope stability (e.g., reducing herd size to retain vegetation, avoiding grazing where saturated soil conditions exist).</u> • <u>Consider the timing and level of grazing practices to promote plant recruitment (e.g., timing prior to seed set of annual grasses to promote perennial species establishment).</u> • <u>Minimize the spread of invasive plants and pathogens through the use of quarantine periods; holding areas; clean stock water; and personnel, equipment, and vehicle sanitation.</u>
Hazards/Health & Safety	Worker Training Safety	<ul style="list-style-type: none"> • Equipment operators and project personnel should have appropriate personal protective equipment and be properly trained in equipment use. • As necessary, tools should be sanitized between project areas to prevent the spread of pathogens. • <u>The SBFD will incorporate environmental awareness training for SBFD field crews that contains these PDFs/BMPs.</u>

Table 3-11. Project Design Features and Best Management Practices

Resource Area	Focus	CWPP Proposed Best Management Practices
Noise	Construction Hours	<ul style="list-style-type: none"> • Work would include weekdays between the hours of 8:00 a.m. to 5:00 p.m. No work will be completed on weekends or designated holidays unless fire conditions (e.g., red flag warning) dictate immediate action.
Transportation	Traffic Circulation and Safety	<ul style="list-style-type: none"> • Haul trucks entering or exiting public streets shall yield to the public traffic at all times. • All project-related staging of vehicles should be kept out of the adjacent public roadways and should occur on site or within other off-street areas. • Traffic control and associated Traffic Control Plans should be prepared for any lane closure, detour, or other disruption to traffic circulation, including bicycle and pedestrian trails. Bicycle and pedestrian trails should remain open, to the greatest extent possible, during vegetation management activities or re-routed to ensure continued connectivity. • Bus route and/or a bus stop access impacts associated with vegetation management activities would be coordinated with the Santa Barbara MTD.
Water Quality	Litter Removal	<ul style="list-style-type: none"> • All refuse, litter, trash, and non-vegetative debris resulting from vegetation treatment operations, and other activity in connection with vegetation treatment operations should be removed from the treatment area and properly disposed of. • Tools should 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.
Wildfire	Fire Safety	<ul style="list-style-type: none"> • Appropriate fire safety measures should be implemented. • For safety purposes, necessary signage alerting the public to active operations should be provided.
Wildfire	Feasibility Determination	<ul style="list-style-type: none"> • The Sbfd will evaluate an action proposed under the CWPP for feasibility at such time as the action is contemplated. Feasibility will be determined based on the ability of the Sbfd to accomplish the action in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors.

Page 4.3-75: Mitigation Measure MM-BIO-1 has been revised as shown below in ~~strike through~~/underline to reflect that protocol surveys shall occur prior to project-level CEQA review. Additionally, MM-BIO-1 has been broken into species-specific subheadings and additional requirements added with regard to Crotch bumblebee.

MM-BIO-1 Special-Status Species Surveys and Mitigation. For any program-level projects identified in this program environmental impact report (PEIR) that may result in a significant impact to a special-status species, a biological reconnaissance of the project site will be conducted by a City qualified biologist within ten days prior to the start of activities to determine if suitable habitat for special-status species occurs on the project site. If suitable habitat is present on or within the immediate vicinity (100–500 feet) of the project site, additional focused surveys and subsequent mitigation measures will be required as described below. These measures shall be implemented prior to performing a project-

specific CEQA review. The following species-specific measures will be implemented for projects identified with a potential to contain suitable habitat for special-status species.

A. Southern Steelhead (*Oncorhynchus mykiss*). If the biological survey identifies the potential for southern steelhead to occur, coordinate with the National Marine Fisheries Service to confirm whether vegetation management has the potential to result in take of that species. As part of future projects that require work within 50-feet of City creeks with potential steelhead habitat or their riparian areas, all such work shall be conducted between June 15 and October 15 or as approved by a City qualified biologist in coordination as required with USACE, NMFS, and CDFW.

B. California Red-Legged Frog (*Rana draytonii*). For program-level projects that occur within suitable California red legged frog habitat, specifically projects within riparian corridors, , surveys shall be conducted by a permitted 10(a)(1)(A) biologist is required (refer to introduction section for information on how to apply for a section 10(a)(1)(A) permit This Guidance recommends a total of up to eight (8) surveys to determine the presence of CRF at or near a project site. Two (2) day surveys and four (4) night surveys are recommended during the breeding season; one (1) day and one (1) night survey is recommended during the non-breeding season. Each survey must take place at least seven (7) days apart. At least one survey must be conducted prior to August 15th. The survey period must be over a minimum period of 6 weeks (i.e., the time between the first and last survey must be at least 6 weeks). Throughout the species' range, the non-breeding season is defined as between July 1 and September 30. If the species is observed at any time, no additional surveys shall be conducted in the area. If California red legged frog are found and cannot be avoided by the project, additional mitigation will be required to comply with the Endangered Species Act and California Endangered Species Act, such as applying for an Incidental Take Permit prior to project implementation.

C. Crotch Bumblebee.

1. If the project-specific biological resources evaluation indicates potential presence of Crotch bumblebee, a qualified entomologist familiar with the species behavior and life history shall conduct surveys to determine the presence/absence of Crotch's bumble bee. Surveys shall be conducted during flying season when the species is most likely to be detected above ground, between March 1 to September. If "take" or adverse impacts to Crotch's bumble bee cannot be avoided either during project activities or over the life of the project, SBFD must consult CDFW to determine if a CESA incidental take permit is required (pursuant to Fish and Game Code Section 2080 et seq.).
2. If the SBFD will perform mowing activities within habitat that has been identified by the project-specific biological resources evaluation to be suitable for the Crotch bumblebee, mowing shall occur outside of Crotch bumble bee flight season (March 1 through September 1). Mowing activities should be completed at the highest cutting height possible, or at a minimum of 12 inches, to prevent disturbance of established nests or overwintering queen hibernacula.
3. Within identified Crotch bumblebee habitat, the SBFD shall maintain a sustained nectar source for foraging bees. The SBFD shall maintain one or more patches (as large as possible) of meadow, lawn, or edge habitat unmowed for the entire year in order to create a mosaic of patches with structurally different vegetation.

D. Special Status Plants.

1. In order to adequately address special-status plant species, prior to implementation of project activities in site-specific location and based upon the recommendations of the site-specific biological resources evaluation, a qualified biologist should conduct botanical surveys for special-status plant species, including those listed by the California Native Plant Society (<http://www.cnps.org/cnps/rareplants/inventory/>), during the blooming period for all sensitive plant species potentially occurring within the project area. Table 4.3-5 of the CWPP PEIR shall be used as a list of potential special-status plant species that may be present in the project area.
2. If special-status plant species are identified within or adjacent to the project area, species specific avoidance and minimization measures shall be developed to avoid impacts to special-status plants. Avoidance and minimization measures may include measures such as seasonal work periods to avoid blooming season, use of hand tools to avoid soil compaction from heavy machinery, flagging of no-work buffers of an appropriate distance to avoid impacts to a specific population or individual, and maintaining a biological monitor on site to ensure that design elements are effective at providing the intended protection. If state or federally listed plant species are identified, consultation with the relevant agency to ensure full avoidance or mitigation shall occur.
3. If avoidance is not feasible, a mitigation ratio shall be developed that is roughly proportionate to the level of impact and with input from the respective wildlife agencies. Measurable success criteria shall be included for any mitigation area required to be established and submitted to the wildlife agencies.
4. For species that are determined to be present and unavoidable in a project work site, a Documented Conservation Seed Collection of the impacted rare plant species shall be deposited at either the Santa Barbara Botanic Garden or the California Botanic Garden (formerly known as Rancho Santa Ana Botanic Garden).

Page 4.3-77: Mitigation Measure MM-BIO-2 has been updated to reflect a creek setback of 50 feet rather than 25 feet, and to note the obligation to obtain an LSAA.

MM-BIO-2 **Riparian Protection.** Prior to conducting work in a creek, or within ~~25~~ 50 feet of the top of bank, the Sbfd shall consult with a City qualified biologist during the preparation of the site-specific Work Plan to identify methods to achieve the vegetation management without significant impacts to riparian resources. Based on this consultation, the Sbfd shall develop site-specific measures to avoid or reduce impacts to riparian resources. These measures shall include (among others) the following:

- a) To the extent feasible, all work near a creek shall be conducted when surface water is absent.
- b) Vegetation shall not be thinned, removed, or pruned, nor shall dead wood be removed, within ~~25-50~~ feet of a creek channel when flowing water is present.
- c) The only plants that can be removed from a creek bed (that is, below the line of the ordinary high water mark) are live or dead eucalyptus trees and dead native shrubs/trees that are deemed to be a fire hazard, and invasive exotics (including, but not limited to giant reed).
- d) Cut stems, tree trunks or other vegetative debris shall not be dragged across a creek bed that contains riparian vegetation, wetlands, or surface water.
- e) No trees shall be felled across a creek while there is flowing water.

- f) No eucalyptus chipping or cut stems shall be left on the creek banks or any upper stream terrace, when present.
- g) Chipped native vegetation shall not be placed on creek banks, unless a qualified biologist determines that placement of the chipping would provide needed erosion protection without an adverse impact on aquatic habitats and water quality in the creek. Native plant chippings can be spread outside the top of bank.
- h) Entities performing vegetation management activities within a stream shall notify the California Department of Fish and Wildlife (CDFW) pursuant to Fish and Game Code Section 1600 et seq. and shall obtain a Lake and Streambed Alteration Agreement if determined to be necessary prior to initiating work within CDFW's jurisdiction.

Page 4.3-75: Mitigation Measure MM-BIO-3 has been updated to enable the public to access biological resource evaluations performed by the SBFD on the CWPP website.

MM-BIO-3 **Property Owner Educational Material.** Defensible space management by property owners could potentially cause inadvertent impacts to sensitive plant and wildlife species, especially near creeks. The SBFD shall create property owner educational material in consultation with a City qualified biologist that will be available at the SBFD website and in a printable brochure that advises property owners about regulatory obligations with defensible space and specifying measures that owners can take, such as avoiding bird nests, when performing vegetation management. The SBFD shall also make available biological resource evaluations associated with CWPP activities, whether performed for private or public projects, on the SBFD website.

Page 4.3-77: Mitigation Measure MM-BIO-4 has been updated to reflect a nesting bird window from January through September and nest buffers.

MM-BIO-4 **Nesting Bird Avoidance.** Construction activities for project-level and program-level projects shall avoid the migratory bird nesting season (typically ~~February 1~~ January through ~~August 31~~ September), to reduce any potential significant impact to birds that may be nesting within 500 feet of project sites. If construction activities must occur during the migratory bird nesting season, an avian nesting survey of the project site and suitable habitat within 500 feet of the site shall be conducted for protected migratory birds and active nests. The avian nesting survey shall be performed by a qualified biologist meeting the standards in the field within 72 hours prior to the start of construction in accordance with the Migratory Bird Treaty Act (16 USC 703–712) and California Fish and Game Code, Sections 3503, 3503.5, and 3513. If an active bird nest is found, the nest shall be flagged and an appropriate buffer established around the nest. Buffers around nests should be set at 300 feet for passerines and 500 feet for raptors, unless greater or lesser distances are deemed appropriate by a qualified biologist, which shall be determined by the biologist based on the species' sensitivity to disturbance (up to 300 feet for passerines and up to 500 feet for raptors and special status species). The nest area shall be avoided until the nest is vacated and the juveniles have fledged. No project activities may encroach into the buffer until a qualified biologist has determined that the nestlings have fledged, and the nest is no longer active.

Page 4.9-16: Section 4.9, Land Use and Planning

Text clarifying the policies within the City's Coastal Land Use Plan, as outlined in Table 4.9-4, City of Santa Barbara Local Coastal Program/Coastal Land Use Plan Consistency Analysis, has been added. In addition, new text has been added before the table, as follows:

The policies of the City’s General Plan in Table 4.9-2 of the Draft PEIR are applicable throughout the City. The Coastal Land Use Plan (LUP) policies listed in Table 4.9-4 apply within the Coastal Zone only. In the Coastal Zone, if there is any conflict between the policies of the General Plan and the policies of the Coastal LUP, the policies of the Coastal LUP take precedence.

Table 4.9-4. City of Santa Barbara Local Coastal Program/Coastal Land Use Plan Consistency Analysis

Goal/Policy	Analysis
<i>Coastal Hazards Policies</i>	
<i>City Planning Efforts and Programs</i>	
<p>Policy 5.1-4 Fire Hazard Risk Reduction Programs. Continue to implement programs that reduce the risk of wildland and structure fires, and that minimize the short- and long-term effects of fires consistent with the policies of this Coastal LUP.</p> <ul style="list-style-type: none"> a. <u>Wildfire Risk Reduction.</u> Continue to implement risk reduction measures such as vegetation fuels management and vegetation chipping through City operations, inter-agency programs, and programs for private property. b. <u>Limit Residential Development in High Fire Hazard Areas.</u> Continue land use map designations that limit residential density in High Fire Hazard Areas. c. <u>Wildland Fire Suppression Assessment District.</u> Continue to implement wildfire risk reduction programs facilitated by the Wildland Fire Suppression Assessment District, such as vegetation management, and homeowner education and assistance programs. d. <u>Coordination.</u> Continue to coordinate fire risk prevention, management, response, recovery, and public education programs with the County of Santa Barbara, Montecito Fire Protection District, U.S. Forest Service, California Emergency Management Agency, CAL FIRE, Federal Emergency Management Agency, and other agencies 	<p>Consistent. The proposed CWPP identifies a series of goals and recommended action items to be implemented by the City that serve to minimize wildfire impacts. Furthermore, the CWPP proposes modifications to existing VMUs to reduce wildfire risk, recommend adoption of amendments to existing codes and standards relating to residential development, discuss implementation and funding strategies through Wildland Fire Suppression Assessment Districts, and foster coordination between police- and fire-protection services. As such, the CWPP continues to implement programs designed to reduce the risk of wildland fires. Therefore, the CWPP is consistent with this policy.</p>
<p>Policy 5.1-5 Evacuation Route Evaluation. Periodically evaluate the effectiveness of existing and proposed fire emergency evacuation routes, and develop standards or conditions that can be applied to projects to assure that adequate evacuation routes are provided and maintained, where feasible.</p>	<p>Consistent. The CWPP outlines interagency coordination between police- and fire-protection service agencies. Through the development of the CWPP, the SBFD developed an evacuation preplan, which outlines the response routes, probable public evacuation routes, traffic control points, and staging areas, as shown in Figure 8, Wildfire Evacuation Preplanning Blocks, of the CWPP. Potential future impacts associated with the CWPP are analyzed in Section 4.7, Hazards and Hazardous Materials, of this PEIR. The CWPP would not interfere with this policy. As such, the CWPP would be consistent with the City’s policy related to emergency response plans.</p>

Table 4.9-4. City of Santa Barbara Local Coastal Program/Coastal Land Use Plan Consistency Analysis

Goal/Policy	Analysis
<p>Policy 5.1-6 Public Water System Improvements for Fire Fighting. Continue to periodically evaluate the potential for additional water system improvements to assist in emergency preparedness and incorporate feasible measures that are consistent with the policies of this Coastal LUP into the City Capital Improvement Plan and development standards and conditions.</p>	<p>Consistent. Action Number 5.7 of the CWPP describes “[a]s appropriate, evaluate the opportunity to incorporate projects and actions identified in this CWPP into the City’s Hazard Mitigation Plan and Capital Improvement Program.” As such, the CWPP facilitates potential future improvements for the City, such as capital improvements to the public water system. Therefore, the CWPP is consistent with this policy.</p>
<p>Policy 5.1-7 Private Water Supplies for Fire Fighting. Encourage and assist homeowners in High Fire Hazard Areas to install their own emergency water supplies to support firefighting operations provided that procurement of such supplies and related development is consistent with the policies of this Coastal LUP.</p>	<p>Consistent. As described in Chapter 3, Project Description, of this PEIR, a portion of the Extreme Foothill Zone/proposed VHFHSZ is not connected to the City water system. This area has additional requirements included in the City’s Municipal Ordinance (No. 5920). Existing regulation is supported by the CWPP to further recommend improvements to residential uses within the HFHA. Therefore, the CWPP would be consistent with this policy.</p>
<p>Policy 5.1-26 Avoid or Minimize the Effects of High Fire Hazard. New development and substantial redevelopment shall provide appropriate site layout, structure design and materials, fire detection and suppression equipment, landscaping and maintenance including defensible space requirement, road access and fire vehicle turnaround, road capacity for evacuation (if new roads are proposed), and water supply to avoid or minimize risks to life and property. Any requirements for fire protection shall be considered as part of any Coastal Development Permit application review to ensure that adverse impacts to coastal resources are avoided or minimized consistent with the policies of this Coastal LUP.</p>	<p>Consistent. The proposed CWPP identifies a series of goals and recommended action items to be implemented by the City that serve to minimize wildfire impacts. CWPP Appendix A, Wildland Fire Evacuation Procedure Analysis Recommendations, and Appendix B, Access and Hydrant Standards, address fire hazard reduction design requirements for the City to implement. As such, the CWPP would be consistent with the City’s policy.</p>
<p>Policy 5.1-27 Defensible Space Requirements. Existing structures, new development, and substantial redevelopment in high fire hazard areas shall provide defensible space as required by the Fire Department. Within defensible space vegetation (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. Fuel modification and brush clearance techniques shall minimize impacts to native vegetation, protect ESHAs consistent with the policies of Chapter 4.1 Biological Resources, and minimize erosion, runoff, and sedimentation, to the maximum feasible extent.</p>	<p>Consistent. The CWPP recommends development standards, such as 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. Further discussion specific on the potential impacts to biological resources can be found in Section 4.4, Biological Resources, of this PEIR. As such, the CWPP applies directly with the City’s policy of reducing wildland fire risk through mitigation efforts like defensible space. Therefore, the CWPP is consistent with this policy.</p>

Table 4.9-4. City of Santa Barbara Local Coastal Program/Coastal Land Use Plan Consistency Analysis

Goal/Policy	Analysis
<i>Development Review Policies</i>	
<i>Protection of ESHAs, Wetlands & Creeks</i>	
<p><u>Policy 4.1-10 Minimization of Impacts for Creek Projects. Any alteration of a creek shall minimize impacts to coastal resources, including the depletion of groundwater, and shall mitigate unavoidable impacts to the extent feasible. Non-intrusive bank stabilization methods such as bioengineering techniques (e.g., revegetation, tree revetment, and native material revetment) shall be used where feasible rather than hard bank solutions such as rip rap or concrete.</u></p>	<p>Consistent. <u>The CWPP recommends vegetation management activities only as needed within riparian habitat and only after completion of a biological resources evaluation, and if identified, special status species surveys. These surveys may identify additional measures to avoid, minimize or offset impacts to habitat within a riparian corridor. Therefore, the CWPP is consistent with this policy.</u></p>
<p><u>Policy 4.1-13 Mitigation of Impacts to ESHAs, Wetlands, and Creeks.</u> <u>A. Where unavoidable permanent impacts to ESHAs, wetlands, and creeks are allowed, mitigation in the form of habitat creation and/or restoration shall be required at a minimum 4:1 ratio (area restored to area impacted) for wetland, open water, or creekbed habitats and a minimum 3:1 ratio for all other ESHAs (including riparian ESHAs). Temporary impacts to ESHAs, wetlands, and creeks shall be restored at a minimum 1:1 ratio. Where mature native trees (four inches [4"] in diameter or greater at four feet six inches [4'-6"] above grade in height) are substantially impacted or removed, they should be replaced at a minimum 10:1 ratio for oak trees and a minimum 5:1 ratio for all other native trees or other trees providing habitat for sensitive species. Sizes of trees planted should be carefully selected to ensure successful restoration. Mitigation shall occur on-site to the maximum extent feasible. Where successful on-site mitigation is not feasible, mitigation may be provided at nearby off-site locations if the restoration area is within public parklands or restricted from development, and success and maintenance is guaranteed through binding agreements.</u></p>	<p>Consistent. <u>The CWPP recommends vegetation management activities only as needed within riparian habitat and only after completion of a biological resources evaluation, and if identified, special status species surveys. These surveys may identify additional measures to avoid, minimize or offset impacts to habitat within a riparian corridor. Offsetting of potential impact would need to comply with the stated policy and mitigation ratios identified therein. Therefore, the CWPP is consistent with this policy</u></p>
<p><u>B. All mitigation sites shall be monitored for a period of no less than five years following completion. Specific mitigation objectives and performance standards shall be designed to measure the success of the restoration. Mid-course corrections shall be implemented if necessary. If performance standards are not met by the end of five years, the monitoring period shall be extended until the standards are met. The restoration will be considered successful after the success criteria have been met for a period of at least two years without remedial actions or</u></p>	<p>Consistent. <u>Mitigation required to offset impacts will be monitored in accordance with the biologist's recommendations and as required by the Coastal Land Use Plan and Coastal Act. Therefore, the CWPP is consistent with this policy</u></p>

Table 4.9-4. City of Santa Barbara Local Coastal Program/Coastal Land Use Plan Consistency Analysis

Goal/Policy	Analysis
<p><u>maintenance other than exotic species control. Where the City has made a specific determination that the mitigation is unsuccessful and is likely to continue to be unsuccessful, an alternate location may be substituted to provide full mitigation of impacts. The substituted location shall be subject to a minimum monitoring period of five years.</u></p>	
<p><u>Policy 4.1-21 Vegetation Management for Fire Hazard Reduction. A. Vegetation management programs to reduce fire fuel loads, as well as project-related landscape and maintenance plans, shall protect and preserve ESHAs, wetlands, and creeks and balance fire risk reduction benefits with possible aesthetic, habitat, and erosion impacts to the extent feasible. Potential adverse environmental impacts resulting from fuel management activities shall be avoided or minimized as feasible.</u></p> <p><u>B. Where vegetation management in ESHAs, wetlands, creeks, and required habitat buffers is required by the City Fire Department to meet City Fire Code Defensible Space Requirements for existing structures in High Fire Hazard Areas, the vegetation management shall be the minimum necessary to meet the City Fire Department requirements and shall be designed to minimize erosion and impacts on habitat values.</u></p> <p><u>C. New development and substantial redevelopment shall be sited to ensure that vegetation management to reduce fire risks (including clearing, landscaping, irrigating, and thinning) does not intrude within any ESHAs, wetlands, or creeks. Vegetation management necessary to meet City Fire Code Defensible Space Requirements for a new or substantially redeveloped primary structure may occur within habitat buffers to ESHAs, wetlands, or creeks, only when all of the following criteria is met:</u></p> <p><u>There is no feasible alternative to site and design the primary structure such that fuel modification is located completely outside of the required habitat buffer;</u></p> <p><u>Encroachment into the habitat buffer is minimized to the extent feasible through siting and design of structures;</u></p> <p><u>Thinning and clearing are the minimum necessary to meet the City Fire Department requirements; and</u></p> <p><u>The vegetation management is designed to avoid habitat and erosion impacts.</u></p>	<p>Consistent. <u>The CWPP recommends vegetation management activities only as needed within riparian habitat and only after completion of a biological resources evaluation, and if identified, special status species surveys. These surveys may identify additional measures to avoid, minimize or offset impacts to habitat within a riparian corridor. Offsetting of potential impact would need to comply with the stated policy and mitigation ratios identified therein. Therefore, the CWPP is consistent with this policy</u></p>

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4 Mitigation Monitoring and Reporting Program

4.1 Introduction

California Public Resources Code Section 21081.6 requires that, upon certification of an Environmental Impact Report, “the public agency shall adopt a reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation.”

A Mitigation Monitoring and Reporting Program (MMRP) is required to ensure that adopted mitigation measures (MMs) and Project Design Features/best management practices (PDFs/BMPs) are successfully implemented for the proposed City of Santa Barbara Community Wildfire Protection Plan (CWPP). The City of Santa Barbara Fire Department (SBFD) is the lead agency for the proposed CWPP and is responsible for implementation of the MMRP. The MMRP will be active through all phases of the CWPP, including design, construction, and operation. SBFD must adopt this MMRP, or an equally effective program, if it approves the proposed CWPP with the mitigation measures that were adopted or made conditions of CWPP approval. This MMRP has been developed in compliance with California Public Resources Code Section 21081.6 and Section 15097 of the California Environmental Quality Act (CEQA) Guidelines (14 CCR 15000 et seq.), and includes the following information:

- A list of mitigation measures, PDFs, and BMPs.
- The entity responsible for ensuring that each mitigation measure or PDF/BMP is implemented and that monitoring and reporting activities occur.
- The timing for implementation of the mitigation measures or PDF/BMP.
- The entity responsible for implementing or monitoring the mitigation measures or PDF/BMP.

As part of the MMRP, monitoring compliance forms for each mitigation measure or PDF/BMP will be developed for the CWPP. These forms will be completed to document implementation of all measures. Once all measures have been completed, the compliance monitor will sign off on the measure to indicate that the required mitigation measure or PDF/BMP has been completed.

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Table 4-1. Mitigation Monitoring and Reporting Program

CWPP Project Design Features and Best Management Practices	Responsible Party	Timing of Implementation
Air Quality		
<ul style="list-style-type: none"> One to three days prior to the commencement of prescribed burning operations, the project proponent would: <ul style="list-style-type: none"> (A): Post signs along the closest public roadway to the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information will be provided with the notice) if they have questions or smoke concerns. (B): Publish a public interest notification in a local newspapers or other widely distributed media source describing the activity, timing, and contact information. (C): Send the local county supervisor and county administrative officer (or equivalent official responsible for distribution of public information) a notification letter describing the activity, its necessity, timing, and measures being taken to protect the environment and prevent prescribed burn escape. <p>This PDF applies only to prescribed burn treatment activities and all treatment types, including treatment maintenance.</p>	SBFD	1 to 3 days prior to prescribed burn
<ul style="list-style-type: none"> The project proponent would comply with the applicable air quality requirements of the SBCAPCD as set forth in Rule 401. This PDF applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance. 	SBFD	Prior to initiation of project activity
<ul style="list-style-type: none"> The project proponent would submit a smoke management plan for all prescribed burns, in accordance with SBCAPCD rules and regulations, and in accordance with 17 CCR Section 80160. Burning will only be conducted in compliance with the burn authorization program of the SBCAPCD. This PDF applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance. 	SBFD	Prior to initiation of project activity
<ul style="list-style-type: none"> The project proponent would create a burn plan using the CAL FIRE burn plan template for all prescribed burns. The burn plan will include a fire behavior model output of First Order Fire Effects Model and BEHAVE or other fire behavior modeling simulation and that is performed by a qualified fire behavior technical specialist that predicts fire behavior and calculates consumption of fuels, tree mortality, predicted emissions, greenhouse gas emissions, and soil heating. The project proponent would minimize soil burn severity from broadcast burning to reduce the potential for runoff and soil erosion. The burn plan would be created with input from a qualified technician or certified state burn boss. This PDF applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance. 	SBFD	Prior to initiation of project activity
<ul style="list-style-type: none"> The project proponent would avoid ground-disturbing treatment activities in areas identified as likely to contain naturally occurring asbestos (NOA) per maps and guidance published by the California Geological Survey, unless an Asbestos Dust Control Plan (17 CCR Section 93105) is prepared and approved by the SBCAPCD. Any NOA-related guidance provided by the SBCAPCD will be followed. This PDF applies to all treatment activities and treatment types, including treatment maintenance. 	SBFD	Prior to initiation of project activity
<ul style="list-style-type: none"> Prescribed burns planned and managed by non-CAL FIRE crews would follow all safety procedures required of CAL FIRE crew, including the implementation of an approved Incident Action Plan (IAP). The IAP would include the burn dates, burn hours, weather limitations, the specific burn prescription, a communications plan, a medical plan, a traffic plan, and special instructions such as minimizing smoke impacts to specific local roadways. The IAP would also assign responsibilities for coordination with the appropriate air district, such as conducting on-site briefings, posting notifications, weather monitoring during burning, and other burn-related preparations. This PDF applies only to prescribed burning treatment activities and all treatment types, including treatment maintenance. 	SBFD	Prior to initiation of project activity
Biological Resources		
<ul style="list-style-type: none"> SBFD will perform a site-specific biological evaluation including a reconnaissance site visit by a City qualified biologist not more than two weeks prior to operations. When mature trees may be affected, a City qualified arborist may also be consulted. The evaluation will address the occurrence or potential occurrence of sensitive vegetation communities, special-status species, aquatic resources, and nesting birds. If any creeks occur within the work area, the biologist will map the top of bank. 	SBFD	Two weeks prior to initiation of activities unless additional species specific surveys are identified.
<ul style="list-style-type: none"> SBFD will develop a site specific Work Plan that will incorporate the results of the biological evaluation. The Work Plan shall be finalized not more than five days prior to the start of operations. The Work Plan may include measures related to special status species avoidance, additional site surveys/documentation and minimizing impacts to riparian habitat and sensitive vegetation communities. The SBFD will perform an after-action report documenting the site conditions after work is complete. The after action report will be maintained in a publicly accessible database. Information from the database shall be evaluated annually to determine native and nonnative vegetation regrowth and measures that have the strongest success in reducing nonnative plant regrowth to help inform future SBFD activities. 	SBFD	Work plan finalization 5 days prior to the start of operation. After-action report within 30 days of completing activities unless the biological resources evaluation and Work Plan identify longer-term monitoring and reporting requirements.
<ul style="list-style-type: none"> During the site-specific biological evaluation, the SBFD would identify invasive exotic plants (such as Pampas Grass [Cortaderia 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 would preferentially remove exotic plants that pose a fire hazard, and generally remove exotic plants in the work area as the opportunity arises 	SBFD	To be incorporated into the Work Plan
<ul style="list-style-type: none"> Vegetation management work would be completed outside of the defined nesting season for birds (i.e., before January and after August 31) unless vegetation management work must occur within the project areas during the breeding season (April 1 to July 30). If so, a site survey would be conducted by a qualified wildlife biologist to determine any presence of nesting birds. The qualified biologist will establish a no-disturbance buffer around any nest located during the survey. The extent of the buffer will be determined based on the natural history traits of the nesting species, at the biologist's discretion. Vegetation management activities will not occur within the buffer while the nest remains active. 	SBFD	Nest buffers to be established based on the biological resources evaluation and as needed nesting bird survey
<ul style="list-style-type: none"> Vegetation management within 50 feet from the outer edge of the tree canopy would be the minimum necessary to meet SBFD requirements and would be designed to minimize erosion and impacts on habitat values. No coast live oak trees with one trunk larger than 4 inches in diameter at 4 feet, 6 inches in height above grade will be removed. 	SBFD	During project activities

Table 4-1. Mitigation Monitoring and Reporting Program

CWPP Project Design Features and Best Management Practices	Responsible Party	Timing of Implementation
<ul style="list-style-type: none"> • Oak saplings less than 4 inches in diameter at 4 feet, 6 inches in height above grade will be protected from damage or cutting during the work. • To the extent feasible, other healthy native understory components such as toyon, lemonade berry and currant will be retained within oak woodlands, as long as they do not create fire ladders. • Lower oak branches (up to 6 feet above grade in height) of oaks should be thinned to eliminate potential fire ladders. • Dried non-native grasses, dead branches, and non-native resinous woody species should be removed in oak tree understory. • Wood chips should not be spread more than 6 to 8 inches in depth, and all chip piles shall be kept at least 5 feet from the outer edge of the tree canopy. • Removed oak limbs should be clean-cut, using the best industry standard practices. 		
<ul style="list-style-type: none"> • Within the Coastal Zone, vegetation treatment within environmentally sensitive habitat areas (ESHAs), wetlands, and creeks, and within ESHA, wetland, and creek buffers shall be avoided, and where full avoidance is not possible, shall minimize impacts to ESHAs to the extent feasible consistent with Policy 4.1-21 of the Coastal Land Use Plan. • Vegetation treatment within City-designated creek channels outside of the Coastal Zone should be limited to the removal of dead brush that is easily accessible and the removal of exotic or invasive species within a 50-foot buffer along the top of banks, as long as the work does not cause damage to the bank structure. • 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 should be prepared by a qualified biologist and peer reviewed by the City Parks Division. • No placement of cut vegetation should occur within a 50-foot buffer along the top of banks. The top of bank should be defined by the first bank out from the present, active stream channel (denoted by an incised bank and cobble bed). The 50-foot buffer should 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. • Equipment should not be placed within sensitive habitat areas. • Vehicles and equipment should arrive at the treatment area clean and weed-free as verified by the SBFD. • Trees should be pruned according to International Society of Arboriculture and American National Standards Institute A300 standards. • Retained trees and vegetation should be protected from tool and equipment damage. • Tools should 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. • All refuse, litter, trash, and non-vegetative debris resulting from vegetation treatment operations, and other activity in connection with vegetation treatment operations should be removed from the treatment area and properly disposed of. • Chipped material should not be placed or deposited into any streambeds. • Prior to turn-out, streams and watercourses in potential grazing areas should be identified and assessed, and exclusionary fencing should be installed where necessary. • Grazing activities should be monitored in riparian areas to minimize the potential for stream bank damage, soil compaction, and soil deposition into streams and watercourses. • Prior to grazing in riparian areas, thresholds should be identified that would trigger a cessation of grazing activity. • Grazing in unstable slope areas or implement measures should be avoided to minimize impacts to slope stability (e.g., reducing herd size to retain vegetation, avoiding grazing where saturated soil conditions exist). • The timing and level of grazing practices should be considered to promote plant recruitment (e.g., timing prior to seed set of annual grasses to promote perennial species establishment). • The spread of invasive plants and pathogens should be minimized through the use of quarantine periods; holding areas; clean stock water; and personnel, equipment, and vehicle sanitation. • Retained trees and vegetation should be protected from tool and equipment damage. 	SBFD	During project activities
<ul style="list-style-type: none"> • The SBFD shall perform work within 50-feet of the top of bank of a creek in accordance with the CDFW approved Lake and Streambed Alteration Agreement Notification No. 1600-2014-0160-R5 	SBFD	During project activities
<ul style="list-style-type: none"> • Identify and assess streams and watercourses in potential grazing areas prior to turn-out and install exclusionary fencing where necessary. • Routinely monitor grazing activities in riparian areas to minimize the potential for stream bank damage, soil compaction, and soil deposition into streams and watercourses. • Prior to grazing in riparian areas, identify thresholds that would trigger a cessation of grazing activity. • Avoid grazing in unstable slope areas or implement measures to minimize impacts to slope stability (e.g., reducing herd size to retain vegetation, avoiding grazing where saturated soil conditions exist). • Consider the timing and level of grazing practices to promote plant recruitment (e.g., timing prior to seed set of annual grasses to promote perennial species establishment). • Minimize the spread of invasive plants and pathogens through the use of quarantine periods; holding areas; clean stock water; and personnel, equipment, and vehicle sanitation. 	SBFD	During project activities

Table 4-1. Mitigation Monitoring and Reporting Program

CWPP Project Design Features and Best Management Practices		Responsible Party	Timing of Implementation
<ul style="list-style-type: none"> Equipment operators and project personnel should have appropriate personal protective equipment and be properly trained in equipment use. As necessary, tools should be sanitized between project areas to prevent the spread of pathogens. The SBFD will incorporate environmental awareness training for SBFD field crews that contains these PDFs/BMPs. 		SBFD	Ongoing to inform SBFD field crews
<ul style="list-style-type: none"> Work would include weekdays between the hours of 8:00 a.m. to 5:00 p.m. No work will be completed on weekends or designated holidays unless fire conditions (e.g., red flag warning) dictate immediate action. 		SBFD	During project activities
<ul style="list-style-type: none"> Haul trucks entering or exiting public streets shall yield to the public traffic at all times. All project-related staging of vehicles should be kept out of the adjacent public roadways and should occur on site or within other off-street areas. Traffic control and associated Traffic Control Plans should be prepared for any lane closure, detour, or other disruption to traffic circulation, including bicycle and pedestrian trails. Bicycle and pedestrian trails should remain open, to the greatest extent possible, during vegetation management activities or re-routed to ensure continued connectivity. Bus route and/or a bus stop access impacts associated with vegetation management activities would be coordinated with the Santa Barbara MTD. 		SBFD	During project activities
<ul style="list-style-type: none"> All refuse, litter, trash, and non-vegetative debris resulting from vegetation treatment operations, and other activity in connection with vegetation treatment operations should be removed from the treatment area and properly disposed of. Tools should 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. 		SBFD	During project activities
<ul style="list-style-type: none"> Appropriate fire safety measures should be implemented. For safety purposes, necessary signage alerting the public to active operations should be provided. 		SBFD	During project activities
<ul style="list-style-type: none"> The SBFD will evaluate an action proposed under the CWPP for feasibility at such time as the action is contemplated. Feasibility will be determined based on the ability of the SBFD to accomplish the action in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors. 		SBFD	During the development of the project specific work plan
CWPP Mitigation Measures		Responsible Party	Timing of Implementation
Aesthetics			
MM-AES-1	<p>The following measures shall be implemented when conducting vegetation management on private and public parcels to the extent feasible:</p> <ul style="list-style-type: none"> Straight line boundaries and other strong linear configurations that tend to detract from the natural appearance of the landscape shall be avoided. Vegetation removal or thinning shall follow natural or existing landscape features such as stream courses, vegetation type lines, ridgetops, and existing roads. Vegetation removal or thinning shall be feathered into the natural landscape, with brush cuttings used to disguise the lines and maintain a natural appearance. 	Private owners/SBFD	Prior to project activities
Air Quality			
MM-AQ-1	Prescribed Burning. The City shall not exceed a hand-built burn pile size of 5 feet x 5 feet x 5 feet and burn in excess of 22 piles of this size in any one day.	SBFD	Prior to project activities
MM-AQ-2	<p>Air Curtain Burner. The City shall implement the following measures prior to the use of an air curtain burner.</p> <p>The City shall coordinate with the Santa Barbara County Air Pollution Control District (SBCAPCD) during the air curtain burner planning process to address any health risk concerns and properly mitigated in coordination with the SBCAPCD, as necessary.</p> <p>The City shall obtain the necessary operating permits (i.e., Title V/Part 70 of the Clean Air Act) with the SBCAPCD for the use of an air curtain burner, when applicable. If the City is using an air curtain burner from another agency or rental company, the City shall ensure that the air curtain burner has air operating permits in place acceptable to the SBCAPCD prior to use.</p>	SBFD	After approval by the SBCAPCD
MM-AQ-3	Covers. Trucks transporting cut vegetation material shall be covered from the point of origin.	SBFD	During project activities
MM-AQ-4	Haul Route Approval. The haul route(s) for all construction-related trucks, three tons or more, entering or exiting the sites, shall be approved by the transportation engineer.	SBFD	After approval by the City Public Works Department
MM-AQ-5	Disturbed Soil. After clearing, grading, earth moving, or excavation is completed, the entire area of disturbed soil shall be treated to prevent wind pickup of soil. This may be accomplished by seeding and watering until vegetative cover is grown, spreading soil binders, sufficiently wetting the area down to form a crust on the surface with repeated soakings as necessary to maintain the crust and prevent dust pickup by the wind, or other methods approved in advance by the Santa Barbara County Air Pollution Control District.	SBFD	After approval by the SBCAPCD
Biological Resources			
MM-BIO-1	Special-Status Species Surveys and Mitigation. For any program-level projects identified in this program environmental impact report (PEIR) that may result in a significant impact to a special-status species, a biological reconnaissance of the project site will be conducted by a City qualified biologist within ten days prior to the start of activities to determine if suitable habitat for special-status species occurs on the project site. If suitable habitat is present on or within the	SBFD	Contingent on results of the biological resources evaluation and, if determined to be necessary, after

Table 4-1. Mitigation Monitoring and Reporting Program

CWPP Project Design Features and Best Management Practices	Responsible Party	Timing of Implementation
<p>immediate vicinity (100–500 feet) of the project site, additional focused surveys and subsequent mitigation measures will be required as described below. These measures shall be implemented prior to performing a project-specific CEQA review. The following species-specific measures will be implemented for projects identified with a potential to contain suitable habitat for special-status species.</p> <p>A. <i>Southern Steelhead (Oncorhynchus mykiss)</i>. If the biological survey identifies the potential for southern steelhead to occur, coordinate with the National Marine Fisheries Service to confirm whether vegetation management has the potential to result in take of that species. As part of future projects that require work within 50-feet of City creeks with potential steelhead habitat or their riparian areas, all such work shall be conducted between June 15 and October 15 or as approved by a City qualified biologist in coordination as required with USACE, NMFS, and CDFW.</p> <p>B. <i>California Red-Legged Frog (Rana draytonii)</i>. For program-level projects that occur within suitable California red legged frog habitat, specifically projects within riparian corridors, , surveys shall be conducted by a permitted 10(a)(1)(A) biologist is required (refer to introduction section for information on how to apply for a section 10(a)(1)(A) permit This Guidance recommends a total of up to eight (8) surveys to determine the presence of CRF at or near a project site. Two (2) day surveys and four (4) night surveys are recommended during the breeding season; one (1) day and one (1) night survey is recommended during the non-breeding season. Each survey must take place at least seven (7) days apart. At least one survey must be conducted prior to August 15th. The survey period must be over a minimum period of 6 weeks (i.e., the time between the first and last survey must be at least 6 weeks). Throughout the species' range, the non-breeding season is defined as between July 1 and September 30. If the species is observed at any time, no additional surveys shall be conducted in the area. If California red legged frog are found and cannot be avoided by the project, additional mitigation will be required to comply with the Endangered Species Act and California Endangered Species Act, such as applying for an Incidental Take Permit prior to project implementation.</p> <p>C. <i>Crotch Bumblebee</i>.</p> <ol style="list-style-type: none"> 1. If the project-specific biological resources evaluation indicates potential presence of Crotch bumblebee, a qualified entomologist familiar with the species behavior and life history shall conduct surveys to determine the presence/absence of Crotch's bumble bee. Surveys shall be conducted during flying season when the species is most likely to be detected above ground, between March 1 to September. If "take" or adverse impacts to Crotch's bumble bee cannot be avoided either during project activities or over the life of the project, SBFD must consult CDFW to determine if a CESA incidental take permit is required (pursuant to Fish and Game Code Section 2080 et seq.). 2. If the SBFD will perform mowing activities within habitat that has been identified by the project-specific biological resources evaluation to be suitable for the Crotch bumblebee, mowing shall occur outside of Crotch bumble bee flight season (March 1 through September 1). Mowing activities should be completed at the highest cutting height possible, or at a minimum of 12 inches, to prevent disturbance of established nests or overwintering queen hibernacula. 3. Within identified Crotch bumblebee habitat, the SBFD shall maintain a sustained nectar source for foraging bees. The SBFD shall maintain one or more patches (as large as possible) of meadow, lawn, or edge habitat unmowed for the entire year in order to create a mosaic of patches with structurally different vegetation. <p>D. <i>Special Status Plants</i>.</p> <ol style="list-style-type: none"> 1. In order to adequately address special-status plant species, prior to implementation of project activities in site-specific location and based upon the recommendations of the site-specific biological resources evaluation, a qualified biologist should conduct botanical surveys for special-status plant species, including those listed by the California Native Plant Society (http://www.cnps.org/cnps/rareplants/inventory/), during the blooming period for all sensitive plant species potentially occurring within the project area. Table 4.3-5 of the CWPP PEIR shall be used as a list of potential special-status plant species that may be present in the project area. 2. If special-status plant species are identified within or adjacent to the project area, species specific avoidance and minimization measures shall be developed to avoid impacts to special-status plants. Avoidance and minimization measures may include measures such as seasonal work periods to avoid blooming season, use of hand tools to avoid soil compaction from heavy machinery, flagging of no-work buffers of an appropriate distance to avoid impacts to a specific population or individual, and maintaining a biological monitor on site to ensure that design elements are effective at providing the intended protection. If state or federally listed plant species are identified, consultation with the relevant agency to ensure full avoidance or mitigation shall occur. 3. If avoidance is not feasible, a mitigation ratio shall be developed that is roughly proportionate to the level of impact and with input from the respective wildlife agencies. Measurable success criteria shall be included for any mitigation area required to be established and submitted to the wildlife agencies. 4. For species that are determined to be present and unavoidable in a project work site, a Documented Conservation Seed Collection of the impacted rare plant species shall be deposited at either the Santa Barbara Botanic Garden or the California Botanic Garden (formerly known as Rancho Santa Ana Botanic Garden). 		<p>species specific protocol level surveys are completed</p>

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CWPP Project Design Features and Best Management Practices		Responsible Party	Timing of Implementation
MM-BIO-2	<p>Riparian Protection. Prior to conducting work in a creek, or within 50 feet of the top of bank, the SBFD shall consult with a City qualified biologist during the preparation of the site-specific Work Plan to identify methods to achieve the vegetation management without significant impacts to riparian resources. Based on this consultation, the SBFD shall develop site-specific measures to avoid or reduce impacts to riparian resources. These measures shall include (among others) the following:</p> <ul style="list-style-type: none"> a) To the extent feasible, all work near a creek shall be conducted when surface water is absent. b) Vegetation shall not be thinned, removed, or pruned, nor shall dead wood be removed, within 50 feet of a creek channel when flowing water is present. c) The only plants that can be removed from a creek bed (that is, below the line of the ordinary high water mark) are live or dead eucalyptus trees and dead native shrubs/trees that are deemed to be a fire hazard, and invasive exotics (including, but not limited to giant reed). d) Cut stems, tree trunks or other vegetative debris shall not be dragged across a creek bed that contains riparian vegetation, wetlands, or surface water. e) No trees shall be felled across a creek while there is flowing water. f) No eucalyptus chipping or cut stems shall be left on the creek banks or any upper stream terrace, when present. g) Chipped native vegetation shall not be placed on creek banks, unless a qualified biologist determines that placement of the chipping would provide needed erosion protection without an adverse impact on aquatic habitats and water quality in the creek. Native plant chippings can be spread outside the top of bank. h) Entities performing vegetation management activities within a stream shall notify the California Department of Fish and Wildlife (CDFW) pursuant to Fish and Game Code Section 1600 et seq. and shall obtain a Lake and Streambed Alteration Agreement if determined to be necessary prior to initiating work within CDFW's jurisdiction. 	SBFD	After completion of site-specific biological resource evaluation, and, if determined to be necessary, after species-specific protocol-level surveys are completed and jurisdictional delineation is completed
MM-BIO-3	<p>Property Owner Educational Material. Defensible space management by property owners could potentially cause inadvertent impacts to sensitive plant and wildlife species, especially near creeks. The SBFD shall create property owner educational material in consultation with a City qualified biologist that will be available at the SBFD website and in a printable brochure that advises property owners about regulatory obligations with defensible space and specifying measures that owners can take, such as avoiding bird nests, when performing vegetation management. The SBFD shall also make available biological resource evaluations associated with CWPP activities, whether performed for private or public projects, on the SBFD website.</p>	SBFD	Within 6 months of City Council certification of the Final PEIR
MM-BIO-4	<p>Nesting Bird Avoidance. Construction activities for project-level and program-level projects shall avoid the migratory bird nesting season (typically January through September), to reduce any potential significant impact to birds that may be nesting within 500 feet of project sites. If construction activities must occur during the migratory bird nesting season, an avian nesting survey of the project site and suitable habitat within 500 feet of the site shall be conducted for protected migratory birds and active nests. The avian nesting survey shall be performed by a qualified biologist meeting the standards in the field within 72 hours prior to the start of construction in accordance with the Migratory Bird Treaty Act (16 USC 703–712) and California Fish and Game Code, Sections 3503, 3503.5, and 3513. If an active bird nest is found, the nest shall be flagged and an appropriate buffer established around the nest. Buffers around nests should be set at 300 feet for passerines and 500 feet for raptors, unless greater or lesser distances are deemed appropriate by a qualified biologist. The nest area shall be avoided until the nest is vacated and the juveniles have fledged. No project activities may encroach into the buffer until a qualified biologist has determined that the nestlings have fledged, and the nest is no longer active.</p>	SBFD	After completion of the site-specific biological resource evaluation and completion of nesting bird surveys
MM-BIO-5	<p>Jurisdictional Waters and Wetlands. Direct impacts to jurisdictional waters that may occur through program-level activities, shall be addressed during project-level California Environmental Quality Act review of the project prior to implementation through first a biological reconnaissance conducted by a City qualified biologist, and a delineation of waters and wetlands to determine potential regulatory agency jurisdiction. If the reconnaissance and delineation determine potentially jurisdictional waters or wetlands occur and may be impacted by the project, mitigation to reduce impacts will be determined through the regulatory application process to implement Clean Water Act Section 401 and Section 404, the Porter-Cologne Water Quality Act, and California Fish and Game Code Section 1602.</p>	SBFD	After completion of site-specific biological resource evaluation, and, if determined to be necessary, after species-specific protocol-level surveys are completed and jurisdictional delineation is completed
MM-BIO-6	<p>CWPP Appendix E Update. The Community Wildfire Protection Plan Appendix E shall be updated with the mitigation measures contained in this Program Environmental Impact Report. Appendix E shall be updated in the Final CWPP prior to consideration by City County and CAL FIRE.</p>	SBFD	Appendix E shall be updated in the Final CWPP prior to consideration by the City Council and CAL FIRE
Cultural Resources			
MM-CUL-1	<p>Cultural Resource Treatment Plan. Potential impacts to cultural resources shall be either minimized or eliminated through development of protocols for practical adherence of mitigation measures MM-CUL-2 and MM-CUL-3 prior to and after the occurrence of vegetation management activities within Community Wildfire Protection Plan (CWPP) Cultural Resource Sensitivity Zones. These protocols shall be outlined in a Cultural Resource Treatment Plan (CRTP). The CRTP shall be developed by a City-qualified archaeologist, meeting the Secretary of Interior Standards (SOI), prior to the implementation of any CWPP ground disturbing activities and include wording of each mitigation measure MM-CUL-2 through MM-CUL-4, specific and detailed explanation for implementation of each mitigation measure and contact protocol. The CRTP shall be provided to all agency personnel, consulting tribes, contractors and archaeological personnel. The existence and necessity for adherence to the CRTP shall be noted on all plans, handbooks, or the like associated with tasks that may incur ground disturbance either intentionally or inadvertently.</p>	SBFD	Prior to the implementation of any CWPP ground-disturbing activities

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CWPP Project Design Features and Best Management Practices	Responsible Party	Timing of Implementation
<p>MM-CUL-2 Workers Environmental Awareness Program (WEAP) Training. All personnel participating in tasks that may incur ground disturbance either intentionally or inadvertently shall be briefed regarding unanticipated discoveries prior to the start of said activities. A basic presentation shall be prepared by a City-qualified archaeologist, meeting the Secretary of the Interior (SOI) Professional Qualification Standards to inform all City-retained personnel working on the project about the archaeological sensitivity of proposed project areas located within Community Wildfire Protection Plan Cultural Resource Sensitivity Zones. The purpose of the WEAP training is to provide specific details on the kinds of archaeological materials that may be identified during project activities and explain the importance of and legal basis for the protection of cultural resources. Each personnel shall also be instructed the proper procedures to follow in the event that cultural resources or human remains are encountered. These procedures include work curtailment or redirection, and the immediate contact of the site supervisor, SOI- and City-qualified archaeologist, and if human remains are encountered, the County Coroner.</p>	SBFD	Prior to the start of project activities
<p>MM-CUL-3 Archaeological Construction Monitoring. Archaeological monitoring shall be conducted during all ground disturbance activities within public space, and when possible private properties, existent within the Community Wildfire Protection Plan Cultural Resource Sensitivity Zone B and during all activities that have the potential to disturb the ground including vegetation removal by hand and mechanical removal when such activity is within or near to a known site. A Secretary of the Interior (SOI)- and City-qualified archaeologist shall be retained to oversee and adjust monitoring efforts as needed (increase, decrease, or discontinue monitoring frequency) based on the observed potential for vegetation management activities to encounter cultural deposits or material. The archaeological monitor shall have the authority to halt all ground-disturbing activities until discovered cultural material can be properly assessed. The archaeological monitor shall be responsible for maintaining daily monitoring logs and immediately contacting the project archaeologist upon discovery of cultural material. If the project archaeologist determines the discovery to be of a nature requiring further evaluation, the project archaeologist shall contact the City as soon as possible and at least within the same working day. Further treatment of cultural material may include redirection or discontinuing ground-disturbing tasks, subsurface testing and/or evaluation and/or data recovery and/or temporary/permanent avoidance. Following the completion of ground disturbing activities, the SOI- and City-qualified archaeologist shall provide an archaeological monitoring report memo to the agency. The project archaeologist shall also submit the same memo to the Central Coastal Information Center for inclusion in the California Historical Research Information System database.</p>	Private Property Owners/SBFD	Archaeological monitoring shall be conducted during all ground disturbance activities within public space, and when possible within private properties, existent within the Community Wildfire Protection Plan Cultural Resource Sensitivity Zone B and during all activities that have the potential to disturb the ground, including vegetation removal by hand and mechanical removal when such activity is within or near to a known site
<p>MM-CUL-4 Intensive Archaeological Pedestrian Surveys of Community Wildfire Protection Plan (CWPP) Cultural Resource Sensitivity Zone. An intensive Pedestrian survey shall be conducted prior to the initial implementation of all CWPP ground disturbance activities within public space, and when possible private properties, existent within the CWPP Cultural Resource Sensitivity Zone B. Initial implementation of all CWPP ground disturbance activities is defined as the first occurrence of vegetation removal after approval of the CWPP. No additional archaeological pedestrian surveys shall be required once the initial survey of the area has been conducted except any circumstance that is subject to other mitigation measure outlined therein. If necessary and depending on the vegetation condition within the “CWPP Cultural Resource Sensitivity Zone” areas (where ground surface visibility is limited such that the survey would results would not be reliable), the survey may be conducted concurrently or immediately subsequent to vegetation removal. The City shall retain a Secretary of the Interior (SOI)- and City-qualified archaeologist/s to conduct Phase I archaeological survey studies within the CWPP Cultural Resource Sensitivity Zone B; the result of which will be a Phase I Archaeological Resources Report consistent with the California Environmental Quality Act and City Master Environmental Assessment guidelines. The report will include methodology, background research, survey results, interpretation and recommendations. Background research shall start with a review of the City’s archaeological database created as a result of this study, but may, if determined necessary by the SOI- and City-qualified archaeologist, include a California Historical Research Information System (CHRIS) records search. Additional records search should be authorized by the City first. Upon completion, the Phase I Archaeological Resources Report shall be submitted to the Central Coastal Information Center for inclusion in the CHRIS database.</p>	Private Property Owners/SBFD	An intensive pedestrian survey shall be conducted prior to the initial implementation of all CWPP ground disturbance activities within public space, and when possible within private properties, existent within the CWPP Cultural Resource Sensitivity Zone B
<p>MM-CUL-5 Inadvertent Discovery of Archaeological Resources. In the event that archaeological resources (sites, features, or artifacts) are exposed during ground disturbing activities within the proposed project areas (within or outside the Community Wildfire Protection Plan Cultural Resource Sensitivity Zones A and B), all construction work occurring within 50 feet of the discovery shall immediately stop until a Secretary of the Interior (SOI)- and City-qualified archaeologist can evaluate the nature and significance of the find and determine whether or not additional study is warranted. Depending upon the significance of the find under the California Environmental Quality Act (14 CCR 15064.5(f); California Public Resources Code Section 21082), the archaeologist may simply record the find and allow work to continue. If the discovery proves significant under CEQA, additional work, such as preparation of an archaeological treatment plan, testing, or data recovery, may be warranted. If the discovery is Native American in nature, consultation with and/or monitoring by a tribal monitor ancestrally affiliated with the area and, if possible, included in the most current City Barbareño Chumash Archaeological Site Monitors List, may be necessary.</p>	Private Property Owners/SBFD	During project activities
<p>MM-CUL-6 Inadvertent Discovery of Human Remains. In the event an inadvertent discovery consists of possible human remains, the Santa Barbara County Coroner shall be contacted immediately as well as the City’s Environmental Analyst and a Secretary of the Interior (SOI)- and City-qualified archaeologist. If the Coroner determines that the remains are Native American, the Coroner shall contact the California Native American Heritage Commission. (NAHC) who will provide the name and contact information for the Most Likely Descendent (MLD). Treatment of the discovery shall be decided in consultation with the MLD provided by the NAHC. Additionally, an SOI- and City-qualified archaeologist and tribal monitor ancestrally affiliated with the area and, if possible, included in the most current City Barbareño Chumash Archaeological Site Monitors List, shall be retained to monitor all further subsurface disturbance in the area of the find. Work in the area may only proceed after the Environmental Analyst grants authorization.</p>	Private Property Owners/SBFD	Contact the County Coroner immediately upon discovery

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CWPP Project Design Features and Best Management Practices		Responsible Party	Timing of Implementation
MM-CUL-7	Post-Fire Management Assessment. In the event that a fire occurs within public space, and when possible private properties, existent within the Community Wildfire Protection Plan Cultural Resource Sensitivity Zones A and B, a Secretary of the Interior (SOI)- and City-qualified archaeologist shall be retained to assess the effects of the fire and/or fire management on known and unknown cultural resources. The retained SOI- and City-qualified archaeologist shall provide to the City, a brief memo outlining the results of the assessment and recommendation for further treatment if necessary. Any exposure of cultural material, change in the nature of a cultural resource, or new information resulting from the fire or fire management, shall be recorded in a site record update. Based on the recommendations provided in the memo, the City may retain a SOI and City-qualified archaeologist to conduct the recommended study or measures. All reports, memos, and site records resulting from post-fire management assessments shall be submitted to the Central Coastal Information Center for inclusion in the California Historical Research Information System database.	Private Property Owners/SBFD	After a wildfire occurs
Geology and Soils			
MM-GEO-1	Erosion Control. The Santa Barbara Fire Department (SBFD) shall implement the following Best Management Practices when conducting vegetation management on slopes greater than 10%: <ul style="list-style-type: none"> To the extent feasible, field crews shall not create footpaths to and from the work areas that remove leaf litter and expose mineral soils to potential future erosion. If crews must use a single path that becomes worn and vulnerable, the path shall be rehabilitated after vegetation management to reduce erosion potential. Rehabilitation would include replacement of leaf litter and chippings on the path, and piling dirt and organic matter at periodic intervals along the path to act as water bars and prevent the concentration of flows. Crews shall avoid stripping the leaf litter from slopes or creek banks when dragging vegetation from the cutting location to the chipper. If the removal of vegetation and leaf litter is unavoidable, the SBFD shall restore the affected areas by spreading leaf litter and chippings back over the stripped areas. If the SBFD field supervisor determines that an erosion potential has been created due to vegetation reduction work, and that the spreading of leaf litter and chippings is insufficient protection from future winter rains, the SBFD shall consider temporary biodegradable erosion control blankets and barriers, such as coconut fiber blankets and straw wattles. These materials shall be placed strategically to reduce the amount and velocity of flow over the affected areas, to prevent gullyng and soil loss by water erosion, and to facilitate the natural regeneration and colonization by native plants. 	SBFD	During project activities
Hazards and Hazardous Materials			
MM-HAZ-1	Non-interference. Vegetation management activities at Elings Park will be coordinated so that they do not interfere with enforced monitoring and reporting activities on the former Las Positas Landfill as described in Enforcement Order R3-2004-0006.	SBFD	Prior to performing work within Elings Park
Hydrology and Water Quality			
MM-HYDRO-1	Sedimentation Control. The Santa Barbara Fire Department (SBFD) shall implement the following when conducting vegetation management on slopes greater than 10%, within 25 feet of the top of a creek, or within a creek: The SBFD shall prepare an erosion control plan that evaluates the potential for erosion from vegetation management actions and identifies Best Management Practices to avoid significant erosion impacts through modifying vegetation removal methods, utilizing alternative access methods, and/or rehabilitating affected areas after the work. If the SBFD field supervisor determines that an erosion potential has been created due to vegetation reduction work, and that the spreading of leaf litter and chippings is insufficient protection from future winter rains, the SBFD shall consider temporary biodegradable erosion control blankets and barriers, such as coconut fiber blankets and logs. These materials shall be placed strategically to reduce the amount and velocity of flow over the affected areas, to prevent gullyng and soil loss by water erosion, and to facilitate natural regeneration and colonization by native plants.	SBFD	During project activities
Noise			
MM-NOI-1	Equipment Maintenance. All construction equipment, including trucks, shall be professionally maintained and fitted with standard manufacturers' muffler and silencing devices.	SBFD	Prior to and during project activities
MM-NOI-2	Hearing Protection. All workers using or within close proximity to operating chain saws, chippers, and other noisy equipment shall utilize noise protection (ear plugs) consistent with Cal OSHA and Federal OSHA requirements and other legal workplace requirements.	SBFD	During project activities
Recreation			
MM-REC-1	The Santa Barbara Fire Department shall consult with the Parks and Recreation Department prior to the commencement of vegetation management in parks, open space areas, and public recreational spaces to ensure that recreational opportunities are not precluded simultaneously in several parks in the same portion of the City.	SBFD	Prior to working in City Parks

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CWPP Project Design Features and Best Management Practices		Responsible Party	Timing of Implementation
<i>Tribal Cultural Resources</i>			
MM-TCR-1	Pre-Fire and Vegetation Management Assessment. The City shall notify all consulting Tribes prior to conducting Intensive Archaeological Pedestrian Surveys of Community Wildfire Protection Plan Cultural Resource Sensitivity Zones (MM-CUL-4). Upon request, Tribes will be provided contact information for the Secretary of the Interior (SOI)- and City-qualified archaeologist retained to conduct the surveys as well as logistical information regarding the surveys. Tribes shall be invited, but are not required, to accompany the SOI- and City-qualified archaeologist during the surveys. No survey shall be delayed or aborted due to the absence of Tribal representatives.	SBFD	Prior to conducting intensive archaeological pedestrian surveys of Community Wildfire Protection Plan Cultural Resource Sensitivity Zones
MM-TCR-2	Native American Construction Monitoring. Native American monitoring shall be conducted during all pre-planned ground disturbance activities within known prehistoric archaeological sites or historic archaeological sites identified as associated with Native American history. A Native American monitor ancestrally affiliated with the area and, if possible, included in the most current City Barbareño Chumash Archaeological Site Monitors List, shall be retained by the City prior to the commencement of all pre-planned ground-disturbance activities. The Native American monitor shall have the authority to halt all ground-disturbing activities until discovered tribal cultural resource (TCR) material can be properly assessed. The Native American monitor shall be responsible for reporting any discovered TCR material to the Secretary of the Interior- and City-qualified archaeologist retained to monitor the same pre-planned ground-disturbance activities.	SBFD	Native American monitoring shall be retained by the City prior to the commencement of all pre-planned ground-disturbance activities
MM-TCR-3	Post-Fire Management Assessment. The Santa Barbara Fire Department shall meet with the Chumash Fire Department at least biannually (i.e., every other year) to discuss ongoing fire management planning and practices within the City to avoid potential impacts to tribal cultural resources. Due to the sensitive nature of certain Native American resources, meeting minutes shall be prepared and maintained by the City and provided upon request to the Chumash Fire Department and the Santa Ynez Band of Chumash Indians Cultural Resources Manager.	SBFD	Biannually
<i>Wildfire</i>			
MM-WLD-1	Erosion Control. Revise City Ordinance No. 5290 (High Fire Hazard Area Landscape Requirements) to require that landscape plans for defensible space areas on slopes exceeding 10% gradient incorporate erosion control techniques and/or best management practices to minimize erosion potential resulting from vegetation management and maintenance activities.	SBFD	As funding is available
MM-WLD-2	Post-fire Assessment. Following any wildfire that burns into the Community Wildfire Protection Plan area, a post-fire field assessment shall be conducted by an engineering geologist to identify any areas that may be subject to increased risk of post-fire flooding, landslide or erosion. Any recommendations identified by the geologist to mitigate such risk shall be implemented by the City.	SBFD	Following a wildfire

