

8 Responses to Comments on the Draft EIR

This section includes comments received during the circulation of the Draft Program Environmental Impact Report (EIR) prepared for the implementation of the Housing Plan programs (Housing Plan).

The Draft Program EIR was circulated for a 45-day public review period that began on January 30, 2026 and ended on March 17, 2026. The City of Santa Barbara held a public comment hearing for the Draft Program EIR during a noticed Planning Commission hearing on March 12, 2026. The City received four comment letters on the Draft EIR, in addition to the comments made during the Planning Commission Draft Program EIR Public Comment Hearing, and notes submitted by one Planning Commission member.

The comments and the page number on which each letter or discussion item appears are listed below.

Letter Number and Commenter		Page Number
1	Steve Johnson	8-2
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The comment letters and responses follow. Each item has been numbered sequentially and each separate issue raised by the commenter, if more than one, has been assigned a number. The responses to each comment identify first the number of the comment letter, and then the number assigned to each issue (Response 1.1, for example, indicates that the response is for the first issue raised in comment Letter 1).

Page 4.9-18: “Consistency with RHNA”

A sentence in the middle of paragraph 2 starts with:

“Therefore, the Housing Plan’s **consistency** with SBCAG’s RHNA allocation plan,”

In fact, the Housing Plan is **inconsistent** with RHNA’s allocation plan.

The RHNA allocation for moderate income housing is 1441 units.

Progress to the end of 2024 is 14 units (all deed restricted).

1.1

The EIR should note the inconsistency, and identify a primary cause:

zoning which disfavors moderate income housing. The EIR should further note that the Housing Element fails to accept the recommendation of the Land Use Element (page 11):

“ .. the Priority Housing Overlay could allow additional units above the High Density incentive program if built at 600 square feet”.

The EIR should also note a consequence:

20,000+ commuters 5 days per week, contrary to the goals of the 2050 RTP-SCS.

1.2

Letter 1, Steve Johnson

Commenter: Steve Johnson

Date: February 1, 2026

Response 1.1

The commenter states that the Draft EIR incorrectly implies that the Housing Plan is consistent with the Regional Housing Needs Allocation (RHNA) and notes that the City is not meeting moderate-income RHNA targets. The commenter also requests that the EIR acknowledge zoning as a primary cause, and notes that the Housing Element does not include the Land Use Element suggestion regarding the Priority Housing Overlay and 600-square-foot units.

The City acknowledges the commenter's concern regarding progress toward meeting the moderate-income RHNA category. The Draft EIR reference to "consistency with [Santa Barbara County Association of Governments (SBCAG)] RHNA" refers to the Housing Plan's ability to provide adequate zoning capacity to accommodate the City's RHNA across all income categories, including moderate-income households, consistent with State Housing Element law. This is separate from the rate of actual housing production. Housing production is influenced by factors beyond zoning, including market conditions, construction costs, financing availability, and developer response.

The commenter also references the Land Use Element discussion of the Priority Housing Overlay and potential incentives for 600-square-foot units. City Council ultimately adopted a maximum average unit size larger than 600 square feet for the Priority Housing Overlay with the Average Unit-Size Density Incentive Program Ordinance, although this does not preclude developers from proposing smaller units. Adoption, modification, or rejection of specific policy tools including unit size incentives is a legislative decision of the City Council and is addressed in the Housing Element rather than in the EIR.

To improve clarity, the Final EIR revises the referenced sentence in Section 4.9, *Transportation and Circulation*, Impact TRA-1, to clarify that RHNA consistency is based on adequate sites, zoning capacity, and programs to accommodate housing needs across all income categories rather than realized development outcomes. These clarifications do not change the EIR impact conclusions.

Response 1.2

The commenter states that the EIR should acknowledge that more than 20,000 people commute into the City five days per week, which the commenter believes conflicts with the SBCAG 2050 Regional Transportation Plan-Sustainable Communities Strategy (RTP-SCS).

The City acknowledges the commenter's concern regarding regional commuting patterns. The Final EIR expands discussion in Section 4.9, *Transportation and Circulation*, Impact TRA-1, on regional travel patterns. The Housing Plan concentrates the majority of the new housing units in the Downtown, putting residents closer to major employment centers, and along high transit corridors. Thus, the Housing Plan meets the general objectives of the RTP-SCS. This clarification does not change the EIR impact conclusions.

Letter 2

From: [Anne Hubbard](#)
To: [Housing EIR](#)
Cc: [HSD Board of Trustees](#)
Subject: Public Comment - Draft Housing Plan Program EIR
Date: Tuesday, February 10, 2026 12:09:10 PM
Attachments: [Screenshot 2026-02-10 at 10.06.53 AM.png](#)

You don't often get email from ahubbard@hopeschooldistrict.org. [Learn why this is important](#)

The following is provided as public comment for the Draft Housing Plan Program EIR. The section the comment pertains to is noted in *italics* and identified by page number(s). The public comments are in [blue](#).

2.1

(4.8-1) HESD maintains approximately 100 staff and is comprised of three elementary (TK-6) school sites: Monte Vista Elementary, Viejas Valley Elementary, and Hope Elementary.

[HESD currently has 183 staff members, excluding substitutes.](#)

(4.8-2) Between school years 2011-2012 and 2021-2022, the number of students enrolled in the Hope Elementary School District declined by approximately 16.5 percent from 1,001 to 836 (CDE 2023a).

Table 4.8-2 2011-2012 Student Enrollment Comparison

School	2011-2012 Enrollment	Percentage Difference from 2022-2023 Enrollment
Santa Barbara Unified School District	15,326	-9.4%
Hope Elementary School District	1,187	-35.2%
Cold Spring School District	152	21.7%
Montecito Union School District	438	-11.6%

Source: CDE 2023e; SBUSD 2023a; schoolwork 2022; Cold Spring School District 2023; Montecito School District 2022; Hope Elementary School District 2024

2.2

[The two figures are different for the 2011-12 year. The verbiage states "1001," but the chart shows "1187." The CDE notes the 2011-12 enrollment as 1001. Current enrollment for the 2025-26 year \(as of 2/10/26\) is 870.](#)

[To use 2021-22 when enrollment was severely impacted by COVID and TK was just being implemented with only 25% of 4-year-olds eligible provides a false picture of enrollment trends. Using 1001 \(CDE reported figure\) and current enrollment of 870, the percentage difference of enrollment is significantly less, only 13.1%. This is a much more accurate representation of enrollment trends. We have been seeing an increase of enrollment with the implementation of full TK and expect it to continue as TK enrollment normalizes. We have already opened enrollment for the 2026-27 year and are seeing a higher enrollment rate for TK than our current TK enrollment.](#)

(4.8-2) Districts retain the ability to transfer students among schools to best utilize the existing physical capacity available in the City.

(4.8-5) Developer Fees (2019)

2.3

(4.8-8) Impact SCH-1 RESIDENTIAL DEVELOPMENT FACILITATED BY THE HOUSING PLAN WOULD RESULT IN NEW STUDENTS ENTERING THE CITY'S SCHOOL

DISTRICTS. HOWEVER, CAPACITY EXISTS TO ACCOMMODATE THE ANTICIPATED INCREASE, SUCH THAT NEW OR PHYSICALLY ALTERED SCHOOL FACILITIES WOULD NOT BE REQUIRED. IMPACTS TO SCHOOLS WOULD BE LESS THAN SIGNIFICANT.

(4.8-8 and 4.8-9) If individual school facilities within a district experience overcrowding, districts have the ability to adjust enrollment boundaries, recommend inter-school district transfers, or other district actions that would balance enrollment between school facilities and districts in accordance with Santa 48,001 housing units x 0.3189 (local student generation rate) = 2,551 students. 4.8-8 Environmental Impact Analysis 4.8 Schools Barbara School Board policies. Due to current declining enrollment and the ability to balance enrollment between school facilities, it is not anticipated that the gradual increase in the number of students following implementation of the Housing Plan would exceed the total citywide enrollment capacity of existing public school facilities.

2.3
cont.

Hope School District respectfully disagrees with the City's finding in the Housing Element Environmental Impact Report (EIR) that implementation of the Housing Plan would have "no significant impact" on schools. As a small elementary district serving transitional kindergarten through sixth grade across three campuses, we face unique operational limitations that must be acknowledged in planning efforts of this magnitude.

1. Interdistrict Transfer Constraints Are Ignored

The EIR's assumption that students generated by the proposed housing developments can be absorbed without significant impact is not consistent with the enrollment realities in Santa Barbara. All local districts, including Hope, are community-funded (Basic Aid) and enforce strict interdistrict transfer policies. Transfers are typically only granted for children of employees. This effectively means new students generated within our boundaries must be served by Hope School District, without the ability to redirect overflow elsewhere.

2. Developer Fees Do Not Adequately Mitigate Impact

While the EIR states that developer fees would sufficiently offset any enrollment-related impacts, this is a significant oversimplification. Developer fees are limited in scope and do not generate the level of funding required to construct the additional classrooms or school buildings needed to accommodate growth. For example, the current statutory developer fees would not come close to funding new construction or modernization costs in today's construction climate. Without the projected student growth from new housing developments, Hope School District would plan to retire and demolish outdated portable classrooms that no longer meet long-term educational or safety standards. However, anticipated enrollment increases would require the district to invest in replacing these aging structures with permanent buildings—an unfunded capital obligation not addressed by developer fees or considered in the EIR's impact analysis.

2.4

Furthermore, developer fees do not cover recurring operational costs, such as:

- Hiring and retaining credentialed teachers and support staff
- Expansion of multipurpose facilities (cafeterias, libraries, activity spaces)
- Increased demand for student services (e.g., special education, English learner support)
- Additional parking and traffic circulation needs for staff and parents

3. Compounding Strain on Facilities and Services

Additional enrollment would directly impact student-teacher ratios, specialized instruction space, and essential services. For example, new students would necessitate expanded services in areas such as health, counseling, and nutrition, none of which are funded through developer fees or acknowledged in the EIR's mitigation assumptions.

2.5

Recommendation

We urge the City to revise the EIR's findings in Section 4.8 to reflect that the proposed Housing Plan **would** result in **potentially significant impacts** to local school districts, particularly small, community-funded districts like Hope. A more thorough analysis of actual school capacity, facility limitations, and transfer restrictions must be conducted. Additionally, mitigation strategies beyond basic developer fees—such as direct school impact agreements or capital investment commitments—should be explored and required.

2.6

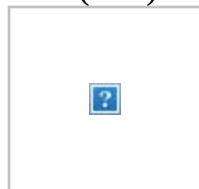
Hope School District is committed to serving all children within our community but cannot do so effectively without thoughtful coordination and support from our city planning partners.

Sincerely,

Dr. Anne Hubbard, Superintendent
Dr. Frann Wageneck, Board President
Mr. Joe Selzler, Board Clerk
Mr. Dan Cunnison, Board Member
Dr. Kelly Keogh, Board Member
Erik Vasquez, Board Member

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Anne Hubbard, Ed.D.
Superintendent
Hope Elementary School District
Office: (805) 682-2564
Fax: (805) 687-7954



Letter 2, Hope Elementary School District

Commenter: Anne Hubbard, Ed.D, Superintendent, representing Hope Elementary School District

Date: February 10, 2026

Response 2.1

The commenter, Hope Elementary School District (HESD), states that the Draft EIR includes inaccurate staffing information and provides updated information that the District currently has 183 staff members.

The City appreciates the updated information, and the Final EIR updates the text and tables to reflect the current total staffing numbers in Section 4.8, *Schools*, Table 4.8-1 and 4.8.1, Environmental Setting. This updated data does not change the EIR impact conclusions.

Response 2.2

HESD states that the Draft EIR does not fully represent enrollment trends by relying on 2021–2022 data, due to factors affected by the COVID-19 pandemic and implementation of transitional kindergarten (TK). HESD provides updated enrollment information and notes that current enrollment is 870 students as of February 2026.

The City appreciates the updated information. The Draft EIR had relied on the most recent, publicly available data at the time of EIR preparation. The Final EIR updates the data in Section 4.8, *Schools*, 4.8.1, Environmental Setting, with the more recent district-reported enrollment numbers provided in the comment. This updated information does not change the EIR impact conclusions.

Response 2.3

HESD expresses concern with the Draft EIR’s conclusion that impacts to schools would be less than significant. The commenter also notes that the Draft EIR analysis may not fully reflect enrollment practices within community funded (Basic Aid) districts such as HESD, where restrict interdistrict transfers are limited except in certain circumstances, such as children of employees.

The City acknowledges HESD’s concern regarding increased student enrollment generation under the Housing Plan. Under CEQA, school impacts are evaluated based on whether a project or program would require the construction or expansion of physical school facilities that could cause significant environmental impacts, rather than on school operational challenges. Impact SCH-1 within Section 4.8, *Schools*, is revised to acknowledge that the Housing Plan would incrementally increase student enrollment across school districts serving the City and explains that the less-than-significant conclusion is based on physical environmental impacts related to the need for new or expanded school facilities. The Final EIR also updates Section 4.8, *Schools*, to more clearly describe the basis for the EIR’s conclusion and avoid implying that school capacity is uniformly available for all school districts. The Final EIR also clarifies that enrollment policies and student assignment practices vary among districts and may influence how growth is accommodated over time.

The City also appreciates the commenter’s clarification of local enrollment policies and the operational characteristics of Basic Aid school districts. The Final EIR clarifies in Section 4.8, *Schools* in 4.8.1, Environmental Setting, to note that Basic Aid districts, including HESD, typically restrict interdistrict transfers except for limited circumstances, such as children of district employees. While

local operational factors provide important context, the clarifications do not change the EIR impact conclusions regarding school facility impacts under CEQA.

Response 2.4

HESD expresses concern that statutory developer fees do not fully fund classroom construction or modernization needs, and that the Draft EIR oversimplifies the relationship between student generation and facility costs. HESD states that developer fees do not fund operational costs such as staffing, program expansion, or ancillary facility operations.

The City acknowledges that school districts face a range of funding and operational challenges related to future growth and that developer fees do not fully fund all construction and operational costs. However, the EIR analysis of school impacts is prepared consistent with CEQA and Government Code Sections 65995–65998, which specify that mitigation for school facility impacts under CEQA is limited to the payment of statutory developer impact fees. The fee amount is established by the State, and fees are designed to contribute toward the cost of accommodating new students generated from development but are not intended to fund the full cost of school facility construction or modernization. The adequacy of developer fees are outside the control of the City of Santa Barbara and the Housing Plan.

To provide additional context, the Final EIR expands discussion in Section 4.8, *Schools*, Impact SCH-1, to acknowledge that developer fees cover only a portion of capital costs and do not fund ongoing operations, and that school districts may require other funding mechanisms to address operational or programmatic needs. This contextual information does not change the EIR impact conclusions.

Response 2.5

HESD notes that increased enrollment would affect student-teacher ratios, specialized instruction space, and services such as counseling, nutrition, and health, which are not funded through developer fees or addressed in the EIR.

The City recognizes that changes in student enrollment present administrative, operational, and fiscal challenges. Under CEQA, the focus of EIR analysis is on physical environmental impacts. While operational considerations, staffing ratios, and educational service needs are important aspects of school operations, they must be addressed outside of the CEQA process. The Final EIR clarifies this distinction between operational considerations and physical facility impacts in Section 4.8, *Schools*, Impact SCH-1, and provides additional information regarding school operations for context. This contextual information does not change the EIR impact conclusions.

Response 2.6

HESD requests that Section 4.8, *Schools*, be revised to determine that the Housing Plan would result in potentially significant impacts to local school districts and include a more detailed capacity analysis, as well as additional mitigation measures such as direct school impact agreements or capital investment commitments.

The City acknowledges HESD's concerns regarding the ability of the school district to accommodate future enrollment growth associated with housing development under the Housing Plan. The EIR evaluates impacts to schools consistent with the CEQA framework and Government Code Sections 65995–65998, which focus on whether implementation of the Housing Plan would result in the need for new or physically altered school facilities that could cause significant environmental effects. The

EIR concludes that existing school facilities across the affected school districts are generally available and the Housing Plan would not result in construction or expansion of new facilities that could cause environmental impacts.

With respect to mitigation, the City understands HESD's concerns regarding long-term school facility funding and the limitations of statutory developer fees. However, state law does not allow the City to impose mitigation beyond what is authorized by Government Code Sections 65995–65998. Accordingly, the EIR does not include additional mitigation measures. Nonetheless, the City recognizes the importance of continued coordination with local school districts through planning processes outside of CEQA.



air pollution control district
SANTA BARBARA COUNTY

Letter 3

March 5, 2026

Julia Pujo
City of Santa Barbara
Community Development Department
630 Garden Street, P.O. Box 1990
Santa Barbara, CA 93102

Sent Via Email: HousingEIR@SantaBarbaraCa.gov

Re: Santa Barbara County Air Pollution Control District Comments on the Draft Program Environmental Impact Report for the City of Santa Barbara Housing Plan, SCH 2022040209

Dear Julia Pujo:

The Santa Barbara County Air Pollution Control District (District) has reviewed the Draft Program Environmental Impact Report (EIR) for the referenced project, which consists of the implementation of 32 programs in the adopted 6th Cycle Housing Element, including ongoing programs, procedural changes, municipal code amendments, and other actions for the City of Santa Barbara to meet state housing requirements and accommodate the City Regional Housing Needs Allocation (RHNA) of 8,001 new housing units. The Housing Element's goals include locating housing close to jobs, transit, and services; streamlining the residential development approval process; and protecting environmental resources, among other objectives. The Housing Plan does not propose any changes in land use to meet the City's RHNA allocation. The Housing Element applies citywide in the City of Santa Barbara.

3.1

The District offers the following comments on the Draft EIR:

- Construction Equipment Emission Standards:** *Mitigation Measure AQ-1 Construction Equipment Exhaust Control Measures* require certain projects to use off-road heavy-duty diesel engines that meet CARB-certified Tier 3 or higher emissions standards or employ CARB-certified Level 3 diesel particulate filters. Tier 3 engine standards are no longer considered to be the most health protective. The District's current recommendation for off-road heavy-duty diesel engines is to meet CARB Tier 4 emission standards and, where available, to use zero-emission off-road equipment. Please see the attached *Construction Diesel Particulate and NOx Emission Reduction Measures* for the District's most current recommendations and consider updating Mitigation Measure AQ-1.
- Permitted Facilities Map:** The *Sensitive Receptors* subsection on page 4.2-16 discusses the placement of residential receptors near potential sources of air contaminants and strategies to reduce land use conflicts. To help identify existing sources of air pollution, the District maintains a Permitted Facilities Map¹ that identifies the location of all facilities permitted and regulated by the District, such as dry cleaners, diesel engines, and gas stations. A variety of information is available for download including active District permits, annual reports of usage and operational

3.2

3.3

¹ Available at <https://map.ourair.org/>

data, compliance history, emissions, inspections, and notices of violation. Please note this map does not identify other non-permitted sources of air pollution such as freeways, distribution centers, and railways.

3.3 cont.

3. **Land Use Compatibility and Impacts to Sensitive Receptors:** The District is supportive of the City's efforts to provide much needed housing and meet the State's RHNA requirements. However, during project-specific review of new projects, the City should be mindful of the potential air quality and health impacts associated with the placement of sensitive land uses (e.g. residential, childcare facilities, schools, senior living communities) proximate to existing land uses that emit toxic air contaminants. The California Air Resources Board (CARB)'s Air Quality and Land Use Handbook² includes recommendations and siting criteria for land development projects and encourages land use agencies to use their planning processes to ensure the appropriate separation from air pollution sources and sensitive land uses. The handbook includes minimum setback recommendations for various sources of toxic air contaminants. Prior to approving projects that involve residential and other sensitive uses, we encourage the City to consider CARB's general guidance and siting recommendations when evaluating new projects that may expose people who will live and occupy a new project area to existing sources of air pollution. Any feasible project changes to avoid, eliminate or reduce adverse impacts on public health should be implemented into project design and/or conditioning.

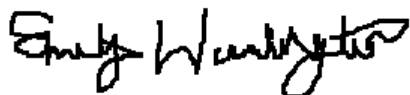
3.4

4. **CalEEMod Report:** CalEEMod was run to estimate the project's maximum daily emissions as displayed in *Table 4.2-3 Estimated Operational Criteria Air Pollutant Emissions (lbs/day)* on page 4.2-14. Please include the CalEEMod report for the modeling that was completed so that the resulting emissions can be confirmed.

3.5

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 979-8334 or via email at WaddingtonE@sbcapcd.org.

Sincerely,



Emily Waddington,
Air Quality Specialist
Planning Division

Attachment: Construction Diesel Particulate and NOx Emission Reduction Measures

cc: Planning Chron File

² Available at: https://ww2.arb.ca.gov/sites/default/files/2023-05/Land%20Use%20Handbook_0.pdf



CONSTRUCTION DIESEL PARTICULATE AND NO_x EMISSION REDUCTION MEASURES

Particulate emissions from diesel exhaust are classified as carcinogenic by the state of California. The following is a list of regulatory requirements and control strategies that should be implemented to the maximum extent feasible.

The following measures are required by state law:

- **Portable Engines:** All portable diesel-powered construction equipment greater than 50 brake horsepower (bhp) shall be registered with the state's portable equipment registration program (PERP)¹ OR shall obtain an APCD permit.
- **Off-Road Equipment:** Fleet owners of diesel-fueled mobile construction equipment greater than 25 hp are subject to the California Air Resource Board (CARB) In-Use Off-Road Diesel-Fueled Fleets Regulation². All off-road vehicles subject to this regulation must use renewable diesel fuel, with some limited exceptions.
- **Diesel Trucks:** Fleet owners of on-road diesel-fueled heavy-duty trucks and buses are subject to CARB's Heavy-Duty (Tractor-Trailer) Greenhouse Gas Regulation, Periodic Smoke Inspection Program (PSIP), the Statewide Truck and Bus Regulation, and the Advanced Clean Fleets Regulation to reduce emissions from trucks and buses.³
- **Idling:** Drivers of diesel-fueled commercial motor vehicles are subject to the Airborne Toxic Control Measure to Limit Diesel-Fueled Commercial Motor Vehicle Idling.⁴ Idling restrictions for off-road equipment are set forth in CARB's In-Use Off-road Diesel-Fueled Fleets Regulation.

The following measures are recommended:

- At a minimum, off-road diesel equipment should be equipped with engines compliant with, or certified to meet or exceed, CARB Tier 4 emission standards. Where available, off-road construction equipment should be zero-emission. Alternative/renewable fuels such as compressed natural gas (CNG), liquefied natural gas (LNG), or propane should be utilized to the maximum extent feasible when zero-emission is not available. Electric auxiliary power units should be used. The Lead Agency should require commitments to Tier 4 and/or zero-emission equipment in applicable bid documents, purchase orders, and contracts; successful contractors should demonstrate the ability to supply the compliant construction equipment for use prior to any ground-disturbing and construction activities.
- On-road heavy-duty equipment with model year 2014 or newer engines, or powered by zero- or near zero-emission technology, should be used whenever feasible.
- All portable generators should be powered by a source other than diesel or gasoline (i.e., battery, natural gas, propane, etc.)
- All construction equipment should be maintained in tune per the manufacturer's specifications.
- The number of construction equipment operating simultaneously should be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- Proposed truck routes should minimize impacts to residential communities and sensitive receptors.
- Construction staging areas should be located away from sensitive receptors such that exhaust and other construction emissions do not enter the fresh air intakes to buildings, air conditioners, and windows. Construction activity schedules and hours should be planned and adjusted as feasible to maximize distance from existing sensitive receptors and minimize exposure to air pollution.

Prior to grading/building permit issuance and/or map recordation, all measures required by the Lead Agency shall be shown as conditions of approval on grading/building plans, and/or on a separate sheet to be recorded with the map. Conditions shall be adhered to throughout grading and construction periods. The contractor shall retain onsite the Certificate of Compliance for CARB's In-Use Regulation for Off-Road Diesel Vehicles and have it available for inspection. The Lead Agency shall ensure measures are on project plans and/or recorded with maps and ensure compliance onsite. APCD inspectors will respond to nuisance complaints.

¹ <https://ww2.arb.ca.gov/our-work/programs/portable-equipment-registration-program-perp>

² <https://ww2.arb.ca.gov/our-work/programs/use-road-diesel-fueled-fleets-regulation>

³ <https://ww2.arb.ca.gov/our-work/programs/truckstop-resources/truckstop>

⁴ <https://ww2.arb.ca.gov/our-work/programs/atcm-to-limit-vehicle-idling/about>

Letter 3, Santa Barbara County Air Pollution Control District

Commenter: Emily Waddington, Air Quality Specialist, Santa Barbara County Air Pollution Control District

Date: March 5, 2026

Response 3.1

The commenter, the Santa Barbara County Air Pollution Control District (APCD), provides a summary of the Draft Program EIR and notes that the Housing Plan consists of implementation programs intended to facilitate compliance with the City's Regional Housing Needs Allocation (RHNA), without proposing specific land use changes, and that the Housing Element applies citywide. The City notes that commenter's summary accurately describes the intent and structure of the Housing Plan.

Response 3.2

APCD recommends revising Mitigation Measure AQ-1 to require CARB Tier 4—certified off-road diesel engines or zero-emission equipment where available, noting that Tier 3 engines are no longer the most health-protective option. APCD also provides the District's current Construction Diesel Particulate and NOx Emission Reduction Measures for reference.

The City acknowledges the APCD's updated recommendations and recognizes that air quality control technology and regulatory standards for off-road construction equipment continue to evolve. In response, Mitigation Measure AQ-1 within Section 4.2, *Air Quality*, is revised in the Final EIR to require as feasible, the use of Tier 4 or zero-emission off-road equipment consistent with the District's most current guidance. The revisions to Mitigation Measure AQ-1 do not change the EIR impact conclusions, as the updated mitigation measure would result in equal or greater emissions reductions than assumed in the Draft EIR.

Response 3.3

APCD notes that Section 4.2, *Air Quality*, discusses sensitive receptors and encourages the City to view the APCD's Permitted Facilities Map, which identifies locations of permitted stationary sources such as dry cleaners, diesel engines, and gas stations.

The City appreciates this resource as an available tool for future project-level review. The Final EIR adds a reference to the APCD Permitted Facilities Map in Section 4.2, *Air Quality*, b. Sources of Air Pollution. The addition of this reference does not change the EIR impact conclusions.

Response 3.4

APCD encourages the City to consider CARB's *Air Quality and Land Use Handbook* during project-specific review, especially for housing or other sensitive uses located near existing sources of toxic air contaminants. APCD states that minimum setback recommendations from sources of toxic air contaminants should be considered, and feasible measures to avoid or reduce public health impacts should be incorporated.

The City acknowledges APCD's recommendation and agrees that land use compatibility between sensitive receptors and sources of air pollution requires careful consideration. The Final EIR discusses in Section 4.2, *Air Quality*, Impact AQ-2, that project-specific review will continue to apply CARB's handbook guidance, APCD recommendations, and other applicable best practices. The clarification does not change the EIR impact conclusions.

Response 3.5

APCD requests that the CalEEMod output files used to estimate operational emissions in Table 4.2-3 be included so results can be confirmed.

The City notes that full CalEEMod output files for the EIR air quality analysis are within Appendix B of the EIR, which is available on the State Clearinghouse website at:
<https://ceqanet.lci.ca.gov/2022040209/2>.



City of Santa Barbara
PLANNING COMMISSION
MINUTES
MARCH 12, 2026

1:00 P.M.
City Hall, Council Chambers
735 Anacapa Street
SantaBarbaraCA.gov

COMMISSION MEMBERS:

Lucille Boss, *Chair*
Donald DeLuccio, *Vice Chair*
Brian Barnwell
John M. Baucke
Benjamin Peterson
Devon Wardlow
Lesley Wiscomb

CITY COUNCIL LIAISON:

Mike Jordan

STAFF:

Tava Ostrenger, Chief Assistant City Attorney
Megan Arciniega, Senior Planner
Jasper Carman, Commission Secretary

CALL TO ORDER

Chair Boss called the meeting to order at 1:00 p.m.

I. ROLL CALL

Chair Lucille Boss, Vice Chair Donald DeLuccio, Commissioners Brian Barnwell, John M. Baucke, Devon Wardlow, and Lesley Wiscomb

Absent: Commissioner Benjamin Peterson

STAFF PRESENT

Tava Ostrenger, Chief Assistant City Attorney
Rosie Dyste, Principal Planner
Megan Arciniega, Senior Planner
Jessica Grant, Supervising Transportation Planner
Julia Pujo, Environmental Analyst
Christopher Bell, City TV Production Supervisor
Janet Ahern, City TV Production Specialist
Jasper Carman, Commission Secretary

II. PRELIMINARY MATTERS

A. Requests for continuances, withdrawals, postponements, or addition of ex-agenda items:

No requests.

B. Announcements and appeals:

Ms. Arciniega announced that the General Plan Annual Progress Report will be heard by City Council on Tuesday, March 17, 2026 and we encourage the public and the Commission to review this report and submit public comment.

Chair Boss additionally recommended that the Commission should review the Annual Progress Report and provide public comment if desired.

C. Comments from members of the public pertaining to items not on this agenda:

Public comment opened at 1:02 p.m., and as no one wished to speak, it closed.

III. **ENVIRONMENTAL HEARING**

ACTUAL TIME: 1:03 P.M.

PUBLIC REVIEW OF THE DRAFT HOUSING PLAN PROGRAM ENVIRONMENTAL IMPACT REPORT

Application Number: PLN2022-00108

Applicant: City of Santa Barbara

The purpose of this hearing is to receive comments from the Planning Commission and the public on the adequacy and completeness of the Draft Housing Plan Program Environmental Impact Report (EIR). All comments on the Draft EIR will be responded to in the Final EIR. No action on the Draft EIR or project approval will be taken at this hearing.

4.1

Julia Pujo, Environmental Analyst, and Chris Bersbach, Rincon Consultants, gave the Staff presentation. Rosie Dyste, Principal Planner, and Jessica Grant, Supervising Transportation Planner, were available to answer questions.

Public comment opened at 1:21 p.m., and the following individual spoke:

1. Steve Johnson

Public comment closed at 1:23 p.m.

Commission comments:

1. The Commission found the report to be very thorough and the knowledge content was strong. 4.2
2. Consider what would happen if underground storage tanks are discovered that weren't previously accounted for. 4.3
3. Consider alternatives and impacts if we were to exceed 8,001 units and how mitigation measures may change. Alternative 2 discussion should be expanded. 4.4
4. Include a general acknowledgement of policy limitations due to state law and its potential impacts as it applies to transportation, schools, and building size, bulk, and scale. 4.5
5. Include an explanation of timing and implementation of mitigation measures in the EIR. 4.6
6. Consider including a second set of pagination that continues consecutively through the PDF for ease of reference and navigation. 4.7

- | | |
|--|------|
| 7. Reference to Chapter 4.1 Aesthetics, Page 4.1-1, third paragraph; surface parking lots and upper stories of buildings do not provide openness and views nor mitigate for the loss of views. | 4.8 |
| 8. If the City cannot require parking for buildings due to state law, the EIR should acknowledge the effect loss of parking has on the Downtown and El Pueblo Viejo. | 4.9 |
| 9. Reference to Chapter 4.1 Aesthetics, Page 4.1-4, regarding light and glare conditions; permits may not be required for some types of lighting. How is it being monitored? | 4.10 |
| 10. Reference to Chapter 4.1 Aesthetics, Page 4.1-7; discussion should be expanded to acknowledge that state regulations have taken some authority away from local control and it's not always true that approved development is appropriately sized and scaled. | 4.11 |
| 11. Reference to Page 4.1-17 regarding Shoreline Drive, the EIR should provide a timeline. | 4.12 |
| 12. Height limitation should be characterized differently throughout the EIR to acknowledge recent changes to state law. | 4.13 |
| 13. Reference to Chapter 4.3 Biological Resources, Page 4.3-7; the EIR should explain how the nearshore marine is measured and monitored. Nearshore marine and kelp habitat has been eroded over time. | 4.14 |
| 14. Regarding Chapter 4.8, Schools, students within one district are not allowed to move to another district. The increase of enrollment generated by development within the Hope School District should be acknowledged, even if the City can't do anything about it. | 4.15 |
| 15. Reference to Chapter 4.9, Transportation, Page 4.9-7, states the Santa Barbara Metropolitan Transit District provides fixed bus routes; however, bus routes are not fixed. Where does the utility users tax go to? | 4.16 |
| 16. Reference to Chapter 4.10, Utilities, Page 4.10-5; Tajiguas Landfill will close in 2036; the need for long term solid waste management should be acknowledged. | 4.17 |
| 17. Referring to Page 2-10, the Pie Chart identifies single unit residential uses. Acknowledge that single unit residential is no longer a single unit due to ADU laws, and explain how this use is separated from other uses due to the City's pyramid zoning. | 4.18 |

IV. ADMINISTRATIVE AGENDA

ACTUAL TIME: 2:10 P.M.

A. Committee and Liaison Reports:

1. Staff Hearing Officer Liaison Report

Vice Chair DeLuccio reported on the Staff Hearing Officer meeting of March 4, 2026.

2. Other Committee and Liaison Reports

- a. Vice Chair DeLuccio reported on the March 11, 2026 meeting of the Historic Landmarks Commission.

B. Discussion on Subcommittees and Workshops

Discussion held.

V. ADJOURNMENT

Chair Boss adjourned the meeting at 2:20 p.m.

Submitted by,

Jasper Carman, Commission Secretary

DRAFT

Letter 4, City of Santa Barbara Planning Commission

Commenter: City of Santa Barbara Planning Commission Minutes

Date: March 12, 2026

An environmental hearing was held before the Planning Commission on March 12, 2026, to receive comments from the Planning Commission and the public on the adequacy and completeness of the Draft Housing Plan Program EIR. During the hearing, the City received one verbal comment from a member of the public, Mr. Steve Johnson, and verbal comments from the Planning Commission, which are summarized within the City of Santa Barbara Planning Commission Minutes for March 12, 2026. A video recording and full transcript of all verbal comments are available at: <https://santabarbaraca.gov/planning-commission>.

Response 4.1

Mr. Steve Johnson provided verbal comments regarding the recent production rate of moderate-income units, as well as land use considerations related to maximum density and average unit sizes. The commenter implies that housing production is not meeting RHNA targets for the moderate-income category. The verbal comments are similar to the comment letter Mr. Johnson submitted on February 1, 2026. Please refer to Comment Response 1.1 and 1.2 for a detailed response to these issues. These comments do not change the EIR impact conclusions.

Response 4.2

The Planning Commission provided verbal comments stating that the report was found to be very thorough and the knowledge content was strong. The City appreciates the comment and thanks the Planning Commission.

Response 4.3

The Planning Commission provided verbal comments requesting the consideration of impacts in the event previously unaccounted underground storage tanks (USTs) are discovered.

The City notes that Section 4.6, *Hazards and Hazardous Materials* of the EIR evaluates the possibility that unknown USTs may be encountered during ground-disturbing activities on infill and redevelopment sites. The EIR includes Mitigation Measure HAZ-2, which establishes procedures for work to be stopped if contamination or a UST is discovered, and requires investigations and remediation activities in accordance with current regulatory standards. In addition, the discovery of any USTs is subject to applicable federal, state, and local regulatory requirements, including oversight by Santa Barbara County Environmental Health Services (EHS) and, as appropriate, the California Regional Water Quality Control Board (RWQCB). With inclusion of Mitigation Measure HAZ-2, along with existing regulatory requirements, potential impacts associated with the unexpected discovery of USTs would be reduced to a less than significant level. No revisions to the EIR are necessary.

Response 4.4

The Planning Commission provided verbal comments requesting consideration of potential impacts if actual housing production were to exceed the 8,001 units assumed in the Housing Plan EIR, and how mitigation measures might change under such a scenario. The Planning Commission also requested that the discussion of Alternative 2 be expanded.

In response to the Planning Commission's comment, discussion within the Final EIR in Section 6.3, *Alternative 2: Additional Housing*, has been expanded. As a higher-growth scenario, the Additional Housing Alternative would increase in the overall amount of construction, intensity of development, and population generated, relative to the Housing Plan. Environmental impacts under this alternative would be similar in type to those identified for the proposed Housing Plan; however, they may be incrementally greater in magnitude. For most issue areas, the degree to which impacts are more severe would depend on the location, density, and design of future development projects.

Increased development under this alternative could result in significant and unavoidable impacts in cases where residential growth exceeds the growth assumptions embedded in regional air quality attainment plans and greenhouse gas reduction strategies. This may conflict with the region's ability to achieve air quality standards and greenhouse gas emissions reduction targets. At the same time, the higher-density development pattern under this alternative could provide potentially lower per capita vehicle miles traveled.

The mitigation measures identified for the Housing Plan would also apply to development projects under the Additional Housing Alternative. These mitigation measures are designed to address impacts at the project level and are not tied to a fixed cap on residential units. Furthermore, individual projects under this alternative may continue to be subject to further environmental review as required by CEQA, at the time specific development projects are proposed.

The expanded discussion of the Additional Housing Alternative does not result in any changes to the EIR impact conclusions.

Response 4.5

The Planning Commission provided verbal comments requesting a general acknowledgement of policy limitations due to state law and its potential impacts as it applies to transportation, schools, and building size, bulk, and scale.

In response to the Planning Commission's comment, a statement in the Final EIR has been included within Section 2, *Environmental Setting*, to acknowledge that the implementation of the Housing Plan occurs within State housing policy framework that includes legislation streamlining housing approvals, limiting local discretion over certain development standards, and modifying requirements related to density, parking, and objective design criteria. These laws may affect the City's ability to regulate aspects of transportation and parking demand, school enrollment distribution, and building form, including size, bulk, and scale. While the City retains authority over objective design standards, certain aspects of project approvals are governed by State law and may limit local discretion authority.

Response 4.6

The Planning Commission provided verbal comments requesting an explanation of timing and implementation of mitigation measures.

The City notes that a Mitigation Monitoring Reporting Program (MMRP) has been developed that specifies for each mitigation measure in the EIR, the relative responsibilities of various City departments for various aspects of administering and implementing measures, and the projected timing of implementation. Please refer to the MMRP for implementation and timing for specific mitigation measures. Annual reporting of the status of each mitigation measure will be included in the Annual Report of the General Plan, required pursuant to Government Code Section 65400.

Response 4.7

The Planning Commission provided verbal comments requesting a second set of pagination that continues consecutively through the EIR. In response to the Planning Commission's request, a second set of page numbers has been added to the Final EIR.

Response 4.8

The Planning Commission provided verbal comments noting that surface parking lots and upper stories of buildings do not provide openness or views, nor do they mitigate for the loss of views.

The City acknowledges the Planning Commission's concern regarding the characterization of visual openness and views in the EIR. The Final EIR revises Section 4.1, *Aesthetics and Visual Resources*, Important Visual Resources and Views, to clarify that lower scale development and underdeveloped lots contribute to varying degrees of openness through the downtown area and may provide limited views of the Santa Ynez Mountains, hillsides, and the Riviera, but are not considered public open space resources. This clarification does not change the EIR impact conclusions.

Response 4.9

The Planning Commission provided verbal comments noting that the City cannot require parking for buildings due to state law and requests acknowledgement of the effect that loss of parking has on the Downtown and El Pueblo Viejo (EPV) Design District.

The City notes that while CEQA no longer considers parking impacts to be a significant environmental effect, implementation of Housing Plan programs could incrementally increase on-street parking demand in the Downtown area. To acknowledge the issue, the Final EIR expands discussion in Section 4.9, *Transportation and Circulation*, in Assembly Bill 2097 (AB 2097) and in Impact TRA-1. The addition of this discussion does not change the EIR impact conclusions.

Response 4.10

The Planning Commission provided verbal comments inquiring how light and glare impacts would be monitored if permits are not required for certain types of lighting.

The City acknowledges that some residential lighting improvements may not trigger discretionary review or permitting requirements. The Final EIR revises text within Section 4.1, *Aesthetics and Visual Resources*, d. Light and Glare Conditions, to clarify that although certain lighting improvements may not require discretionary permits or project-level review, applicable Municipal Code standards and City code enforcement procedures to apply to lighting installations that create nuisance conditions or conflict with adopted development standards. This clarification does not change the EIR impact conclusions.

Response 4.11

The Planning Commission provided verbal comments recommending expansion of discussion to acknowledge that state regulations have taken some authority away from local control and it is not always true that approved development is appropriately sized and scaled.

The City acknowledges that recent State housing laws have modified local authority over certain development standards and approval processes for qualifying housing projects. Section 4.1, *Aesthetics and Visual Resources*, 4.1.3 Impact Analysis, of the Final EIR has been revised to acknowledge that recent state housing legislation has in some circumstances, reduced the level of discretionary review available to local agencies and may limit the City's ability to apply certain aspects of traditional project-by-project review processes. The addition of this discussion does not change the EIR impact conclusions.

Response 4.12

The Planning Commission provided verbal comments requesting that the EIR include a timeline related to the potential designation of Shoreline Drive as a scenic route.

The City notes that the EIR discussion regarding the potential designation of Shoreline Drive is intended to describe planning and policy direction rather than identify committed capital improvements. Any potential designation of Shoreline Drive as a scenic route would be considered through a separate future discretionary process, which would determine the timing, independent of the Housing Plan. Section 4.1, *Aesthetics and Visual Resources*, City of Santa Barbara General Plan, of the Final EIR has been revised for clarification. This clarification does not change the EIR impact conclusions.

Response 4.13

The Planning Commission provided verbal comments recommending that references to “height limitations” be revised throughout the EIR to acknowledge recent changes to state law.

The City acknowledges that recent State housing laws have modified the extent to which local development standards, including building height limits, may be applied to certain qualifying housing projects. Where relevant, the EIR has been reviewed and updated to ensure that references to height standards are consistent with current state law and accurately describe the interplay between state requirements and local development regulations. These clarifications are informational in nature and do not change the EIR impact conclusions.

Response 4.14

The Planning Commission provided verbal comments requesting clarification in Section 4.3, *Biological Resources*, regarding how nearshore marine habitat is measured and monitored, and notes that nearshore marine and kelp habitat has changed over time.

In response to the Planning Commission’s comment, the Final EIR clarifies in Section 4.3, *Biological Resources*, that nearshore marine habitats, including kelp beds, are generally characterized and monitored using a combination of remote sensing data, field surveys, and long-term regional monitoring programs conducted by resource agencies and scientific institutions; these data sources document changes in habitat extent and condition over time. This clarification does not change the EIR impact conclusions.

Response 4.15

The Planning Commission provided verbal comments noting that students within one district are not allowed to move to another district and requests that the EIR should acknowledge that development within the Hope School District could increase enrollment within that district.

The City recognizes that new housing development would increase student enrollment within school districts serving the City, including the Hope School District. The Final EIR clarifies in Section 4.8, *Schools* in Impact SCH-1, that interdistrict transfers are typically restricted except for limited circumstances, such as children of district employees. The Final EIR also clarifies that enrollment policies and student assignment practices vary among districts and may influence how growth is accommodated over time. These clarifications do not change the EIR impact conclusions.

Response 4.16

The Planning Commission provided verbal comments noting that bus routes are not fixed and asks where the utility users tax is allocated.

The City acknowledges that MTD periodically evaluates and modifies routes, schedules, and service patterns in response to ridership demand, operational considerations, funding availability, and community needs. The Final EIR clarifies in Section 4.9, *Transportation and Circulation*, c. Public Transit, that routes and service levels are subject to periodic adjustments based on operational needs and service planning. The reference to “fixed-route bus service” is intended to describe scheduled transit service operated along established routes, as opposed to demand-responsive service.

With respect to the Utility Users Tax, revenues may support other City programs and services as determined through future budget decisions. These clarifications do not change the EIR impact conclusions.

Response 4.17

The Planning Commission provided verbal comments noting that Tajiguas Landfill is anticipated to close in 2036 and requests acknowledgement of long-term solid waste management needs.

The City acknowledges that the anticipated closure of the Tajiguas Landfill presents a long-term planning consideration for regional solid waste management. The County of Santa Barbara, in coordination with other regional partners, is evaluating alternatives for future solid waste disposal, in line with state guidance. Discussion has been expanded in Section 4.10, *Utilities and Service Systems*, e. Solid Waste Management, to acknowledge that while the Tajiguas Landfill is currently anticipated to reach capacity in 2038, regional solid waste planning efforts are ongoing and include strategies to expand diversion programs, extend landfill capacity, and identify future disposal options to ensure long-term solid waste management needs are met beyond the current planning horizon. This contextual information does not change the EIR impact conclusions.

Response 4.18

The Planning Commission provided verbal comments noting that the pie chart on Page 2-10 identifies single-unit residential uses and requested clarification in light of accessory dwelling unit (ADU) laws and zoning structure.

The City notes that the land use pie chart is intended to summarize existing land use categories based on City zoning and land use designations. While state ADU laws allow additional dwelling units on single family residential lots, ADUs are considered accessory uses and do not change the primary land use classification. For example, a single family house with an ADU is classified as a single family residential land use. The Final EIR clarifies in Section 2, *Environmental Setting* that the City's zoning code organizes land uses based on primary residential, commercial, and industrial designations, with accessory uses such as ADUs permitted within the underlying residential classification in accordance with applicable regulations. This clarification does not change the EIR impact conclusions.

Notes on Draft Report:

Commissioner Barnwell

1. Executive Summary

OVERALL

I think **Implementation and/or timing** should be addressed here. How and when does all this happen.

5.1

Alternative # 2 may need more explanation.

5.2

Page ES-6 — Top-of-Bank Setback

Commissioner Wiscombe addressed this. I concur. A bit wider explanation of needing to develop an absolute “top-of-bank” setback standard.

5.3

Page ES-7 — Biological Study Scope

I did not mention this but it would be nice to expand what we feel are the wildlife species maybe explicitly recognize additional wildlife species, esp Possums, Raccoons, and Coyotes

5.4

- Current study appears **incomplete in its recognition of common urban wildlife.**

Page ES-15 — Schools / Transportation Impact

- Statement regarding schools: **Not accurate.**
- Comment on **Impact TRA-3**:
 - The report claims the City can **limit hazardous design features.**
 - This is **no longer correct** due to **California AB 2097**, which restricts local authority in this area.

5.5

5.6

2. Section 4 — Aesthetics and Visual Resources

Page 4-12 — Parking Garages

- The report suggests **surface parking lots and the tops of buildings provide visual open space ??**
- Comment: This characterization is questionable and should be clarified. Private bldgs. don't provide public viewing space.

5.7

Legislative Strategy (Related Policy Issue)

I did not mention this but I think it would be an excellent idea to explore state legislation (through Assemblymember Greg Hart) to allow cities to circumvent AB 2097 by creating defined districts in which height and size, bulk and scale can be locally controlled, to [preserve the very important character of the town and its history (a cultural resource)]. Esp:

5.8

- Potential application:
 - **Historic Downtown / Paseo Nuevo area.**

Page 4.1-4 — Lighting and Glare Conditions

The report states that **night lighting impacts are minimized** because:

- Outdoor lighting must match residential zones.
- Lighting must be compatible with neighborhood standards.

5.9

Question:

- Are backyard patios **required to obtain permits for lighting?**
- If patios are **not regulated**, then the statement about minimized lighting may be misleading.

Page 4-17 — General Plan Statement

The report states:

“We enhance the community’s character with appropriately sized and scaled buildings.”

Comment:

- This is **no longer be accurate** due to **AB 2097**, which limits the City’s authority over certain development standards.

5.10

Seems like we need to begin to reflect current planning limitations that have been put on us by State law. We cannot limit size, bulk, and scale and yet we use verbiage from our policies of long ago that do not apply any more.

The same issue applies to:

- **Building size**
- **Bulk**
- **Scale standards**

Page 4-17 — Scenic Highways / Shoreline Drive

The report states that the City will:

- Enhance Shoreline Drive
- Add planters
- Lower speed limits

5.11

Comment:

- **When will these improvements occur?**
- The report does not specify implementation.

Page 4.1-8 — City Charter

- The report references **City Charter authority over building heights**.
- Comment: This statement may **no longer be accurate** due to AB 2097.

5.12

Page 4-19 — Municipal Code Height Restrictions

Repeat (ad infinitum): The report states that **municipal code height restrictions apply**.

5.13

- Comment:
 - These restrictions may **no longer function as described due to AB 2097**.

3. Section 4.3 — Biological Resources

(User intends to examine this section in depth.)

Page 4-36 — Wildlife Species

I did not mention this in the meeting but

The report lists:

- Bird species
- Waterfowl
- Amphibians
- Reptiles
- Foraging and nesting birds

5.14

However, it **does not mention common urban mammals**, including:

- Possums
- Raccoons
- Coyotes

Comment:

- The biological survey appears **incomplete**.

Page 4-37 — Nearshore Marine Environment

The report references the **nearshore marine environment**.

Questions:

- **How is the health of this environment measured?**
- Does the City **monitor runoff impacts from creeks entering the ocean?**

5.15

Comment:

- The report appears to **assume conditions rather than measure them**.

4. Schools

Page 48-1 — Hope Elementary School

5.16

- The description **does not mention that the school will serve the La Cumbre Plaza housing developments**.

Page 48-2 — Student Transfers

The report states that districts may **transfer students among schools to best utilize facilities**.

Correction:

5.17

- Transfers may occur **within a district (intra-district)**.
- Transfers **cannot occur across district lines (inter-district)**.

Page 48-6

- Again references **transfers between districts**.

5.18

Comment:

- This is **incorrect**.

Page 48-7 — Environmental Impact from School Expansion

The report concludes that **housing development will not require new school facilities.**

Comment:

- This conclusion appears **to be insufficiently studied**, particularly given incorrect assumptions about **inter-district transfers. HOWEVER**, As per the meeting, there is little the City can do because it is a State issue **BUT** we might want to mention that we cannot do it, Then we don't look like we are shirking our duty.

5.19

Page 48-8 — Mitigation Recommendation

The report suggests **inter-district transfers** as a mitigation strategy.

Comment:

- This is **not legally permissible.**

5.20

Page 48-9 — Development Fees as Mitigation

Second paragraph states:

Payment of development fees is considered full mitigation.

Comment:

This is **state law**, but **may not adequately mitigate impacts in this case**. If it doesn't, and we can't do anything about it because it is a state issue, we should nonetheless motion it and why.

Third paragraph states:

Housing plan would not result in environmental impacts from new school facilities.

Comment:

- This conclusion may be **unsupported due to flawed assumptions.**

5.21

5.22

5. Section 4.9 — Transportation and Circulation

Page 49-1 — Density and Mixed-Use Development

The report suggests that **higher density housing and mixed-use development in the downtown area is positive.**

5.23

Comment:

- This assumption should be **examined more critically**, vis a vis AB 2097 etc..

Page 49-7 — Transit Service

The report states:

Metropolitan Transit District provides fixed-route bus service.

5.24

Comment:

- This statement appears **incorrect**. They are not “fixed” routes. The MTD can and does change them frequently.

Page 49-7 — Utility Transfer Tax

- The report states the **Utility Users Tax is 6%**, with **half allocated to street capital maintenance**.

5.25

Question:

- **Where does the remaining half go?**

49-12 Will AB 2097 Really decrease traffic? We have not studied that. That assumption appears to be possibly flawed. Eliminating parking does not causally eliminate cars.

5.26

4.10-5 UTILITIES

Tajiguas land fill will close in Jan 2026. This report is effective through 2025. It might be misleading to not even mention that solid waste will become/may become a vvery large issue and mitigation is iffy.

5.27

2-10 Environmental Setting

The circle with land use zoning designation percentages. Are those numbersd correct, considering ADU's and pyramid zoning

5.28

4.7-10 We have golf courses but I don't think we have "gold" courses. (ha!)

5.29

Letter 5, Brian Barnwell, Planning Commissioner

Commenter: Brian Barnwell, Planning Commissioner, City of Santa Barbara

Date: March 12, 2026

Response 5.1

The commenter requests that the Executive Summary include implementation and timing.

The City notes that a Mitigation Monitoring Reporting Program (MMRP) has been developed for the Final EIR that specifies for each mitigation measure in the EIR, the relative responsibilities of various City departments for various aspects of administering and implementing measures, and the projected timing of implementation. Annual reporting of the status of each mitigation measure will be included in the Annual Report of the General Plan, required pursuant to the Government Code Section 65400. The Final EIR updates the Executive Summary to include a summary of the MMRP.

Response 5.2

The commenter requests additional explanation of Alternative 2, Additional Housing Alternative, in the Executive Summary.

The City agrees that additional discussion in the Executive Summary regarding Alternative 2 is helpful for readers. The Final EIR Executive Summary includes an expanded discussion of Alternative 2.

Response 5.3

The commenter supports additional clarification regarding the need to develop an absolute top-of-bank setback standard.

The City acknowledges the commenter's support of a top-of-bank setback standard. The City is currently evaluating approaches to implement a creek setback regulations, which may include the use of a defined top-of-bank setback standard and would implement Mitigation Measures BIO-1 and BIO 2 of the EIR. Creek protection regulations are currently in development and will undergo additional technical analysis, public review, and potential revision. Creek protection requirements will be based on objective and context-sensitive standards that balance resource protection, public safety, and housing objectives while improving predictability and consistency in permit review.

Response 5.4

The commenter recommends expanding the biological resources discussion to explicitly recognize common urban wildlife species, including opossums, raccoons, and coyotes, and notes that the existing discussion may not fully recognize common urban wildlife.

In response to the comment, background information has been added to the Final EIR in Section 4.3, *Biological Resources*, 4.3.1, Environmental Setting. The City recognizes that urban and suburban environments within Santa Barbara support a variety of common wildlife species such as opossums, raccoons, coyotes, and other urban-adapted wildlife. This information does not change the EIR impact conclusions.

Response 5.5

The commenter states that the Executive Summary statement regarding school impacts is not accurate.

In response to comments received during the public review period, the Final EIR updates the impact statement SCH-1 within the Executive Summary and Section 4.8, *Schools*, to more clearly describe the basis for the EIR's conclusion, and to avoid implying that school capacity is uniformly available for all school districts. Revised impact statement SCH-1 acknowledges that the Housing Plan would incrementally increase student enrollment across school districts serving the City and explains that the less-than-significant conclusion is based on physical environmental impacts related to the need for new or expanded school facilities. These revisions provide additional context and clarification and do not change the EIR impact conclusion that impacts to schools would be less than significant.

Response 5.6

The commenter states that Impact TRA-3 should be revised because local authority has changed under recent State law AB 2097.

The City acknowledges that State housing laws have modified aspects of local land use authority in recent years, including limitations on local parking requirements for qualifying residential development. The Final EIR revises text within Section 4.9, *Transportation and Circulation*, Impact TRA-3 to acknowledge that State law may affect certain development standards while recognizing the City's continuing authority to apply applicable health and safety requirements. This clarification does not change the EIR impact conclusions.

Response 5.7

The commenter notes that the discussion Section 4.1, *Aesthetics*, appears to suggest that surface parking lots and the tops of buildings provide visual open space, and recommends clarification that private buildings do not provide public views or open space.

The City acknowledges the commenters concern regarding the characterization of visual openness and views in the EIR. The Final EIR revises text within Section 4.1, *Aesthetics and Visual Resources*, Important Visual Resources and Views, to clarify that lower scale development and underdeveloped lots contribute to varying degrees of openness through the downtown area and may provide limited views of the Santa Ynez Mountains, hillsides, and the Riviera, but are not considered public open space resources. This clarification does not change the EIR impact conclusions.

Response 5.8

The commenter suggests exploring future State legislation that would allow cities to create defined districts to regulate height, size, bulk, and scale.

The City acknowledges the suggestion. The comment concerns potential future legislative actions and policy considerations that are outside the scope of the Program EIR. Nonetheless, comments are included in Final EIR administrative record for the consideration of City decision-makers.

Response 5.9

Regarding light and glare conditions, the commenter questions whether the discussion regarding minimized lighting impacts may be misleading because some forms of lighting, such as backyard patio lighting, may not require permits or planning review.

The City acknowledges that some residential lighting improvements may not trigger discretionary review or permitting requirements. The Final EIR revises text within Section 4.1, *Aesthetics and Visual Resources*, d. Light and Glare Conditions, to clarify that although certain lighting improvements may not require discretionary permits or project-level review, applicable Municipal Code standards and City code enforcement procedures to apply to lighting installations that create nuisance conditions or conflict with adopted development standards. This clarification does not change the EIR impact conclusions.

Response 5.10

The commenter notes that recent State laws have affected local authority over certain development standards, including building size, bulk, and scale, and suggests that some General Plan language may no longer fully reflect the current regulatory environment.

The City acknowledges that recent State housing laws have modified local authority over certain development standards and approval processes for qualifying housing projects. The referenced statement is intended to describe adopted General Plan policy direction. The Final EIR has been revised in Section 4.1, *Aesthetics and Visual Resources*, Section 4.1.3, Impact Analysis, to acknowledge that recent state housing legislation has, in some circumstances, reduced the level of discretionary review available to local agencies and may limit the City's ability to apply certain aspects of traditional project-by-project review processes. The City's General Plan includes policies intended to maintain and enhance community character through building design, scale, and neighborhood compatibility. Implementation of these policies occurs within the context of applicable State laws, which may limit local discretion over certain development standards and approval processes for qualifying housing projects. This information is provided for context and does not change the EIR impact conclusions.

Response 5.11

The commenter requests clarification regarding the timing of potential improvements along Shoreline Drive, including streetscape enhancements, planters, and traffic-calming measures.

The City notes that the EIR discussion regarding the potential designation of Shoreline Drive is intended to describe planning and policy direction rather than identify committed capital improvements. Any potential designation of Shoreline Drive as a scenic route would be considered through a separate future discretionary process, which would determine the timing, independent of the Housing Plan. Section 4.1, *Aesthetics and Visual Resources*, City of Santa Barbara General Plan, of the Final EIR has been revised for clarification. This clarification does not change the EIR impact conclusions.

Response 5.12

The commenter states that the discussion referencing City Charter authority over building heights may no longer be accurate due to Assembly Bill (AB) 2097.

The City acknowledges that recent State housing laws have modified the extent to which local development standards, including building height limits, may be applied to certain qualifying housing projects. To provide clarity, the Final EIR has been revised in Section 4.1, *Aesthetics and Visual Resources*, City Charter, to acknowledge that application of local height standards and Charter provisions occurs within the context of applicable State law, which may modify or limit local authority over development standards for certain qualifying housing projects. This clarification is informational in nature and does not change the EIR impact conclusions.

Response 5.13

The commenter states that the discussion regarding Municipal Code height restrictions may no longer apply due to recent State housing law.

The City acknowledges that recent State housing laws have modified the extent to which local development standards, including building height limits, may be applied to certain qualifying housing projects. Where relevant, the EIR has been reviewed and updated to ensure that references to height standards are consistent with current state law and accurately describe the interplay between state requirements and local development regulations. These clarifications are informational in nature and do not change the EIR impact conclusions.

Response 5.14

The commenter notes that Section 4.3, *Biological Resources*, identifies various bird species, waterfowl, amphibians, and reptile species but does not mention common urban mammals such as opossums, raccoons, and coyotes, and suggests that the biological survey may therefore be incomplete.

The City recognizes that urban and suburban environments within Santa Barbara support a variety of common wildlife species. The EIR evaluates biological resources at a programmatic level and is not intended to provide an exhaustive inventory of all wildlife that may occur within the city. The omission of specific common urban wildlife species does not indicate that these species are absent from the City's environment. To provide additional context, background information has been added to the Final EIR in Section 4.3, *Biological Resources*, Special Status Species. This information does not change the EIR impact conclusions.

Response 5.15

The commenter inquires how the health of the nearshore marine environment is measured and if the City monitors potential impacts associated with runoff from creeks entering the ocean. The commenter also states that the EIR appears to assume conditions rather than measure them.

In response to the comment, the Final EIR provides additional information in Section 4.3, *Biological Resources*, Nearshore Marine, that describes nearshore marine habitats, including kelp beds, are generally characterized and monitored using a combination of remote sensing data, field surveys, and long-term regional monitoring programs conducted by resource agencies and scientific institutions; these data sources document changes in habitat extent and condition over time. The City also conducts and participates in activities related to stormwater management and water quality protection, including implementation of stormwater permit requirements and the City Storm Water Management Program, which is intended to reduce pollutants entering creeks and downstream receiving waters. Monitoring of creek conditions and coastal water quality occurs

through multiple agencies and programs depending on the resource being evaluated, including the Regional Water Quality Control Board, California Coastal Commission, and California Department of Fish and Wildlife. This information does not change the EIR impact conclusions.

Response 5.16

The commenter notes that the discussion within Section 4.8, *Schools*, does not mention that Hope Elementary School District will serve the La Cumbre Plaza housing developments.

The City acknowledges that future residential development within the La Cumbre Plaza area could contribute to enrollment within the Hope Elementary School District service area. The Final EIR has been revised in Section 4.8, *Schools*, Impact SCH-1 to acknowledge that major housing opportunity sites, including the La Cumbre Plaza area, may contribute to future enrollment within Hope Elementary School District. The EIR's school impact analysis evaluates cumulative student generation and districtwide capacity rather than assigning projected students to individual school sites. This information provides additional context regarding potential sources of future student generation but does not change the EIR impact conclusions.

Response 5.17

The commenter notes that the EIR should distinguish between transfers within a school district and transfers between separate school districts.

In response to comments received, the Final EIR is updated to clarify in Section 4.8, *Schools*, Impact SCH-1, that school districts may manage enrollment and facility utilization through transfers among schools within the same district, where appropriate. While limited interdistrict transfer opportunities may exist in certain circumstances and subject to district-specific policies, capacity management generally occurs within individual school districts. This clarification does not change the EIR impact conclusions.

Response 5.18

The commenter notes that the discussion referencing transfers between districts in Section 4.8, *Schools*, page 4.8-6 is incorrect.

The City acknowledges that the referenced discussion should distinguish between transfers occurring within a school district and those occurring between separate districts. The Final EIR has been updated in Section 4.8, *Schools*, Current Enrollment, to clarify that while limited interdistrict transfer opportunities may exist in certain circumstances and subject to district-specific policies, capacity management generally occurs within individual school districts. This clarification does not change the EIR impact conclusions.

Response 5.19

The commenter states that the conclusion that housing development would not require new school facilities may not be adequately supported because of earlier references to interdistrict transfers. The commenter also notes that the City has limited authority in this area.

In response to this comment and prior comments, Section 4.8, *Schools* of the Final EIR has been revised to clarify that enrollment management generally occurs within individual school districts and that the analysis does not rely on broad assumptions regarding interdistrict transfers. The EIR's

conclusion regarding school impacts is based on districtwide capacity information, enrollment trends, and the projected incremental pace of growth anticipated under the Housing Plan, rather than on the assumption that students could be reassigned across district boundaries.

The City also acknowledges that the mechanisms available to address school facility impacts are established by State law under CEQA and Government Code Sections 65995–65998, where payment of statutory school impact fees constitutes full and complete mitigation for impacts associated with school facilities. The City does not have authority through CEQA to impose additional school facility mitigation beyond that authorized by State law.

To provide additional context, Section 4.8, *Schools* of Final EIR has been revised to clarify the role of State law and the basis for the EIR’s conclusions, acknowledging that while individual school districts may experience localized enrollment changes over time, the City’s authority to require additional school facility mitigation through CEQA is limited by the State regulatory framework. These clarifications do not change the EIR impact conclusions.

Response 5.20

The commenter states that the discussion within Section 4.8, *Schools*, suggests interdistrict transfers as a mitigation strategy and notes that such transfers are not permissible as a mechanism for addressing school impacts.

The City acknowledges that interdistrict transfers are governed by district-specific policies and applicable legal requirements and are not generally relied upon as a mechanism for accommodating projected enrollment growth. The EIR discussion is intended to describe examples of enrollment management practices that may occur under certain circumstances. As discussed in responses to related comments, the Final EIR has been revised in Section 4.8, *Schools*, to clarify that the school impact analysis does not rely on assumptions regarding interdistrict transfers. These clarifications do not change the EIR impact conclusions.

Response 5.21

The commenter notes that while payment of development school impact fees is considered full mitigation, such fees may not adequately address all effects associated with enrollment growth and suggests that the EIR acknowledge the City’s limited authority in this area.

The City recognizes the commenter’s concern that the costs associated with accommodating future student enrollment may extend beyond the funding provided through statutory school impact fees. School districts may face broader operational or capital funding needs over time, and the level of funding provided through development fees may not necessarily address all future district needs or expenditures. The Final EIR has been revised in Section 4.8, *Schools* to clarify this distinction and acknowledge both the role of statutory school fees and the City’s limited authority under the CEQA framework. These clarifications do not change the EIR impact conclusions.

Response 5.22

The commenter states that the conclusion that Housing Plan implementation would not result in environmental impacts from new school facilities may be unsupported due to flawed assumptions.

As discussed in responses to related school comments and interdistrict transfer practices, the Final EIR has been revised to clarify aspects of the school analysis, including distinctions between intra-district and inter-district enrollment practices and the basis for projected student accommodation assumptions. The EIR's conclusions are based on districtwide facility capacity information, enrollment trends, projected student generation estimates, and the anticipated incremental pace of development under the Housing Plan. To provide additional clarity regarding the basis for this determination, Section 4.8, *Schools* of the Final EIR has been revised. These clarifications do not change the EIR impact conclusion.

Response 5.23

The commenter states that the discussion within Section 4.9, *Transportation and Circulation* describing higher-density housing and mixed-use development in the downtown area as positive should be examined more critically, particularly in light of recent State laws such as Assembly Bill (AB) 2097.

The discussion in the EIR is intended to describe land use and transportation planning principles regarding the relationship between land use patterns and travel behavior. Higher-density and mixed-use development can support shorter trip lengths, alternative transportation and transit use, and may reduce reliance on vehicle travel. However, the City acknowledges that the effects of increased residential density and mixed-use development can vary depending on location, transportation infrastructure, parking conditions, and implementation of State and local regulations.

Response 5.24

The commenter notes that the EIR's statement that the Santa Barbara Metropolitan Transit District (MTD) provides "fixed-route" service may imply that routes are permanently fixed and not subject to change. The

The City acknowledges that MTD periodically evaluates and modifies routes, schedules, and service patterns in response to ridership demand, operational considerations, funding availability, and community needs. Text within the Final EIR has been revised in Section 4.9, *Transportation and Circulation*, c. Public Transit, to clarify that routes and service levels are subject to periodic adjustments based on operational needs and service planning. The reference to "fixed-route bus service" is intended to describe scheduled transit service operated along established routes, as opposed to demand-responsive service. This clarification does not change the EIR impact conclusions.

Response 5.25

The commenter asks how the remaining portion of utility users tax revenues is used if half is allocated for street capital maintenance.

The City notes that Utility Users Tax revenues are deposited into City funds and support a range of municipal services and programs as determined through the City's budgeting process and applicable City Council actions. Allocation of these revenues may change over time depending on City priorities and funding needs. The Final EIR clarifies this in Section 4.9, *Transportation and Circulation*, Utility User Tax. This clarification does not change the EIR impact conclusions.

Response 5.26

The commenter questions if the EIR assumes that AB 2097 and reductions in parking requirements would decrease traffic and notes that eliminating parking does not causally eliminate cars.

The City acknowledges that the relationship between parking availability, vehicle ownership, and travel demand is complex and can vary depending location, housing type, access to transit, income levels, and available transportation alternatives. The EIR transportation analysis does not rely on an assumption that reduced parking alone would eliminate vehicle trips or substantially reduce traffic impacts. It is noted however, that the AB 2097 transit priority area is already the area of the city with the lowest vehicle miles traveled (VMT) of the city.

The Final EIR has been revised in Section 4.9, *Transportation and Circulation*, Assembly Bill (AB) 2097, to provide additional information regarding the relationship between parking availability and travel behavior. This clarification does not change the EIR impact conclusions.

Response 5.27

The commenter notes the anticipated closure of Tajiguas Landfill and expresses concern that long-term solid waste management could become a large issue during the Housing Plan planning period.

The City acknowledges that the anticipated closure of the Tajiguas Landfill presents a long-term planning consideration for regional solid waste management. The County of Santa Barbara, in coordination with other regional partners, is evaluating alternatives for future solid waste disposal, in line with state guidance. Discussion has been expanded in Section 4.10, *Utilities and Service Systems*, e. Solid Waste Management, to acknowledge that while the Tajiguas Landfill is currently anticipated to reach capacity in 2038, regional solid waste planning efforts are ongoing and include strategies to expand diversion programs, extend landfill capacity, and identify future disposal options to ensure long-term solid waste management needs are met beyond the current planning horizon. This clarification does not change the EIR impact conclusions.

Response 5.28

The commenter questions whether the land use percentages shown in the figure on Page 2-10 are correct the prevalence of accessory dwelling units (ADUs) and the City's pyramid zoning framework.

The City notes that the land use pie chart is intended to summarize existing land use categories based on City zoning and land use designations. While state ADU laws allow additional dwelling units on single family residential lots, ADUs are considered accessory uses and do not change the primary land use classification. For example, a single family house with an ADU is classified as a single family residential land use. The Final EIR clarifies in Section 2, *Environmental Setting*, that the City's zoning code organizes land uses based on primary residential, commercial, and industrial designations, with accessory uses such as ADUs permitted within the underlying residential classification in accordance with applicable regulations. This clarification does not change the EIR impact conclusions.

Response 5.29

The commenter notes a typographical error on page 4.7-10, where the text references "gold courses" instead of "golf courses." The City acknowledges the comment and has corrected the error in the Final EIR.



State of California – Natural Resources Agency
 DEPARTMENT OF FISH AND WILDLIFE
 South Coast Region
 3883 Ruffin Road
 San Diego, CA 92123
wildlife.ca.gov

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director



Letter 6

March 20, 2026

Julia Pujo
 City of Santa Barbara
 P.O. Box 1990
 Santa Barbara, CA 93102
jpuyo@santabarbaraca.gov

Subject: Draft Programmatic Environmental Impact Report for the Housing Plan Program Project, SCH No. 2022040209, City of Santa Barbara, CA

Dear Julia Pujo:

The California Department of Fish and Wildlife (CDFW) reviewed the City of Santa Barbara's (City) Draft Programmatic Environmental Impact Report (DPEIR) for the Housing Plan Program Project (Project), pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines¹.

Thank you for the opportunity to provide comments and recommendations regarding Project activities that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to comment on 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 (Fish & G. Code, § 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.

CDFW may also act 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

¹ CEQA is codified in the California Public Resources Code in section 21000 et seq. The "CEQA Guidelines" are found in Title 14 of the California Code of Regulations, commencing with section 15000.

6.1

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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 law² of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, §1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

Proponent: City of Santa Barbara

Objective: The City of Santa Barbara's Housing Plan consists of programs included in the 6th Cycle Housing Element and associated amendments to the Municipal Code, General Plan, and Local Coastal Program. The Housing Plan provides the framework for meeting state housing requirements and accommodating the City's Regional Housing Needs Allocation.

The proposed Project includes implementation of Housing Plan programs that facilitate housing production, remove governmental constraints, and ensure compliance with state housing laws. These programs include the adoption of an Adaptive Reuse Ordinance, the preparation of a planning framework for the La Cumbre Plaza Planning Area, amendments to the Average Unit-Size Density (AUD) Incentive Program, the adoption of Objective Design and Development Standards, updates to the Accessory Dwelling Unit (ADU) ordinance, and process improvements to streamline permitting. The Project also includes implementation of associated amendments to the Municipal Code, General Plan, and Local Coastal Program to maintain consistency with the Housing Element and State law.

For environmental analysis purposes, this EIR assumes a conservative scenario in which up to 8,001 housing units could be permitted and constructed by 2035, along with associated nonresidential development anticipated under cumulative conditions. These updates do not authorize specific development projects but instead provide the regulatory and policy framework to implement Housing Plan programs. Additionally, no housing is proposed in the Airport area under the Housing Plan, and the Airport, along with offshore areas, is largely excluded from the area of analysis in the DPEIR. The DPEIR also includes two alternatives which are:

Alternative 1 – No Project: This alternative assumes that the Housing Plan programs and associated amendments to the Municipal Code, General Plan, and Local Coastal Program are not adopted or implemented. Existing development standards and policies contained in the City of Santa Barbara General Plan, Zoning Ordinance, and Coastal Land Use Plan would remain in place. Under this alternative, residential development

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² "Take" is defined in section 86 of the Fish and Game Code as "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill."

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would continue at the existing growth rate based on historical permitting trends but would not implement Housing Plan programs necessary to meet the City's obligations under state housing law, including planning for the Regional Housing Needs Allocation. Growth was estimated using the City's 2015–2022 permitting data, which shows an average of 230 housing units permitted annually. For the purposes of this analysis, the No Project Alternative assumes this average rate continues through 2035, resulting in approximately 2,760 new housing units. This alternative would not accomplish most of the Project objectives, including increasing housing opportunities and streamlining development processes, but would maintain existing policies and development patterns.

Alternative 2 – Additional Housing: This alternative assumes implementation of the Housing Plan with additional measures to increase residential density and accelerate housing production beyond what is analyzed for the proposed Project. Under this alternative, housing growth would increase by approximately 450 additional units, resulting in a total of 8,640 residential units by 2035. This total includes the City's Regional Housing Needs Allocation plus an 8 percent buffer. It also assumes the City would adopt additional measures to facilitate housing development, including requiring minimum residential densities, increasing density ranges in the AUD Program, increasing density in targeted areas, and revising zoning regulations to round up density calculations. This alternative would provide the opportunity to increase the percentage of affordable units along with a moderate increase in overall housing supply. However, it would result in greater residential growth than the proposed Housing Plan and could increase associated environmental impacts.

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Location: The Project applies to the entire geographic area within the boundaries of the City of Santa Barbara, which encompasses approximately 19.7 square miles of land area. The City is located on the central coast of California. Bordered by the Pacific Ocean to the south, Santa Ynez Mountains to the north, Eastern Goleta Valley to the west, and Montecito to the east.

Biological Setting: Santa Barbara contains substantial areas of relatively undisturbed natural habitats. These include a wide range of upland habitats, wetlands, riparian areas, streams, and marine areas. Contiguous areas of upland habitats within the City are located in the foothills. Within the upland habitat areas, vegetation communities are primarily dominated by California annual non-native grassland; native perennial grassland; coastal sage scrub; chaparral; coast live oak woodland, savanna, or forest; ornamental trees; and invasive species.

Habitats within the City limits include riparian corridors, wetlands and marshes, the Goleta Slough, and nearshore marine habitat. Riparian habitat ranges from low-growing herbaceous and scrub areas to major woodlands. Riparian habitat supports native species such as willows (*Salix spp.*), mulefat scrub (*Baccharis salicifolia*), California sycamore (*Platanus racemosa*), cottonwoods (*Populus spp.*), oaks, alders, bay laurels, lower-growing shrubs, and herbs.

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Freshwater wetlands are limited to vernal and perennial depressions, at springs, and along the margins of slow-moving streams such as lower Arroyo Burro Creek. Brackish marshes are found at coastal estuaries or lagoons such as the mouth of Mission Creek, Arroyo Burro Creek, Sycamore Creek, the Andr  e Clark Bird Refuge, and Goleta Slough. The City's creeks and associated riparian and estuarine habitats in the Coastal Zone are considered Environmentally Sensitive Habitat Areas (ESHA) and could support special-status species. These include the Arroyo Burro Creek, Arroyo Honda Creek, Mesa Creek, Goleta Slough, Lighthouse Creek, Mission Creek, Laguna Creek, and Sycamore Creek, all of the creek mouth estuaries/coastal lagoons, and other minor tributaries.

Fourteen special-status plant species have a high potential to occur in the Project area. While some are not federally or state-listed, they have a California Rare Plant Rank (CRPR). A CRPR of 1B, 2A, and 2B indicates species that are rare throughout their range, endemic to California, and are seriously or moderately threatened in California. All plants constituting CRPR 1A, 1B, 2A, and 2B legally meet the definitions of "endangered" or "threatened" under CESA, and are eligible for state listing (CNPS 2020). These species include: Gambel's water cress (*Nasturtium gambelii*; Endangered Species Act (ESA) listed and CESA-listed; 1B.1); Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*; 1B.2), Coulter's saltbush (*Atriplex coulteri*; 1B.2); Davidson's saltscale (*Atriplex serenana* var. *davidsonii*; 1B.2); Santa Barbara morning-glory (*Calystegia sepium* ssp. *binghamiae*; 1A); Santa Ynez false lupine (*Thermopsis macrophylla*; 1B.3); Nuttall's scrub oak (*Quercus dumosa*; 1B.1); white-veined monardella (*Monardella hypoleuca* ssp. *hypoleuca*; 1B.3); late-flowered mariposa-lily (*Calochortus fimbriatus*; 1B.3); Ojai fritillary (*Fritillaria ojaiensis*; 1B.2); umbrella larkspur (*Delphinium umbraculorum*; 1B.3); mesa horkelia (*Horkelia cuneata* var. *puberula*; 1B.1); black-flowered figwort (*Scrophularia atrata*; 1B.2); and Sonoran maiden fern (*Thelypteris puberula* var. *sonorensis*; 2B.2).

Twenty-five special-status wildlife species have potential to occur in the Project area. These species include: California red-legged frog (*Rana draytonii*; CESA listed; California Species of Special Concern (SSC)); coast range newt (*Taricha torosa*; SSC); white-tailed kite (*Elanus leucurus*; State Fully Protected); western snowy plover (*Charadrius nivosus nivosus*; ESA listed; SSC); common loon (*Gavia immer*; SSC); bank swallow (*Riparia riparia*; CESA threatened); California least tern (*Sternula antillarum browni*; ESA and CESA listed); California brown pelican (*Pelecanus occidentalis californicus*; fully protected); yellow rail (*Coturnicops noveboracensis*; SSC); California black rail (*Laterallus jamaicensis coturniculus*; CESA listed); olive-sided flycatcher (*Contopus cooperi*; SSC); tidewater goby (*Eucyclogobius newberryi*; ESA-listed and SSC); steelhead - southern California DPS (*Oncorhynchus mykiss irideus* pop. 10; ESA and CESA-listed); monarch – California overwintering population

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(*Danaus plexippus plexippus* pop. 1; Precluded³ ESA-listed); Crotch’s bumble bee (*Bombus crotchii*; CESA candidate listed); big free-tailed bat (*Nyctinomops macrotis*; SSC); southern sea otter (*Enhydra lutris nereis*; ESA-listed; State Fully Protected); southern California ringtail (*Bassariscus astutus octavus*; State Fully Protected); Townsend’s big-eared bat (*Corynorhinus townsendii*; SSC); Northern California legless lizard (*Anniella pulchra*; SSC); California legless lizard (*Anniella* spp. SSC); coast patch-nosed snake (*Salvadora hexalepis virgulata*; SSC); southwestern pond turtle (*Actinemys pallida*; Proposed ESA listed); two-striped garter snake (*Thamnophis hammondi*; SSC); and coast horned lizard (*Phrynosoma blainvillii*; SSC).

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COMMENTS AND RECOMMENDATIONS

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

COMMENT # 1: Impacts to ESHAs and Wildlife Connectivity Areas

Issue: Future projects that tier from the DPEIR, especially those in or adjacent to ESHAs, have the potential to impact and degrade riparian habitats, upland linkages, and other sensitive areas throughout the City. These habitats not only support aquatic and riparian functions but may also serve as critical connectivity corridors for wildlife. Impacts to both stream systems and non-riparian upland habitats (such as grasslands, oak woodlands, and coastal sage scrub) could reduce habitat permeability, fragment wildlife populations, and impair long-term ecological functions.

6.2

Specific impact: The DPEIR does not sufficiently define areas slated for development in relation to sensitive habitat areas, including riparian, wetlands, and/or other aquatic features that provide essential ecological functions for numerous special-status species. In the City, riparian systems associated with Arroyo Burro Creek, Arroyo Honda Creek, Mesa Creek, Goleta Slough, Lighthouse Creek, Mission Creek, Laguna Creek, and Sycamore Creek, as well as ephemeral drainages in inland and foothill regions, constitute critical habitat and linkages for these species. Projects proposed within or adjacent to ESHAs have the potential to result in substantial adverse impacts on these systems, including habitat loss, functional degradation, and increased fragmentation.

In addition to riparian and aquatic systems, the DPEIR should also characterize non-stream habitat linkages, including upland open space areas, native grasslands, oak woodlands, and coastal sage scrub, which serve as critical movement corridors and

³ The United States Fish and Wildlife Service has determined the species needs protection under the Endangered Species Act (ESA) but listing it is being delayed because other species are at higher risk and require immediate attention. The species becomes a candidate for listing and is added to the candidates list. These “warranted but precluded” findings require subsequent 12-month findings on each succeeding anniversary of the petition until they either undertake a proposal or make a “not warranted” finding.

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refugia for terrestrial wildlife. These habitats support ecological connectivity by allowing species to migrate, disperse, and forage. The DPEIR should assess potential impacts on these broader landscape connections and incorporate conservation strategies that maintain or enhance regional habitat permeability beyond stream-centered systems.

Why impact would occur: Without comprehensive mapping and characterization of sensitive natural communities/ESHAs within or adjacent to development areas, the City cannot ensure that future projects tiering from this DPEIR will effectively avoid, minimize, and mitigate impacts to these resources. This is despite the DPEIR stating that the “majority of residential development facilitated by the Housing Plan is anticipated to be infill development within urban areas and on previously developed sites.” Figure 4.3-1 of the DPEIR shows the Habitats within Santa Barbara but this information is insufficient to provide a comprehensive baseline of impacts from future development. The DPEIR should include a quantitative baseline of riparian and upland habitats to allow meaningful assessment of cumulative impacts at a regional scale (CEQA Guidelines, §§15125, 15126.2(a)(1), 15126.4(a)(1), 15130). Multiple studies, including Stein et al. (2014), have documented the widespread loss and fragmentation of California’s riparian vegetation due to urbanization, agriculture, water diversions, and other anthropogenic disturbances. These impacts have contributed to the decline of sensitive species and the impairment of critical ecosystem functions. Additionally, fragmentation or loss of non-stream habitat linkages in upland habitats, especially in foothill and montane zones, can isolate wildlife populations, reduce genetic diversity, and undermine the long-term viability of special-status species.

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Moreover, site-specific analyses for individual projects within the City alone risk overlooking critical linkages that maintain landscape connectivity and enable wildlife to adapt to environmental changes. Without a broader-scale assessment, the cumulative impacts of development on wildlife corridors may be underestimated, leading to habitat fragmentation and loss of biodiversity. Assessing wildlife connectivity at a regional scale is essential because many species rely on large, interconnected habitats for movement, breeding, and survival. CDFW recommends that the final CEQA document identify the significance of these impacts (CEQA Guidelines, §§ 15065 and 15380).

The DPEIR lacks a sufficient environmental baseline and fails to provide an adequate impact assessment necessary to inform meaningful avoidance, minimization, or mitigation measures for riparian and/or other sensitive habitats/linkages citywide. CDFW recommends that the DPEIR provide a spatially explicit baseline of sensitive habitats and species distributions to support impact assessment and mitigation planning.

Evidence impact may be significant: The Project area may support a variety of special status species. CEQA Guidelines, section 15065(a)(1) and section 15380 require that a finding of significance is mandatory where a project has the potential to substantially reduce the number or restrict the range of rare, threatened, or endangered species. CEQA Guidelines, section 15126.4(a)(1) emphasizes that mitigation should be designed to avoid impacts whenever feasible, and that reliance on future project-level

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biological assessments does not eliminate the need for meaningful programmatic safeguards. Impacts to special-status species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Further, CEQA Guidelines, section 15126.4(a)(3) specifies that compensatory mitigation, when necessary, must be measurable, enforceable, and maintained over the long term.

The DPEIR states the City will develop regulatory guidelines for Creek Protection Requirements (BIO-1), Riparian Vegetation Protection (BIO-2), and Oak Woodland Protection (BIO-4). These mitigation measures are not sufficiently specific and detailed (i.e., responsible party, timing, specific actions, and location) to ensure that they are fully enforceable and capable of successful implementation through a mitigation monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097). Pursuant to CEQA Guidelines, section 15126.4, an environmental document shall describe feasible measures which could mitigate impacts below a significant level under CEQA. Mitigation measures must be feasible, effective, implementable, and fully enforceable by the lead agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, § 15126.4). Mitigation measures that depend on the future creation of regulatory guidelines are not adequate under CEQA, as they are neither presently feasible nor enforceable. Because these guidelines have not yet been developed, the lead agency cannot implement or impose them.

6.2 cont.

Habitat fragmentation and loss of connectivity constitute significant impacts under CEQA because they restrict wildlife movement, reduce genetic exchange, and impair the long-term viability of sensitive populations. Loss of riparian areas within the City may result in substantial adverse direct, indirect, and cumulative effects, 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 the United States Fish and Wildlife Service (USFWS).

Recommended Potentially Feasible Mitigation Measure(s)

To adequately reduce potential impacts to riparian habitats, upland linkages, and sensitive biological resources, ensure consistency with CEQA Guidelines, sections 15065, 15126.4, and 15380, and provide sufficient avoidance, minimization, and mitigation measures to support sustainable land use planning, CDFW recommends the following mitigation measures and analyses be incorporated into the final CEQA document:

Mitigation Measure #1: Analysis of Impacts to ESHAs and Sensitive Habitat

Linkages: Prior to identifying specific project sites outside of previously developed/urban areas, the City shall conduct a Project-wide Habitat and Connectivity Constraints Analysis to inform site selection and ensure the avoidance of riparian habitat, upland habitat linkages, and other sensitive biological resources, including critical habitat corridors and ecological connectivity areas. A Habitat and Connectivity

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Constraints Analysis is a landscape-scale assessment that identifies riparian and upland habitats, wildlife movement corridors, and areas of high conflict between development and ecological resources. It provides a spatially explicit baseline to guide project siting, determine buffers and set-asides, and evaluate cumulative impacts at the regional scale.

This analysis shall support impact assessment and mitigation planning by mapping sensitive habitats and species. Buffers and set-asides shall be determined based on site-specific analyses and cumulative landscape needs. The analysis shall evaluate how land use changes and/or development will affect riparian habitat along creek corridors, associated drainages, upland habitat, regional wildlife movement corridors, and the Goleta Slough. The analysis shall also explicitly evaluate cumulative impacts to riparian and sensitive habitats from past, present, and reasonably foreseeable projects, consistent with CEQA Guidelines, section 15130.

The analysis shall:

- a) Be conducted by qualified biologists and landscape ecologists and be applied citywide. It shall include a minimum 300-foot buffer around the riparian corridors and associated ephemeral drainages. Buffers should also include key upland habitat areas and linkage zones critical for terrestrial species movement and connectivity.
- b) Identify and map high conflict areas (e.g., sensitive riparian habitat, upland habitat cores, and essential connectivity blocks for wildlife movement) that shall be removed from further consideration for development. CDFW recommends the following resources for connectivity data:
 - i) Wildlife Movement Barriers - CDFW 2024 [ds2867]
https://services2.arcgis.com/Uq9r85Potqm3MfRV/arcgis/rest/services/biosds2867_fnu/FeatureServer
 - ii) Terrestrial Connectivity - ACE [ds2734]
https://services2.arcgis.com/Uq9r85Potqm3MfRV/arcgis/rest/services/biosds2734_fpu/FeatureServer
 - iii) Fish Passage Priorities - CDFW - 2021 [ds2970]
https://services2.arcgis.com/Uq9r85Potqm3MfRV/arcgis/rest/services/biosds2970_fmu/FeatureServer
 - iv) Wildlife Crossing Database- Caltrans [ds3074]
 - v) Essential Connectivity Areas - California Essential Habitat Connectivity (CEHC) [ds620]
 - vi) Natural Landscape Blocks - California Essential Habitat Connectivity (CEHC) [ds621]
- c) Assess areas that would most benefit acquisition and permanent preservation, enhancement of existing habitat (both aquatic and upland), and/or installation of

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wildlife crossings and structures with consideration to past, present, and reasonably foreseeable future projects.

- d) Be completed and adopted prior to the approval of any site-specific project and updated at least every five years or as new biological and landscape connectivity data becomes available.

The recommended Habitat Connectivity and Constraints Analysis should be used to supplement and refine the environmental baseline, not replace it, ensuring that cumulative, indirect, and long-term impacts are appropriately considered.

Mitigation Measure #2: No Net Loss of Riparian and ESHA Habitats: For all projects under the DPEIR, if riparian/ESHA impacts are determined to be unavoidable, the project shall ensure no net loss of riparian habitat acreage, function, or value through on-site restoration or off-site compensatory mitigation. Compensatory mitigation shall be based on habitat quality and function, as verified by a qualified biologist and approved by the City and CDFW.

- a) Riparian Buffer and Setback Requirements: All projects shall incorporate unobstructed vegetated buffers and setbacks from the outer edge of riparian vegetation or top of bank, whichever is greater
 - i) Minimum 300-foot buffer;
 - ii) Buffers shall be vegetated with native species, free from development, fencing, lighting, or grading activity, and managed to support habitat and connectivity functions.
 - iii) Buffers and set-asides shall be designed based on site-specific analyses and cumulative landscape needs, including connectivity to adjacent these areas.
- b) Site-Specific Adjustment: Buffer widths shall be increased at the project level where site-specific biological analysis determines that greater setbacks are necessary to maintain habitat function, species movement, or water quality. Reductions to buffer widths shall only be allowed if supported by a site-specific biological assessment, independently peer-reviewed by a City-approved biologist, and approved by CDFW.
- c) Monitoring: The project applicant shall submit a Riparian Mitigation and Monitoring Plan (RMMP) detailing buffer implementation, restoration/enhancement techniques, performance criteria, and monitoring for a minimum of five years post-construction, subject to City and CDFW approval.
- d) Reporting: Annual monitoring reports shall be submitted to the City and CDFW by December 31 of each monitoring year. Reports shall include photo

6.2
cont.

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documentation, vegetation cover data, and an assessment of whether performance criteria are met.

- e) Adaptive Management. Monitoring and reporting shall include evaluation of cumulative impacts across the City and incorporate adaptive management if mitigation objectives are not met.

CDFW recommends that the final CEQA document identify the significance of these impacts pursuant to CEQA Guidelines, sections 15065 and 15380.

6.2
cont.

Recommendation #1: Habitat and Connectivity Constrains Analysis

CDFW recommends the City incorporate the Habitat and Connectivity Constraints Analysis into the DPEIR. The Habitat and Connectivity Constraints Analysis should disclose any new information on the potential impacts to biological resources within the Project area. CDFW recommends the City consult with CDFW on the development of the Habitat and Connectivity Constraints Analysis prior to finalizing the environmental document.

ADDITIONAL COMMENTS

Recommendation #2: Use of Native Plants and Trees.

CDFW recommends the City require that any project involving restoration and/or landscaping under the Project provide a native plant palette. The Project's landscaping plan should be disclosed and evaluated in the Project's environmental document for potential impacts on biological resources such as natural communities adjacent to the project site (e.g., the introduction of non-native, invasive species). CDFW supports the use of native plants for the Project and strongly recommends avoiding non-native, invasive species for landscaping and restoration, particularly any species listed as 'Limited', 'Watch', 'Moderate', or 'High' by the [California Invasive Plant Council](https://www.cal-ipc.org/plants/inventory/)⁴. CDFW supports the use of native species found in naturally occurring plant communities within or adjacent to the Project site.

6.3

In addition, CDFW supports planting tree species, such as oaks (*Quercus genus*), and understory vegetation (e.g., ground cover, subshrubs, and shrubs) that create habitat and provide a food source for birds. CDFW recommends retaining any standing, dead, or dying trees (snags) where possible because snags provide perching and nesting habitat for birds and raptors. Finally, CDFW supports planting vegetation species with high insect and pollinator value.

Mitigation and Monitoring Reporting Plan.

⁴ <https://www.cal-ipc.org/plants/inventory/>

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CDFW recommends the Project's environmental document include mitigation measures recommended in this letter. CDFW has provided comments via a mitigation monitoring and reporting plan to assist in the development of feasible, specific, detailed (i.e., responsible party, timing, specific actions, location), and fully enforceable mitigation measures (CEQA Guidelines, § 15097; Pub. Resources Code, § 21081.6). The City is welcome to coordinate with CDFW to further review and refine the Project's mitigation measures. Per Public Resources Code, section 21081.6(a)(1), CDFW has provided a summary of our suggested mitigation measures and recommendations in the form of an attached Draft Mitigation Monitoring and Reporting Plan (Attachment A).

6.3
 cont.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database that may be used to inform subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).). Accordingly, CDFW requests that any special status species and natural communities detected during Project surveys be reported to the California Natural Diversity Database (CNDDDB). The [CNDDDB website](https://wildlife.ca.gov/Data/CNDDDB)⁵ provides guidance regarding the types of information that should be reported and allows on-line submittal of field survey forms. In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the [Combined Rapid Assessment and Relevé Form](https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit)⁶.

6.4

CDFW recommends that the City ensure all data collected for the preparation of the DPEIR is properly submitted to CNDDDB and the Vegetation Classification and Mapping Program to support accurate environmental review and ongoing species conservation.

FILING FEES

The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of environmental document 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 environmental document filing 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.)

6.5

CONCLUSION

CDFW appreciates the opportunity to comment on the DPEIR to assist the City in identifying and mitigating Project impacts on biological resources. To ensure that significant impacts are adequately avoided or mitigated to a level less than significant,

6.6

⁵ <https://wildlife.ca.gov/Data/CNDDDB>

⁶ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

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the feasible mitigation measures described above should be incorporated as enforceable conditions in the DEIR for the Project. CDFW requests an opportunity to review and comment on any response that the City has to our comments and to receive notification of any forthcoming public hearing dates for the Project (CEQA Guidelines, § 15073(e)).

6.6
cont.

Questions regarding this letter or further coordination should be directed to Felicia Silva⁷, Senior Environmental Scientist (Specialist).

Sincerely,

DocuSigned by:

57FC782AB67942E...
Baron Barrera, acting for
Heather A. Pert
Environmental Program Manager
South Coast Region

ec: California Department of Fish and Wildlife
Baron Barrera, Senior Environmental Scientist (Supervisor)
Felicia Silva, Senior Environmental Scientist (Specialist)
Cindy Hailey, Staff Services Analyst
CEQA Program Coordinator – Sacramento

Office of Land Use and Climate Innovation
State Clearinghouse - State.Clearinghouse@lci.ca.gov

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

⁷ Phone: 562-292-8105; Email: Felicia.Silva@wildlife.ca.gov

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REFERENCES

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- [CDFWa] California Department of Fish and Wildlife. 2025. California Natural Diversity Database. Available from: <https://wildlife.ca.gov/Data/CNDDDB>
- [CDFWb] California Department of Fish and Wildlife. 2025. Natural Communities- Submitting information. Available from: <https://wildlife.ca.gov/Data/VegCAMP/NaturalCommunities/Submit>
- [CNPS] California Native Plant Society. 2020. CNPS Rare Plant Ranks. Available from: <https://www.cnps.org/rare-plants/cnps-rare-plant-ranks>
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- [USFWS] United States Fish and Wildlife Service. 2017. Critical Habitat- What is it? Available from: <https://www.fws.gov/sites/default/files/documents/critical-habitat-factsheet.pdf>

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ATTACHMENT A: DRAFT MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

CDFW provides the following language to be incorporated into the MMRP for the Project.

Mitigation Measure or Recommendation	Timing	Responsible Party
Mitigation Measure #1: Analysis of Impacts to ESHAs and Sensitive Habitat Linkages Prior to identifying specific project sites outside of previously developed/urban areas, the City shall conduct a Project-wide Habitat and Connectivity Constraints Analysis to inform site selection and ensure the avoidance of riparian habitat, upland habitat linkages, and other sensitive biological resources, including critical habitat corridors and ecological connectivity areas. A Habitat and Connectivity Constraints Analysis is a landscape-scale assessment that identifies riparian and upland habitats, wildlife movement corridors, and areas of high conflict between development and ecological resources. It provides a spatially explicit baseline to guide project siting, determine buffers and set-asides, and evaluate cumulative impacts at the regional scale. This analysis shall support impact assessment and mitigation planning by mapping sensitive habitats and species. Buffers and set asides shall be determined based on site-specific analyses and cumulative landscape needs. The analysis shall evaluate how land use changes and/or development will affect riparian habitat along creek corridors, associated drainages, upland habitat, regional wildlife movement corridors, and the Goleta Slough. The analysis shall also explicitly evaluate cumulative impacts to riparian and sensitive habitats from past, present, and reasonably foreseeable projects, consistent with CEQA Guidelines, section 15130. The analysis shall:	Prior to Project Activities	City of Santa Barbara

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Mitigation Measure or Recommendation	Timing	Responsible Party
a) Be conducted by qualified biologists and landscape ecologists and be applied citywide. It shall include a minimum 300 foot buffer around the riparian corridors and associated ephemeral drainages. Buffers should also include key upland habitat areas and linkage zones critical for terrestrial species movement and connectivity. b) Identify and map high conflict areas (e.g., sensitive riparian habitat, upland habitat cores, and essential connectivity blocks for wildlife movement) that shall be removed from further consideration for development. CDFW recommends the following resources for connectivity data: i) Wildlife Movement Barriers - CDFW 2024 [ds2867] https://services2.arcgis.com/Uq9r85Potqm3MfRV/arcgis/rest/services/biosds2867_fnu/FeatureServer ii) Terrestrial Connectivity - ACE [ds2734] https://services2.arcgis.com/Uq9r85Potqm3MfRV/arcgis/rest/services/biosds2734_fpu/FeatureServer iii) Fish Passage Priorities - CDFW - 2021 [ds2970] https://services2.arcgis.com/Uq9r85Potqm3MfRV/arcgis/rest/services/biosds2970_fmu/FeatureServer iv) Wildlife Crossing Database- Caltrans [ds3074] v) Essential Connectivity Areas - California Essential Habitat Connectivity (CEHC) [ds620] vi) Natural Landscape Blocks - California Essential Habitat Connectivity (CEHC) [ds621] c) Assess areas that would most benefit acquisition and permanent preservation, enhancement of existing habitat (both aquatic and upland), and/or installation of		

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Mitigation Measure or Recommendation	Timing	Responsible Party
wildlife crossings and structures with consideration to past, present, and reasonably foreseeable future projects. d) Be completed and adopted prior to the approval of any site-specific project and updated at least every five years or as new biological and landscape connectivity data becomes available. The recommended Habitat Connectivity Constraints Analysis should be used to supplement and refine environmental baseline, not replace it, ensuring that cumulative, indirect, and long-term impacts are appropriately considered.		
Mitigation Measure #2: No Net Loss of Riparian and ESHAs For all projects under the DPEIR, if riparian/ESHA impacts are determined to be unavoidable, the project shall ensure no net loss of riparian habitat acreage, function, or value through on-site restoration or off-site compensatory mitigation. Compensatory mitigation shall be based on habitat quality and function, as verified by a qualified biologist and approved by the City and CDFW. a) <u>Riparian Buffer and Setback Requirements</u>: All projects shall incorporate unobstructed vegetated buffers and setbacks from the outer edge of riparian vegetation or top of bank, whichever is greater i) Minimum 300 foot buffer; ii) Buffers shall be vegetated with native species, free from development, fencing, lighting, or grading activity, and managed to support habitat and connectivity functions.	During/After Project Activities	City of Santa Barbara

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Mitigation Measure or Recommendation	Timing	Responsible Party
iii) Buffers and set asides shall be designed based on site-specific analyses and cumulative landscape needs, including connectivity to adjacent these areas. b) <u>Site-Specific Adjustment</u>: Buffer widths shall be increased at the project level where site-specific biological analysis determines that greater setbacks are necessary to maintain habitat function, species movement, or water quality. Reductions to buffer widths shall only be allowed if supported by a site-specific biological assessment, independently peer-reviewed by a City-approved biologist, and approved by CDFW. c) <u>Monitoring</u>: The project applicant shall submit a Riparian Mitigation and Monitoring Plan (RMMP) detailing buffer implementation, restoration/enhancement techniques, performance criteria, and monitoring for a minimum of five years post-construction, subject to City and CDFW approval. d) <u>Reporting</u>: Annual monitoring reports shall be submitted to the City and CDFW by December 31 of each monitoring year. Reports shall include photo documentation, vegetation cover data, and an assessment of whether performance criteria are met. e) <u>Adaptive Management</u>. Monitoring and reporting shall include evaluation of cumulative impacts across the City and incorporate adaptive management if mitigation objectives are not met. CDFW recommends that the final CEQA document identify the significance of these impacts pursuant to CEQA Guidelines, sections 15065 and 15380.		

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Mitigation Measure or Recommendation	Timing	Responsible Party
Recommendation #1: Habitat and Connectivity Constrains Analysis CDFW recommends the City incorporate the Habitat and Connectivity Constrains Analysis into the DPEIR. The Habitats and Connectivity Constraints Analysis should disclose any new information on the potential impacts to biological resources within the Project area. CDFW recommends the City consult with CDFW on the development of the Habitat and Connectivity Constraints Analysis prior to finalizing the environmental document.	Prior to Project Activities	City of Santa Barbara
Recommendation #2: Use of Native Plants and Trees CDFW recommends the City require that any project involving restoration and/or landscaping under the Project provide a native plant palette. The Project's landscaping plan should be disclosed and evaluated in the Project's environmental document for potential impacts on biological resources such as natural communities adjacent to the project site (e.g., the introduction of non-native, invasive species). CDFW supports the use of native plants for the Project and strongly recommends avoiding non-native, invasive species for landscaping and restoration, particularly any species listed as 'Limited', 'Watch', 'Moderate', or 'High' by the California Invasive Plant Council⁸. CDFW supports the use of native species found in naturally occurring plant communities within or adjacent to the Project site. In addition, CDFW supports planting tree species, such as oaks (<i>Quercus genus</i>), and understory vegetation (e.g., ground cover, subshrubs, and shrubs) that create habitat and provide a food source for birds. CDFW recommends retaining any standing, dead, or dying trees (snags) where possible because snags provide perching and nesting habitat	Prior to Project Activities	City of Santa Barbara

⁸ <https://www.cal-ipc.org/plants/inventory/>

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Mitigation Measure or Recommendation	Timing	Responsible Party
for birds and raptors. Finally, CDFW supports planting vegetation species with high insect and pollinator value.		

Letter 6, California Department of Fish and Wildlife

Commenter: Baron Barrera, acting for Heather A. Pert, Environmental Program Manager, South Coast Region, Department of Fish and Wildlife

Date: March 20, 2026

Although the California Department of Fish and Wildlife (CDFW) comments were received after the formal close of the Draft EIR public review period, the City considered the comments and prepared detailed responses to provide a comprehensive administrative record and facilitate interagency coordination. In addition, City staff met with CDFW representatives on March 25, 2026, to further discuss the recommendations provided within the comment letter.

Response 6.1

The commenter, CDFW, provides background information regarding CDFW's regulatory authority and summarizes applicable State requirements, including the Fish and Game Code, Lake and Streambed Alteration Agreement requirements, CESA, and other biological resource protections that may apply to future development facilitated by the Housing Plan.

The City acknowledges CDFW's role as a Responsible and Trustee Agency and appreciates the detailed information provided regarding biological resources and applicable regulatory requirements. This information supports the biological resource setting described in the EIR. Section 4.3, *Biological Resources*, of the Final EIR has been updated to integrate information from the comment letter for additional context. This background information does not change the EIR impact conclusions.

Response 6.2

CDFW states that the Housing Plan could adversely affect Environmentally Sensitive Habitat Areas (ESHAs) and wildlife connectivity areas. CDFW recommends additional mitigation measures including preparation of a Habitat and Connectivity Constraints Analysis; establishment of riparian buffers and habitat set-asides; no-net-loss habitat mitigation standards; long-term monitoring and adaptive management requirements; and additional mapping and evaluation of wildlife corridors, upland habitat linkages, and ecological connectivity areas.

The City appreciates the opportunity to coordinate with CDFW regarding recommendations for the Housing Plan EIR. In response to CDFW's comment stating that the EIR does not define areas slated for development, the City would like to clarify that Housing Plan programs may facilitate future development on existing residentially zoned parcels across the city. The Housing Plan does not include any rezoning and would not expand the geographic extent of areas where residential development is currently allowed; future housing development would occur only on properties already designated and zoned for residential use.

The City acknowledges CDFW's concerns regarding impacts to ESHA and wildlife connectivity. The EIR recognizes that ESHA and wildlife linkages exist on privately owned, residential zoned parcels which may be developed under Housing Plan programs. Major habitat types and upland biological resources within the city are identified in the EIR, which constitutes the environmental baseline for the Program EIR. This is based on available data and prior biological surveys within the City of Santa Barbara, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service. Section 4.3, *Biological Resources*, of the EIR evaluates potential impacts to ESHA and wildlife connectivity at a

programmatic level and identifies mitigation measures intended to avoid and minimize impacts. The Final EIR has been revised to expand discussion regarding habitat connectivity, wildlife movement functions, upland habitat linkages, and cumulative habitat fragmentation considerations. This information and revisions do not change the EIR impact conclusions.

The City also acknowledges the commenter's recommendation for comprehensive mapping and a quantitative baseline of riparian and upland habitats. However, since residential parcels are privately owned and access is restricted, it is not feasible for the City to comprehensively survey residential areas for biological resources. Because the Housing Plan does not identify specific future development sites or final project designs, preparation of parcel-level habitat mapping and species distribution analysis for all potential future development sites is not feasible or required for programmatic CEQA review.

In response to CDFW comments requesting a Habitat and Connectivity Constraints Analysis, the Final EIR includes a new map in Section 4.3, *Biological Resources*, titled *Suitable Sites and Habitat Connectivity Analysis* (Figure 4.3-2). This figure identifies parcels included in the Housing Element Suitable Sites Inventory in relation to mapped creeks, wetlands, riparian corridors, ESHAs, and other sensitive biological resources using available data from the City, California Department of Fish and Wildlife, U.S. Fish and Wildlife Service, and prior City biological resource mapping efforts. The Suitable Sites Inventory parcels are located within urbanized infill areas and previously developed sites. As described in the Housing Element, parcels with known significant biological resources were specifically excluded from the Suitable Sites Inventory. City's Housing Element Suitable Sites Inventory is a state-required planning tool used to demonstrate that the City has sufficient residential land inventory and zoning capacity to accommodate its Regional Housing Needs Allocation (RHNA). It is noted, however, that development under Housing Plan may also occur on residentially zoned parcels that are not included on the Suitable Sites Inventory. For this reason, the EIR conservatively assumes residentially zoned parcels containing biological resources could be developed under the Housing Plan. The addition of a new map is provided for context and does not change the EIR impact conclusions.

Regarding CDFW comments that some mitigation measures within the EIR require development of implementing regulations and guidelines, CEQA allows the use of performance-based mitigation measures in programmatic environmental review where specific future projects and site conditions are not yet known, provided that the measures establish clear standards, performance objectives, and enforceable implementation mechanisms. Consistent with CEQA Guidelines Sections 15126.4 and 15097 and Public Resources Code Section 21081.6, Mitigation Measures BIO-1 through BIO-4 establish specific performance standards and implementation requirements, including preparation of Municipal Code amendments, development of biological resource protection standards, incorporation of project-level conditions of approval, and review procedures applicable to future development projects. In response to comments and recommendations provided by CDFW, the Final EIR has been revised to clarify and strengthen criteria for biological resource Mitigation Measures BIO-1 through BIO-4. Some of the specific measures recommended by CDFW, including 300-foot riparian buffers, exclusionary development setbacks, and citywide habitat acquisition requirements, may not be feasible or appropriate in the urbanized context of the city. Such measures are not required to support the adequacy of the programmatic EIR under CEQA. However, Mitigation Measure BIO-2 has been revised in the Final EIR to clarify riparian habitat protection requirements, including incorporation of a no-net-loss standard for riparian habitat function and value and additional monitoring and reporting requirements for projects affecting riparian habitat

areas. These edits are intended to make Mitigation Measures BIO-1 through BIO-4 more effective and do not change the EIR impact conclusions.

Response 6.3

CDFW recommends that development projects involving restoration or landscaping use a native plant palette, avoid invasive species, incorporate locally appropriate native species, and retain habitat features such as snags where feasible to support wildlife, birds, and pollinators. CDFW requests that the EIR include mitigation measures recommended in the comment letter and provides a suggested a Mitigation Monitoring and Reporting Program (MMRP) for City consideration.

The City concurs with CDFW's recommendation on the use of native plant species and the avoidance of invasive non-native species. This recommendation is incorporated into Mitigation Measures BIO-2 and BIO-4 of the Final EIR. These edits do not change the EIR impact conclusions.

The Final EIR includes programmatic mitigation measures within a Mitigation Monitoring and Reporting Program (MMRP). Compliance at the project-level will be verified through plan review, conditions of approval, field inspections, technical studies, and project-level biological review.

Response 6.4

CDFW requests that any special-status species, sensitive natural communities, and related biological survey data collected for preparation of the EIR be submitted to the California Natural Diversity Database (CNDDDB).

The City acknowledges CDFW's request. Where special-status species, sensitive natural communities, or other reportable biological resources are identified during surveys, such information will be submitted to CNDDDB and, as applicable, CDFW's Vegetation Classification and Mapping Program in accordance with their established data submission protocols.

Response 6.5

CDFW notes that CDFW environmental document filing fees are required pursuant to Fish and Game Code Section 711.4, Public Resources Code Section 21089, and CEQA Guidelines Section 753.5, and are due upon filing of the Notice of Determination. The City acknowledges this requirement. Payment of any required CDFW filing fee will be handled in accordance with State law.

Response 6.6

The City appreciates CDFW's review of the EIR and its recommendations regarding biological resources. The City will continue to coordinate with CDFW, as appropriate, during implementation of the biological resource mitigation measures and during project-level review to ensure that biological resource protections are effectively applied.