



State of California – Natural Resources Agency
DEPARTMENT OF FISH AND WILDLIFE
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GAVIN NEWSOM, Governor
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March 20, 2026

Julia Pujo
City of Santa Barbara
P.O. Box 1990
Santa Barbara, CA 93102
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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.

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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

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.

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 ssp.*), 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 Andrée 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).

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.

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.

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.

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

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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.

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](#)⁴. 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 (*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).

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](#)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](#)⁶.

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.)

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,

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)).

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

Sincerely,

DocuSigned by:

Baron Barrera

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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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
<p>Mitigation Measure #1: Analysis of Impacts to ESHAs and Sensitive Habitat Linkages</p> <p>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.</p> <p>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.</p> <p>The analysis shall:</p>	<p>Prior to Project Activities</p>	<p>City of Santa Barbara</p>

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Mitigation Measure or Recommendation	Timing	Responsible Party
<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> 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] <p>c) Assess areas that would most benefit acquisition and permanent preservation, enhancement of existing habitat (both aquatic and upland), and/or installation of</p>		

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Mitigation Measure or Recommendation	Timing	Responsible Party
<p>wildlife crossings and structures with consideration to past, present, and reasonably foreseeable future projects.</p> <p>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.</p> <p>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.</p>		
<p>Mitigation Measure #2: No Net Loss of Riparian and ESHAs</p> <p>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.</p> <p>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</p> <ul style="list-style-type: none"> 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. 	<p>During/After Project Activities</p>	<p>City of Santa Barbara</p>

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Mitigation Measure or Recommendation	Timing	Responsible Party
<p>iii) Buffers and set asides shall be designed based on site-specific analyses and cumulative landscape needs, including connectivity to adjacent these areas.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>CDFW recommends that the final CEQA document identify the significance of these impacts pursuant to CEQA Guidelines, sections 15065 and 15380.</p>		

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Mitigation Measure or Recommendation	Timing	Responsible Party
<p>Recommendation #1: Habitat and Connectivity Constrains Analysis</p> <p>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.</p>	<p>Prior to Project Activities</p>	<p>City of Santa Barbara</p>
<p>Recommendation #2: Use of Native Plants and Trees</p> <p>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.</p> <p>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</p>	<p>Prior to Project Activities</p>	<p>City of Santa Barbara</p>

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.		