



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

GAVIN NEWSOM, Governor
MEGHAN HERTEL, Director

South Coast Region
3883 Ruffin Road
San Diego, California 92123
(858) 467-4201
wildlife.ca.gov

August 10, 2026

Jeff Lindgren
County of Santa Barbara Community Services Dept.
(Parks Division)
123 E. Anapamu St.
Second Floor
Santa Barbara, CA 93101
jlindgren@countyofsb.org

Subject: Programmatic Environmental Impact Report for the Santa Barbara County Recreation Master Plan and Related Amendments to the Comprehensive Plan and Zoning Ordinances, SCH No. 2025010342, Santa Barbara County, CA

Dear Jeff Lindgren:

The California Department of Fish and Wildlife (CDFW) has reviewed the Draft Programmatic Environmental Impact Report (PEIR) from Santa Barbara County (County; Lead Agency) for the Santa Barbara County Recreation Master Plan and Related Amendments to the Comprehensive Plan and Zoning Ordinances (Project). Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife or be subject to Fish and Game Code.

CDFW's Role

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

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 2

CDFW is also submitting comments as a Responsible Agency under CEQA (Public Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code, including lake and streambed alteration regulatory authority (Fish & Game Code, § 1600 et seq.). To the extent implementation of the Project as proposed may result in “take” of any species protected under the California Endangered Species Act (CESA; Fish & Game Code, § 2050 et seq.), or CESA-listed rare plant pursuant to the Native Plant Protection Act (NPPA; Fish & Game Code, § 1900 et seq.), CDFW recommends the Project proponent obtain appropriate authorization under the Fish and Game Code.

Project Description and Summary

Proponent: County

Objective: The objective of the Project is to implement the proposed Recreation Master Plan, which describes a long-range plan to fund, guide, and develop new public parks and trails countywide. The Project would aid in supporting the demands of recreation users through 2050 within five recreation planning areas. Thirty-nine sites have been identified by the Master Plan as proposed and would result in the following:

- 9 improvement projects to existing County-owned parks;
- 11 acquisition projects that would expand County Parks' parkland inventory by 186.5 acres;
- 7 trail projects that would expand the County's trail inventory by 75.2 miles of public trails; and
- 12 projects in partnership with other public agencies, including cities, the State of California, and the federal government.

To implement the Master Plan, the Project would amend sections of the County's 1979 Comprehensive Plan (Land Use Element and Agricultural Element) and zoning ordinances to support the permitting of public parks and trails on County owned properties, properties owned by other public agencies, and on privately owned land to be acquired for public use.

The Project also includes the introduction of the Recreation Benefit Project (RBP) Program. This Program provides a pathway for private developments to contribute to the County's public recreation system and to aid in the implementation of proposed Projects within the Master Plan. Projects that qualify as an RBP must include a public recreation component

Jeff Lindgren

County of SB Community Services Dept.

August 10, 2026

Page 3

(that aligns with the proposed Master Plan) and a private use or development component, such as campgrounds, country clubs, or housing. Inclusion into the RBP may also provide incentives to applicants who voluntarily provide needed public park, recreation, or trail projects as a part of proposed private development projects.

Future parks, recreation, and trail development tiered from the Master Plan as well as RBPs would be subject to existing federal, state, and county policies as well as standards proposed under the Master Plan. Primary Project activities include the development of, but are not limited to, sports and aquatic facilities, public parks, and trails. These activities involve site preparation, grading, construction, and landscaping.

Location: The Project areas include unincorporated inland and coastal areas of Santa Barbara County. The Project area is comprised of five planning areas defined by the proposed Project consisting of the Santa Maria Valley (including the cities of Santa Maria and Guadalupe as well as the communities of Orcutt, Casmalia, Garey, and Sisquoc); Cuyama Valley (including the communities of Cuyama and New Cuyama); Lompoc Valley (including the City of Lompoc and the communities of Vandenberg Village and Mission Hills); Santa Ynez Valley (including the cities of Buellton and Solvang as well as communities of Bollard, Santa Ynez, Los Olivos, and Los Alamos); and the South Coast (including the cities of Santa Barbara, Goleta, and Carpinteria as well as the communities of Isla Vista, Eastern Goleta Valley, Montecito, Mission Canyon, Toro Canyon, Summerland, and rural Gaviota Coast) (Figure 1). Areas that are owned and/or managed by federal agencies are excluded from the Project.

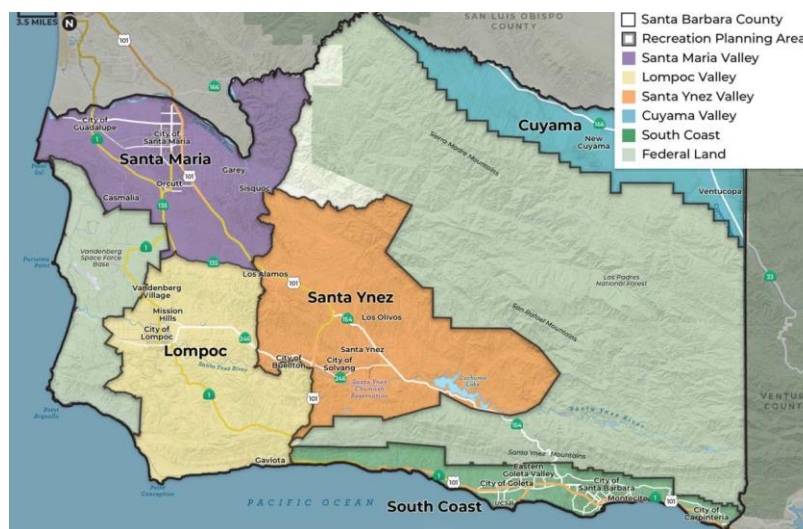


Figure 1. Planning and Project Area

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 4

Timeframe: The Project is proposed to occur over the course of 10 to 20 years.

Alternatives:

No Project Alternative. No Implementation of the programs featured in the Recreation Master Plan and supplemental amendments.

Alternative 1 Reduced Eligibility of RBPs. Would result in a revised RBP Program that considers comments received from the public, Parks Commission, and Planning Commission to eliminate Resource Protection zone districts as eligible zones for RBPs. All other elements of the proposed Project would continue to be implemented under this alternative.

Alternative 2 Increased Agricultural Buffers. Would result in a revised RBP Program that considers comments received from the public, Parks Commission, and Planning Commission to provide more protection from agricultural uses. Buffer requirements would be increased to a minimum of 500 feet for RBPs and privately proposed recreational uses (unless in specific overlay). This alternative would also prohibit RBPs on sites within the limited agricultural enterprise overlay. All other elements of the proposed Project would continue to be implemented under this alternative.

Biological Setting: The Project area includes a variety of vegetation communities such as oak and riparian woodlands, chaparral and coastal sage scrub, maritime chaparral, pine forest, dune scrub, vernal pools, native grasslands, coastal wetlands, and eucalyptus groves. Additionally, three river or large stream systems, such as the Santa Ynez River, Santa Maria River, and San Antonio Creek, perennial and intermittent creeks, and coastal and inland wetlands occur within the Project area. The County did not prepare an Initial Study, and biological surveys were not provided. Likewise, a Biological Assessment was only provided for one Project Location (Jalama) proposed under the Master Plan. Given the size and scope of the Project, species that are of potential concern include but are not limited to:

Amphibians: Foothill yellowlegged frog –South Coast DPS (*Rana boylei* pop. 6; ESA listed endangered; CESA listed endangered), western spadefoot (*Spea hammondi*; ESA proposed threatened; CESA proposed; SSC), California red-legged frog (*Rana draytonii*; ESA listed threatened; SSC), arroyo toad (*Anaxyrus californicus*; ESA-listed endangered; SSC), California tiger salamander – Santa Barbara County Distinct Population Segments (*Ambystoma californiense* pop. 2; ESA listed endangered; CESA listed threatened; CDFW Watch List), , coast range newt (*Taricha torosa*; SSC);

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 5

Birds: western burrowing owl (*Athene cunicularia*; CESA candidate endangered), southwestern willow flycatcher (*Empidonax traillii extimus*; ESA listed endangered; CESA listed endangered), California least tern (*Sternula antillarum browni*; Fully Protected), tricolored blackbird (*Agelaius tricolor*; CESA listed threatened; SSC), least bell's vireo (*Vireo bellii pusillus*; ESA listed endangered; CESA listed endangered), southern California rufous crowned sparrow (*Aimophila ruficeps canescens*; CDFW Watch List), bald eagle (*Haliaeetus leucocphalus*; CESA listed endangered; Fully Protected), Prairie falcon (*Falco mexicanus*; CDFW Watch List), Cooper's hawk (*Accipiter cooperii*; CDFW Watch list), ferruginous hawk (*Buteo regalis*; CDFW watch list), Swainson's hawk (*Buteo swainsoni*; CESA listed threatened), western snowy plover (*Charadrius nivosus nivosus*; ESA listed threatened), purple martin (*Progne subis*; SSC), yellow warbler (*Setophaga petechia*; SSC), short-eared owl (*Asio flammeus*; SSC);

Fish: southern California steelhead (*Oncorhynchus mykiss irideus* pop. 10; Endangered Species Act (ESA)-listed endangered; CESA candidate endangered), unarmored threespine stickleback (*Gasterosteus aculeatus williamsoni*; ESA listed Endangered; CESA listed Endangered; Fully Protected), tidewater goby (*Eucyclogobius newberryi*; ESA listed endangered; California Species of Special Concern (SSC)), arroyo chub (*Gila orcuttii*; SSC);

Invertebrates: monarch butterfly – California overwintering population (*Danaus plexippus plexippus*; ESA proposed threatened), Crotch's bumble bee (*Bombus crotchii*; CESA candidate endangered), vernal pool fairy shrimp (*Branchinecta lynchi*; ESA listed threatened);

Mammals: giant kangaroo rat (*Dipodomys ingens*; ESA listed endangered; CESA listed endangered), Nelson's antelope squirrel (*Ammospermophilus nelsoni*; CESA listed threatened), San Joaquin kit fox (*Vulpes macrotis mutica*; ESA listed endangered; CESA listed threatened), Tulare grasshopper mouse (*Onychomys torridus tularensis*; SSC), American badger (*Taxidea taxus*; SSC), pallid bat (*Antrozous pallidus*; SSC), San Diego desert woodrat (*Neotoma lepida intermedia*; SSC), Townsend's big-eared bat (*Corynorhinus townsendii*; SSC), western mastiff bat (*Eumops perotis californicus*; SSC), western red bat (*Lasiurus frantzii*; SSC);

Plants: black-flowered figwort (*Scrophularia atrata*; California Rare Plant Rank (CRPR) 1B.2), sand mesa manzanita (*Arctostaphylos rudis*; CRPR 1B.1), La Purisima manzanita (*Arctostaphylos purissima*; CRPR 1B.1), Alice's lovely bushmallow (*Malacothamnus eastwoodiae*; CRPR 1B.1), Gaviota tarplant (*Deinandra increscens* ssp. *villosa*; ESA listed

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 6

andangered; CESA listed endangered; CRPR 1B.1), Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*; CRPR 1B.2), seaside bird's beak (*Cordylanthus rigidus* ssp. *littoralis*; CESA listed endangered; CRPR 1B.1), Santa Ynez groundstar (*Ancistrocarphus keilii*; CRPR 1B.1), Aphanisma (*Aphanisma blitoides*; CRPR 1B.2), Blochman's dudleya (*Dudleya blochmaniae* ssp. *Blochmaniae*; CRPR 1B.1), Blochman's leafy daisy (*Erigeron blochmaniae*; CRPR 1B.1), blushing layia (*Layia erubescens*; CRPR 1B.2), compact cobwebby thistle (*Cirsium occidentale* var. *compactum*; 1B.2), crisp monardella (*Monardella undulata* ssp. *Crispa*; CRPR 1B.2), dune larkspur (*Delphinium parryi* ssp. *Blochmaniae*; CRPR 1B.2), Blakley's spineflower (*Chorizanthe blakleyi*; CRPR 1B.3), Hoover's bent grass (*Agostis hooveri*; CRPR 1B.2), south coast saltscale (*Atriplex pacifica*; CRPR 1B.2), Kellogg's horkelia (*Horkelia cuneata* var. *sericea*; CRPR 1B.1), beach spectaclepod (*Dithyrea maritima*; CESA listed threatened), La Graciosa thistle (*Cirsium scariosum* var. *loncholepis*; ESA listed endangered; CESA listed threatened; CRPR 1B.1), Lompoc yerba santa (*Eriodictyon capitatum*; ESA listed endangered; CESA listed rare; CRPR 1B.2), Santa Barbara jewelflower (*Caulanthus amplexicaulis* var. *barbarae*; CRPR 1B.1), mesa horkelia (*Horkelia cuneata* var. *puberula*; CRPR 1B.1), Ojai fritillary (*Fritillaria ojaiensis*; CRPR 1B.2), San Luis Obispo monardella (*Monardella undulata* ssp. *Undulata*; CRPR 1B.2), Santa Barbara ceanothus (*Ceanothus impressus* var. *impressus*; CRPR 1B.2), late flowered mariposa lily (*Calochortus fimbriatus*; CRPR 1B.3), Mile's milk vetch (*Astragalus didymocarpus* var. *milesianus*; CRPR 1B.2), slender bushmallow (*Malacothamnus jonesii* var. *gracilis*; CRPR 1B.1), southern curly leaved monardella (*Monardella sinuata* ssp. *sinuate*; CRPR 1B.2), surf thistle (*Cirsium rhotophilum*; CESA listed threatened; CRPR 1B.2), chaparral ragwort (*Senecio aphanactis*; CRPR 1B.2), Coulter's saltbrush (*Atriplex coulteri*; CRPR 1B.2);

Reptiles: western pond turtle (*Actinemys pallida*; ESA proposed threatened; SSC), northern California legless lizard (*Anniella pulchra*; SSC), two-striped gartersnake (*Thamnophis hammondi*; SSC), coast horned lizard (*Phrynosoma blainvillii*; SSC) and other special status species.

Project History: A Notice of Preparation (NOP) was submitted for the Project on January 13, 2025. CDFW provided recommendations in the form of a comment letter on February 20, 2025. Recommendations included assessing impacts from: recreation, wildlife movement, trails within the PEIR; adequately addressing and assessing impacts to CESA and CESA candidates within the PEIR; developing appropriate measures for monarch butterfly within the PEIR as well as requiring monitoring for Projects tiered off the document during overwintering season (typically September 15-March 11); avoiding work that could impact tidewater goby and southern California steelhead such as not working in streams during April 1-June 31 and November 1-June 15; providing a thorough discussion of potential impacts to

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 7

Species of Special Concern (SSC) as well as provide mitigation measures that provide compensatory mitigation for SSC; analyzing impacts to rare plants and conducting appropriate surveys for rare plants; incorporating measures within the PEIR to fully avoid impacts to nesting birds (i.e. avoiding vegetation clearing during peak avian breeding season (January 1- September 1)); utilizing native plants for landscaping for projects tiered off the PEIR as well as evaluating impacts due to landscaping within the PEIR.

COMMENTS AND RECOMMENDATIONS

CDFW offers the comments and recommendations below to assist the County 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 may also be included to improve the document.

Comment # 1: Inadequate BIO-Measures

Issue: Projects tiered from the PEIR may impact biological resources.

Specific Impact: Direct and indirect impacts to biological resources may result from Project site development. Impacts to biological resources may result in reproductive suppression, mortality, injury to wildlife, and population decline of a special status, sensitive, or rare species or natural community.

Why impact would occur: The PEIR states that approximately 186.5 acres of parkland and approximately 75.2 acres of trails will be developed in the County as part of the Master Plan. Within these areas a variety of special status species and habitats exist. However, the PEIR only provided five (5) BIO-Measures to help minimize and avoid impacts. Of these BIO-Measures only BIO-Measure 3 included species-specific avoidance, minimization, and mitigation language. However, the species-specific and mitigation measures were specific only to the Jalama Beach Campground Expansion and Upgrade Project, a project proposed under the Master Plan. Additionally, the only Biological Assessment provided for the Master plan was specific only to the Jalama Beach campground Project; no additional Biological Assessments were provided for any of the additional 38 proposed Project sites within the Master Plan. Given that 39 locations have been identified and mapped as part of the Master Plan, it appears that more project-specific information should be included (See General Comment 1). Although BIO-Measure 2 requires a Habitat Protection Plan for all Projects tiered off the Master Plan and subsequent RBPs, CDFW is concerned that enforceable measures have not been provided for the variety of special status species and habitats potentially present. BIO-2 states "[t]he HPP shall first determine the presence of sensitive biological resources at a project site, including special status species and their habitats, ESH, riparian corridors, wetlands, and other sensitive natural communities."

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 8

However, it does not mention the requirement for species-specific surveys or protocol-level surveys to inform a presence/absence determination. Only nesting bird surveys are mentioned within the measure. Additionally, although it is reinforced within the document that future parks, recreation, and trail development tiered from the Master Plan as well as RBPs would be subject to existing federal, state, and county policies as well as standards proposed under the Master Plan, Projects should not rely on future regulatory authority to mitigate or minimize the impacts of their Project. It is CDFW's opinion that the proposed BIO-Measures, goals, and building standards are policies that do not prescribe, require, or impose specific actions that would substantially mitigate for impacts to candidate, sensitive, or special status species at a project level. As a result, the Project may result in unmitigated impacts.

Evidence impact would be significant: The Master Plan has identified multiple new recreation areas that will be added within the County, which will require ongoing management. Further the Master Plan describes existing facilities that may undergo changes (e.g., upgrades, expansions, or demolition) during the life of the Master Plan. The Project as described may result in direct physical changes to the environment and impact special status, sensitive, or rare plant or wildlife species, or natural communities. Even when conducted in disturbed areas, indirect impacts from Project activities, including increased noise and human activity could cause impacts to plant or wildlife species. Take under ESA includes significant habitat modification or degradation that could result in death or injury to a listed species by interfering with essential behavioral patterns such as breeding, foraging, or nesting.

Plants with a California Rare Plant Rank (CRPR) of 1B meets the definition of endangered, rare, or threatened species under CEQA (CEQA Guidelines, § 15380; CNPS 2026a). Plants with a CRPR of 4 may meet the definition of endangered, rare, or threatened species. CDFW considers Sensitive Natural Communities as threatened habitats having both regional and local significance. Natural communities, alliances, and associations with a State-wide rarity ranking of S1, S2, and S3 should be considered sensitive and declining at the local and regional level. These ranks can be obtained by visiting the [Vegetation Classification and Mapping Program - Natural Communities](#)¹ webpage (CDFW 2026a). Without enforceable mitigation measures, impacts on sensitive natural communities could require a mandatory finding of significance (CEQA Guidelines, § 15065).

Development facilitated by the Project may substantially reduce the habitat of fish and wildlife species; cause fish or wildlife populations to drop below self-sustaining levels; threaten to eliminate plant or animal communities; or substantially reduce the number or restrict the range of endangered, rare, or threatened species [CEQA Guidelines, § 15065(a)(1)]. Without appropriate mitigation, the Project may have a substantial adverse direct, indirect, and

¹ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities>

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 9

cumulative effect, either directly or through habitat modifications, on species identified as a candidate, sensitive, or special status species, or a Sensitive Natural Community, in local or regional plans, policies, or regulations, or by CDFW and/or the United States Fish and Wildlife Service (USFWS).

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Mitigation Measure #1 CESA-Listed Species Surveys and Avoidance/Minimization Measures –

Projects tiered from the Master Plan and subsequent RBPs shall:

- A. Southern California Steelhead: Be conditioned to avoid impacts to southern California Steelhead. No in-water work shall occur in the bed, bank, or channel in streams where southern California steelhead may be present.
- B. Crotch's Bumble Bee: Retain a qualified biologist with the appropriate handling permits to conduct focused surveys. Focused surveys shall follow CDFW's Survey [Considerations for California Endangered Species Act Candidate Bumble Bee Species](#)². Focused surveys shall also be conducted throughout the entire Project area and during the appropriate flying season to ensure no missed detection of Crotch's bumble bee occurs.
- C. Western Burrowing Owl: Retain a qualified biologist with the appropriate handling permits to conduct the full suite of focused surveys for western burrowing owl pursuant to CDFW's March 7, 2012, [Staff Report on Burrowing Owl Mitigation](#)³ or CDFW's most recent guidance. These surveys shall include habitat assessment surveys, breeding surveys, and non-breeding surveys within appropriate habitat (including a 500-foot buffer) to sufficiently assess presence or absence. The qualified biologist shall also perform a pre-activity western burrowing owl clearance survey within appropriate habitat no more than 14 days prior to any vegetation removal or ground disturbing activities.

²[Survey Considerations for CESA Candidate Bumble Bee Species](#)

³[Microsoft Word - BUOW Staff Report final 030712 REV 1.doc](#)

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 10

- D. San Joaquin Kit Fox: Retain a qualified biologist to conduct protocol surveys on site (and within an appropriate buffer) to determine presence of San Joaquin kit fox following the [USFWS's 2011 Recommendations Document](#)⁴.
- E. Giant Kangaroo Rat: Retain a qualified biologist to conduct protocol surveys on site (and within an appropriate buffer) to determine presence of giant Kangaroo rat while considering materials such as [USFWS's 1996 Approved Survey Protocol for the Morro Bay Kangaroo Rat](#)⁵. No trapping may occur without the necessary permits.
- F. Nelson's Antelope Squirrel: Retain a qualified biologist to conduct protocol surveys on site (and within an appropriate buffer) to determine presence of Nelson's antelope squirrel following the latest survey guidance and employing only non-take survey methodologies. No trapping may occur without the necessary permits.
- G. Foothill Yellow-Legged Frog: Retain a qualified biologist to conduct protocol surveys on site (and within an appropriate buffer) to determine presence or absence of foothill yellow-legged frog on applicable Project site(s) following the [2018 CDFW Guidance](#)⁶.
- H. California Tiger Salamander: Retain a qualified biologist to conduct protocol surveys on site (and within an appropriate buffer) to determine presence or absence of California tiger salamander on applicable Project sites(s) following the [USFWs 2003 Guidelines](#)⁷.
- I. Western Spadefoot Toad: Retain a qualified biologist who shall conduct focused surveys for western spadefoot within all portions of the Project site containing suitable breeding habitat prior to the start of any ground disturbance, construction, or site preparation activities. Surveys shall take into consideration [A Standardized Protocol for Surveying Aquatic Amphibians](#)⁸ or any approved updated CDFW guidance on the species. Surveys shall be conducted during the peak activity period of January through June following the first rain event.
- J. Survey Results: Submit to CDFW and the County all CESA-listed and CESA-candidate species survey results including negative findings prior to implementing Project-related

⁴ [Microsoft Word - San Joaquin Kit Fox Ground Disturbance 2011 FINAL.doc](#)

⁵ [Survey Protocol for the Morro Bay Kangaroo Rat](#)

⁶ [Considerations for Conserving the Foothill Yellow-Legged Frog](#)

⁷ [Microsoft Word - CTS Final Guidance 10.22.03_1.doc](#)

⁸ [A Standardized Protocol for Surveying Aquatic Amphibians - Gary M. Fellers - Google Books](#)

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 11

activities. Each applicant or developer is responsible for analyzing potential impacts to the above species where applicable.

- K. CESA Incidental Take Permit (ITP): Seek to obtain an Incidental Take Permit from CDFW or otherwise prove compliance with CESA if there are potential impacts to southern California steelhead trout, Crotch's bumble bee, western burrowing owl, San Joaquin kit fox, giant kangaroo rat, Nelson's antelope squirrel, foothill yellow-legged frog, California tiger salamander and/or western spadefoot toad.

Mitigation Measure #2 ESA-Listed and ESA-Candidate Species Surveys and Avoidance/Minimization Measures –

Projects tiered from the Master Plan and subsequent RBPs shall:

- A. Tidewater Goby: Be conditioned to avoid impacts to tidewater goby. No in-water work shall occur in the bed, bank, or channel in streams where the species may be present.
- B. Monarch Butterfly: Retain a qualified biologist to assess the future development sites for monarch presence and overwintering habitat. A qualified biologist shall survey any eucalyptus groves and other trees within the Project site that are suitable for overwintering monarchs. A qualified biologist shall conduct multiple surveys for overwintering monarchs where potential overwintering habitat has been identified. Monitoring shall be done as frequently as possible during the overwintering season (typically September 15 through March 11) to capture changing distributions through the season and in response to storm events. CDFW recommends the County also consult the following resources to develop appropriate measures to mitigate the Project's potential impacts to monarchs:
- [Western Monarch Butterfly Conservation Plan](#)⁹ (WAFWA 2019);
 - [Overwintering Site Management and Protection](#)¹⁰ (Western Monarch Count 2022);
 - [Protecting California's Butterfly Groves](#)¹¹ (Xerces Society 2017);

⁹ [Western Monarch Butterfly Conservation Plan](#)

¹⁰ [Managing and Protecting Overwintering Sites - Western Monarch Count](#)

¹¹ [2017-040_ProtectingCaliforniaButterflyGroves.pdf](#)

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 12

- [Managing Monarch Habitat in the West](#)¹² (Xerces Society 2024a);
- [Pollinator-Friendly Native Plant Lists](#)¹³ (Xerces Society 2024b); and,
- [CDFW's Monarch Butterfly webpage](#)¹⁴ (CDFW 2024d).

- C. Arroyo Toad: Retain a qualified biologist to conduct focused surveys on site (and within an appropriate buffer) for arroyo toad following the [USFWS's 1999 Survey Protocol for the Arroyo Toad](#)¹⁵.
- D. Western Pond Turtle: Retain a qualified biologist to conduct focused surveys for western pond turtle following the [U.S. Geological Survey's 2006 Western Pond Turtle \(*Emys marmorata*\) Visual Survey Protocol for the Southcoast Region](#)¹⁶. No trapping shall be performed. Survey results shall be submitted to the County before the initiation of any tiered Project activities. If survey findings are negative, a qualified biologist shall monitor all sediment and vegetation removal activities in all areas that contain suitable habitat for western pond turtle.
- E. Red-Legged Frog: Retain a qualified biologist to conduct focused surveys for California red-legged frog. Surveys shall adhere to survey methods described in [Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog](#)¹⁷.
- F. Survey Results: Submit to the County all ESA-listed and ESA-candidate species survey results including negative findings prior to implementing Project-related activities. Each applicant or developer is responsible for analyzing potential impacts to the above species where applicable.

Mitigation Measure #3 Unarmored Threespine Stickleback – The Project shall avoid all impact to unarmored threespine stickleback. CDFW cannot authorize the take of any fully protected species as defined by State law. State fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for its take (Fish & G.

¹² [Managing Monarch Habitat in the West | Xerces Society](#)

¹³ [Pollinator-Friendly Native Plant Lists | Xerces Society](#)

¹⁴ [Pollinator-Friendly Native Plant Lists | Xerces Society](#)

¹⁵ [Survey Protocol for the Arroyo Toad](#)

¹⁶ [USGS Western Pond Turtle Visual Survey Protocol for the Southcoast Ecoregion](#)

¹⁷ [Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog](#)

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 13

Code, §§ 3511, 4700, 5050, 5515). Take of any species designated as fully protected under the Fish and Game Code is prohibited.

Mitigation Measure #4 Special Status Reptiles Surveys – Due to potentially suitable habitat within the Project site, prior to vegetation removal and/or grading, qualified biologists familiar with reptile species behavior and life history shall conduct specialized surveys to determine the presence/absence of SSC reptile species. Surveys shall be conducted during active season when the reptiles are most likely to be detected. Survey results, including negative findings, shall be submitted to the County prior to initiation of Project activities.

Mitigation Measure #5 SSC Mammals – For Projects tiered off the Master Plan and subsequent RBPs proponent shall survey for American Badger, San Diego desert woodrat, Tulare grasshopper mouse, and any other SSC mammal species throughout the Project site and within an appropriate buffer. Survey results, including negative findings, shall be submitted to the County prior to initiation of Project activities.

- A. American Badger- If American badger is detected at or near the Project site(s), they shall be allowed to move out of the work site of its own volition. If American badger is denning on or within 500 feet of the Project area, the den shall be protected in place with a 500-foot no-disturbance buffer. If impacts to American badger cannot be avoided an American Badger Eviction and Relocation Plan shall be composed and submitted to the County. No eviction shall take place while American badger kits are utilizing the den.
- B. San Diego desert woodrat- If San Diego desert woodrat is detected at or near the Project site(s) the County shall protect woodrat dens found within Project areas utilizing buffers deemed sufficient by the qualified biologist to avoid impacts to the species. Buffer demarcation shall use post and rope fencing and be installed prior to Project activities. If Project activities must occur where dens are located, a qualified biologist shall create three artificial dens for every one den removed. New dens shall be constructed prior to removing the original dens. New dens shall be constructed in suitable habitat no further than 300 feet from the original location using native material stacked horizontally in areas under shady canopy and upslope of seasonal drainages. New dens shall be placed at least 25 feet from other dens. A qualified biologist shall direct the deconstruction of the original den by hand to allow inhabitants to escape unharmed. Den removal shall only occur between September 1 and November 30. Material from the original den shall then be placed adjacent to the newly created dens. The County shall submit a woodrat den relocation report to the County within two months after implementation. The report shall include a map, photos of existing and created dens, and any pertinent information on the process and/or its success.

Jeff Lindgren

County of SB Community Services Dept.

August 10, 2026

Page 14

- C. Tulare grasshopper mouse- A qualified biologist shall be at each project area to ensure potential burrows for Tulare grasshopper mouse are avoided to the maximum extent feasible during ground disturbing activities. Permittee shall allow Tulare grasshopper mouse individuals that are encountered or excavated to leave the project area of their own volition. If that is not feasible or if individuals are disoriented, a qualified biologist shall capture individuals and release them into a suitable burrow at least 300 feet from the outer work limits from where the individual was found.

Mitigation Measure #6 Special Status Bat Surveys – For Projects tiered off the Master Plan and subsequent RBPs proponent shall retain a qualified bat specialist to conduct daytime and nighttime bat surveys throughout the Project area (plus a 100-foot buffer as access allows). These surveys shall identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. Acoustic recognition technology shall be utilized during day and night surveys to maximize detection of bats. A discussion of survey results, including negative findings, shall be provided to the County. If bat species are detected, no Project activities shall commence, and the Project proponent shall develop avoidance and minimization where possible and compensatory mitigation measures when complete avoidance is not possible.

Mitigation Measure #7: Rare Plants – If a rare plant species or a Sensitive Natural Community is detected, the County shall fully avoid impacts to that species or community. If the Project cannot feasibly avoid impacts to rare plants and associated habitat, or sensitive natural communities, either during Project activities or over the life of the Project, the County shall provide compensatory mitigation for the loss of individual plants and habitat acres. Impacts on rare plants or a Sensitive Natural Community due to hazard mitigation/remediation shall also be mitigated as these impacts would result in permanent loss and perpetual impacts on habitat function and quality. The County shall provide compensatory mitigation so that there is no net loss of rare plants and habitat, or sensitive natural communities. Compensatory mitigation shall be appropriate for the extent of permanently disturbed habitat. Compensatory mitigation shall be higher for impacts on CRPR 1 species, S1 or S2 Sensitive Natural Community, and Sensitive Natural Community with an additional rank of 0.1 or 0.2. Compensatory mitigation shall be implemented by a qualified restoration ecologist. The County shall also prepare a Restoration Plan including, at a minimum, success criteria and performance standards for measuring the establishment of rare plants and habitat, responsible parties, maintenance techniques and schedule, five-year monitoring and reporting schedule, adaptive management strategies, and contingencies.

Comment #2 Impact to Environmentally Sensitive Habitat Areas (ESHA), Environmentally Sensitive Habitat (ESH), and Wildlife Connectivity Areas

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 15

Issue: Future projects that tier from the PEIR, especially those in or adjacent to ESHAs/ESHs, have the potential to impact and degrade riparian habitats, upland linkages, and other sensitive areas throughout the County. These habitats not only support aquatic and riparian functions but may also serve as critical connectivity corridors for wildlife.

Specific impact: 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.

Why impacts would occur: The PEIR does not 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. Projects proposed within or adjacent to ESHAs/ESHs have the potential to result in substantial adverse impacts on these systems, including habitat loss, functional degradation, and increased fragmentation. Without comprehensive mapping and characterization of sensitive natural communities/ESHAs/ESHs within or adjacent to proposed development areas, the County cannot ensure that future projects tiering from the PEIR will effectively avoid, minimize, and mitigate impacts to these resources. CDFW appreciates and acknowledges that proposed Mitigation Measure 5 (MM-5; Wildlife Movement Plan) aims to address potential impacts to wildlife movement. However, CDFW is concerned that deferred project-by-project analysis will not comprehensively address impacts to wildlife movement to below the threshold of significance for the proposed Project.

The PEIR claims that “[f]or many of the parks, trails, and recreational facilities proposed under the Project, the development of these facilities would occur in urban areas and would not significantly impact sensitive habitats and natural communities. Within many of the urban areas, proposed development would occur at existing disturbed sites or on open lands supporting ruderal, nonnative vegetation, which do not exhibit or support sensitive habitats or natural communities.” However, there are no figures/studies that outline habitats throughout Santa Barbara County, nor were biological assessments included to provide a comprehensive baseline of impacts from future development, even for proposed projects which have already been identified (except for Jalama). Therefore, the lack of baseline biological information, habitat mapping, and project-specific assessments introduces substantial uncertainty about the true scope of environmental effects. This uncertainty increases the risk that sensitive habitats and species could be adversely affected without adequate disclosure or mitigation.

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 16

Likewise, the above quote from the PEIR is contrasted by statements such as “[...] the proposed RBP Program could allow for development of a new 2,000-seat outdoor amphitheater or 160-site campground/RV park, the development of which may not be able to be accommodated entirely with previously disturbed areas.” Thus, the PEIR's own acknowledgment that substantial new development, such as a 2,000-seat amphitheater or a large campground, may extend beyond previously disturbed areas directly undermines its earlier assurances that impacts would be limited to urban or already degraded sites. This inconsistency signals the potential for far more extensive habitat disturbance than disclosed, heightening the likelihood of unassessed biological impacts.

Evidence impacts may be significant: The Project area may support a variety of special status species. A quantitative baseline of riparian and upland habitats is necessary to allow meaningful assessment of cumulative impacts at a regional scale (CEQA Guidelines, §§15125, 15126.2(a)(1), 15126.4(a)(1), 15130). 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 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.

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 County of Santa Barbara 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

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 17

sustainable land use planning, CDFW recommends the following mitigation measures and analyses be incorporated into the final CEQA document:

Mitigation Measure #8 Riparian Buffer and Setback Requirements– All projects tiered from the Master Plan/RBPs shall incorporate unobstructed vegetated buffers and setbacks from the outer edge of riparian vegetation or top of bank, whichever is greater.

- A. Buffers shall be vegetated with native species, free from development, fencing, lighting, or grading activity, and managed to support habitat and connectivity functions;
- B. Buffers shall be designed based on site-specific analyses and cumulative landscape needs, including connectivity to adjacent these areas; and
- C. 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 County-approved biologist.

Recommendation #1 Analysis of Impacts to ESHAs, ESHs, and Sensitive Habitat Linkages –

CDFW recommends the County incorporate a Habitat and Connectivity Constraints Analysis into the PEIR. 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. The Habitat and Connectivity Constraints Analysis should disclose any new information on the potential impacts to biological resources within the Project area. Prior to identifying specific project sites outside of previously developed/urban areas, the County should 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.

CDFW recommends the following resources for connectivity data:

- A. Wildlife Movement Barriers - CDFW 2024 [ds2867]
https://services2.arcgis.com/Uq9r85Potqm3MfRV/arcgis/rest/services/biosds2867_fnu/FeatureServer

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 18

- B. Terrestrial Connectivity - ACE 2025 [ds2734] [biosds2734_fpu \(FeatureServer\)](#)
- C. Fish Passage Priorities - CDFW - 2021 [ds2970] [biosds2970_fmu \(FeatureServer\)](#)
- D. Wildlife Crossing Database- Caltrans [ds3074]
- E. Essential Connectivity Areas - California Essential Habitat Connectivity (CEHC) [ds620]
- F. Natural Landscape Blocks - California Essential Habitat Connectivity (CEHC) [ds621]

Mitigation Measure #9 No Net Loss of Riparian and ESHA/ESH Habitats – For all applicable projects under the PEIR, if riparian/ESHA/ESH 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 County.

Comment #3: Increased Recreation

Issue: The Project may increase human and wildlife interactions through the addition of new trails and recreational facilities.

Specific impact: Direct impacts in the form of habitat loss and degradation may occur as a result of the construction of new trails and recreational facilities, as well as from off-trail use from visitors. Allowed recreational facilities will also be expanded to include more impactful facilities than those allowed within the 1979 Comprehensive Plan. Impacts to wildlife may include reduced habitat quality, increase in species mortality or injury, reproductive suppression during breeding seasons, or population decline of special-status species. Indirect effects to biological resources, such as noise, trash, and predation of, and by, domestic pets, also occur when trail systems run through natural open spaces.

Why impact would occur: The PEIR proposes not only 39 Projects of varying scale, which would result in the addition of 75.2 miles of trails and 186.5 acres of additionally public recreation parkland, but also proposes a Program that provides private developers to participate. Incentives include allowing land uses that are otherwise not allowed within selected zoning districts. CDFW is most concerned with the allowance of certain incentives such as the development of: campgrounds and RV Parks with a minimum lot size of 20 acres in AG-I and AG-II; country inns with a minimum lot size of 5 acres in AG-I, AG-II, and Recreation (REC); trailside cafes with a minimum lot size of 0.5 acres in AG-I, AG-II, and REC; visitor-serving commercial structures in AG-I, AG-II, resource management zones (RMZ), and REC; and outdoor amusement and recreational uses (i.e. BMX or mountain bike courses,

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 19

outdoor theaters, outdoor motorbike or ATV trails and riding parks, outdoor aquatic centers etc.).

High volume recreational use within the trail system will result in increased human and wildlife interaction. Additionally, the Project site and adjacent areas may experience increased noise levels, increased trash or pet waste, and the introduction of unnatural food sources via trash and trash receptacles. Outdoor recreation may also cause distress on individual wildlife, resulting in energetic costs to the animal and a decline in the animals' behavior and overall fitness. Studies have shown that outdoor recreation is the second leading cause of the decline of federally threatened and endangered species on public lands (Losos *et al.* 1995) and fourth leading cause on all lands (Czech *et al.* 2000). Overall, an expansion of recreational trails and facilities will likely lead to an increase in human-wildlife interactions that may result in harm to wildlife and/or humans.

A discussion regarding potential impacts resulting from ongoing recreational activities including an increased human presence within the Project site was not provided, and measures to mitigate for the impacts described above were not included in the PEIR. In addition, the PEIR did not consider that the buildout of the proposed Project may not provide an effective buffer to neutralize edge effects. As such, the undisturbed open space may restrict wildlife movement and may result in increased human disturbance. Habitat in adjacent areas may also be impacted by edge effects, for example, impacts resulting from artificial lighting, introduction of pets and domestic animals, and the potential introduction of invasive and non-native vegetation.

Evidence impact would be significant: The Project area supports a variety of special-status species. Impacts to special-status species should be considered significant under CEQA unless they are clearly mitigated below a level of significance. Impacts on the special-status wildlife may require a mandatory finding of significance because the Project may potentially threaten to eliminate a plant or animal community and/or substantially reduce the number or restrict the range of endangered, rare, or threatened species (CEQA Guidelines, § 15065). Inadequate avoidance, minimization, and mitigation measures for impacts to special status plant or wildlife species will result in the Project continuing to have a substantial adverse direct, indirect, and cumulative effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special status species in local or regional plans, policies, or regulations, or by CDFW or United States Fish and Wildlife Service (USFWS).

Recommended Potentially Feasible Mitigation Measure(s)

CDFW requests the following recommendations and mitigation measures are incorporated into the final CEQA document:

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 20

Mitigation Measure #10 Public Education – For all Projects tiered off the Master Plan and any subsequent RBPs, the County shall install appropriate public information signage at trailheads and/or along trails to: 1) educate and inform the public about wildlife present in the area; 2) advise on proper avoidance measures to reduce human-wildlife conflicts; 3) advise on proper use of open space trails in a manner respectful to wildlife (e.g., dogs on leash, proper waste disposal); and 4) provide local contact information to report injured or dead wildlife. Signage shall be written in language(s) understandable to all those likely to recreate and use the trails. Signs shall not be made of materials harmful to wildlife such as spikes or glass.

Mitigation Measure #11 Trash – For all Projects tiered off the Master Plan and any subsequent RBPs the County shall ensure trash receptacles shall be wildlife proof and placed only at trailheads to avoid creating an unnatural food source that may attract nuisance wildlife and to minimize waste in core habitat areas.

Mitigation Measure #12 Compensatory Mitigation – Based on the new impacts identified and disclosed as part of Recommendation #5 below, the County shall provide commensurate compensatory mitigation to offset the temporal and permanent loss of habitat. Habitat shall be replaced at a ratio appropriate to maintain no net loss of habitat values, acreage, and function.

Recommendation #2 Buffer Determination – For all Projects tiered off the Master Plan and any subsequent RBPs the County should identify an appropriate buffer from the trail(s) that would continue to be indirectly affected by the Project (due to edge effects, spreading of invasive species, introduction of light, encroachment, etc.). This buffer of impacts should be justified using technical details such as data, maps, diagrams, and similar relevant information and disclosed in the PEIR.

Recommendation #3 Recreation Discussion – The PEIR should include a discussion regarding potential impacts that Project implementation may have on biological resources and describe measures to be implemented to mitigate for Project related impacts. At a minimum the discussion should include the following potential items: potential impacts of Project activities or Project implementation to influence wildlife's spatial distribution, abundance, predator avoidance behavior, foraging efficiency, vocal frequency, amplitude, or timing, physiology, and reproductive success; the loss of suitable habitat, encroachment, injury or mortality, ongoing edge effects (i.e., noise), or attraction of nuisance wildlife to trash receptacles; and the effect of outdoor motorbikes, ATVs, and electric bikes (e-bikes) on biological resources. Specifically, e-bikes, ATVs, and motorbikes may lead to changes in habitat; alter diurnal activity patterns; result in excess soil compaction and erosion; and lead to direct, indirect, and/or cumulative impacts. The Final Environmental Impact Report (FEIR) should provide an analysis of impacts that may result from the use of e-bikes, ATVs, and motorbikes as well as provide mitigation measures for their use. Additionally, the FEIR should include a description of the types of recreational activities that will be allowed within the

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 21

Project site, clearly identify the areas that will be open for public access as opposed to activities more limited in their occurrence, as well as discuss how regulations will be enforced.

Recommendation #4 Fencing Designs – Fencing designs should be disclosed and evaluated in the FEIR for potential impacts of biological resources, specifically wildlife movement. Wildlife-friendly fencing should be used and strategically placed in areas of high biological resource value to protect biological resources, habitat, and wildlife movement. CDFW recommends [A Landowner's Guide to Wildlife Friendly Fences](#)¹⁸ for information about wildlife-friendly fences (MFWP 2012).

Additional Comments and Recommendations

Inadequate Disclosure. CDFW is concerned with the level of analysis performed as part of the PEIR. Use of a PEIR for the 39 project locations may not allow for adequate environmental assessment of biological impacts to be conducted. Following certification of a PEIR, subsequent activities or specific projects tiered from the PEIR only require an Initial Study to check if new effects or worse impacts exist, if the subsequent project fits within the scope, no new review is needed (LCI, 2026). Sufficient information is known regarding the 39 proposed Project locations within the Master Plan to provide additional analysis and/or Project level information. Thirty-nine locations have already been identified and mapped as part of the PEIR. No Biological Assessments were provided as part of the PEIR with exception of the Jalama Expansion Project location. CDFW has no baseline in which to assess the appropriateness of proposed BIO-Measures or whether the Project has been mitigated to below the level of significance with the inclusion of proposed BIO-Measures. It is also unclear how the County concluded that impacts would be mitigated below the level of significance absent of these studies and information. CDFW is concerned that including these identified locations within the PEIR would exempt them from further CEQA review and eliminate CDFW's ability to comment on tiered projects. In CDFW's view the PEIR defers analysis and disclosure is inadequate.

Recommendation #5 Recirculate the PEIR with Project Level Analysis for 39 Identified Project Locations within the PEIR OR Supplemental EIR(s) – CDFW recommends that the County conduct the appropriate biological resource and technical studies as part of Project-level analyses including baseline surveys, protocol-level surveys, and tree inventories to confirm

¹⁸ [A Landowner's Guide to Wildlife Friendly Fences](#)

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 22

the presence of any special status species within or immediate adjacent to proposed impact areas. Focused species-specific surveys should be required if suitable habitat is present. These surveys should be performed according to any established CDFW and/or USFWS protocols. Reports should be prepared that document baseline conditions at the time of Project application, identify constraints, recommend Project redesign, analyze potential effects, and propose mitigation measures that reduce potential impacts to less than significant levels. CDFW recommends recirculating the PEIR with this information so that CDFW can sufficiently assess potential impacts and mitigation measures. PEIR Biological resources technical studies should include the following:

1. A complete, recent, assessment of rare, threatened, and endangered species, regionally and locally unique species, and sensitive habitats at the Project site and Fwithin the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of land around the Project site should also be addressed. A nine-quadrangle search of CDFW's [California Natural Diversity Database](#)¹⁹ (CNDDB) should be conducted to obtain current information on any previously reported sensitive species and habitat (CDFW 2026a);
2. A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's [Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities](#)²⁰ (CDFW 2018). Adjoining habitat areas should be included where Project construction and activities could lead to direct or indirect impacts off site;
3. Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the Project site and within the area of potential effect. The [Manual of California Vegetation](#)²¹ (MCV), should be used to inform this mapping and assessment (Sawyer et al. 2009);

¹⁹ <https://wildlife.ca.gov/Data/CNDDB>

²⁰ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959>

²¹ <http://vegetation.cnps.org/>

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 23

4. A rare plant assessment using online databases for rare, threatened, and endangered plants, including the California Native Plant Society (CNPS) [Online Inventory of Rare and Endangered Plants of California](https://rareplants.cnps.org/)²² (CNPS 2026b) as well as the Calflora's [Information on Wild California Plants](https://www.calflora.org/)²³ database (Calflora 2026);
5. A discussion regarding Project-related indirect impacts on biological resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)]; and
6. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the Project site (See Comment 2 above).

If the County does not have enough information to recirculate the PEIR the County should produce a supplemental EIR to analyze effects of the 39 project locations within the Master Plan and subsequent RBPs on special status species for the below species and any other species that may be impacted.

Recommendation #6 Preferred Alternative –CDFW is of the opinion that Alternative 1 may reduce impacts to natural resources by limiting tiered projects/RBPs within Resource Protections Zones.

Recommendation #7 Analysis of Impacts to Established Mitigation Sites – Established Conservation Lands may be impacted directly or indirectly from the proposed Project. CDFW recommends that a discussion is included within the FEIR, which includes an analysis on potential impacts to established Mitigation sites and/or Conservation Easements in the surrounding areas of any applicable Project sites tiered from the Master Plan and/or subsequent RBPs. The analysis should include Measures to reduce potential impacts to neighboring Conservation Lands. CDFW recommends reviewing [the California Conservation Easement Database](https://www.calflora.org/)²⁴.

Recommendation #8 Gaviota Tarplant – MM-3 states the following, “[a]s recommended by CDFW and USFWS, additional Gaviota tarplant surveys should be conducted by a qualified

²² <https://rareplants.cnps.org/>

²³ <https://www.calflora.org/>

²⁴ [CCED_wm \(FeatureServer\)](#)

Jeff Lindgren
 County of SB Community Services Dept.
 August 10, 2026
 Page 24

biologist prior to issuance of any construction permits to continued documentation of the distribution and abundance of Gaviota tarplant populations in the Upper Mesa expansion area. Following CDFW and USFWS guidelines, voucher specimen for Gaviota tarplant populations should be collected by a permitted biologist for genetic analysis...." CDFW recommends removing genetic testing from MM-3. Although hybrid genetics may be present in the population, CDFW still considers proposed impacts to Gaviota tarplant at Jalama an impact to the population. CDFW also recommends that for any Project activities tiered from the Master Plan/RBPs, CDFW is consulted whenever Gaviota tarplant or any CESA-protected plant species is found.

Recommendation #9 Proposed Mitigation Measure 1 – MM-1 of the PEIR provides protections for mature native trees. CDFW recommends the County defines "mature" by diameter at breast height (DBH). CDFW also suggest higher ratios are provided for locally important tree species such as western sycamore and black walnut. CDFW also recommends that a monitoring period of 10 years is applied to oak species and 5 years for other tree species to ensure minimization of potential impacts.

Recommendation #10 Proposed Mitigation Measure 2 – CDFW recommends modifying portions of BIO-2 to include the underlined language and remove language with strikethrough:

If any ground disturbances would occur during the nesting bird season (~~February~~ January–mid-September), the HPP shall include requirements for nesting bird surveys. Prior to any ground disturbing activity, surveys for active nests shall be conducted by a biologist approved by Count P&D following CDFW-approved protocols, no more than 10 days prior to the start of activities. The surveys shall be conducted around the entire project site to identify any nests that are present and to determine their status. Identified nests shall be continuously surveyed for the first 24 hours prior to any activities to establish a behavioral baseline. Once work commences, all nests shall be continuously monitored to detect any behavioral changes. If behavioral changes are observed, the work causing that change shall cease and CDFW shall be consulted for additional avoidance and minimization measures. A minimum no-disturbance buffer of ~~250-~~ 300 feet around active nests of bird species and a 500- foot no-disturbance buffer around the nests of raptors and special status passerines shall be maintained until the breeding season has ended, or until the biologist determines that the birds have fledged and are no longer reliant upon the nest or parental care for survival. Any variance from these buffers shall be supported by the biologist and CDFW shall be notified in advance of implementation of a no-disturbance buffer variance.

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 25

Recommendation #11 Vernal Pool Avoidance and Minimization Measure – CDFW

recommends that the Final PEIR include a Mitigation Measure for all applicable Projects tiered from the Master Plan and subsequent RBPs that grading activities immediately adjacent to vernal pools should be timed to avoid wet weather to minimize potential impacts to vernal pools and associated watersheds. After a rain even of greater than 0.2 inch, grading should occur only after the soil surface has dried sufficiently (soil is dry to the touch both at the surface and 1 inch below) and no sooner than 2 days (48 hours) after the rain ends. If rain occurs during grading, work should stop and resume only after soils are dry.

Recommendation #12 Lake and Streambed Alteration – Project activities, as described, have the potential to temporarily and permanently impact hydrological systems and features across Santa Barbara County and may be subject to CDFW's regulatory authority pursuant to Fish and Game Code 1600 *et seq.* Project activities that substantially change the bed, bank, and channel of any river, stream, or lake are subject to CDFW's regulatory authority pursuant Fish and Game Code section 1600 *et seq.* Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake (including the removal of riparian vegetation); (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or lake" includes those that are ephemeral or intermittent as well as those that are perennial and may include those that are highly modified such as canals and retention basins.

CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration Agreement (LSAA); therefore, if the CEQA document approved for the Project does not adequately describe the Project and its impacts to lakes or streams, a subsequent CEQA analysis may be necessary for LSAA issuance. For information on notification requirements, please refer to CDFW's [LSA webpage](#)²⁵.

Recommendation #13 Scientific Collecting Permit - Focused surveys for special-status species (i.e., Crotch's bumble bee) require specific handling permits prior to conducting surveys. The County should retain a qualified biologist(s) with appropriate handling permits, or should obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities. CDFW has the

²⁵ <https://wildlife.ca.gov/Conservation/LSA>

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 26

authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). Please visit CDFW's [Scientific Collection Permits](#)²⁶ webpage for information (CDFW 2026b).

Recommendation #14 Updating the California Natural Diversity Database – CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., CNDDDB] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Information on special status species should be submitted to the CNDDDB by completing and submitting CNDDDB Field Survey Forms (CDFW 2026c). Information on special status native plant populations and sensitive natural communities, the Combined Rapid Assessment and Relevé Form should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFWa 2026).

Recommendation #15 Fuel Modification – If Projects tiered off the PEIR/subsequent RBPs include fuel modification, CDFW recommends that the final environmental documents include avoidance and mitigation measures for any fuel modification activities conducted within and adjacent to the Project area(s). A weed management plan should be developed for all areas adjacent to open space that will be subject to fuel modification disturbance. CDFW also recommends that any irrigation proposed in fuel modification zones do not allow for the introduction of invasive Argentine ants. Monitoring should also include parameters to identify possible introduction of Argentine ants.

Recommendation #16 Weed Management Plans – Weed management plans should be developed for Projects tiered off the PEIR/subsequent RBPs for all Project areas and implemented both during, and for at least 3 years post-Project. Non-native weeds including noxious weeds (as listed by the California Invasive Plant Council) (CALIPC 2026) should be prevented from becoming established to control the local spread of invasive plants, both during and after construction. Site visits should be conducted monthly and weekly during the

²⁶ <https://wildlife.ca.gov/Licensing/Scientific-Collecting#53949678>

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 27

rainy season. The Project areas should be monitored via mapping for new introductions and expansions of non-native weeds. Annual threshold limits, eradication targets, and monitoring should be included in this plan.

ENVIRONMENTAL DATA

CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database which may be used to make subsequent or supplemental environmental determinations. (Pub. Resources Code, § 21003, subd. (e).) Accordingly, please report any special status species and natural communities detected during Project surveys to the California Natural Diversity Database (CNDDDB). The CNDDDB website²⁷ provides direction 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 Form²⁸.

County should ensure data collected for the preparation of the PEIR is properly submitted.

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 PEIR to assist the County in identifying and mitigating Project impacts on biological resources. CDFW requests an opportunity to review and comment on any response that the County to our comments and to receive notification of any forthcoming hearing date(s) for the Project (CEQA Guidelines, § 15073(e)).

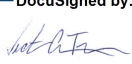
²⁷ <https://wildlife.ca.gov/Data/CNDDDB>

²⁸ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit>

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 28

Questions regarding this letter or further coordination should be directed to Angela Castanon²⁹, Environmental Scientist.

Sincerely,

DocuSigned by:

5991E19EF8094C3...

Victoria Tang
Environmental Program Manager
South Coast Region

ATTACHMENTS

Attachment A: Draft Mitigation, Monitoring, and Reporting Program

ec: California Department of Fish and Wildlife

Victoria Tang, Environmental Program Manager
Frederic (Fritz) Rieman, Senior Environmental Scientist (Supervisory)
Angela Castanon, Environmental Scientist
Cindy Hailey, Staff Services Analyst

Office of Land Use and Climate Innovation
state.clearinghouse@lci.ca.gov

²⁹ Phone: (626) 513-6308; Email: Angela.Castanon@wildlife.ca.gov

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 29

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Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 30

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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	Timing	Responsible Party
Mitigation Measure #1 CESA-Listed Species Surveys and Avoidance/Minimization Measures – Projects tiered from the Master Plan and subsequent RBPs shall: A. Southern California Steelhead: Be conditioned to avoid impacts to southern California Steelhead. No in-water work shall occur in the bed, bank, or channel in streams where southern California steelhead may be present. B. Crotch's Bumble Bee: Retain a qualified biologist with the appropriate handling permits to conduct focused surveys. Focused surveys shall follow CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species^[1]. Focused surveys shall also be conducted throughout the entire Project area and during the appropriate flying season to ensure no missed detection of Crotch's bumble bee occurs. C. Western Burrowing Owl: Retain a qualified biologist with the appropriate handling permits to conduct the full suite of focused surveys for western burrowing owl pursuant to CDFW's March 7, 2012, Staff Report on Burrowing Owl Mitigation^[2] or CDFW's most recent guidance. These surveys shall include habitat assessment surveys, breeding surveys, and non-breeding surveys within appropriate habitat (including a 500-foot buffer) to sufficiently assess presence or absence. The qualified biologist shall also	Prior to Project Initiation	Project Proponent/ Qualified Biologist

Jeff Lindgren
 County of SB Community Services Dept.
 August 10, 2026
 Page 32

Mitigation Measure	Timing	Responsible Party
perform a pre-activity western burrowing owl clearance survey within appropriate habitat no more than 14 days prior to any vegetation removal or ground disturbing activities. D. San Joaquin Kit Fox: Retain a qualified biologist to conduct protocol surveys on site (and within an appropriate buffer) to determine presence of San Joaquin kit fox following the USFWS's 2011 Recommendations Document^[3]. E. Giant Kangaroo Rat: Retain a qualified biologist to conduct protocol surveys on site (and within an appropriate buffer) to determine presence of giant Kangaroo rat while considering materials such as USFWS's 1996 Approved Survey Protocol for the Morro Bay Kangaroo Rat^[4]. No trapping may occur without the necessary permits. F. Nelson's Antelope Squirrel: Retain a qualified biologist to conduct protocol surveys on site (and within an appropriate buffer) to determine presence of Nelson's antelope squirrel following the latest survey guidance and employing only non-take survey methodologies. No trapping may occur without the necessary permits. G. Foothill Yellow-Legged Frog: Retain a qualified biologist to conduct protocol surveys on site (and within an appropriate buffer) to determine presence or absence of foothill yellow-legged frog on applicable Project site(s) following the 2018 CDFW Guidance^[5]. H. California Tiger Salamander: Retain a qualified biologist to conduct protocol surveys on site (and within an appropriate buffer) to determine presence or absence of California tiger salamander on applicable Project sites(s)		

Jeff Lindgren
 County of SB Community Services Dept.
 August 10, 2026
 Page 33

Mitigation Measure	Timing	Responsible Party
following the USFWs 2003 Guidelines^[6]. I. Western Spadefoot Toad: Retain a qualified biologist who shall conduct focused surveys for western spadefoot within all portions of the Project site containing suitable breeding habitat prior to the start of any ground disturbance, construction, or site preparation activities. Surveys shall take into consideration A Standardized Protocol for Surveying Aquatic Amphibians^[7] or any approved updated CDFW guidance on the species. Surveys shall be conducted during the peak activity period of January through June following the first rain event. J. Survey Results: Submit to CDFW and the County all CESA-listed and CESA-candidate species survey results including negative findings prior to implementing Project-related activities. Each applicant or developer is responsible for analyzing potential impacts to the above species where applicable. K. CESA Incidental Take Permit (ITP): Seek to obtain an Incidental Take Permit from CDFW or otherwise prove compliance with CESA if there are potential impacts to southern California steelhead trout, Crotch's bumble bee, western burrowing owl, San Joaquin kit fox, giant kangaroo rat, Nelson's antelope squirrel, foothill yellow-legged frog, California tiger salamander and/or western spadefoot toad. ^[1] Survey Considerations for CESA Candidate Bumble Bee Species ^[2] Microsoft Word - BUOW Staff Report final 030712 REV 1.doc ^[3] Microsoft Word - San Joaquin Kit Fox Ground Disturbance 2011 FINAL.doc ^[4] Survey Protocol for the Morro Bay Kangaroo Rat		

Jeff Lindgren
 County of SB Community Services Dept.
 August 10, 2026
 Page 34

Mitigation Measure	Timing	Responsible Party
[5] Considerations for Conserving the Foothill Yellow-Legged Frog [6] Microsoft Word - CTS Final Guidance 10.22.03 1.doc [7] A Standardized Protocol for Surveying Aquatic Amphibians - Gary M. Fellers - Google Books		
Mitigation Measure #2 ESA-Listed and ESA-Candidate Species Surveys and Avoidance/Minimization Measures – Projects tiered from the Master Plan and subsequent RBPs shall: A. Tidewater Goby: Be conditioned to avoid impacts to tidewater goby. No in-water work shall occur in the bed, bank, or channel in streams where the species may be present. B. Monarch Butterfly: Retain a qualified biologist to assess the future development sites for monarch presence and overwintering habitat. A qualified biologist shall survey any eucalyptus groves and other trees within the Project site that are suitable for overwintering monarchs. A qualified biologist shall conduct multiple surveys for overwintering monarchs where potential overwintering habitat has been identified. Monitoring shall be done as frequently as possible during the overwintering season (typically September 15 through March 11) to capture changing distributions through the season and in response to storm events. CDFW recommends the County also consult the following resources to develop appropriate measures to mitigate the Project's potential impacts to monarchs: • Western Monarch Butterfly Conservation Plan^[1] (WAFWA 2019);	Prior to Project Initiation	Project Proponent/ Qualified Biologist

Jeff Lindgren

County of SB Community Services Dept.

August 10, 2026

Page 35

Mitigation Measure	Timing	Responsible Party
• Overwintering Site Management and Protection ^[2] (Western Monarch Count 2022); • Protecting California's Butterfly Groves^[3] (Xerces Society 2017); • Managing Monarch Habitat in the West^[4] (Xerces Society 2024a); • Pollinator-Friendly Native Plant Lists^[5] (Xerces Society 2024b); and, • CDFW's Monarch Butterfly webpage^[6] (CDFW 2024d). C. Arroyo Toad: Retain a qualified biologist to conduct focused surveys on site (and within an appropriate buffer) for arroyo toad following the USFWS's 1999 Survey Protocol for the Arroyo Toad^[7]. D. SWestern Pond Turtle: Retain a qualified biologist to conduct focused surveys for western pond turtle following the U.S. Geological Survey's 2006 Western Pond Turtle (<i>Emys marmorata</i>) Visual Survey Protocol for the Southcoast Region^[8]. No trapping shall be performed. Survey results shall be submitted to the County before the initiation of any tiered Project activities. If survey findings are negative, a qualified biologist shall monitor all sediment and vegetation removal activities in all areas that contain suitable habitat for western pond turtle. E. Red-Legged Frog: Retain a qualified biologist to conduct focused surveys for California red-legged frog. Surveys shall adhere to survey methods described in Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog^[9]. F. Survey Results: Submit to the County all ESA-listed and ESA-candidate species survey results including negative findings prior to implementing		

Jeff Lindgren
 County of SB Community Services Dept.
 August 10, 2026
 Page 36

Mitigation Measure	Timing	Responsible Party
Project-related activities. Each applicant or developer is responsible for analyzing potential impacts to the above species where applicable. [1] Pollinator-Friendly Native Plant Lists Xerces Society [2] Pollinator-Friendly Native Plant Lists Xerces Society [3] Western Monarch Butterfly Conservation Plan [4] Managing and Protecting Overwintering Sites - Western Monarch Count [5] 2017-040_ProtectingCaliforniaButterflyGroves.pdf [6] Managing Monarch Habitat in the West Xerces Society [7] Survey Protocol for the Arroyo Toad [8] USGS Western Pond Turtle Visual Survey Protocol for the Southcoast Ecoregion [9] Revised Guidance on Site Assessment and Field Surveys for the California Red-legged Frog		
Mitigation Measure #3 Unarmored Threespine Stickleback – The Project shall avoid all impact to unarmored threespine stickleback. CDFW cannot authorize the take of any fully protected species as defined by State law. State fully protected species may not be taken or possessed at any time and no licenses or permits may be issued for its take (Fish & G. Code, §§ 3511, 4700, 5050, 5515). Take of any species designated as fully protected under the Fish and Game Code is prohibited.	Prior to Project Initiation/ During Project	Project Proponent/ Qualified Biologist
Error! Reference source not found.Due to potentially suitable habitat within the Project site, prior to vegetation removal and/or grading, qualified biologists familiar with reptile species behavior and life history shall conduct specialized surveys to	Prior to Project Initiation	Project Proponent/

Jeff Lindgren
 County of SB Community Services Dept.
 August 10, 2026
 Page 37

Mitigation Measure	Timing	Responsible Party
determine the presence/absence of SSC reptile species. Surveys shall be conducted during active season when the reptiles are most likely to be detected. Survey results, including negative findings, shall be submitted to the County prior to initiation of Project activities.		Qualified Biologist
Mitigation Measure #5 SSC Mammals – For Projects tiered off the Master Plan and subsequent RBPs proponent shall survey for American Badger, San Diego desert woodrat, Tulare grasshopper mouse, and any other SSC mammal species throughout the Project site and within an appropriate buffer. Survey results, including negative findings, shall be submitted to the County prior to initiation of Project activities. 1. American Badger- If American badger is detected at or near the Project site(s), they shall be allowed to move out of the work site of its own volition. If American badger is denning on or within 500 feet of the Project area, the den shall be protected in place with a 500-foot no-disturbance buffer. If impacts to American badger cannot be avoided an American Badger Eviction and Relocation Plan shall be composed and submitted to the County. No eviction shall take place while American badger kits are utilizing the den. 2. San Diego desert woodrat- If San Diego desert woodrat is detected at or near the Project site(s) the County shall protect woodrat dens found within Project areas utilizing buffers deemed sufficient by the qualified biologist to avoid impacts to the species. Buffer demarcation shall use post and rope fencing and be installed prior to Project activities. If Project activities must	Prior to Project Initiation/ During Project	Project Proponent/ Qualified Biologist

Jeff Lindgren

County of SB Community Services Dept.

August 10, 2026

Page 38

Mitigation Measure	Timing	Responsible Party
occur where dens are located, a qualified biologist shall create three artificial dens for every one den removed. New dens shall be constructed prior to removing the original dens. New dens shall be constructed in suitable habitat no further than 300 feet from the original location using native material stacked horizontally in areas under shady canopy and upslope of seasonal drainages. New dens shall be placed at least 25 feet from other dens. A qualified biologist shall direct the deconstruction of the original den by hand to allow inhabitants to escape unharmed. Den removal shall only occur between September 1 and November 30. Material from the original den shall then be placed adjacent to the newly created dens. The County shall submit a woodrat den relocation report to the County within two months after implementation. The report shall include a map, photos of existing and created dens, and any pertinent information on the process and/or its success. 3. Tulare grasshopper mouse- A qualified biologist shall be at each project area to ensure potential burrows for Tulare grasshopper mouse are avoided to the maximum extent feasible during ground disturbing activities. Permittee shall allow Tulare grasshopper mouse individuals that are encountered or excavated to leave the project area of their own volition. If that is not feasible or if individuals are disoriented, a qualified biologist shall capture individuals and release them into a suitable burrow at least 300 feet from the outer work limits from where the individual was found.		

Jeff Lindgren

County of SB Community Services Dept.

August 10, 2026

Page 39

Mitigation Measure	Timing	Responsible Party
Mitigation Measure #6 Special Status Bat Surveys – For Projects tiered off the Master Plan and subsequent RBPs proponent shall retain a qualified bat specialist to conduct daytime and nighttime bat surveys throughout the Project area (plus a 100-foot buffer as access allows). These surveys shall identify potential habitat that could provide daytime and/or nighttime roost sites, and any maternity roosts. Acoustic recognition technology shall be utilized during day and night surveys to maximize detection of bats. A discussion of survey results, including negative findings, shall be provided to the County. If bat species are detected, no Project activities shall commence, and the Project proponent shall develop avoidance and minimization where possible and compensatory mitigation measures when complete avoidance is not possible.	Prior to Project Initiation	Project Proponent/ Qualified Biologist
Mitigation Measure #7 Rare Plants – If a rare plant species or a Sensitive Natural Community is detected, the County shall fully avoid impacts to that species or community. If the Project cannot feasibly avoid impacts to rare plants and associated habitat, or sensitive natural communities, either during Project activities or over the life of the Project, the County shall provide compensatory mitigation for the loss of individual plants and habitat acres. Impacts on rare plants or a Sensitive Natural Community due to hazard mitigation/remediation shall also be mitigated as these impacts would result in permanent loss and perpetual impacts on habitat function and quality. The County shall provide compensatory mitigation so that there is no net loss of rare plants and habitat, or sensitive natural communities. Compensatory mitigation shall be appropriate for the extent of permanently disturbed habitat. Compensatory mitigation shall be higher for impacts on CRPR 1	Prior to Project Initiation	Project Proponent/ Qualified Biologist

Jeff Lindgren

County of SB Community Services Dept.

August 10, 2026

Page 40

Mitigation Measure	Timing	Responsible Party
species, S1 or S2 Sensitive Natural Community, and Sensitive Natural Community with an additional rank of 0.1 or 0.2. Compensatory mitigation shall be implemented by a qualified restoration ecologist. The County shall also prepare a Restoration Plan including, at a minimum, success criteria and performance standards for measuring the establishment of rare plants and habitat, responsible parties, maintenance techniques and schedule, five-year monitoring and reporting schedule, adaptive management strategies, and contingencies.		
Mitigation Measure #8 Riparian Buffer and Setback Requirements: – All projects tiered from the Master Plan/RBPs shall incorporate unobstructed vegetated buffers and setbacks from the outer edge of riparian vegetation or top of bank, whichever is greater. A. Buffers shall be vegetated with native species, free from development, fencing, lighting, or grading activity, and managed to support habitat and connectivity functions; B. Buffers shall be designed based on site-specific analyses and cumulative landscape needs, including connectivity to adjacent these areas; and C. 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	Prior to Project Initiation/ During Project	Project Proponent/ Qualified Biologist

Jeff Lindgren
 County of SB Community Services Dept.
 August 10, 2026
 Page 41

Mitigation Measure	Timing	Responsible Party
biological assessment, independently peer-reviewed by a County-approved biologist.		
Mitigation Measure #9 No Net Loss of Riparian and ESHA/ESH Habitats – For all applicable projects under the PEIR, if riparian/ESHA/ESH 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 County.	Prior to Project Initiation	Lead Agency

Jeff Lindgren

County of SB Community Services Dept.

August 10, 2026

Page 42

Mitigation Measure	Timing	Responsible Party
Mitigation Measure #10: Public Education – For all Projects tiered off the Master Plan and any subsequent RBPs, the County shall install appropriate public information signage at trailheads and/or along trails to: 1) educate and inform the public about wildlife present in the area; 2) advise on proper avoidance measures to reduce human-wildlife conflicts; 3) advise on proper use of open space trails in a manner respectful to wildlife (e.g., dogs on leash, proper waste disposal); and 4) provide local contact information to report injured or dead wildlife. Signage shall be written in language(s) understandable to all those likely to recreate and use the trails. Signs shall not be made of materials harmful to wildlife such as spikes or glass.	After Project Completion	Project Proponent
Mitigation Measure #11: Trash – For all Projects tiered off the Master Plan and any subsequent RBPs the County shall ensure trash receptacles shall be wildlife proof and placed only at trailheads to avoid creating an unnatural food source that may attract nuisance wildlife and to minimize waste in core habitat areas.	Prior to Project Initiation	Project Proponent
Mitigation Measure #12 Compensatory Mitigation – Based on the new impacts identified and disclosed as part of Recommendation #5 below, the County shall provide commensurate compensatory mitigation to offset the temporal and permanent loss of habitat. Habitat shall be replaced at a ratio appropriate to maintain no net loss of habitat values, acreage, and function.	Prior to Project Initiation	Project Proponent
Recommendation #1 Analysis of Impacts to ESHAs, ESHs, and Sensitive Habitat Linkages – CDFW recommends the County incorporate a Habitat and Connectivity Constraints Analysis into the PEIR. A Habitat and Connectivity Constraints Analysis is a landscape-scale assessment that identifies riparian and	Prior to FEIR	Lead Agency

Jeff Lindgren
 County of SB Community Services Dept.
 August 10, 2026
 Page 43

Mitigation Measure	Timing	Responsible Party
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. The Habitat and Connectivity Constraints Analysis should disclose any new information on the potential impacts to biological resources within the Project area. Prior to identifying specific project sites outside of previously developed/urban areas, the County should 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. CDFW recommends the following resources for connectivity data: A. Wildlife Movement Barriers - CDFW 2024 [ds2867] https://services2.arcgis.com/Uq9r85Potqm3MfRV/arcgis/rest/services/biosds2867_fnu/FeatureServer B. Terrestrial Connectivity - ACE 2025 [ds2734] biosds2734_fpu (FeatureServer) C. Fish Passage Priorities - CDFW - 2021 [ds2970] biosds2970_fmu (FeatureServer) D. Wildlife Crossing Database- Caltrans [ds3074] E. Essential Connectivity Areas - California Essential Habitat Connectivity (CEHC) [ds620]		

Jeff Lindgren
 County of SB Community Services Dept.
 August 10, 2026
 Page 44

Mitigation Measure	Timing	Responsible Party
F. Natural Landscape Blocks - California Essential Habitat Connectivity (CEHC) [ds621]		
Recommendation #2 Buffer Determination – For all Projects tiered off the Master Plan and any subsequent RBPs the County should identify an appropriate buffer from the trail(s) that would continue to be indirectly affected by the Project (due to edge effects, spreading of invasive species, introduction of light, encroachment, etc.). This buffer of impacts should be justified using technical details such as data, maps, diagrams, and similar relevant information and disclosed in the PEIR.	Prior to Project Initiation	Project Proponent
Recommendation #3 Recreation Discussion – The PEIR should include a discussion regarding potential impacts that Project implementation may have on biological resources and describe measures to be implemented to mitigate for Project related impacts. At a minimum the discussion should include the following potential items: potential impacts of Project activities or Project implementation to influence wildlife's spatial distribution, abundance, predator avoidance behavior, foraging efficiency, vocal frequency, amplitude, or timing, physiology, and reproductive success; the loss of suitable habitat, encroachment, injury or mortality, ongoing edge effects (i.e., noise), or attraction of nuisance wildlife to trash receptacles; and the effect of outdoor motorbikes, ATVs, and electric bikes (e-bikes) on biological resources. Specifically, e-bikes, ATVs, and motorbikes may lead to changes in habitat; alter diurnal activity patterns; result in excess soil compaction and erosion; and lead to direct, indirect, and/or cumulative impacts.	Prior to FEIR	Lead Agency

Jeff Lindgren

County of SB Community Services Dept.

August 10, 2026

Page 45

Mitigation Measure	Timing	Responsible Party
The Final Environmental Impact Report (FEIR) should provide an analysis of impacts that may result from the use of e-bikes, ATVs, and motorbikes as well as provide mitigation measures for their use. Additionally, the FEIR should include a description of the types of recreational activities that will be allowed within the Project site, clearly identify the areas that will be open for public access as opposed to activities more limited in their occurrence, as well as discuss how regulations will be enforced.		
Recommendation #4 Fencing Designs – Fencing designs should be disclosed and evaluated in the FEIR for potential impacts of biological resources, specifically wildlife movement. Wildlife-friendly fencing should be used and strategically placed in areas of high biological resource value to protect biological resources, habitat, and wildlife movement. CDFW recommends A Landowner's Guide to Wildlife Friendly Fences^[1] for information about wildlife-friendly fences (MFWP 2012). [1] A Landowner's Guide to Wildlife Friendly Fences	Prior to FEIR	Lead Agency
Recommendation #5 Recirculate the PEIR with Project Level Analysis for 39 Identified Project Locations within the PEIR OR Supplemental EIR(s) – CDFW recommends that the County conduct the appropriate biological resource and technical studies as part of Project-level analyses including baseline surveys, protocol-level surveys, and tree inventories to confirm the presence of any special status species within or immediate adjacent to proposed impact areas. Focused species-specific surveys should be required if suitable habitat is present. These	Prior to FEIR	Lead Agency

Jeff Lindgren
 County of SB Community Services Dept.
 August 10, 2026
 Page 46

Mitigation Measure	Timing	Responsible Party
surveys should be performed according to any established CDFW and/or USFWS protocols. Reports should be prepared that document baseline conditions at the time of Project application, identify constraints, recommend Project redesign, analyze potential effects, and propose mitigation measures that reduce potential impacts to less than significant levels. CDFW recommends recirculating the PEIR with this information so that CDFW can sufficiently assess potential impacts and mitigation measures. PEIR Biological resources technical studies should include the following: 1. A complete, recent, assessment of rare, threatened, and endangered species, regionally and locally unique species, and sensitive habitats at the Project site and within the area of potential effect, including California Species of Special Concern and California Fully Protected Species (Fish & G. Code, §§ 3511, 4700, 5050, and 5515). Species to be addressed should include all those which meet the CEQA definition of endangered, rare, or threatened species (CEQA Guidelines, § 15380). Seasonal variations in use of land around the Project site should also be addressed. A nine-quadrangle search of CDFW's <u>California Natural Diversity Database^[1]</u> (CNDDDB) should be conducted to obtain current information on any previously reported sensitive species and habitat (CDFW 2026a); 2. A thorough, recent, floristic-based assessment of special status plants and natural communities following CDFW's <u>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural</u>		

Jeff Lindgren
 County of SB Community Services Dept.
 August 10, 2026
 Page 47

Mitigation Measure	Timing	Responsible Party
<u>Communities</u>^[2] (CDFW 2018). Adjoining habitat areas should be included where Project construction and activities could lead to direct or indirect impacts off site; 3. Floristic, alliance- and/or association-based mapping and vegetation impact assessments conducted at the Project site and within the area of potential effect. The <u>Manual of California Vegetation</u>^[3] (MCV), should be used to inform this mapping and assessment (Sawyer et al. 2009); 4. A rare plant assessment using online databases for rare, threatened, and endangered plants, including the California Native Plant Society (CNPS) <u>Online Inventory of Rare and Endangered Plants of California</u>^[4] (CNPS 2026b) as well as the Calflora's <u>Information on Wild California Plants</u>^[5] database (Calflora 2026); 5. A discussion regarding Project-related indirect impacts on biological resources in nearby public lands, open space, adjacent natural habitats, riparian ecosystems, and any designated and/or proposed or existing reserve lands [e.g., preserve lands associated with a Natural Community Conservation Plan (Fish & G. Code, § 2800 et. seq.)]; and 6. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the Project site (See Comment 2 above). If the County does not have enough information to recirculate the PEIR the County should produce a supplemental EIR to analyze effects of the 39 project locations		

Jeff Lindgren
 County of SB Community Services Dept.
 August 10, 2026
 Page 48

Mitigation Measure	Timing	Responsible Party
within the Master Plan and subsequent RBPs on special status species for the below species and any other species that may be impacted. ^[1] https://wildlife.ca.gov/Data/CNDDDB ^[2] https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959 ^[3] http://vegetation.cnps.org/ ^[4] https://rareplants.cnps.org/ ^[5] https://www.calflora.org/		
Recommendation #6 Preferred Alternative –CDFW is of the opinion that Alternative 1 may reduce impacts to natural resources by limiting tiered projects/RBPs within Resource Protections Zones.	Prior to FPEIR	Lead Agency
Recommendation #7 Analysis of Impacts to Established Mitigation Sites – Established Conservation Lands may be impacted directly or indirectly from the proposed Project. CDFW recommends that a discussion is included within the FEIR, which includes an analysis on potential impacts to established Mitigation sites and/or Conservation Easements in the surrounding areas of any applicable Project sites tiered from the Master Plan and/or subsequent RBPs. The analysis should include Measures to reduce potential impacts to neighboring Conservation Lands. CDFW recommends reviewing the California Conservation Easement Database^[1]. ^[1] CCED_wm (FeatureServer)	Prior to FPEIR	Lead Agency

Jeff Lindgren
 County of SB Community Services Dept.
 August 10, 2026
 Page 49

Mitigation Measure	Timing	Responsible Party
Recommendation #8 Gaviota Tarplant – MM-3 states the following, “[a]s recommended by CDFW and USFWS, additional Gaviota tarplant surveys should be conducted by a qualified biologist prior to issuance of any construction permits to continued documentation of the distribution and abundance of Gaviota tarplant populations in the Upper Mesa expansion area. Following CDFW and USFWS guidelines, voucher specimen for Gaviota tarplant populations should be collected by a permitted biologist for genetic analysis....” CDFW recommends removing genetic testing from MM-3. Although hybrid genetics may be present in the population, CDFW still considers proposed impacts to Gaviota tarplant at Jalama an impact to the population. CDFW also recommends that for any Project activities tiered from the Master Plan/RBPs, CDFW is consulted whenever Gaviota tarplant or any CESA-protected plant species is found.	Prior to FPEIR	Lead Agency
Recommendation #9 Proposed Mitigation Measure 1 – MM-1 of the PEIR provides protections for mature native trees. CDFW recommends the County defines “mature” by diameter at breast height (DBH). CDFW also suggest higher ratios are provided for locally important tree species such as western sycamore and black walnut. CDFW also recommends that a monitoring period of 10 years is applied to oak species and 5 years for other tree species to ensure minimization of potential impacts. Error! Reference source not found.	Prior to FPEIR	Lead Agency

Jeff Lindgren
 County of SB Community Services Dept.
 August 10, 2026
 Page 50

Mitigation Measure	Timing	Responsible Party
Recommendation #10 Proposed Mitigation Measure 2 – CDFW recommends modifying portions of BIO-2 to include the underlined language and remove language with strikethrough: If any ground disturbances would occur during the nesting bird season (~~February~~ <u>January</u>–mid-September), the HPP shall include requirements for nesting bird surveys. Prior to any ground disturbing activity, surveys for active nests shall be conducted by a biologist approved by Count P&D following CDFW-approved protocols, no more than 10 days prior to the start of activities. The surveys shall be conducted around the entire project site to identify any nests that are present and to determine their status. Identified nests shall be continuously surveyed for the first 24 hours prior to any activities to establish a behavioral baseline. Once work commences, all nests shall be continuously monitored to detect any behavioral changes. If behavioral changes are observed, the work causing that change shall cease and CDFW shall be consulted for additional avoidance and minimization measures. A minimum no-disturbance buffer of ~~250-~~ <u>300</u> feet around active nests of bird species and a 500- foot no-disturbance buffer around the nests of raptors <u>and special status passerines</u> shall be maintained until the breeding season has ended, or until the biologist determines that the birds have fledged and are no longer reliant upon the nest or parental care for survival. Any variance from these buffers shall be supported by the biologist and CDFW shall be notified in advance of implementation of a no-disturbance buffer variance.	Prior to FPEIR	Lead Agency

Jeff Lindgren
 County of SB Community Services Dept.
 August 10, 2026
 Page 51

Mitigation Measure	Timing	Responsible Party
Recommendation #11 Vernal Pool Avoidance and Minimization Measure – CDFW recommends that the Final PEIR include a Mitigation Measure for all applicable Projects tiered from the Master Plan and subsequent RBPs that grading activities immediately adjacent to vernal pools should be timed to avoid wet weather to minimize potential impacts to vernal pools and associated watersheds. After a rain even of greater than 0.2 inch, grading should occur only after the soil surface has dried sufficiently (soil is dry to the touch both at the surface and 1 inch below) and no sooner than 2 days (48 hours) after the rain ends. If rain occurs during grading, work should stop and resume only after soils are dry.	Prior to FPEIR	Lead Agency
Recommendation #12 Lake and Streambed Alteration – Project activities, as described, have the potential to temporarily and permanently impact hydrological systems and features across Santa Barbara County and may be subject to CDFW's regulatory authority pursuant to Fish and Game Code 1600 et seq. Project activities that substantially change the bed, bank, and channel of any river, stream, or lake are subject to CDFW's regulatory authority pursuant Fish and Game Code section 1600 et seq. Fish and Game Code section 1602 requires an entity to notify CDFW prior to commencing any activity that may (a) substantially divert or obstruct the natural flow of any river, stream, or lake; (b) substantially change or use any material from the bed, bank, or channel of any river, stream, or lake (including the removal of riparian vegetation); (c) deposit debris, waste or other materials that could pass into any river, stream, or lake. "Any river, stream, or	Prior to Project Initiation	Project Proponent

Jeff Lindgren
 County of SB Community Services Dept.
 August 10, 2026
 Page 52

Mitigation Measure	Timing	Responsible Party
lake" includes those that are ephemeral or intermittent as well as those that are perennial and may include those that are highly modified such as canals and retention basins. CDFW is required to comply with CEQA in the issuance of a Lake or Streambed Alteration Agreement (LSAA); therefore, if the CEQA document approved for the Project does not adequately describe the Project and its impacts to lakes or streams, a subsequent CEQA analysis may be necessary for LSAA issuance. For information on notification requirements, please refer to CDFW's LSA webpage^[1]. ^[1] https://wildlife.ca.gov/Conservation/LSA		
Recommendation #13 Scientific Collecting Permit - Focused surveys for special-status species (i.e., Crotch's bumble bee) require specific handling permits prior to conducting surveys. The County should retain a qualified biologist(s) with appropriate handling permits, or should obtain appropriate handling permits to capture, temporarily possess, and relocate wildlife to avoid harm or mortality in connection with Project construction and activities. CDFW has the authority to issue permits for the take or possession of wildlife, including mammals; birds, nests, and eggs; reptiles, amphibians, fish, plants; and invertebrates (Fish & G. Code, §§ 1002, 1002.5, 1003). Effective October 1, 2018, a Scientific Collecting Permit is required to monitor project impacts on wildlife resources, as required by environmental documents, permits, or other legal authorizations; and, to capture,	Prior to Project Initiation	Project Proponent

Jeff Lindgren
 County of SB Community Services Dept.
 August 10, 2026
 Page 53

Mitigation Measure	Timing	Responsible Party
temporarily possess, and relocate wildlife to avoid harm or mortality in connection with otherwise lawful activities (Cal. Code Regs., tit. 14, § 650). Please visit CDFW's Scientific Collection Permits^[1] webpage for information (CDFW 2026b). ^[1] https://wildlife.ca.gov/Licensing/Scientific-Collecting#53949678		
Recommendation #14 Updating the California Natural Diversity Database – CEQA requires that information developed in environmental impact reports and negative declarations be incorporated into a database [i.e., CNDDDB] which may be used to make subsequent or supplemental environmental determinations [Pub. Resources Code, § 21003, subd. (e)]. Information on special status species should be submitted to the CNDDDB by completing and submitting CNDDDB Field Survey Forms (CDFW 2026c). Information on special status native plant populations and sensitive natural communities, the Combined Rapid Assessment and Relevé Form should be completed and submitted to CDFW's Vegetation Classification and Mapping Program (CDFWa 2026).	Prior to/ During Operations	Project Proponent
Recommendation #15 Fuel Modification – If Projects tiered off the PEIR/subsequent RBPs include fuel modification, CDFW recommends that the final environmental documents include avoidance and mitigation measures for any fuel modification activities conducted within and adjacent to the Project area(s). A weed management plan should be developed for all areas adjacent to open space that will be subject to fuel modification disturbance. CDFW also recommends that any irrigation proposed in fuel modification zones do not allow for the introduction	Prior to FPEIR/Prior to Project Initiation	Lead Agency

Jeff Lindgren
County of SB Community Services Dept.
August 10, 2026
Page 54

Mitigation Measure	Timing	Responsible Party
of invasive Argentine ants. Monitoring should also include parameters to identify possible introduction of Argentine ants.		
Recommendation #16 Weed Management Plans – Weed management plans should be developed for Projects tiered off the PEIR/subsequent RBPs for all Project areas and implemented both during, and for at least 3 years post-Project. Non-native weeds including noxious weeds (as listed by the California Invasive Plant Council) (CALIPC 2026) should be prevented from becoming established to control the local spread of invasive plants, both during and after construction. Site visits should be conducted monthly and weekly during the rainy season. The Project areas should be monitored via mapping for new introductions and expansions of non-native weeds. Annual threshold limits, eradication targets, and monitoring should be included in this plan.	Prior to Project Initiation	Project Proponent