





FINAL
SEPTEMBER 2026

ENVIRONMENTAL IMPACT REPORT (EIR)

Santa Barbara County Recreation Master Plan & Related Recreation Amendments to the Comprehensive Plan & Zoning Ordinances

SCH #2025010342











one COUNTY one FUTURE

SCH No. 2025010342

Santa Barbara County Recreation Master Plan & Related Recreation Amendments to the Comprehensive Plan & Zoning Ordinances

Program Environmental Impact Report

Prepared for:

County of Santa Barbara
Community Services Department, Parks Division
123 East Anapamu Street, 2nd Floor
Santa Barbara, CA 93101
Contact: Jeff Lindgren, Deputy Director
(805) 568-2467

Prepared by:

WSP USA Inc.
104 West Anapamu Street, Suite 204A
Santa Barbara, CA 93101
Contact: Taylor Lane
(805) 962-0992

With assistance from:

Bjornstad Planning & Development
Contact: Erika Leachman
(612) 807-1178

September 2026

EXECUTIVE SUMMARY

ES-1 INTRODUCTION

The County of Santa Barbara (County) is proposing to adopt the Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (Project). The County Community Services Department, Parks Division (County Parks), as the Lead Agency under the California Environmental Quality Act (CEQA), has prepared this Program Environmental Impact Report (EIR) in accordance with CEQA, Public Resources Code (PRC) Sections 21000 et seq., the CEQA Guidelines, California Code of Regulations (CCR), Title 14, Sections 15000 et seq., and the County's 2020 revised *Guidelines for the Implementation of the California Environmental Quality Act of 1970*.

This Program EIR is an informational document that may be used by the public and governmental agencies to review and consider the environmental effects of the Project as part of its decision-making process (Chapter 2, *Project Description* provides a summary of the Project and Section 3.0.4, *Impact Assessment Methodology* provides additional discussion regarding the Key CEQA Principles Guiding the Program EIR Analysis). The reader should not rely exclusively on the Executive Summary as the sole basis for judgment of the Project and its alternatives. The complete Program EIR should be consulted for specific information about the environmental effects and the implementation of required mitigation measures, consistent with CEQA.

As a program-level EIR, the level of detail included in the project description and methodology for impact analysis is more general than a project-level EIR. The Project's site-level details are conceptual, rendering analysis too speculative for detailed evaluation. Further, this Program EIR considers regulatory changes to the County's Comprehensive Plan and zoning ordinances, including allowances for a range of recreation facilities and private development that could be developed under the proposed Recreation Benefit Project (RBP) Program. As a result, the Program EIR allows the County Board of Supervisors to consider broad implications and impacts associated with the Project while not requiring a detailed evaluation of individual properties or limiting the potential for future parks, trails, and recreational development in the unincorporated county. Per CEQA Guidelines Section 15168, the programmatic analysis and findings of this Program EIR may be incorporated by reference in subsequent environmental documents to describe regional settings, general effects, cumulative impacts, and other factors that may apply to individual parks, trails, and recreational development that implement the Project.

ES-2 PROJECT OVERVIEW

The Project includes the proposed Recreation Master Plan, a strategic long-range plan to fund and construct new public parks and trails to meet current and future recreation needs countywide. The Recreation Master Plan identifies recreation needs within five recreation planning regions and proposes capital improvements, programs, funding, and implementation strategies to guide the development of a range of public park, trail, and recreation facility projects over 10 to 20 years.

In summary, the Project 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
- 12 projects in partnership with other public agencies, including cities, the State of California, and the federal government.

Improved and expanded parks, trails, and recreation facilities would support the demands of a range of recreation users and activities through 2050. Improvements would be made through phases of funding, planning, and development. Project implementation would involve site preparation and grading, installation of new facilities, and construction of required recreation equipment and infrastructure.

In addition to public park, trail, and recreation facility projects proposed by County Parks, the Project would introduce the Recreation Benefit Project (RBP) Program, which would create a voluntary opportunity for private development projects to contribute directly to the County's public recreation system. The program would establish incentives for eligible projects that provide public recreation facilities as part of a proposed private development project.

To support the Recreation Master Plan and the RBP Program, the Project involves a General Plan Amendment (GPA) to update the Recreation Section of the Land Use Element and policies within the County's Comprehensive Plan, including the updates to the existing "Recreation" land use designation and the "Proposed Public or Private Park/Recreational Facility Overlay". The Project would also amend the County Land Use and Development Code (LUDC), the Montecito LUDC, and the Coastal Zoning Ordinance (CZO) to update the Recreation (REC) zoning district to be consistent with the Comprehensive Plan and to implement the RBP and other related amendments, including allowing and regulating parks and trails as permitted uses in selected zoning districts. Finally, the Project includes updates to the County's Parks, Recreation, and Trails (PRT) Map and changes to the extent of the "Proposed Public or Private Park/Recreational Facility Overlay" either to improve the accuracy of the County's Land Use Map and/or Zoning Map or to support the implementation of the Recreation Master Plan.

The Project area includes unincorporated inland and coastal areas of Santa Barbara County. Project implementation actions would occur relative to the five Recreation Planning Areas defined by the proposed Recreation Master Plan to distinguish the different existing recreational facilities and identify and assess region-specific recreational needs. These recreation planning areas include Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, Cuyama Valley, and the South Coast (Figure 2-1). The Project area excludes areas owned and/or managed by federal agencies (i.e., Los Padres National Forest, Vandenberg Space Force Base, and Santa Rosa, Santa Cruz, and San Miguel Channel Islands).

ES-3 SUMMARY OF PROJECT OBJECTIVES

The objectives of the Recreation Master Plan are:

1. Facilitate interagency cooperation and coordination to expand and improve recreation facilities and services countywide.
2. Create a unified countywide blueprint of planned park, recreation, and trail facilities to address unmet and future recreation needs to help guide overall recreation planning in the County through 2050 while retaining flexibility for each agency or service provider.
3. Develop an overview of the cost of development and operation of existing and planned parks, trails, and recreation facilities countywide.
4. Identify existing and potential options for funding recreation improvements and operations, including local revenue streams, state and federal grant programs, and options for improving funding for parks and recreation.
5. Integrate recreation planning with economic development both countywide and in disadvantaged communities to maximize the economic benefits of recreation development and activities.
6. Build upon existing and ongoing transportation planning efforts to increase access to parks and recreation facilities via transit and active transportation such as bike paths and trails.
7. Assist disadvantaged or underserved communities by providing improved parks and recreation services within or accessible to such communities.
8. Improve the linkages between the provision of adequate parks and recreation and public health to address key issues such as obesity, diabetes, asthma, and major health concerns.

ES-4 NOTICE OF PREPARATION

County Parks published a Notice of Preparation (NOP) and Environmental Scoping Document for the Project on January 10, 2025, announcing the intent to prepare an Environmental Impact

Report (EIR) and solicit comments on the scope of the analysis to be provided in the EIR (Appendix A). The CEQA Guidelines require the circulation of an NOP for a minimum 30-day review period. County Parks released the NOP for a 45-day comment period, from January 10, 2025, to February 24, 2025, then extended the comment period to March 11, 2025. The public comment period included a virtual public meeting on February 6, 2025, where the Project was presented in English with live captions in Spanish and verbal public comment was recorded. The NOP was made available and published online at:

https://www.countyofsb.org/1214/Recreation-Master-Plan.

Appendix A contains the NOP/Environmental Scoping Document, a summary of the scoping process, and a record of all comments and input received during the review period which was considered in preparing the scope of this EIR (CEQA Guidelines Section 15082). The City received approximately 239 sets of comments in the form of letters, emails, and verbal comments provided at public scoping meetings, from community residents, stakeholders, agencies, and organizations. These comments are provided in Appendix A. All comments were considered by County Parks during the preparation of this EIR.

ES-5 SCOPE OF THE ENVIRONMENTAL IMPACT REPORT

This EIR assesses the potential environmental impacts that would occur with the implementation of the Project. The EIR evaluates potentially significant environmental impacts including issues raised in public comments received in response to the NOP/IS and at public scoping meetings (See Appendix B and C). This scoping process determined that the EIR should analyze the following issues (See Section 3.0, *Environmental Impact Analysis*.):

- Aesthetics & Visual Resources
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural & Tribal Cultural Resources
- Energy
- Geology & Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology & Water Quality
- Land Use & Planning
- Noise
- Public Services
- Recreation
- Transportation
- Utilities & Service Systems
- Wildfire

This EIR addresses the issues referenced above and identifies potential environmental impacts associated with the Project, following the provisions of the State CEQA Guidelines. The EIR identifies feasible mitigation measures where necessary that would reduce or eliminate adverse environmental effects. A summary of cumulative impacts, which considers other projects or

plans in the vicinity, is described in each CEQA resource analysis presented in Chapter 3.0, *Environmental Impact Analysis*. Cumulative project analyses represent a comprehensive assessment of potential impacts using a list of past, present, and probable future projects capable of producing related or compounded impacts. Per CEQA Guidelines Section 15128 (Effects Not Found to Be Significant), environmental impacts related to Mineral Resources, Forestry Resources, and Population & Housing would be insignificant and therefore are addressed in Section 5.0, *Other CEQA Considerations* of this EIR.

This Program EIR examines potential direct, indirect, secondary, cumulative, and residual impacts of the Project. These impacts were determined through a rigorous process mandated by CEQA in which existing conditions are compared and contrasted with conditions that would exist once the Project is implemented. The significance of each identified impact was determined using the County's *Environmental Thresholds and Guidelines Manual* (2021) informed by the CEQA Guidelines. While the criteria for determining significant impacts are unique to each issue area, the analysis applies a uniform classification of the impacts based on the following definitions:

- *Significant and Unavoidable Impacts:* Potentially significant impacts that cannot be feasibly mitigated or avoided. No measures could be taken to avoid or reduce these adverse effects to insignificant levels. Even after application of feasible mitigation measures, the residual impact would be significant. If the Project is approved with significant and unavoidable impacts, decision-makers must adopt a Statement of Overriding Considerations (SOC) pursuant to CEQA Guidelines Section 15093 explaining why benefits of the Project outweigh the potential damage caused by these significant unavoidable impacts.
- *Significant but Mitigable Impacts:* Potentially significant adverse impacts that can be feasibly mitigated or avoided. If the Project is approved with significant but mitigable impacts, decision-makers are required to make findings pursuant to CEQA Guidelines Section 15091, stating that impacts have been mitigated to the maximum extent feasible and the residual impact would not be significant.
- *Insignificant Impacts:* These adverse but insignificant impacts do not require mitigation, and they do not require findings to be made. Mitigation measures may still be recommended to improve consistency with policies in the County's Comprehensive Plan.
- *No Impacts:* No adverse changes in the environment would result from implementation of the proposed Project.
- *Beneficial Impacts:* Implementation of the Project would result in impacts that would be beneficial to the environment.

Consistent with CEQA Guidelines Section 15126.6(d), this EIR includes an assessment of a reasonable range of alternatives to the Project that could feasibly attain the Project objectives while avoiding or substantially lessening any of the significant effects of the Project. The

alternatives analysis includes alternatives that were considered but discarded from further analysis, and two alternatives fully analyzed per the CEQA Statute and Guidelines. Please refer to Section 4.0, *Alternatives Analysis*.

ES-6 NOTICE OF COMPLETION / NOTICE OF AVAILABILITY

The County prepared and filed a Notice of Completion (NOC) for the Draft Program EIR with the Office of Land Use and Climate Innovation on June 26, 2026. In addition, the County prepared and distributed a Notice of Availability (NOA) for the Draft Program EIR to relevant agencies and interested parties within the County on June 26, 2026. The NOC and NOA provided notice of a 45-day public review and comment period for the Draft Program EIR, from **June 26, 2026,** to **August 10, 2026**, and the Draft Program EIR was made available and published online at: https://www.countyofsb.org/1214/Recreation-Master-Plan and at both the County Planning and Development Department (P&D) office locations (CEQA Guidelines Sections 15087).

ES-7 SUMMARY OF PROJECT IMPACTS

Table ES-3 presents a summary of the impacts, mitigation measures, and residual impacts from the implementation of the Project. Based on the analysis provided in this Program EIR, the Project would result in the following environmental impacts, categorized by their level of significance:

Significant and Unavoidable

- **Agricultural Resources.** The Project could potentially convert Prime Farmland, Unique Farmland, Farmland of Local Importance, and Farmland of Statewide Importance to non-agricultural uses. Additionally, the Project would convert existing agriculturally zoned lands to non-agricultural uses, impair agricultural productivity, and potentially conflict with existing zoning.
- **Transportation.** The proposed Project could result in potentially significant increases in total vehicle miles traveled (VMT) within the county. While many proposed and future recreation development projects enabled by the Project would likely not result in an increase in VMT individually, other larger projects proposed or enabled under the Project would have the potential generate a net increase in VMT compared to existing conditions.

Significant but Mitigable

- **Air Quality.** The Project has the potential to generate emissions and contribute to air quality violations for nonattainment criteria pollutants (i.e., O_2 and PM_{10}). The emissions modeling results for the Project indicate that construction and operational related emissions would be far below SBCAPCD's recommended thresholds; however, due to the county's designated

nonattainment status for PM_{10}, SBCAPCD considers all construction-related earthwork activity to cause potential impacts associated with short-term PM10 and fugiture dust emissions. The Project would implement mitigation to avoid violating air quality standards and impacting nearby sensitive receptors.

- **Biological Resources.** The Project would facilitate new parks, trails, and recreational development that are considered compatible with biological resources and typically result in only negligible impacts. In addition, existing federal, state, and local regulations would reduce potential impacts to an insignificant level for the vast majority of proposed development. The Project would also implement mitigation to minimize or avoid impacts to special status species and sensitive habitats that may result from the implementation of the privately-proposed recreational improvements and RBPs, as well as the County-proposed Jalama Beach County Park Expansion and Coastal Access Improvements Project.
- **Cultural and Tribal Cultural Resources.** The Project has the potential to directly or indirectly impact historic, archaeological, human remains, and tribal cultural resources. While future parks, trails, and recreation development would adhere to existing and proposed policies and regulations, such policies and regulations would not eliminate the potential for impacts to occur. Therefore, the Project would implement mitigation measures to avoid or minimize impacts on historic and archaeological resources, as well as require tribal consultation if an inadvertent discovery occurs. In addition, compliance with the State Health and Safety Code and the California Code of Regulations would reduce impacts on human remains to an insignificant level.
- **Geology.** Project construction and operation of future parks, trails, and recreational development may introduce or exacerbate geologic and seismic hazards. However, all future construction and alteration activities would be subject to the County Code, Comprehensive Plan policies, and proposed development standards to minimize or reduce such impacts. Furthermore, for those projects requiring an onsite wastewater treatment system (OWTS), applicants would adhere to existing County and Environmental Health & Safety permitting requirements to ensure the construction, modification, or maintenance of the OWTS would avoid impacts associated with soils that have inadequate capacity to support onsite sewage disposal. Lastly, mitigation measures would be required for projects in areas of high paleontological sensitivity to avoid disturbing and/or damaging such geological resources.
- **Hazards and Hazardous Materials.** The Project would facilitate the development of recreation facilities that would likely involve the routine use, transport, and disposal of hazardous materials, including those associated with aquatic facilities, artificial turf playing fields, and campgrounds. The Project would implement mitigation measures that would require the siting of future development to avoid hazardous sites and the adverse effects of hazardous sites, such as former oil and gas facilities, to the maximum extent feasible. In addition, future development of community parks within an Airport Influence Area would

be subject to the policies and compatibility criteria defined in the respective Airport Land Use Compatibility Plan, requiring that each future project is planned and designed consistently with the applicable development standards, such as those regarding population densities, height limitations, lighting, and open space requirements. Lastly, recreational development would not interfere with the County's emergency response or evacuation plans.

- **Hydrology and Water Quality.** The Project has the potential to degrade surface and ground water quality, violate waste discharge requirements, and alter drainage patterns. However, future parks, trails, and recreation development enabled by the Project would be subject to federal, state, and local regulations pertaining to water quality, erosion, and runoff standards. This includes compliance with the NPDES program, Comprehensive Plan policies, County's Stormwater Management Plan, California Green Building Standards Codes, and other permitting requirements. Furthermore, to ensure sustainable groundwater supplies, new park projects would be required to use recycled water when feasible.
- **Land Use and Planning.** The Project has the potential to create an adverse quality-of-life impact in regard to noise. However, the proposed development standards and the implementation of mitigation would reduce the potential impact to an insignificant level. Implementation of the Project would not divide an established community or result in adverse environmental impacts due to potential conflicts with land use plans, policies, or regulations.
- **Noise.** The Project would generate construction and operational noise and groundborne vibration that may adversely affect the surrounding communities and sensitive receptors. In many cases, however, future parks, trails, and recreation development would not result in noise that would exceed County's noise thresholds, as construction noise is temporary and operational noise associated with recreation uses is generally low and are considered common within developed areas. Furthermore, projects that may generate high noise levels, such as permitted outdoor theaters or amphitheaters, would be subject to additional mitigation that enforce stricter noise standards than what is established in the County's noise thresholds and existing regulations.
- **Recreation.** The Project would foster the development of parks, trails, and recreational facilities in many different areas of the county, improving the availability and accessibility of parks and trails to existing and future residents of the county. The Project would help to prevent or alleviate the overuse of existing parks, improve the quality of existing recreational opportunities, and reduce future physical deterioration of any one recreation facility, thereby reducing the indirect need for additional recreational facilities, the construction of which could cause adverse physical environmental impacts. New development enabled by the Project could result in adverse physical impacts on the environment; however, this EIR identifies various mitigation measures to reduce or avoid potential physical impacts associated with the construction and operation of new parks,

recreational facilities, trails, and RBPs. As part of the Project, the County would adopt new policies applying to development enabled under the Project to balance the needs of different user groups and reduce conflicts between user groups.

- **Utilities and Water Supply.** The Project may increase the demand for water, wastewater, and solid waste services that may necessitate the construction or expansion of utility infrastructure or exceed the capacity of existing utility providers. All future developments would adhere to existing policies and regulations that ensure adequate public or private services are available to serve the proposed development. In addition, the Project would implement mitigation measures to ensure adequate water supplies. The Project is not expected to exceed the County's threshold for solid waste generation.

Insignificant

- **Energy.** The Project would require increased demand for electricity, natural gas, and transportation fuels to serve the construction and operation of future parks, trails, and recreation development. Based on the energy demand modeling results for the Project, the construction and operation of individual projects would be nominal and insignificant compared to the county's total energy supply and demand. In addition, the Project would be consistent with applicable plans, policies, and regulations regarding energy consumption, including, but not limited to, the California Green Building Standards and the California Building Energy Efficiency Standards.
- **Greenhouse Gases (GHGs).** The Project would be consistent with applicable plans, policies, and regulations adopted for the purpose of reducing the GHG emissions, including the County's 2030 Climate Action Plan (CAP). Future parks, trails, and recreation development are generally consistent with the 2030 CAP policies, as such development would reduce GHG emissions by decreasing vehicle miles traveled, sequestering carbon, and encouraging the use of active transportation modes. Through its consistency with the 2030 CAP, the Project would be consistent with other State plans and policies, including California Air Resources Board's (CARB's) 2022 Scoping Plan Update and SB 32.
- **Public Services.** The Project would not directly or indirectly result in increased permanent populations that would result in the need for or provision of new or physically altered fire protection, law enforcement, emergency medical response, healthcare, schools, or library facilities. In regard to emergency medical response, the Project would have a beneficial effect by constructing training facilities (e.g., lifeguard training quarters) and increasing County staff who become emergency personnel in the event of a major emergency.
- **Wildfire.** The Project could facilitate new recreational development within the Wildland-Urban Interface (WUI) or High/Very High Fire Hazards Severity Zones (FHSZs). However, all future parks, trails, and recreation development enabled by the Project would adhere to existing laws, regulations, and policies, such as the California Fire Code and the proposed development standards, that require proper site ingress/egress, fire suppression standards,

etc. As a result, the Project would not significantly exacerbate wildfire risk and fire-related hazards. In addition, future projects would be adequately served by firefighting and emergency services.

Beneficial

- **Aesthetics and Visual Resources.** The Project would not substantially alter existing scenic vistas or the character or quality of designated visual resources. In some cases, the Project may improve visual resources with the installation of landscaping, trees, pathways, and other site improvements. The existing and proposed development standards would require future parks, trails, and RBPs to be visually compatible with the character and quality of the Rural and Urban areas.
- **Recreation.** The Project would facilitate the development of parks, trails, and recreation facilities that would improve the availability and accessibility of parks and trails to existing and future residents. The Project would help to prevent or alleviate the overuse of existing parks, improve the quality of existing recreational opportunities, and reduce future deterioration of any one recreation facility. Where potentially significant impacts are identified as they relate to the construction or expansion of recreational facilities, applicable existing regulations, proposed Comprehensive Plan policies, proposed development standards, and/or appropriate mitigation would reduce associated direct and indirect environmental impacts.

ES-8 ALTERNATIVES CONSIDERED AND ANALYZED

Pursuant to CEQA Guidelines Section 15126.6 the County considered several alternatives to the proposed Project through the screening process. The purpose of considering and analyzing alternatives under CEQA is to identify other means to attain the Project Objectives while avoiding or substantially reducing potentially significant environmental impacts caused by adopting the proposed Project. Alternatives selected for analysis are summarized in Table ES-1, including the No Project alternative as required by CEQA.

Table ES-1. Alternatives Considered and Analyzed

Alternative	Key Details/Description
No Project Alternative	• No implementation of the programs featured in the Recreation Master Plan and supplemental amendments, including but not limited to: ○ Newly planned park, recreation, and trail projects. ○ Amendments to the County's Comprehensive Plan to update the Recreation Section of the Land Use Element, modernize the "Recreation" designation, revisions to the Parks, Recreation, and Trails (PRT) maps and the Public and Private Parks/Recreation Facility Overlay map to align with the Recreation Master Plan, and update the Agricultural Element to align agricultural goals and policies to allow for outdoor recreation, trails, and related uses in agricultural areas. ○ Amendments to the County's zoning ordinance to support permitting parks, recreation, and trails in unincorporated areas, including changes in permitting requirements for parks and trails and addition of new specific use and development standards. ○ Changes in the Recreation (REC) Zoning Regulations to support and encourage a diversity of recreational uses that support both active and passive recreation and enhance access to recreation areas for the public. ○ Approval of the RBP Program which would allow and foster public-private partnerships to help fulfill recreational needs identified by the Recreation Master Plan.
Alternative 1 – Reduced Eligibility of RBPs	• Implementation of a revised RBP Program that considers some of the comments received from the public, Parks Commission, and Planning Commission to eliminate Resource Protection zone districts as eligible zones for RBPs. • All other elements described for the proposed Project would continue to be implemented under this alternative.
Alternative 2 – Increased Agricultural Buffers	• Implementation of modified zoning ordinance amendments that considers some of the comments received from the public, Parks Commission, Planning Commission to provide more protection from agricultural uses by: ○ Increasing buffer requirements from active agriculture on adjacent properties to 500 feet at a minimum for RBPs and privately-proposed recreational uses, unless the site is within the Public and Private Park/Recreation Facility Overlay. ○ Prohibiting RBPs on sites within the Limited Agricultural Enterprise Overlay and within 1,000 feet of any mapped Limited Agricultural Enterprise Overlay site. • All other elements described for the proposed Project would continue to be implemented under this alternative.

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives shall identify an environmentally superior alternative among the alternatives evaluated in the EIR. In general, the environmentally superior alternative as defined by CEQA should minimize adverse impacts to the project site and its surrounding environment. Table ES-2 summarizes the environmental impact findings for each alternative analyzed in the section relative to the proposed Project. This assessment considers the overall advantages and disadvantages associated with the analyzed alternatives relative to the proposed Project. Of the alternatives considered, the No Project Alternative eliminates the significant and unavoidable impacts identified for the proposed Project; therefore, it is environmentally superior to any project that would lead to a change in existing conditions. However, the No Project Alternative would not achieve any of the Project Objectives. Without the Recreation Master Plan and proposed amendments to the Comprehensive Plan and zoning ordinances, recreational needs of the County's communities are likely to go unmet, as recreational uses would continue to be subject to existing, dated policies and limitations on recreational development within many of the County's zone districts. Permitting and environmental review of recreational development projects would not be streamlined, resulting in continuation of existing permitting processes that can be costly, time consuming, and disincentivizing for public recreational improvement projects. As such, the No Project Alternative would not meet the primary intent of the proposed Project to facilitate the expansion and improvement of parks, trails, and recreational facilities to help meet countywide needs for diverse forms of recreation.

Other than the No Project Alternative, none of the alternatives would avoid the significant and unavoidable impacts related to agricultural resources and VMT. Further, neither Alternative 1 nor Alternative 2 would result in a substantial reduction in the severity impacts or eliminate need for any of the mitigation measures described for the proposed Project. Alternative 2, the Increased Agricultural Buffer Alternative, is considered the Environmentally Superior Alternative since it would slightly reduce significant and unavoidable impacts related to agricultural resources as a result of requiring increased buffers from and protection of adjacent agricultural uses, while continuing to meet all of the Project Objectives.

Table ES-2. Comparison of Project Impacts by Alternative

Resource Area	Proposed Project	No Project Alternative	Alternative 1 – Reduced Eligibility of RBPs	Alternative 2 – Increased Agricultural Buffers
Aesthetics and Visual Resources	Insignificant	Less Adverse	Similar	Similar
Agricultural Resources	Significant and Unavoidable	Substantially Less Adverse	Similar	Slightly Less Adverse
Air Quality	Significant but Mitigable	Substantially Less Adverse	Slightly Less Adverse	Similar
Biological Resources	Significant but Mitigable	Less Adverse	Slightly Less Adverse	Similar
Cultural and Tribal Cultural Resources	Significant but Mitigable	Less Adverse	Similar	Similar
Energy	Insignificant	Less Adverse	Slightly Less Adverse	Similar
Geology and Soils	Significant but Mitigable	Less Adverse	Similar	Similar
Greenhouse Gas Emissions	Insignificant	Less Adverse	Similar	Similar
Hazards and Hazardous Materials	Significant but Mitigable	Less Adverse	Similar	Similar
Hydrology and Water Quality	Significant but Mitigable	Less Adverse	Similar	Similar
Land Use and Planning	Significant but Mitigable	Less Adverse	Slightly Less Adverse	Similar
Noise	Significant but Mitigable	Less Adverse	Slightly Less Adverse	Similar
Public Services	Insignificant	Less Adverse	Slightly Less Adverse	Similar
Recreation	Significant but Mitigable	Less Adverse	Slightly Less Adverse	Similar
Transportation	Significant and Unavoidable	Substantially Less Adverse	Similar	Similar
Utilities and Water Supply	Significant but Mitigable	Less Adverse	Slightly Less Adverse	Similar
Wildfire	Insignificant	Less Adverse	Slightly Less Adverse	Similar
Project Objectives Met	Yes	No	Yes, but to a Lesser Extent	Yes
Reduce Significant and Unavoidable Impacts?	--	Yes	No	No

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts

Impact	Impact Classification	Mitigation Measures	Residual Impacts
Section 3.1, *Aesthetics and Visual Resources*			
Impact AV-1. The Project could result in changes to public scenic vistas and visual resources, such as trees and rock outcroppings, along State Scenic Highways.	Insignificant	No mitigation measures required.	Insignificant
Impact AV-2. The Project could degrade the existing visual character or quality of public views in the Rural Area.	Insignificant	No mitigation measures required.	Insignificant
Impact AV-3. The Project would support the visual quality of neighborhoods and communities, consistent with policies and regulations governing scenic quality in the Urban Area.	Beneficial	No mitigation measures required.	Beneficial
Impact AV-4. Potential future development facilitated by the proposed Project could result in a new source of substantial light or glare that may adversely affect day or nighttime views in the area.	Insignificant	No mitigation measures required.	Insignificant
Cumulative Impacts	Insignificant	No mitigation measures required.	Insignificant
Section 3.2, *Agricultural Resources*			
Impact AG-1. The Project would potentially convert Prime Farmland, Unique Farmland, Farmland of Local Importance, and Farmland of Statewide Importance to non-agricultural uses.	Potentially significant	No mitigation is feasible.	Significant and unavoidable
Impact AG-2. The Project would potentially convert existing agriculturally zoned lands to non-agricultural uses, impair agricultural productivity, and potentially conflict with existing zoning, but would not conflict with Williamson Act contracts or the County's agricultural preserve programs.	Potentially significant	No mitigation is feasible.	Significant and unavoidable
Cumulative Impacts	Potentially significant	No mitigation is feasible.	Significant and unavoidable

Impact	Impact Classification	Mitigation Measures	Residual Impacts
Section 3.3, *Air Quality*			
Impact AQ-1. The Project would be consistent with applicable air quality plans, including the Ozone Plan and County Land Use Element Air Quality Supplement.	Insignificant	No mitigation measures required.	Insignificant impacts
Impact AQ-2. The Project could result in a cumulatively considerable net increase of criteria air pollutants for which the region is in nonattainment under an applicable Federal or State ambient air quality standard.	Potentially significant	**MM AQ-1: PM_{10} and Dust Control.** Development of County parks, permitted uses in Recreation zones, permitted parks and trails, and RBPs involving permitted construction activities ~~The County~~ shall require the following standards ~~for permitted uses in Recreation zones, permitted parks and trails, and RBPs~~: • During construction, use water trucks, sprinkler systems, or dust suppressants in all areas of vehicle movement to prevent dust from leaving the site and from exceeding SBCAPCD's limit of 20 percent opacity for greater than 3 minutes in any 60-minute period. When using water, this includes wetting down areas as needed but at least once in the late morning and after work is completed for the day. Increased watering frequency should be required when sustained wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption. • Onsite vehicle speeds shall be no greater than 15 mph when traveling on unpaved surfaces. • Install and operate a track-out prevention device where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can include any device or combination of devices that are effective at preventing track out of dirt such as gravel pads, pipe-grid track-out control devices, rumble strips, or wheel-washing systems. • If importation, exportation, and stockpiling of fill material are involved, soil stockpiled for more than	Significant but mitigable impacts

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		one day shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin. • Minimize the amount of disturbed area. After clearing, grading, earthmoving, or excavation is completed, treat the disturbed area by watering, OR using roll-compaction, OR revegetating, OR by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. • Schedule clearing, grading, earthmoving, and excavation activities during periods of low wind speed to the extent feasible. During periods of high winds (>25 mph) clearing, grading, earthmoving, and excavation operations shall be minimized to prevent fugitive dust created by onsite operations from becoming a nuisance or hazard. • The contractor or builder shall designate a person or persons to monitor and document the dust control program requirements to ensure any fugitive dust emissions do not result in a nuisance and to enhance the implementation of the mitigation measures as necessary to prevent the transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to SBCAPCD before grading/building permit issuance and/or map clearance. **Plan Requirements and Timing:** This measure shall apply to applicable projects immediately following the certification of this EIR. These control measures shall be noted on all grading and building plans. The contractor or builder shall provide the County and SBCAPCD with the name	

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		and contact information for an assigned onsite dust control monitor(s) who has the responsibility to: • Assure all dust control requirements are complied with, including those covering weekends and holidays. • Order increased water as necessary to prevent the transport of dust offsite. • Attend the pre-construction meeting. The dust monitor shall be designated before the issuance of grading. The dust control components apply to the beginning of any grading or construction throughout all development activities until final inspection and until landscaping is successfully installed. **Monitoring:** County Parks or ~~and~~ County P&D processing planner(s) shall ensure measures are on the project plan. County grading and building inspectors shall spot-check. Grading and Building shall ensure compliance onsite. SBCAPCD inspectors shall respond to nuisance complaints. **MM AQ-2: Equipment Exhaust.** Development of County parks, permitted uses in Recreation zones, permitted parks and trails, and RBPs involving permitted construction activities shall require the following standards ~~The County shall require the following standards for permitted uses in Recreation zones, permitted parks and trails, and RBPs~~: • Diesel equipment meeting the CARB Tier 3 or higher emission standards for off-road heavy-duty diesel engines should be used to the maximum extent feasible. • On-road heavy-duty equipment with model year 2010 engines or newer should be used to the maximum extent feasible.	

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		• Diesel-powered equipment should be replaced by electric equipment whenever feasible. Electric auxiliary power units should be used to the maximum extent feasible. • Equipment/vehicles using alternative fuels, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel, should be used onsite where feasible. • Catalytic converters shall be installed on gasoline-powered equipment, if feasible. • All construction equipment shall be maintained per the manufacturer's specifications. • The engine size of construction equipment shall be the minimum practical size. The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time. • Construction worker trips should be minimized by requiring carpooling and by providing lunch onsite. • Construction truck trips should be scheduled during non-peak hours to reduce peak-hour emissions whenever feasible. • Proposed truck routes should minimize, to the extent feasible, impacts on residential communities and sensitive receptors. • Construction staging areas should be located away from sensitive receptors such that exhaust and other construction emissions do not enter the fresh air intakes of buildings, air conditioners, and windows. **Plan Requirements and Timing:** This measure shall apply to applicable projects immediately following the certification of this EIR. These control measures shall be noted on all grading and building plans.	

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		Monitoring: County Parks or ~~and~~ County P&D processing planner(s) shall ensure measures are on the project plan. County grading and building inspectors shall spot-check. Grading and Building shall ensure compliance onsite. SBCAPCD inspectors shall respond to nuisance complaints.	
Impact AQ-3. The Project could expose sensitive receptors to substantial pollutant concentrations or toxic or hazardous air pollutants.	Potentially significant	**MM AQ-1 (PM_{10} and Dust Control)** would apply. **MM AQ-2 (Exhaust Emissions)** would apply.	Significant but mitigable impacts
Impact AQ-4. The Project would not generate odors or nuisance problems impacting a considerable number of people.	Insignificant	No mitigation measures required.	Insignificant impacts
Cumulative Impacts	Potentially significant	**MM AQ-1 (PM_{10} and Dust Control)** would apply. **MM AQ-2 (Exhaust Emissions)** would apply.	Significant but mitigable impacts
Section 3.4, *Biological Resources*			
Impact BIO-1. The Project could impact ESH, Riparian Corridors, wetlands, oak woodlands, native grasslands, and other sensitive habitats and natural communities.	Potentially significant	**MM BIO-1: Tree Protection Plan.** Development of County parks, ~~The County shall require the applications for~~ permitted uses in Recreation zones, permitted parks and trails, and RBPs shall be sited to prevent the removal or damage to mature trees to the extent feasible. Where development cannot be sited to avoid removal or damage to mature native trees, the County shall require the preparation of ~~to include for County P&D approval~~ a TPP. The TPP shall be prepared by an arborist/biologist approved by County P&D ~~and shall determine whether mature native trees are located on the project site~~. If the biologist finds that there are no mature native trees ~~at the project site~~ that would be adversely affected by the project, they shall submit a memorandum describing these findings to the County ~~P&D~~ for review. If mature native trees ~~are present~~ would be adversely affected by the project, the TPP shall determine ~~whether~~ appropriate avoidance, minimization, or compensatory measures to be	Significant and unavoidable

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		implemented to sufficiently mitigate adverse impacts to mature native trees ~~are necessary~~. The TPP shall include the following components: Site Plan Component: • All mature native trees shall be identified in the site plan. • All ground disturbance and development shall be sited to avoid mature native trees to the maximum extent practicable as determined by the arborist/biologist. • The location of all tree wells or retaining walls shall be located at least 6 feet from the dripline of all protected trees. • The location of all paths (i.e., driveways, sidewalks, etc.) shall be located at least 25 feet from dripline areas. Only pervious paving materials (e.g., gravel, brick without mortar, turf block) shall be located within 6 feet of dripline areas. Construction Component: • Fencing of all trees to be protected shall be located at least 6 feet outside the dripline with chain-link (or other material satisfactory to the County) fencing at least 3 feet high, staked to prevent any collapse, and with signs identifying the protection area placed in 15-foot intervals on the fencing. • Fencing/staking/signage shall be maintained throughout all grading and construction activities. • Equipment storage (including construction materials, equipment, fill soil, or rocks), and construction staging and parking areas shall be located outside of the protection area. • All trees located within 25 feet of buildings shall be protected from stucco and/or paint during construction. • No irrigation shall occur within 6 feet of the dripline of any protected tree.	

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		• The TPP shall require that the following activities shall be done only by hand: any excavation or trenching required within the dripline or sensitive root zone of any specimen within the habitat; cleanly cutting any roots of 1 inch in diameter or greater within the habitat; and tree removal and trimming within the habitat. • If large rocks or challenging conditions are present onsite, rubber-tired construction equipment weighing 5 tons or less or a small, tracked excavator (i.e., 215 or smaller track hoe) may be used. • Grading shall be designed to avoid ponding and ensure proper drainage within the driplines of oak trees. <u>Tree Replacement Component</u>: • The replacement trees shall be a native species, planted at a 10:1 ratio for oak trees (15:1 for blue oaks or valley oaks), and a 2:1 ratio for other trees. The replanting location shall be shown on site plans. • Species shall be from locally obtained plans and seed stock. • The trees shall be gopher-fenced. • The trees shall be irrigated with drip irrigation on a timer until established. • The trees shall be weaned off of irrigation over a period of 2 to 3 years. • No permanent irrigation shall occur within the dripline of any tree. • If replacement trees cannot all be accommodated onsite, the applicant shall submit a plan for approval by the Planning and Development Department for replacement trees to be planted offsite on lands owned by the property owner/applicant, on land with which the property owner/applicant has a real interest, or on other approved restoration site(s).	

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		• All new and replanted trees shall be protected from predation by wild and domestic animals and from human interference by the use of staked, chain link fencing, and gopher fencing during the maintenance period. **Plan Requirements and Timing:** The TPP shall be prepared by the applicant and submitted as part of project application materials. For County Parks projects, the TPP shall be prepared prior to preparation of the final site plan. The County ~~P&D~~ shall review and confirm that all recommendations for the protection of mature native trees are reflected in project plans and permit requirements. All site plan components related to earth movement, construction, and temporarily and/or permanently installed protection measures shall be graphically depicted ~~by the applicant~~ on project plans and submitted to the County ~~P&D~~ for review and approval before the issuance of final approvals or permits by the County. All standards and requirements for the protection of mature native trees shall be printed on all building and grading plans. **Monitoring:** County Parks or County P&D processing planner(s) ~~County P&D~~ shall ensure that the TPP is included as part of the project plans ~~application and that all standards and requirements for protection are reflected in project plans~~. ~~The~~ County Parks and/or the applicant shall demonstrate to County ~~P&D~~ compliance monitoring staff that protection or other required measures are in place before ground disturbance and that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed as required by the approved TPP.	

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		MM BIO-2: Habitat Protection Plan. Development of County parks, ~~The County shall require the applications for~~ permitted uses in Recreation zones, permitted parks and trails, and RBPs shall be sited to avoid adverse affects to sensitive biological resources to the extent feasible. Where development cannot be sited to avoid adverse affects to sensitive biological resources, the County shall require the preparation of ~~to include for County P&D approval~~ an HPP. The HPP shall be prepared by a biologist approved by County P&D. The 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. If the biologist finds that there are no potential sensitive biological resources at the project site that would be adversely affected by the project, they shall submit a memorandum describing these findings to the County ~~P&D for review~~. If resources are present and would be adversely affected by the project, the HPP shall determine ~~whether~~ appropriate avoidance, minimization, or compensatory measures to be implemented to sufficiently mitigate adverse impacts to sensitive biological resources~~are necessary~~. The HPP shall include at a minimum the following components: • A description of the location and extent of driplines and sensitive root zones for all vegetation to be preserved, locations of sensitive habitats with a detailed description of allowed disturbance, and depictions of original and new locations for replanted species. • Depiction of approved development envelopes, equipment storage, construction staging, and parking areas. • If sensitive habitats, watercourses, or riparian habitats occur within the project site, to the maximum	

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		extent feasible as determined by the biologist, the HPP shall identify a 100-foot buffer for ground disturbance and vegetation removal. The area shall be fenced with a fencing type and in a location acceptable to County P&D. Depiction of the type and location of protective fencing or other barriers to be in place to protect the habitat areas. Protective fencing/staking/barriers shall be maintained throughout all grading and construction activities. <u>To the extent feasible, grading activities adjacent to sensitive habitats, watercourses, or riparian habitats shall be timed to avoid wet weather conditions.</u> • If a project site is located adjacent to sensitive habitats, watercourses, or riparian habitats, the project shall be landscaped with only native, non-invasive, or compatible species to the adjacent habitat. • No alteration to stream channels or banks shall be permitted until the applicant demonstrates receipt of all authorizations from USACE, Central Coast RWQCB, and/or CDFW for any planned alteration to stream channels or banks. • 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	

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		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. • The HPP shall require that the following activities be done only by hand: any excavation or trenching required within the dripline or sensitive root zone of any specimen within the habitat; cleanly cutting any roots of 1 inch in diameter or greater within the habitat; and tree removal and trimming within the habitat. • If large rocks or challenging conditions are present onsite, rubber-tired construction equipment weighing 5 tons or less or a small, tracked excavator (i.e., 215 or smaller track hoe) may be used. • If it becomes necessary to disturb or remove any plants within the habitat area, or in the event of unexpected damage, specimens shall be boxed and replanted. If it is not feasible to replant, plants shall be replaced at a minimum using the standards from the applicable Community Plan. If no replacement standards are provided in a Community Plan, the project biologist shall determine the appropriate replacement ratio based on existing habitat quality. If replacement plants cannot all be accommodated	

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		onsite, a plan must be approved by County P&D for replacement plants to be planted off-site on lands owned by the property owner/applicant, on land with which the property owner/applicant has a real interest, or on other approved restoration site(s). • Grading shall be designed to ensure that habitat areas have proper drainage during and after construction, per biologist recommendations. • Focused surveys for special-status species, and any capture, temporary possession, and relocation of wildlife shall be conducted only by a County-approved biologist(s) with appropriate collection and handling permits from CDFW and USFWS. • Any planting stock brought onto a project site for landscaping or habitat restoration shall be inspected to ensure it is free of pest species that could invade natural areas, including but not limited to Argentine ants. Any planting stock found to be infested with such pests shall be quarantined, treated, or disposed of according to best management practices by qualified personnel, in a manner that precludes invasion into natural habitats. **Plan Requirements and Timing:** The HPP shall be prepared by the applicant and submitted as part of project application materials. For County Parks projects, the HPP shall be prepared prior to preparation of the final site plan. The County ~~P&D~~ shall review and confirm that all recommendations for the protection of sensitive biological resources are reflected in project plans and permit requirements. All site plan components related to earth movement, construction, and temporarily and/or permanently installed protection measures shall be graphically depicted ~~by the applicant~~ on project plans and submitted to the County ~~P&D~~ for review and	

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		approval before the issuance of final approvals or permits by the County. All standards and requirements for the protection of sensitive biological resources shall be printed on all building and grading plans. **Monitoring:** County Parks or County P&D processing planner(s) ~~County P&D~~ shall ensure that the HPP is included as part of the project plans ~~application and that all standards and requirements for protection are reflected in project plans~~. ~~The~~ County Parks and/or the applicant shall demonstrate to County ~~P&D~~ compliance monitoring staff that protection or other required measures are in place before ground disturbance and that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed as required by the approved HPP. **MM BIO-3: Species-Specific and Sensitive Habitat Avoidance and Minimization Measures.** To mitigate impacts to special-status species and sensitive habitats resulting from implementation of the Jalama Beach County Park Expansion and Coastal Access Improvements Project, the County shall implement the following: 1. As recommended by CDFW and USFWS, additional Gaviota tarplant surveys should be conducted by a qualified biologist prior to issuance of any construction permits to continue documentation of the distribution and abundance of Gaviota tarplant populations in the Upper Mesa expansion area. ~~Following CDFW and USFWS guidelines, voucher specimens for Gaviota tarplant populations should be collected by a permitted biologist for genetic analysis.~~ This measure applies only to proposed campground improvements in the Upper Mesa expansion area.	

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		2. Continue consultation with the regulatory agencies concerning the need for an Incidental Take Permit from the USFWS and Consistency Determination from CDFW for impacts to California red-legged frog upland habitat and Gaviota tarplant in the Campground Area and Upper Mesa expansion area. Agency consultation should also include involvement of the USACE for construction of the beach access staircase and drainage crossings for the blufftop trail. This measure applies only to proposed campground improvements in the Upper Mesa expansion area, proposed campground improvements in the existing campground, and proposed Crack stairway improvements. 3. A Gaviota Tarplant Mitigation Plan should be developed for the Project in consultation with CDFW and USFWS that includes a suitable offsite mitigation location that can be preserved in perpetuity. In addition, a Gaviota Tarplant Protection Plan & Weed Management Plan should be prepared for Gaviota tarplant habitat that will remain protected in place. This measure applies only to proposed campground improvements in the Upper Mesa expansion area. 4. A Dune & Riparian Habitat Restoration Plan should be prepared that provides the details of proposed onsite restoration to mitigate impacts to dune mat vegetation and encroachment on the prescribed ESH buffers. The Dune & Riparian Habitat Restoration Plan should identify where along the northern and western perimeters of the campground restoration is to take place and provide details of how restoration would be implemented (e.g., site preparation, planting specifications, planting palette, irrigation, maintenance, monitoring, success criteria, and reporting requirements). The Dune & Riparian Habitat Restoration Plan should also provide details of how	

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		restored and existing dune habitat will be protected from pedestrians accessing the beach. This measure applies only to proposed campground improvements in the existing campground. 5. An Offsite Habitat Restoration Plan should be prepared to mitigate impacts to purple needlegrass, California brittlebush scrub, and giant coreopsis scrub. If suitable habitat is available, the Offsite Habitat Restoration Plan could also incorporate the offsite Gaviota tarplant mitigation referenced above. The Offsite Habitat Restoration Plan should identify suitable mitigation locations to allow for a minimum 3:1 mitigation of ESH impacted by the Project. Mitigation areas must be in locations that can be preserved in perpetuity. The Offsite Habitat Restoration Plan should provide details of all restoration locations and how restoration would be implemented (e.g., site preparation, planting specifications, planting palette, irrigation, maintenance, monitoring, success criteria, and reporting requirements). This measure applies only to proposed campground improvements in the Upper Mesa expansion area, proposed campground improvements in the existing campground, and proposed blufftop trail improvements. 6. A qualified biologist shall conduct pre-construction surveys of the campground, the Upper Mesa campground expansion area, equipment access routes, proposed trail alignments, parking areas, and surrounding habitats, including the adjacent portions of Jalama Creek, for sensitive plant and wildlife species that may occur in the Survey Area. During pre-construction surveys all sensitive plant populations (i.e., Gaviota tarplant, red sand verbena, and cliff aster) should be flagged/fenced for avoidance during construction. Pre-construction surveys for sensitive	

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		wildlife (i.e., California red-legged frog, southwestern pond turtle, two-striped garter snake) should be conducted within 7 days of the commencement of work on each trail alignment. This may require multiple pre-work wildlife surveys, depending on the construction timeline, to ensure that potential impacts to sensitive wildlife are avoided. If any federally- or state-listed wildlife species are observed or considered potentially present the USFWS and/or CDFW will be consulted regarding any necessary avoidance measures. This measure applies to all proposed improvements. 7. If the Project is implemented during the bird nesting season (~~February 1 to August 31~~ January – mid-September), a qualified biologist shall conduct a pre-construction survey of the Survey Area and adjacent habitats within 7 days of vegetation removal or construction commencement (i.e., mobilization, staging equipment) to avoid impacts to nesting raptors and other birds. If breeding birds with active nests are found prior to (or during) campground/trail construction, a qualified biologist shall oversee the establishment of a buffer (prescriptively 300 feet ~~for passerines~~ and 500 feet for raptors and special-status passerines). No activities will be allowed within the buffer(s) until the young have fledged from the nest or the nest fails. The prescribed buffers may be adjusted by a qualified biologist to reflect existing conditions, including but not limited to ambient noise, topography, and level of disturbance. Consultation with CDFW may be necessary to implement reduced nest buffers. This measure applies to all proposed improvements. 8. Prior to the start of work, a County-approved biologist shall oversee a worker orientation for all trail crew personnel (including supervisors, equipment	

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		operators, laborers, and volunteers) which emphasizes the presence of special-status plant and wildlife species within or adjacent to the Survey Area, identification of those species, their habitat requirements, applicable regulatory policies and provisions regarding their protection, measures being implemented to avoid and/or minimize impacts, and penalties for noncompliance will be conducted. No staging of equipment or construction supplies shall occur prior to the worker orientation. This measure applies to all proposed improvements. 9. Prior to the start of campground construction, protective fencing and/or BMPs (e.g., silt fencing, fiber rolls) should be installed along the perimeters of disturbance areas to protect adjacent dune, riparian, purple needlegrass, and Gaviota tarplant habitat. Protective fencing and BMPs should also be installed along trails and around proposed parking lots following initial vegetation removal to protect surrounding native scrub habitat. This measure applies only to proposed campground improvements in the Upper Mesa expansion area, proposed campground improvements in the existing campground, and proposed blufftop trail improvements. 10. All vegetation removal and construction activities should be monitored full-time by a qualified biologist to ensure that impacts to sensitive habitat and plants are minimized to the greatest extent feasible and impacts to wildlife are avoided. This measure applies to all proposed improvements. 11. Pesticide/insecticide use should be avoided to prevent impacts to sensitive invertebrates that have the potential to occur. This measure applies to all proposed improvements.	

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		Plan Requirements and Timing: This measure shall apply to implementation of the improvements proposed as part of the Jalama Beach County Park Expansion and Coastal Access Improvements Project. These conditions shall be noted on all grading and construction plans. Species and habitat surveys, agency consultation, mitigation and restoration plan, worker orientation, and construction fencing requirements shall be implemented prior to commencement of grading throughout the year. Construction monitoring activities shall occur throughout the duration of construction. **Monitoring:** County Parks staff ensure all conditions are reflected on all grading and construction plans, and shall ensure compliance on site during construction through periodic site visits. **MM BIO-4: General Construction Avoidance and Minimization Measures.** To mitigate impacts to special-status species and sensitive habitats resulting from the implementation of the Jalama Beach County Park Expansion and Coastal Access Improvements Project, the County shall implement the following: • All construction equipment shall be limited to the designated work areas, access routes, and trail alignments. Trails should be constructed with hand tools whenever possible to avoid impacts to sensitive biological resources. • All motorized equipment used shall be maintained in proper working condition and shall be free of drips and leaks of coolant, hydraulic, and petroleum products. No equipment shall be used for the Project unless such equipment is free of leaks and drips. A spill prevention and clean-up kit (including socks, absorbent pads, kitty litter, broom, dustpan, shovel, and container for	

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		dirty absorbent material) shall be available on-site for immediate use in case of an accidental spill. No equipment maintenance or fueling shall occur within 100 feet from any drainages. • Dust generated by the construction activities shall be kept to a minimum with a goal of reducing impacts to adjacent habitat. A water truck or sprinkler system should be used to prevent excessive dust. • Trash and food items will be kept in closed containers and removed daily. **Plan Requirements and Timing:** This measure shall apply to implementation of the improvements proposed as part of the Jalama Beach County Park Expansion and Coastal Access Improvements Project. These conditions shall be noted on all grading and construction plans. **Monitoring:** County Parks staff shall ensure all conditions are reflected on all grading and construction plans, and shall ensure compliance on site during construction through periodic site visits.	
Impact BIO-2. The proposed Project could have a substantial adverse effect, either directly or indirectly through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the CDFW or USFWS.	Potentially significant	**MM BIO-1 (Tree Protection Plan)** would apply. **MM BIO-2 (Habitat Protection Plan)** would apply. **MM BIO-3 (Species-Specific and Sensitive Habitat Avoidance and Minimization Measures)** would apply. **MM BIO-4 (General Construction Avoidance and Minimization Measures)** would apply. **MM NOI-1 (Recreation Noise Standards)** would apply.	Significant but Mitigable
Impact BIO-3. The proposed Project could interfere substantially with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.	Insignificant	**MM BIO-2 (Habitat Protection Plan)** would apply. **MM BIO-5: Wildlife Movement Plan.** Development of County parks, ~~The County shall require the applications for permitted uses in Recreation zones,~~ permitted parks and trails, and RBPs shall be sited to avoid adverse affects to wildlife corridors or linkages to the extent feasible. Where development cannot be sited to avoid adverse affects to	Significant but Mitigable

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		wildlife corridors or linkages, the County shall require the preparation of ~~to include for County P&D approval~~ a Wildlife Movement Plan. The Wildlife Movement Plan shall be prepared by a biologist approved by County P&D. ~~The Wildlife Movement Plan shall first determine whether the project site has the potential to support wildlife linkages.~~ If the biologist finds that there are no potential wildlife corridors traversing the project site that would be adversely affected by the project, they shall submit a memorandum describing these findings to the County ~~P&D for review~~. If wildlife corridors ~~are identified~~ would be adversely affected by the project, the Wildlife Movement Plan shall analyze proposed fencing in relation to the surrounding opportunities for wildlife movement/migration, identify the type, material, length, and design of proposed fencing, and shall propose non-disruptive, wildlife-friendly fencing, such as post and rail fencing, wire fencing, and/or high-tensile electric fencing, to allow passage by smaller animals and prevent movement in and out of the project sites by larger mammals, such as deer. The evaluation and Wildlife Movement Plan shall also identify project design features that would reduce potential impacts and maintain habitat and wildlife movement. **Plan Requirements and Timing:** The Wildlife Movement Plan shall be prepared by the applicant and submitted as part of project application materials. For County Parks projects, the Wildlife Movement Plan shall be prepared prior to preparation of the final site plan. The County ~~P&D~~ shall review and confirm that all recommendations for the protection of wildlife corridors are reflected in project plans and permit requirements. All project design features and protection measures shall be graphically depicted ~~by the applicant~~ on project plans and submitted	

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		to the County ~~P&D~~ for review and approval before the issuance of final approvals or permits by the County. All standards and requirements for the protection of wildlife movement corridors shall be printed on all building and grading plans. **Monitoring:** County Parks or County P&D processing planner(s) ~~County P&D~~ shall ensure that the Wildlife Movement Plan is included as part of the project plans ~~application and that all standards and requirements for protection are reflected in project plans~~. The applicant shall demonstrate to County ~~P&D~~ compliance monitoring staff that protection or other required measures are in place before ground disturbance and that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed as required by the approved Wildlife Movement Plan.	
Impact BIO-4. The proposed Project could conflict with adopted local plans, policies, or ordinances oriented towards the protection and conservation of biological resources.	Insignificant	No mitigation measures required.	Insignificant impacts
Cumulative impacts	Potentially significant	**MM BIO-1 (Tree Protection Plan)** would apply. **MM BIO-2 (Habitat Protection Plan)** would apply. **MM BIO-3 (Species-Specific and Sensitive Habitat Avoidance and Minimization Measures)** would apply. **MM BIO-4 (General Construction Avoidance and Minimization Measures)** would apply. **MM BIO-5 (Wildlife Movement Plan)** would apply. **MM NOI-1 (Recreation Noise Standards)** would apply.	Significant but Mitigable
Section 3.5, *Cultural and Tribal Cultural Resources*			
Impact CTCR-1. The Project could occur in or near previously unevaluated historic properties and	Potentially significant	**MM CTCR-1: Objective Development Standards for Addressing Historic and Archaeological Resources.** Development of County parks, permitted uses in	Significant but mitigable

Impact	Impact Classification	Mitigation Measures	Residual Impacts
could cause physical demolition, destruction, relocation, or alteration of historical resources.		Recreation zones, permitted parks and trails, and RBPs shall be sited to avoid the alteration, relocation, or demolition of structures 50 years of age or greater. ~~All County Parks projects shall be subject to the following standards. The County shall amend the Santa Barbara County zoning ordinances to add the following requirements for permitted uses in Recreation zones, permitted parks and trails, and RBPs: Development does not alter, relocate, or demolish structures 50 years of age or greater.~~ If the site of proposed development exhibits potentially historic and/or archaeological resources, the applicant shall retain a County P&D-qualified professional historian/archaeologist to document all potentially historic and/or archaeological resource features. If the historian/archaeologist finds that there are no qualifying historic or archaeological resources onsite with potential to be adversely affected by proposed development, they shall submit a memorandum describing these findings to the County ~~P&D for review~~. If historic, archaeological, or tribal cultural resources are encountered during grading, construction, landscaping, other construction-related activity, or any operation-related activity, the Owner/Applicant and/or their agents, representatives, or contractors shall stop or redirect work immediately and retain a County P&D approved archaeologist and Native American representative to evaluate the significance of the find in compliance with the provisions of Phase 2 investigations of the County Archaeological Guidelines and funded by the Owner/Applicant. **Plan Requirements and Timing:** This measure shall apply to applicable projects immediately following the certification of this EIR. **Monitoring:** P&D compliance monitoring staff shall ensure compliance through a review of project plans and/or applicant/contractor-provided documentation.	

Impact	Impact Classification	Mitigation Measures	Residual Impacts
Impact CTCR-2. The Project could cause disruption, alteration, destruction, or adverse effects on significant archaeological resources.	Potentially significant	**MM CTCR-1 (Objective Development Standards for Addressing Historic and Archaeological Resources)** would apply. **MM CTCR-2: Avoidance of Disturbance to Native Soils**. To reduce impacts within the primary area of sensitivity associated with improvements proposed as part of the Jalama Beach County Park Expansion and Coastal Access Improvements project site, all new development shall be located on existing concrete foundations or slabs and existing utilities or subsurface features (e.g., septic tanks and leach fields) shall be abandoned in place to the maximum extent feasible. Where such avoidance is deemed infeasible, construction shall occur on sterile fill placed on geofabric. Designers should work with an archaeologist to determine what construction methods should be used to avoid or minimize impacts. Existing paving and structural foundations should remain in place to avoid ground disturbance, and (optionally) be covered with fill. The depth of fill over geofabric would vary depending on the depth of significant archaeological deposits but should be deep enough to avoid incursion into such deposit, plus a buffer of at least 12 inches. Where no excavation is planned but project elements (such as new campsites) would be placed on the surface over significant deposits, fill of at least 12 inches would be required. Fill should be deep enough to support shallow- to medium-rooted vegetation. Deep-rooted vegetation may cause impacts on archaeological deposits. The location and required depth of fill should be delineated on grading plans. Within the area of secondary sensitivity, the depth of required fill would vary depending on the depth of the significant archaeological deposit and the maximum depth of ground disturbance. Existing subsurface elements such as utility lines should be abandoned in place.	Significant but mitigable

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		For areas outside of, but adjacent to, the primary and secondary sensitivity areas, placement of cabins and associated elements on sterile fill, abandoning any existing utilities in place, and avoiding ground disturbance here would avoid disturbing these materials. The risk of encountering intact materials in this area is considered relatively low, and monitoring would suffice as an appropriate condition for work in this area. **Plan Requirements and Timing**: Protection or other required measures shall be in place before ground disturbance. **Monitoring:** County Parks shall ensure that all archaeological resource protection standards are reflected in project plans. County Parks staff shall ensure that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed. **MM CTCR-3: Location-Specific Phase 2 Testing.** At the Jalama Beach County Park Expansion and Coastal Access Improvements project site, within the area of primary sensitivity, where new development requires ground disturbance, location-specific Phase 2 testing shall be required in previously untested areas to evaluate data potentials and assess project impacts. New play structures, and potentially the ranger structure, may require footings. As identified below, excavation for footings or foundations would require targeted Phase 2 excavation in the exact area(s) planned for disturbance. The purpose of the Phase 2 study would be to identify if data potentials are present in this part of the site, and if so, assess project impacts. Optimally, the Phase 2 work would include the collection of sufficient material so that if data potentials are present, additional analysis of that material would serve as Phase 3 data recovery/mitigation to reduce impacts from ground disturbance to less than significant. If Phase 2 testing demonstrates that the	

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		deposit within the project footprint does not contain a density and diversity of artifacts sufficient to address relevant research questions, then this area should be delineated on grading plans and monitoring would suffice during development activities. If Phase 2 testing indicates that data potentials are present, the area should be avoided or capped. Phase 2 testing results would delineate the area to be capped (the area with data potentials). The depth of capping would depend on the depth of significant deposits and the required depth of grading and would be identified in the Phase 2 report. In the area of primary sensitivity, if portions of the park are capped to protect the site, the Cultural Resource Guidelines for Santa Barbara County specify that an "index sample" should be collected and curated, since capping precludes future research within that area. Once these areas are identified, a review of previous excavations should occur to identify if they are sufficient to qualify as an index sample for the capped locations. Given the extent of prior work within the area of primary sensitivity, it is likely that sufficient data has been collected to qualify as an index sample. As with the primary sensitivity area, several locations within the area of secondary sensitivity have been previously tested. Comparison of the test results with proposed ground disturbance locations is necessary and could identify areas without data potentials, where ground disturbance would not cause a significant impact. **Plan Requirements and Timing**: Phase 2 Testing shall be completed and recommendations shall be integrated into project plans before approval and construction. **Monitoring:** County Parks shall ensure that all archaeological resource protection standards developed through Phase 2 Testing are reflected in project plans.	

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		MM CTCR-4: Extended Phase 1/Phase 2 Testing Program. The Jalama Beach County Park Expansion and Coastal Access Improvements project proposes to relocate the existing administrative structures (e.g., ranger's residences, garages, etc.) from the existing park to the bluff immediately above the park. To characterize this area's deposit and identify where (and if) fill is required, a focused extended Phase 1/Phase 2 testing program shall be carried out within the area proposed for development. If the Extended Phase 1/Phase 2 testing demonstrates that the deposit within the project footprint does not have data potentials (i.e., deposit does not contain a density and diversity of artifacts sufficient to address relevant research questions), then no fill would be required, and monitoring would suffice during development activities. If the Extended Phase 1/Phase 2 results indicate that data potentials are present, the testing would clarify and delineate the area to be capped and the recommended depth of fill. The extended Phase 1/Phase 2 effort should be designed to collect enough material so that technical analysis of lithics, shell, and bone, and radiocarbon dating, could be performed and no additional excavation would be needed. This material would also serve as an index sample required for the area(s) that are capped. **Plan Requirements and Timing:** Extended Phase 1/Phase 2 Testing shall be completed and recommendations shall be integrated into project plans before approval and construction. **Monitoring:** County Parks shall ensure that all archaeological resource protection standards developed through Extended Phase 1/Phase 2 Testing are reflected in project plans.	
Impact CTCR-3. The Project could disrupt human remains, including those interred outside of formal cemeteries.	Insignificant	No mitigation measures required.	Insignificant

Impact	Impact Classification	Mitigation Measures	Residual Impacts
Impact CTCR-4. The Project could cause disruption, alteration, destruction, or adverse effects on significant tribal cultural resources.	Potentially significant	**MM CTCR-1 (Objective Development Standards for Addressing Historic and Archaeological Resources**) would apply. **MM CTCR-5: Post-Discovery Tribal Consultation.** For future park, recreation, and trail projects and RBPs enabled by the Project, if tribal cultural resources are identified or discovered during construction, landscaping, or other construction-related or operational activities, the owner/applicant and/or their agents, representatives, or contractors shall immediately contact P&D. P&D shall coordinate consultation with a Native American tribal representative. The appropriate Native American tribal representative shall be identified using the most recent contact list provided by the NAHC. If mitigation actions are required through consultation with the Native American tribal representative, appropriate mitigation shall be funded by the owner/applicant. **Plan Requirements and Timing:** If tribal cultural resources are discovered, construction activities shall stop immediately. The owner/applicant/owner shall immediately contact County P&D permit compliance staff, who would consult with a Native American tribal representative. This condition shall be printed on all building and grading plans. **Monitoring:** County P&D permit compliance staff shall ensure that no further disturbance shall occur via periodic site visits and other appropriate measures until consultation with a Native American tribal representative is complete and any site-specific mitigation has been identified and implemented.	Significant but mitigable
Cumulative Impacts	Potentially significant	**MM CTCR-1 (Objective Development Standards for Addressing Historic and Archaeological Resources)** would apply.	Significant but mitigable

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		MM CTCR-5 (Post-Discovery Tribal Consultation) would apply.	
Section 3.6, *Energy*			
Impact EN-1. The Project would increase energy demand, but would not result in a substantial increase in demand, necessitate expansion or installation of new energy infrastructure, or result in wasteful, inefficient, and unnecessary consumption of energy resources during the construction or operation of individual parks, recreation, and trail developments.	Insignificant	No mitigation measures required.	Insignificant
Impact EN-2. The Project would conform to the applicable plans, policies, and regulations regarding energy conservation relative to parks, recreation, and trail development.	Insignificant	No mitigation measures required.	Insignificant
Cumulative Impacts	Insignificant	No mitigation measures required.	Insignificant
Section 3.7, *Geology and Soils*			
Impact GEO-1. The Project could have adverse effects due to exposure of buildings and people to seismically induced conditions, such as ground shaking, ground failure, liquefaction, and landslides, or other non-seismic related unstable earth conditions, such as erosion, landslide, lateral spreading, subsidence, liquefaction, collapse, or expansive soils.	Insignificant	No mitigation measures required.	Insignificant
Impact GEO-2. The Project could be located in areas with soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.	Insignificant	No mitigation measures required.	Insignificant
Impact GEO-3. The Project could potentially directly or indirectly cause disruption, alteration, destruction, or adverse effects on significant paleontological or unique geological resources.	Potentially significant	**MM GEO-1. Paleontological Resource Assessment and Monitoring.** ~~For individual recreation development projects and RBPs resulting from the Project that are~~ Development of County parks, permitted uses in	Significant but mitigable

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		Recreation zones, permitted parks and trails, and RBPs shall be sited to avoid adverse affects to significant paleontological resources to the extent feasible. Where projects are determined to have high or undetermined potential for significant paleontological resources, an intensive field survey and surface salvage should occur before earth-moving or ground-disturbing activities. The survey shall result in an adequate preconstruction paleontological resource impact assessment and a subsequent mitigation program, if applicable. If deemed necessary, for excavations in rock units of known high potential, the project paleontologist or paleontological monitor shall be present initially during 100% of the earth-moving activities. After 50% of excavations are completed in either an area or rock unit and no fossils of any kind have been discovered, the level of monitoring can be reduced or suspended entirely at the project paleontologist's discretion. **Plan Requirements and Timing**: The County shall confirm that a qualified paleontologist has been contacted and selected for assessment and monitoring before construction activities begin. To ensure compliance at the start of the project, a statement that confirms the site's paleontological potential, confirms the repository agreement with an established public institution, and describes the program for impact mitigation must be deposited with the lead agency and contractor(s) before any ground disturbance begins. **Monitoring:** ~~P&D~~ County compliance monitoring staff shall ensure compliance through a review of project plans and/or applicant/contractor-provided documentation. **MM GEO-2. Stop Work at Encounter.** For individual recreation development projects and RBPs resulting from the proposed Project, all ground disturbing work shall stop	

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		or be redirected immediately if paleontological resources are encountered during grading, construction, landscaping, or other construction-related activity. A County-approved paleontologist who will salvage the fossils and assess the necessity for further mitigation measures, if applicable. **Plan Requirements and Timing:** The County shall confirm that this paleontological resource protection standard is printed on all building and grading plans. **Monitoring:** The County permit processing planner shall check plans before issuance of a permit for the proposed uses and related development. County compliance monitoring staff shall spot-check in the field throughout grading and construction.	
Cumulative Impacts	Potentially significant	**MM GEO-1 (Paleontological Resource Assessment and Monitoring)** would apply. **MM GEO-2 (Stop Work at Encounter)** would apply.	Significant but mitigable
Section 3.8, *Greenhouse Gas Emissions*			
Impact GHG-1. The Project would be consistent with the 2030 CAP, as well as other plans, policies, or regulations adopted to reduce the emissions of greenhouse gases (GHG), and would not generate GHG emissions that would have a significant impact on the environment.	Insignificant	No mitigation measures required.	Insignificant
Cumulative Impacts	Insignificant	No mitigation measures required.	Insignificant
Section 3.9, *Hazards and Hazardous Materials*			
Impact HAZ-1. The Project could involve the routine transport, use, or disposal of hazardous materials that could create a significant hazard to the public or result in the release of hazardous materials into the environment.	Potentially significant	**MM HAZ-1: Hazards Management for Public Parks.** Development of County parks, permitted uses in Recreation zones, permitted parks and trails, and RBPs shall be ~~All County Parks projects shall be subject to the following standards. The County shall amend the Santa Barbara County zoning ordinances to add the following~~	Significant but mitigable

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		~~requirements for permitted uses in Recreation zones and permitted parks and recreation facilities: Public parks and playgrounds shall be~~ located and designed to avoid hazardous sites and the adverse effects of nearby hazardous sites to the maximum extent feasible. Synthetic grass, artificial turf, or rubberized playground surfaces shall be allowed in public parks and playgrounds only if natural materials, surfaces, and turf is infeasible due to insufficient water supply. **Plan Requirements and Timing:** This measure shall apply to applicable projects immediately following the certification of this EIR. **Monitoring:** County compliance monitoring staff shall ensure compliance through a review of project plans and/or applicant/contractor-provided documentation.	
Impact HAZ-2. The Project could occur on hazardous sites or otherwise result in foreseeable upset involving the disturbance of existing soil or groundwater contamination.	Potentially significant	**MM HAZ-1 (Hazard Management for Public Parks)** **MM HAZ-2: Incidental Discovery of Contamination**. If previously unknown or unidentified soil and/or groundwater contamination that could present a threat to human health or the environment is encountered during construction at a development site enabled by the Project, construction activities near the contamination shall cease immediately. A qualified environmental specialist (e.g., a licensed Professional Geologist, a licensed Professional Engineer or similarly qualified individual) shall investigate to identify and determine the level of soil and/or groundwater contamination. If contamination is encountered, a Human Health Risk Management Plan shall be prepared and implemented that: 1) identifies the contaminants of concern and the potential risk each contaminant would pose to human health and the environment during construction and post-development; and 2) describes measures to be taken to protect workers, and the public from exposure to potential site hazards. Such measures could include a range of options, including,	Significant but mitigable impacts

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		but not limited to, physical site controls during construction, remediation, long-term monitoring, post-development maintenance or access limitations, or some combination thereof. Depending on the nature of contamination, if any, appropriate agencies shall be notified. If needed, a Site Health and Safety Plan that meets OSHA requirements shall be prepared and in place before commencement of work in any contaminated area. **Plan Requirements and Timing:** This measure shall apply to applicable projects immediately following the certification of this EIR. **Monitoring:** County compliance monitoring staff shall ensure that no further disturbance shall occur until the contaminants are identified and a soil management plan and/or remediation plan is prepared and implemented.	
Impact HAZ-3. The Project would result in new community parks and recreation facilities within the Santa Maria Airport, Santa Barbara Municipal Airport, and VSFB Land Use Plan areas, presenting potential safety hazards to people in the area.	Insignificant	No mitigation measures required.	Insignificant
Impact HAZ-4. The Project would result in development that could potentially impair the implementation of or physically interfere with an emergency evacuation plan.	Insignificant	No mitigation measures required.	Insignificant
Cumulative Impacts	Potentially significant	**MM HAZ-1 (Hazard Management for Public Parks)** would apply. **MM HAZ-2 (Incidental Discovery of Contamination)** would apply.	Insignificant
Section 3.10, *Hydrology and Water Quality*			
Impact HWR-1. The Project would not violate any water quality standards or waste discharge requirements and would not conflict with applicable water quality control plans.	Insignificant	No mitigation measures required.	Insignificant

Impact	Impact Classification	Mitigation Measures	Residual Impacts
Impact HWR-2. The Project could adversely affect groundwater quality, supplies, and recharge, impeding sustainable management of local groundwater basins.	Potentially significant	**MM HWR-1: Recycled Water in Parks and Recreation Facilities.** All County Parks projects shall be subject to the following standards. The County shall amend the Santa Barbara County zoning ordinances to add the following requirements for permitted uses in Recreation zones, permitted parks and recreation facilities, and public recreational components of RBPs: • For recreation projects including sports fields, campgrounds, or other features requiring a substantial water supply, such as landscaping, a Recycled Water Feasibility Assessment shall be prepared during the design phase to determine the site-specific water reuse strategies based on site conditions, service availability, and cost-effectiveness. • Landscaped areas (e.g., sports fields) shall be designed to use recycled water for irrigation where available. • Parks shall connect to existing recycled water lines or use recycled water infrastructure when feasible, as determined by the Recycled Water Feasibility Assessment. **Plan Requirements and Timing:** This measure shall apply to applicable projects immediately following the certification of this EIR. **Monitoring:** ~~P&D~~ County compliance monitoring staff shall ensure compliance through a review of project plans and/or applicant/contractor-provided documentation.	Significant but mitigable
Impact HWR-3. The Project could have adverse effects on surface water runoff or water quality, or substantially increase the risk of release of pollutants in the event of inundation by flood hazards, tsunamis, and seiche.	Insignificant	No mitigation measures required.	Insignificant

Impact	Impact Classification	Mitigation Measures	Residual Impacts
Cumulative Impacts	Insignificant	No mitigation measures required.	Insignificant impacts
Section 3.11, *Land Use and Planning*			
Impact LU-1. The proposed Project would not divide an established community.	Insignificant	No mitigation measures required.	Insignificant
Impact LU-2. The proposed Project would not result in adverse environmental impacts due to potential conflicts with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.	Insignificant	No mitigation measures required.	Insignificant
Impact LU-3. The proposed Project would not cause a potential adverse quality-of-life effects on existing communities due to visual incompatibility, noise, and traffic, or other physical environmental impacts.	Potentially significant	**MM NOI-1 (Recreation Noise Standards)** would apply.	Significant but mitigable
Cumulative Impacts	Insignificant	No mitigation measures required.	Insignificant
Section 3.11, *Noise*			
Impact NOI-1. The Project would generate temporary noise or groundborne vibration from the construction of public parks, trails, and recreational facilities, or related uses.	Insignificant	No mitigation measures required.	Insignificant
Impact NOI-2. The Project would generate noise associated with park and recreation activities and associated vehicle traffic on roadways.	Insignificant	No mitigation measures required.	Insignificant
Impact NOI-3. The Project would support outdoor special events, which could result in periodic temporary increases in ambient noise levels.	Potentially significant	**MM NOI-1: Recreation Noise Standards.** <u>All County Parks projects shall be subject to the following standards.</u> The County shall amend the Santa Barbara County zoning ordinances to add the following requirements for permitted uses in Recreation zones, permitted parks and trails, and RBPs: • Outdoor amplified sound and other uses generating maximum noise levels above 65 dBA associated with public parks, trails, recreation facilities, and	Significant but mitigable

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		Recreation Benefit Projects shall not exceed 65 dBA at the property boundary and the amplified sound shall cease by 10:00 p.m. **Plan Requirements and Timing:** This measure shall be incorporated with proposed Project amendments to the zoning ordinances and standards shall apply to applicable projects immediately following the certification of this EIR. **Monitoring:** Permit compliance monitoring staff shall ensure compliance through a review of project plans and/or applicant/contractor-provided documentation.	
Impact NOI-4. Outdoor events and recreational activities could result in a substantial periodic increase in ambient noise levels.	Insignificant	No mitigation measures required.	Insignificant
Cumulative Impacts	Potentially significant	**MM NOI-1 (Recreation Noise Standards)** would apply.	Significant but mitigable
Section 3.13, *Public Services*			
Impact PSR-1. The Project could result in the need for or provision of new or physically altered fire protection, law enforcement, emergency medical response, healthcare, schools, or library facilities, the construction of which could cause significant environmental impacts.	Insignificant	No mitigation measures required.	Insignificant impacts
Cumulative Impacts	Insignificant	No mitigation measures required.	Insignificant impacts
Section 3.14, *Recreation*			
Impact REC-1. The Project would facilitate the development of parks, recreational facilities, and trails that would reduce the use and physical deterioration of existing recreational facilities.	Beneficial	No mitigation measures required.	Beneficial
Impact REC-2. The Project would facilitate the development of parks, recreational facilities, and	Potentially significant	**MM AQ-1 (PM_{10} and Dust Control)** would apply. **MM AQ-2 (Equipment Exhaust)** would apply. **MM BIO-1 (Tree Protection Plan)** would apply.	Significant but mitigable

Impact	Impact Classification	Mitigation Measures	Residual Impacts
trails that could result in adverse physical effects on the environment.		**MM BIO-2 (Habitat Protection Plan)** would apply. **MM BIO-3 (Species-Specific and Sensitive Habitat Avoidance and Minimization Measures)** would apply. **MM BIO-4 (General Construction Avoidance and Minimization Measures)** would apply. **MM BIO-5 (Wildlife Movement Plan)** would apply. **MM CTCR-1 (Objective Development Standards for Addressing Historic and Archaeological Resources**) would apply. **MM CTCR-2 (Avoidance of Disturbance to Native Soils)** would apply. **MM CTCR-3 (Location-Specific Phase 2 Testing)** would apply. **MM CTCR-4 (Extended Phase 1/Phase 2 Testing Program)** would apply. **MM CTCR-5 (Post-Discovery Tribal Consultation)** would apply. **MM GEO-1 (Paleontological Resource Assessment and Monitoring)** would apply. **MM GEO-2 (Stop Work at Encounter)** would apply. **MM HAZ-1 (Hazard Management for Public Parks)** would apply. **MM HAZ-2 (Incidental Discovery of Contamination)** would apply. **MM HWR-1 (Recycled Water in Parks and Recreation Facilities)** would apply. **MM NOI-1 (Recreation Noise Standards)** would apply.	
Impact REC-3. The Project would facilitate the development of parks, recreational facilities, and trails that could result in conflicts with the established recreational use of an area or conflicts between user groups.	Insignificant	No mitigation measures required.	Insignificant
Cumulative Impacts	Insignificant	No mitigation measures required.	Insignificant impacts

Impact	Impact Classification	Mitigation Measures	Residual Impacts
Section 3.15, *Transportation*			
Impact T-1. The proposed Project could result in potential conflicts with regional transportation plans, or County transportation plans, policies, or regulations.	Insignificant	No mitigation measures required.	Insignificant
Impact T-2. The proposed Project could result in potentially significant increases in total VMT within the county.	Potentially significant	No mitigation is feasible.	Significant and unavoidable impacts
Impact T-3. The proposed Project could result in adverse changes to the transportation safety environment.	Insignificant	No mitigation measures required.	Insignificant
Cumulative Impacts	Potentially significant	No mitigation is feasible.	Significant and unavoidable impacts
Section 3.16, *Utilities and Water Supply*			
Impact UWS-1. The Project could result in the construction, expansion, or replacement of utilities, including water and wastewater facilities.	Potentially significant	**MM AQ-1 (PM_{10} and Dust Control)** would apply. **MM AQ-2 (Equipment Exhaust)** would apply. **MM BIO-1 (Tree Protection Plan)** would apply. **MM BIO-2 (Habitat Protection Plan)** would apply. **MM BIO-3 (Species-Specific and Sensitive Habitat Avoidance and Minimization Measures)** would apply. **MM BIO-4 (General Construction Avoidance and Minimization Measures)** would apply. **MM BIO-5 (Wildlife Movement Plan)** would apply. **MM CTCR-1 (Objective Development Standards for Addressing Historic and Archaeological Resources**) would apply. **MM CTCR-2 (Avoidance of Disturbance to Native Soils)** would apply. **MM CTCR-3 (Location-Specific Phase 2 Testing)** would apply. **MM CTCR-4 (Extended Phase 1/Phase 2 Testing Program)** would apply.	Significant but mitigatable

Impact	Impact Classification	Mitigation Measures	Residual Impacts
		MM CTCR-5 (Post-Discovery Tribal Consultation) would apply. **MM HWR-1 (Recycled Water in Parks and Recreation Facilities)** would apply. **MM NOI-1 (Recreation Noise Standards)** would apply.	
Impact UWS-2. The Project would result in increased water demand that could exceed the capacity of water purveyors to serve future development during normal, dry, and multiple dry years.	Insignificant	No mitigation measures required.	Insignificant
Impact UWS-3. The Project would result in increased wastewater generation, which may exceed the capacity of wastewater treatment providers in the county.	Insignificant	No mitigation measures required.	Insignificant
Impact UWS-4. The Project would not result in the generation of solid waste that could exceed relevant standards and/or the capacity of existing waste disposal facilities serving the county, as well as impair the attainment of solid waste reduction goals.	Insignificant	No mitigation measures required.	Insignificant
Cumulative Impacts	Insignificant	No mitigation measures required.	Insignificant
Section 3.17, *Wildfire*			
Impact WF-1. The Project would not substantially impair or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Insignificant	No mitigation measures required.	Insignificant
Impact WF-2. The Project could exacerbate wildfire risks or expose people or structures to loss, injury, or death involving wildland fires or post-fire flooding or landslides.	Insignificant	No mitigation measures required.	Insignificant
Impact WF-3. The Project would involve construction and maintenance of trails that may exacerbate fire risk.	Insignificant	No mitigation measures required.	Insignificant
Cumulative Impacts	Insignificant	No mitigation measures required.	Insignificant

TABLE OF CONTENTS

SECTION	TITLE	PAGE
LIST OF ACRONYMS AND ABBREVIATIONS		**xiv**
EXECUTIVE SUMMARY		**ES-1**
1.0	**INTRODUCTION**	1-1
1.1	Background and Project Overview	1-1
1.2	Purpose and Intended Use of This EIR	1-2
1.3	Agencies and Roles	1-3
1.4	Program-Level EIR Analysis	1-4
1.5	EIR Process	1-5
1.6	Public Outreach & Engagement	1-6
1.6.1	Notice of Preparation & Scoping	1-6
1.7	Scope of the Program EIR	1-7
1.7.1	Areas of Known Public Controversy	1-8
1.8	Organization of the EIR	1-8
1.9	Revisions to the Draft Program EIR	1-10
2.0	**Project Description**	**2-1**
2.1	Introduction	2-1
2.1.1	Background	2-1
2.2	Existing Setting	2-3
2.2.1	County Setting and Characteristics	2-3
2.2.2	Recreation Planning Regions	2-9
2.3	Project Overview	2-15
2.4	Project Objectives	2-15
2.5	Project Components	2-16
2.5.1	Planned County Parks, Recreation, and Trails Projects under the Recreation Master Plan	2-17
2.5.2	Comprehensive Plan Amendments for Parks, Recreation, and Trails	2-36
2.5.3	Zoning Ordinance Amendments	2-41
2.5.4	Recreation Benefit Project (RBP) Program	2-45
2.6	Recreation Master Plan Adoption and Implementation	2-62
3.0	**ENVIRONMENTAL IMPACT ANALYSIS**	**3-1**
3.0.1	Introduction and Approach to Analysis	3-1
3.0.2	Impact Analysis Guidelines	3-1
3.0.3	Organization of Environmental Impact Analysis	3-2
3.0.4	Impact Assessment Methodology	3-4
3.0.5	Environmental Resource Areas Analyzed in the Program EIR	3-6
3.0.6	Mitigation Measures and Monitoring	3-7
3.0.7	Cumulative Impacts Analyses	3-8
3.1	Aesthetics and Visual Resources	3.1-1
3.1.1	Introduction	3.1-1
3.1.2	Environmental Setting	3.1-1

SECTION	TITLE	PAGE
3.1.2.1	Existing Visual Character by Region	3.1-2
3.1.2.2	Viewer Groups and Visual Sensitivity	3.1-6
3.1.2.3	Existing Visual Resources	3.1-7
3.1.2.4	Light and Glare	3.1-12
3.1.3	Regulatory Setting	3.1-13
3.1.3.1	State	3.1-13
3.1.3.2	Local	3.1-14
3.1.4	Environmental Impact Analysis	3.1-21
3.1.4.1	Thresholds of Significance	3.1-21
3.1.4.2	Project Impacts	3.1-23
3.1.4.3	Cumulative Impacts	3.1-29
3.1.4.4	Proposed Mitigation	3.1-30
3.1.4.5	Secondary Impacts	3.1-30
3.1.4.6	Residual Impacts	3.1-30
3.2	Agricultural Resources	3.2-1
3.2.1	Introduction	3.2-1
3.2.2	Environmental Setting	3.2-1
3.2.2.1	Agricultural Productivity in Santa Barbara County	3.2-2
3.2.2.2	Agricultural Productivity within Santa Barbara County Regions	3.2-5
3.2.2.3	Farmland Mapping and Monitoring Program Categorization	3.2-9
3.2.2.4	Other Benefits of Agriculture in Santa Barbara County	3.2-10
3.2.3	Regulatory Setting	3.2-14
3.2.3.1	Federal	3.2-14
3.2.3.2	State	3.2-14
3.2.3.3	Local	3.2-17
3.2.4	Environmental Impact Analysis	3.2-27
3.2.4.1	Thresholds of Significance	3.2-27
3.2.4.2	Project Impacts	3.2-30
3.2.4.3	Cumulative Impacts	3.2-36
3.2.4.4	Proposed Mitigation	3.2-37
3.2.4.5	Secondary Impacts	3.2-37
3.2.4.6	Residual Impacts	3.2-37
3.3	Air Quality	3.3-1
3.3.1	Introduction	3.3-1
3.3.2	Environmental Setting	3.3-1
3.3.2.1	Topography and Meteorology	3.3-1
3.3.2.2	Sensitive Receptors	3.3-3
3.3.2.3	Common Air Pollutants	3.3-3
3.3.2.4	Toxic Air Contaminants	3.3-7
3.3.2.5	Ambient Air Monitoring	3.3-8
3.3.2.6	Odors	3.3-11
3.3.3	Regulatory Setting	3.3-12
3.3.3.1	Federal and State: Ambient Air Quality Standards	3.3-12

SECTION	TITLE	PAGE
3.3.3.2	Federal	3.3-12
3.3.3.3	State	3.3-14
3.3.3.4	Local	3.3-16
3.3.4	Environmental Impact Analysis	3.3-19
3.3.4.1	Thresholds of Significance	3.3-19
3.3.4.2	Project Impacts	3.3-29
3.3.4.3	Cumulative Impacts	3.3-38
3.3.4.4	Proposed Mitigation	3.3-39
3.3.4.5	Secondary Impacts	3.3-42
3.3.4.6	Residual Impacts	3.3-42
3.4	Biological Resources	3.4-1
3.4.1	Introduction	3.4-1
3.4.2	Environmental Setting	3.4-1
3.4.2.1	Existing Biological Resources	3.4-2
3.4.2.2	Special-Status Species	3.4-11
3.4.2.3	Sensitive Habitats	3.4-12
3.4.2.4	Wetlands and Other Waters of the United States	3.4-16
3.4.2.5	Wildlife Movement Corridors	3.4-17
3.4.3	Regulatory Setting	3.4-18
3.4.3.1	Federal	3.4-18
3.4.3.2	State	3.4-20
3.4.3.3	Local	3.4-23
3.4.4	Environmental Impact Analysis	3.4-32
3.4.4.1	Thresholds of Significance	3.4-32
3.4.4.2	Project Impacts	3.4-38
3.4.4.3	Cumulative Impacts	3.4-50
3.4.4.4	Proposed Mitigation	3.4-51
3.4.4.5	Secondary Impacts	3.4-60
3.4.4.6	Residual Impacts	3.4-60
3.5	Cultural and Tribal Cultural Resources	3.5-1
3.5.1	Introduction	3.5-1
3.5.2	Environmental Setting	3.5-1
3.5.2.1	Precontact Setting	3.5-2
3.5.2.2	Ethnography	3.5-4
3.5.2.3	History	3.5-5
3.5.2.4	Known Cultural Resources in Santa Barbara County	3.5-8
3.5.3	Regulatory Setting	3.5-18
3.5.3.1	Federal	3.5-18
3.5.3.2	State	3.5-19
3.5.3.3	Local	3.5-25
3.5.4	Environmental Impact Analysis	3.5-33
3.5.4.1	Thresholds of Significance	3.5-33
3.5.4.2	Project Impacts	3.5-35
3.5.4.3	Cumulative Impacts	3.5-44
3.5.4.4	Proposed Mitigation	3.5-45

SECTION	TITLE	PAGE
3.5.4.5	Secondary Impacts	3.5-49
3.5.4.6	Residual Impacts	3.5-49
3.6	Energy	3.6-1
3.6.1	Introduction	3.6-1
3.6.2	Environmental Setting	3.6-1
3.6.2.1	Electricity	3.6-1
3.6.2.2	Natural Gas	3.6-4
3.6.2.3	Petroleum and Transportation Energy	3.6-5
3.6.2.4	Energy Conservation and Renewable Resources	3.6-6
3.6.3	Regulatory Setting	3.6-8
3.6.3.1	Federal	3.6-8
3.6.3.2	State	3.6-10
3.6.3.3	Local	3.6-14
3.6.4	Environmental Impact Analysis	3.6-16
3.6.4.1	Thresholds of Significance	3.6-16
3.6.4.2	Project Impacts	3.6-19
3.6.4.3	Cumulative Impacts	3.6-24
3.6.4.4	Proposed Mitigation	3.6-26
3.6.4.5	Secondary Impacts	3.6-26
3.6.4.6	Residual Impacts	3.6-26
3.7	Geology and Soils	3.7-1
3.7.1	Introduction	3.7-1
3.7.2	Environmental Setting	3.7-1
3.7.2.1	Existing Conditions	3.7-1
3.7.2.2	Topography	3.7-1
3.7.2.3	Soils	3.7-2
3.7.2.4	Seismic Hazards	3.7-3
3.7.2.5	Soil Hazards	3.7-7
3.7.2.6	Paleontological Resources and Unique Geologic Features	3.7-10
3.7.3	Regulatory Setting	3.7-11
3.7.3.1	Federal	3.7-12
3.7.3.2	State	3.7-13
3.7.3.3	Local	3.7-17
3.7.4	Environmental Impact Analysis	3.7-22
3.7.4.1	Thresholds of Significance	3.7-22
3.7.4.2	Project Impacts	3.7-24
3.7.2.3	Cumulative Impacts	3.7-33
3.7.2.4	Proposed Mitigation	3.7-34
3.7.4.5	Secondary Impacts	3.7-35
3.7.4.6	Residual Impacts	3.7-35
3.8	Greenhouse Gas Emissions	3.8-1
3.8.1	Introduction	3.8-1
3.8.2	Environmental Setting	3.8-1
3.8.2.1	Background	3.8-2
3.8.2.2	Potential Effects of Climate Change	3.8-4

SECTION		TITLE	PAGE
		3.8.2.3 Existing GHG Emissions from Human Activity	3.8-7
	3.8.3	Regulatory Setting	3.8-9
		3.8.3.1 Federal	3.8-9
		3.8.3.2 State	3.8-13
		3.8.3.3 Local	3.8-16
	3.8.4	Environmental Impact Analysis	3.8-18
		3.8.4.1 Thresholds of Significance	3.8-19
		3.8.4.2 Project Impacts	3.8-21
		3.8.4.3 Cumulative Impacts	3.8-29
		3.8.4.4 Proposed Mitigation	3.8-29
		3.8.4.5 Secondary Impacts	3.8-29
		3.8.4.6 Residual Impacts	3.8-29
3.9	Hazards and Hazardous Materials		3.9-1
	3.9.1	Introduction	3.9-1
	3.9.2	Environmental Setting	3.9-1
		3.9.2.1 Hazardous Sites	3.9-2
		3.9.2.2 Hazardous Materials Incidents	3.9-6
		3.9.2.3 Hazardous Materials and Agriculture	3.9-7
		3.9.2.4 Pool Chemical Safety	3.9-7
		3.9.2.5 Natural Gas Pipeline Rupture and Storage Facility Incidents	3.9-8
		3.9.2.6 Oil Extraction Areas	3.9-8
		3.9.2.7 Airport Safety Zones	3.9-9
		3.9.2.8 Emergency Response and Evacuation	3.9-13
	3.9.3	Regulatory Setting	3.9-13
		3.9.3.1 Federal	3.9-14
		3.9.3.2 State	3.9-16
		3.9.3.3 Local	3.9-23
	3.9.4	Environmental Impact Analysis	3.9-27
		3.9.4.1 Thresholds of Significance	3.9-27
		3.9.4.2 Project Impacts	3.9-31
		3.9.4.3 Cumulative Impacts	3.9-40
		3.9.4.4 Proposed Mitigation	3.9-41
		3.9.4.5 Secondary Impacts	3.9-42
		3.9.4.6 Residual Impacts	3.9-42
3.10	Hydrology and Water Quality		3.10-1
	3.10.1	Introduction	3.10-1
	3.10.2	Environmental Setting	3.10-1
		3.10.2.1 Surface Water	3.10-1
		3.10.2.2 Groundwater	3.10-4
		3.10.2.3 Water Quality	3.10-16
		3.10.2.4 Flood Hazards	3.10-19
	3.10.3	Regulatory Setting	3.10-23
		3.10.3.1 Federal	3.10-23
		3.10.3.2 State	3.10-25

SECTION	TITLE	PAGE
	3.10.3.3 Local	3.10-29
3.10.4	Environmental Impact Analysis	3.10-35
	3.10.4.1 Thresholds of Significance	3.10-35
	3.10.4.2 Project Impacts	3.10-38
	3.10.4.3 Cumulative Impacts	3.10-47
	3.10.4.4 Proposed Mitigation	3.10-48
	3.10.4.5 Secondary Impacts	3.10-49
	3.10.4.6 Residual Impacts	3.10-49
3.11	Land Use and Planning	3.11-1
3.11.1	Introduction	3.11-1
3.11.2	Environmental Setting	3.11-1
	3.11.2.1 Land Use and Zoning	3.11-2
	3.11.2.2 Recreational Land Use and Zoning	3.11-5
	3.11.2.3 Unincorporated Planning Area Summaries	3.11-9
3.11.3	Regulatory Setting	3.11-11
	3.11.3.1 State	3.11-11
	3.11.3.2 Local	3.11-12
3.11.4	Environmental Impact Analysis	3.11-19
	3.11.4.1 Thresholds of Significance	3.11-20
	3.11.4.2 Project Impacts	3.11-21
	3.11.4.3 Cumulative Impacts	3.11-31
	3.11.4.4 Proposed Mitigation	3.11-32
	3.11.4.5 Secondary Impacts	3.11-32
	3.11.4.6 Residual Impacts	3.11-32
3.12	Noise	3.12-1
3.12.1	Introduction	3.12-1
3.12.2	Fundamentals of Sound and Noise	3.12-1
3.12.3	Environmental Setting	3.12-11
3.12.4	Regulatory Setting	3.12-18
	3.12.4.1 Federal	3.12-19
	3.12.4.2 State	3.12-19
	3.12.4.3 Local	3.12-21
3.12.5	Environmental Impact Analysis	3.12-22
	3.12.5.1 Thresholds of Significance	3.12-22
	3.12.5.2 Project Impacts	3.12-26
	3.12.5.3 Cumulative Impacts	3.12-34
	3.12.5.4 Proposed Mitigation	3.12-35
	3.12.5.5 Secondary Impacts	3.12-36
	3.12.5.6 Residual Impacts	3.12-36
3.13	Public Services	3.13-1
3.13.1	Introduction	3.13-1
3.13.2	Environmental Setting	3.13-1
3.13.3	Regulatory Setting	3.13-18
	3.13.3.1 Federal	3.13-18
	3.13.3.2 State	3.13-18

SECTION	TITLE	PAGE
	3.13.3.3 Local	3.13-21
3.13.4	Environmental Impact Analysis	3.13-30
	3.13.4.1 Thresholds of Significance	3.13-30
	3.13.4.2 Project Impacts	3.13-31
	3.13.4.3 Cumulative Impacts	3.13-35
	3.13.4.4 Proposed Mitigation	3.13-35
	3.13.4.5 Secondary Impacts	3.13-36
	3.13.4.6 Residual Impacts	3.13-36
3.14	Recreation	3.14-1
3.14.1	Introduction	3.14-1
3.14.2	Environmental Setting	3.14-1
	3.14.2.1 Parks and Recreation Facilities	3.14-2
	3.14.2.2 Trails	3.14-9
	3.14.2.3 State and Federal Parks and Recreation Facilities	3.14-9
3.14.3	Regulatory Setting	3.14-9
	3.14.3.1 State Regulations	3.14-10
	3.14.3.2 Local Regulations	3.14-11
3.14.4	Environmental Impact Analysis	3.14-17
	3.14.4.1 Thresholds of Significance	3.14-17
	3.14.4.2 Project Impacts	3.14-18
	3.14.4.3 Cumulative Impacts	3.14-22
	3.14.4.4 Proposed Mitigation	3.14-23
	3.14.4.5 Secondary Impacts	3.14-24
	3.14.4.6 Residual Impacts	3.14-24
3.15	Transportation	3.15-1
3.15.1	Introduction	3.15-1
3.15.2	Environmental Setting	3.15-2
	3.15.2.1 Countywide Transportation Network	3.15-2
	3.15.2.2 Future Transportation Network Improvements	3.15-19
3.15.3	Regulatory Setting	3.15-20
	3.15.3.1 Federal	3.15-20
	3.15.3.2 State	3.15-21
	3.15.3.3 Local	3.15-24
3.15.4	Environmental Impact Analysis	3.15-35
	3.15.4.1 Thresholds of Significance	3.15-36
	3.15.4.2 Project Impacts	3.15-42
	3.15.4.3 Cumulative Impacts	3.15-55
	3.15.4.4 Proposed Mitigation	3.15-57
	3.15.4.5 Secondary Impacts	3.15-57
	3.15.4.6 Residual Impacts	3.15-57
3.16	Utilities and Water Supply	3.16-1
3.16.1	Introduction	3.16-1
3.16.2	Environmental Setting	3.16-1
	3.16.2.1 Water	3.16-1
	3.16.2.2 Wastewater	3.16-13

SECTION	TITLE	PAGE
	3.16.2.3 Solid Waste	3.16-17
3.16.3	Regulatory Setting	3.16-20
	3.16.3.1 Federal	3.16-20
	3.16.3.2 State	3.16-21
	3.16.3.3 Local	3.16-26
3.16.4	Environmental Impact Analysis	3.16-32
	3.16.4.1 Thresholds of Significance	3.16-33
	3.16.4.2 Project Impacts	3.16-36
	3.16.4.3 Cumulative Impacts	3.16-43
	3.16.4.4 Proposed Mitigation	3.16-44
	3.16.4.5 Secondary Impacts	3.16-44
	3.16.4.6 Residual Impacts	3.16-44
3.17	Wildfire	3.17-1
3.17.1	Introduction	3.17-1
3.17.2	Environmental Setting	3.17-1
	3.17.2.1 Existing Fire Hazards and Contributing Factors	3.17-1
	3.17.2.2 Historic Wildfires in Santa Barbara County	3.17-4
	3.17.2.3 Fire Hazard Severity Zones	3.17-5
	3.17.2.4 Wildland-Urban Interface and Communities at Risk	3.17-6
	3.17.2.5 Recreation and Wildfire	3.17-9
	3.17.2.6 Wildfire Management and Firefighting Strategies	3.17-10
	3.17.2.7 Evacuation and Emergency Response	3.17-13
	3.17.2.8 Post-Wildfire Hazards	3.17-15
3.17.3	Regulatory Setting	3.17-16
	3.17.3.1 State	3.17-16
	3.17.3.2 Local	3.17-21
3.17.4	Environmental Impact Analysis	3.17-29
	3.17.4.1 Thresholds of Significance	3.17-29
	3.17.4.2 Project Impacts	3.17-30
	3.17.4.3 Cumulative Impacts	3.17-36
	3.17.4.4 Proposed Mitigation	3.17-37
	3.17.4.5 Secondary Impacts	3.17-38
	3.17.4.6 Residual Impacts	3.17-38
4.0	**ALTERNATIVES ANALYSIS**	**4-1**
4.1	Introduction	4-1
4.1.1	Project Objectives	4-2
4.1.2	Summary of Potentially Significant and Unavoidable Impacts	4-2
4.2	Alternatives Considered and Discarded	4-3
4.2.1	Elimination of the South Coast Aquatic Center, Goleta Community Sports Park, and Guadalupe Community Park & Campground Projects	4-3
4.2.2	Elimination of Campground Projects	4-3
4.2.3	Vehicle Miles Traveled (VMT) Reduction Alternative	4-4
4.2.4	Elimination of the Recreation Benefit Project (RBP) Program	4-5

SECTION	TITLE	PAGE
4.2.5	Modification of the RBP Program to Prohibit RBPs on AG-II Zones with Minimum Lot Size 40 Acres or Less	4-5
4.3	Alternatives Considered and Analyzed	4-6
4.3.1	No Project Alternative	4-6
4.3.2	Alternative 1 — Reduced Eligibility of RBPs	4-17
4.3.3	Alternative 2 — Increased Agricultural Buffers	4-28
4.4	Identification of Environmentally Superior Alternative	4-37
5.0	**OTHER CEQA CONSIDERATIONS**	**5-1**
5.1	Significant Unavoidable Environmental Effects	5-1
5.2	Reasons the Project is Being Proposed Notwithstanding its Significant and Unavoidable Impacts	5-2
5.3	Significant Irreversible Environmental Changes	5-3
5.4	Growth-Inducing Impact Analysis	5-4
5.5	Effects Found Not to be Significant	5-6
5.5.1	Forestry	5-6
5.5.2	Mineral Resources	5-7
5.5.3	Population and Housing	5-7
6.0	**LIST OF PREPARERS**	**6-1**
7.0	**REFERENCES**	**7-1**
8.0	**RESPONSE TO COMMENTS**	**8-1**
8.1	Introduction	8-1
8.2	Distribution of the Draft Program EIR	8-1
8.3	Comments on the Draft Program EIR	8-1
8.3.1	Introduction and Organization	8-1
8.4	Response to Comments Received on the Draft Program EIR	8-2
8.4.1	State Agencies	8-3
8.4.2	Local Agencies and Advisory Groups	8-67
8.4.3	Non-Governmental Organizations and Community Groups	8-80
8.4.4	Individuals	8-226
9.0	**MITIGATION MONITORING AND REPORTING PROGRAM**	**9-1**
9.1	Purpose	9-1
9.2	Responsibilities	9-1
9.3	Monitoring Table	9-1

List of Appendices

A – Public Scoping Summary

B – Air Quality & Energy Demand Calculations

C – Biological Resources Database Results & Reports

D – Cultural Resources Reports

LIST OF FIGURES

NUMBER	TITLE	PAGE
Figure 2-1.	Santa Barbara County Regional Setting	2-4
Figure 2-2.	Recreation Planning Regions in Santa Barbara County	2-11
Figure 3.1-1.	Santa Barbara County Scenic Highways	3.1-11
Figure 3.2-1.	Santa Barbara County FMMP Lands	3.2-11
Figure 3.2-2.	Santa Barbara County Agriculture Zoning Map	3.2-12
Figure 3.2-3.	Santa Barbara County Williamson Act Contracts	3.2-13
Figure 3.3-1.	Air Quality Monitoring Station Locations	3.3-9
Figure 3.4-1.	Federally Designated Critical Habitats in Santa Barbara County	3.4-14
Figure 3.4-2.	Environmentally Sensitive Habitat Areas in the South Coast	3.4-15
Figure 3.6-1.	Santa Barbara County Electrical Transmission Grid	3.6-4
Figure 3.7-1.	Geologic Hazard Areas in Santa Barbara County	3.7-6
Figure 3.9-1.	Santa Barbara County Hazardous Sites	3.9-4
Figure 3.9-2.	Designated Airport Safety Zones	3.9-10
Figure 3.10-1.	Santa Barbara County Hydrologic Setting	3.10-3
Figure 3.10-2.	Santa Barbara County Groundwater Basins	3.10-7
Figure 3.10-3.	Santa Barbara County Flood Hazards	3.10-21
Figure 3.11-1.	Santa Barbara County Land Use Element Boundaries	3.11-4
Figure 3.11-2.	Santa Barbara County Land Use Designations	3.11-8
Figure 3.13-1.	Santa Barbara County Public Services	3.13.-2
Figure 3.15-1.	Santa Barbara County Transportation Network	3.15-3
Figure 3.16-1.	d/D Ratio as Related to Sewer Design and Sizing	3.16-16
Figure 3.17-1.	Fire Hazard Severity Zones, Santa Barbara County	3.17-7
Figure 3.17-2.	Santa Barbara County WUI	3.17-8

LIST OF TABLES

NUMBER	TITLE	PAGE
Table 1-1.	Agencies and Roles	1-3
Table 1-2.	Environmental Review Process	1-5
Table 2-1.	Summary of Public Parkland by Recreation Planning Area	2-10
Table 2-2.	Summary of Planned Park, Recreation, and Trail Projects	2-19
Table 2-3.	Summary of Proposed Recreation Goals & Policies in the Land Use Element of the County Comprehensive Plan	2-38
Table 2-4.	Sites under the Updated Extent of the Public and Private Parks/Recreation Facility Overlay	2-40
Table 2-5.	Summary of Proposed Recreation Goals & Policies in the Agricultural Element of the County Comprehensive Plan	2-40
Table 2-6.	Zones Allowing Public Parks/Playgrounds & Trails for Hiking and Riding	2-41
Table 2-7.	Summary of Proposed Standards for Development of Parks/Playgrounds and Trails	2-42
Table 2-8.	Summary of Proposed Additional Standards in REC Zone	2-44
Table 2-9	Proposed Additional Allowed Land Use in the REC Zone and AG-II Zone	2-45
Table 2-10.	Zones Allowing Eligible Recreation Benefit Projects1	2-46
Table 2-11.	Summary of Additional Allowed Uses & Requirements for Eligible RBPs	2-49
Table 3-1.	Geographic Context for Cumulative Analysis	3-12
Table 3-2.	Cumulative Project List	3-13
Table 3.1-1.	Summary of Aesthetics and Visual Resources Impacts	3.1-23
Table 3.2-1.	Summary of Agricultural Production in Santa Barbara County (2023)	3.2-4
Table 3.2-2.	Summary of Agricultural Lands within the Unincorporated Areas of the County	3.2-4
Table 3.2-3.	Summary of FMMP Lands within the Unincorporated Areas of the County	3.2-10
Table 3.2-4.	Summary of Agricultural Resources Impacts	3.2-30
Table 3.3-1.	Santa Barbara County Air Quality Monitoring Stations	3.3-10
Table 3.3-2.	Ambient Air Quality Standards for Criteria Pollutants in the SCCAB	3.3-11
Table 3.3-3.	Santa Barbara County Attainment/Nonattainment Classification Summary	3.3-13
Table 3.3-4.	Summary of Air Quality Impacts	3.3-29
Table 3.3-5.	Estimated Annual Construction Emissions (tons per year) for Conceptual Community Park Development Project Scenario	3.3-32
Table 3.3-6.	Estimated Maximum Daily Operational Emissions (lbs/day) for Large-Scale Recreational Development Scenario	3.3-34
Table 3.4-1.	Federally Designated Critical Habitat for Threatened and Endangered Species in Santa Barbara County	3.4-10
Table 3.4-2.	Summary of Biological Resources Impacts	3.4-39
Table 3.4-3.	Summary of Impacts to Sensitive Habitat and Natural Communities for the Jalama Beach County Park Expansion and Coastal Access Improvements Project	3.4-43
Table 3.5-1.	Known Historic Sites within Unincorporated Area of Santa Barbara County	3.5-9

Table 3.5-2. County Places of Historic Merit....3.5-12
Table 3.5-3. Archaeological Site Density Areas in Santa Barbara County....3.5-16
Table 3.5-4. Summary of Cultural and Tribal Cultural Resources Impacts....3.5-35
Table 3.6-1. Statewide and Countywide Electricity Demand 2018-2022 (Millions of kWh [GWh])....3.6-2
Table 3.6-2. Statewide and Countywide Natural Gas Demand 2018-2022 (Millions of therms)....3.6-5
Table 3.6-3. State and County Transportation Fuel Demand 2018-2022 (millions of gallons)....3.6-6
Table 3.6-4. Summary of Energy Impacts....3.6-19
Table 3.6-5. Estimated Electricity and Natural Gas Demand for Large-Scale Conceptual Community Park Scenario....3.6-20
Table 3.6-6. Estimated Construction Fuel Consumption for Large-Scale Recreational Development Scenario....3.6-21
Table 3.6-7. Comparison of Construction and County Diesel Fuel Usage....3.6-22
Table 3.6-8. Estimated Operational Fuel Consumption for Large-Scale Recreational Development Scenario....3.6-23
Table 3.7-1. Active Faults within or near the Project Area....3.7-4
Table 3.7-2. Land Subsidence for Groundwater Basins in Santa Barbara County (2018)....3.7-10
Table 3.7-3. Summary of Geology and Soils Impacts....3.7-25
Table 3.8-1. Global Warming Potential for Various GHGs....3.8-3
Table 3.8-2. Summary of GHG Emissions Impacts....3.8-21
Table 3.8-3. Climate Action Plan Consistency Checklist....3.8-23
Table 3.9-1. Known Regulated Hazardous Sites within the Unincorporated County....3.9-5
Table 3.9-2. Hazardous Materials Incidents in Santa Barbara County by Location and Type....3.9-6
Table 3.9-3. Summary of Airport Safety Zones 1 - 6....3.9-11
Table 3.9-4. Summary of Hazards and Hazardous Materials Impacts....3.9-31
Table 3.10-1. Surface Waters in Santa Barbara County....3.10-2
Table 3.10-2. Status of Groundwater Basins in Santa Barbara County....3.10-6
Table 3.10-3. Major Surface Waters in the Project Area on the California 303(d) List....3.10-17
Table 3.10-4. FEMA Riverine 1-Percent Annual Chance Flood Acreage Inundation by HMA....3.10-20
Table 3.10-5. Summary of Hydrology and Water Quality Impacts....3.10-39
Table 3.11-1. Acres of Designated Existing Public or Private Recreation and/or Open Space Land Use....3.11-6
Table 3.11-2. Summary of Land Use and Planning Impacts....3.11-22
Table 3.12-1. Definitions of Acoustical Terms....3.12-3
Table 3.12-2. Typical Noise Levels in the Environment....3.12-4
Table 3.12-3. Human Response to Different Levels of Groundborne Vibration (PPV)....3.12-9
Table 3.12-4. Human and Structural Responses to Typical Levels of Vibration....3.12-11
Table 3.12-5. Vibration Thresholds for Potential Structural Damage....3.12-11
Table 3.12-6. Maximum Airport-Related Noise Thresholds for Recreational Uses at Airports in Santa Barbara County....3.12-16
Table 3.12-7. Summary of Noise Impacts....3.12-26
Table 3.12-8. Noise Ranges of Typical Construction Equipment....3.12-28

Table 3.12-9 Typical Noise Levels by Construction Phase and Activities....3.12-28
Table 3.13-1. Summary of Public Service Providers in the Unincorporated County....3.13-3
Table 3.13-2. Santa Barbara County Fire Department Stations....3.13-5
Table 3.13-3. Sheriff Stations and Sub-Stations in Santa Barbara County....3.13-14
Table 3.12-4. Santa Barbara County School Districts (2024)....3.13-16
Table 3.13-5. Summary of Public Service Impacts....3.13-32
Table 3.14-1. County Parks' Properties by Location, Type, and Size (Acres)....3.14-3
Table 3.14-2. Recreation Special Districts' Properties by Location, Type, and Size (Acres)....3.14-6
Table 3.14-3. Public Parkland and Public Open Space by Region (Excluding LPNF and VSFB)....3.14-7
Table 3.14-4. Existing Public Parkland-to-Population Ratio in Unincorporated County....3.14-8
Table 3.14-5. Projected Public Parkland-to-Population Ratio in Unincorporated County by 2050....3.14-8
Table 3.14-6. Total Estimated Trail Miles by Recreation Planning Area....3.14-9
Table 3.14-7. Summary of Recreation Impacts....3.14-19
Table 3.15-1. Class I, II, and III Bikeways in the Unincorporated Communities (miles)....3.15-14
Table 3.15-2. Santa Barbara County Daily VMT....3.15-17
Table 3.15-3. Santa Barbara County Daily VMT....3.15-18
Table 3.15-4. Summary of Transportation Impacts....3.15-42
Table 3.16-1. Existing Municipal Water Suppliers and Demands Serving Unincorporated Areas of Santa Barbara County....3.16-5
Table 3.16-2. Local Sources of Existing Municipal Water Supply....3.16-8
Table 3.16-3. Santa Barbara County SWP Participant Table A Amounts....3.16-9
Table 3.16-4. Projected Future Normal Year Conditions for Municipal Water Suppliers and Demands Serving Unincorporated Areas of Santa Barbara County....3.16-12
Table 3.16-5. Existing Wastewater Service Providers Serving Unincorporated Areas of Santa Barbara County....3.16-14
Table 3.16-6. Wastewater Treatment/Reclamation Facilities Servicing Unincorporated Areas of Santa Barbara County....3.16-15
Table 3.16-7. Solid Waste Facilities Serving Santa Barbara County....3.16-19
Table 3.16-8. Summary of Utility Service and Water Supply Impacts....3.16-36
Table 3.17-1. Major Wildfires in Santa Barbara County....3.17-5
Table 3.17-2. Summary of Wildfire Impacts....3.17-31
Table 4-1. Summary of Alternatives Considered and Analyzed....4-7
Table 4-2. Zones Allowing Eligible Recreation Benefit Projects under Alternative 1....4-18
Table 4-3. Alternative 1 – Comparison to Project Objectives....4-27
Table 4-4. Alternative 2 – Comparison to Project Objectives....4-38
Table 4-5. Comparison of Project Impacts by Alternative....4-41
Table 8-1. List of Public Comments Received on the Draft Program EIR....8-2
Table 9-1. Mitigation Monitoring and Reporting Program....9-2

LIST OF ACRONYMS AND ABBREVIATIONS

Acronyms	Meaning
AAC	Agricultural Advisory Committee
AADT	Annual Average Daily Trip
AAI	All Appropriate Inquiry
AAQS	Ambient Air Quality Standards
AB	Assembly Bill
ABOP	antifreeze, vehicular batteries, motor oils, oil filters, and latex paint
AC	Commercial Agriculture
ACM	Asbestos-containing material
ACS	American Community Survey
ADA	Americans with Disabilities Act
ADT	average daily trips
ADU	accessory dwelling unit
AE	Applied Earthworks, Inc.
AEO	Agricultural Enterprise Ordinance
AF	acre-feet
AFY	acre-feet per year
AIA	Airport Influence Area
ALS	Advanced Life Support
ALUC	Airport Land Use Commission
ALUCP	Airport Land Use Compatibility Plan
AMM	Avoidance & Minimization Measure
AMR	American Medical Response
ANCA	Airport Noise and Capacity Act
APAC	Agricultural Preserve Advisory Committee
APCD	Air Pollution Control District
APN	Assessor Parcel Number
APS	Alternative Planning Strategy
AQAP	Air Quality Attainment Plan
AQMP	Air Quality Management Plan
ASCE	American Society of Civil Engineers
ASHRAE	American Society of Heating and Air-Conditioning Engineers
AST	aboveground storage tank
ASTM	American Society for Testing and Materials
ASU	air support unit
ATP	active transportation plan
ATV	all-terrain vehicle

Acronyms	Meaning
AVO	average vehicle occupancy
BAR	Board of Architectural Review
Basin Plan	Water Quality Control Plan for the Central Coast Basin
BBQ	barbeque
BGEPA	Bald and Golden Eagle Protection Act
BLM	Bureau of Land Management
BMP	best management practice
Board	Santa Barbara County Board of Supervisors
CAA	Clean Air Act
CAAA	Clean Air Act Amendments
CAAQS	California Ambient Air Quality Standards
CAFE	Corporate Average Fuel Economy
CAL FIRE	California Department of Forestry and Fire Protection
Cal OES	Governor's Office of Emergency Services
Cal Poly	California Polytechnic State University
Cal/OSHA	California Occupational Safety and Health Administration
CalARP	California Accidental Release Prevention
CalEEMod	California Emissions Estimator Model
CalEPA	California Environmental Protection Agency
CalGEM	California Department of Conservation Geologic Energy Management Division
Caltrans	California Department of Transportation
CAP	Clean Air Plan
CARB	California Air Resources Board
CASGEM	California Statewide Groundwater Elevation Monitoring
CBC	California Building Code
CBSC	California Building Standards Code
CCAA	California Clean Air Act
CCC	California Coastal Commission
CCIC	Central Coast Information Center
CCR	California Code of Regulations
CCT	California Coastal Trail
CCUS	Carbon capture, utilization, and storage
CCVA	Climate Change and Vulnerability Assessment
CCWA	Central Coast Water Authority
CDFW	California Department of Fish and Wildlife
CDP	Coastal Development Permit
CDPH	California Department of Public Health

Acronyms	Meaning
CDPR	California Department of Pesticide Regulation
CDR	Carbon dioxide removal
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CERCLIS	Comprehensive Environmental Response, Compensation, and Liability Information System
CERP	Community Emission Reduction Program
CESA	California Endangered Species Act
CFC	California Fire Code
CFD	Community Facilities District
CFR	Code of Federal Regulations
CHL	California Historical Landmarks
CHP	California Highway Patrol
CHSC	California Health and Safety Code
CIP	Capital Improvement Program
CLUP	Coastal Land Use Plan
CNDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNG	compressed natural gas
CNPPA	California Native Plant Protection Act
CNPS	California Native Plant Society
CNRA	California Natural Resources Agency
CO	Carbon monoxide
COLT	City of Lompoc Transit
County	County of Santa Barbara
County Code	Santa Barbara County Code
County Parks	County of Santa Barbara, Community Services Department, Parks Division
CPSC	Consumer Product Safety Commission
CPUC	California Public Utilities Commission
CRHP	California Register of Historic Places
CRHR	California Register of Historical Resources
CRPR	California Rare Plant Rank
CSA	County Service Area
CSD	Community Services District
CTC	California Transportation Commission
CTSA	Consolidated Transportation Services Agency

Acronyms	Meaning
CUP	Conditional Use Permit
CUPA	Certified Unified Program Agency
CVC	Critical Viewshed Corridor
CVRD	Cuyama Valley Recreation District
CVWD	Carpinteria Valley Water District
CWA	Clean Water Act
CWPP	Community Wildfire Protection Plan
CZO	Coastal Zoning Ordinance
dB	decibel
dBA	A-Weighted Sound Level
DDT	Dichlorodiphenyltrichloroethane
DMV	Department of Motor Vehicles
DOI	Department of the Interior
DOT	Department of Transportation
DPM	Diesel particulate matter
DPR	Department of Pesticide Regulation
DPS	distinct population segment
DR	Design Residential
DTSC	California Department of Toxic Substances Control
DU	dwelling unit
du/ac	dwelling unit per acre
DWQ	Division of Water Quality
DWR	Department of Water Resources
EAP	Energy Action Plan
EAS	Emergency Alert System
ECAP	Energy and Climate Action Plan
EDRN	Existing Developed Rural Neighborhood
EGV	Eastern Goleta Valley
EHS	Environmental Health Services
EIR	Environmental Impact Report
EIS	Environmental Impact Statement
EISA	Energy Independence and Security Act of 2007
EMFAC	Emission FACtors
EMP	Emergency Management Plan
EMS	Emergency Medical Services
EMT	emergency medical technicians
EO	Executive Order
EOC	Emergency Operations Center

Acronyms	Meaning
EOP	Santa Barbara County and Operational Area Emergency Operations Plan
EPA	Environmental Protection Agency
ERF	Effective Response Force
ERM	Emissions Reduction Measure
ERME	Environmental Resources Management Element
ESA	Endangered Species Act
ESH	Environmentally Sensitive Habitat
ESHA	Environmentally Sensitive Habitat Area
EV	electric vehicle
FAA	Federal Aviation Administration
FAR	floor area ratio
FEMA	Federal Emergency Management Agency
FHSZ	Fire Hazard Severity Zone
FHWA	Federal Highway Administration
FICON	Federal Interagency Committee on Noise
FIRM	Flood Insurance Rate Map
Flood Control District	Sanat Barbara County Flood Control and Water Conservation District
FMMP	Farmland Mapping and Monitoring Program
FR	Federal Register
FRA	Federal Responsibility Area
FRAP	Fire and Resources Assessment Program
FTA	Federal Transit Administration
FY	fiscal year
GC	General Commercial
GHG	Greenhouse gas
GIS	geographic information system
GPA	General Plan Amendment
GPD	gallons per day
GPM	gallons per minute
GSA	groundwater sustainability agency
GSP	groundwater sustainability plan
Gt	gigaton
GWh	Gigawatt hour
GWP	Global Warming Potential
HAPS	Hazardous air pollutants
HC	Highway 101 Corridor Overlay
HFC	Hydrofluorocarbon

Acronyms	Meaning
Highway 101	U.S. Highway 101
HLAC	Historic Landmarks Advisory Commission
HMA	Housing Market Area
HOV	high occupancy vehicle
HPP	Habitat Protection Plan
HQTC	High Quality Transit Corridor
HRA	Health Risk Assessment
HUD	U.S. Housing and Urban Development
HVAC	Heating, ventilation, and air conditioning
Hz	Hertz
IBC	International Building Code
ICC	International Code Council
ILRP	Irrigated Lands Regulatory Program
IMS	Industrial Monitoring Station
InSAR	Interferometric Synthetic Aperture Radar
IPaC	Information, Planning, and Consultation
IPCC	Intergovernmental Panel on Climate Change
IRP	Integrated Resource Plan
IRWM	Integrated Regional Water Management
IRWMP	Integrated Regional Water Management Plan
IVRPD	Isla Vista Recreation and Parks District
IWG	Interagency Working Group on the Social Cost of Greenhouse Gases
IWMF	Los Flores Integrated Waste Management Facility
IZA	Santa Ynez Airport
JPA	joint powers authority
kHz	kilohertz
KSF	thousand square feet
kW	kilowatt
kWh	kilowatt-hour
LACP	Los Alamos Community Plan
L_{AF}	A-weighted, acute sound level
LAFCO	Local Agency Formation Commission
LAMP	Local Agency Management Plan
LBP	Lead-based paint
LCI	California Governor's Office of Land Use and Climate Innovation
LCP	Local Coastal Program
$\mathbf{L_{dn}}$	Day-Night Average Noise Level
L_{eq}	Equivalent Noise Level

Acronyms	Meaning
LESA	Land Evaluation and Site Assessment
LHMP	Local Hazard Mitigation Plan
L_{max}	Maximum Instantaneous Noise Level
L_{min}	Minimum Instantaneous Noise Level
LNG	liquified natural gas
LORS	Laws, Ordinances, Regulations, and Standards
LOS	Level of service
LPC	Lompoc Airport
LPNF	Los Padres National Forest
LRA	Local Responsibility Area
LSAA	Lake and Streambed Alteration Agreement
LUDC	Land Use Development Code
LUST	Leaking Underground Storage Tank
MBTA	Migratory Bird Treaty Act
mg/L	milligrams per liter
MGD	million gallons per day
MHFP	Multi-Hazard Function Plan
MJHMP	Multi-Jurisdictional Hazard Mitigation Plan
MLUDC	Montecito Land Use Development Code
MMPA	Marine Mammal Protection Act
MMRP	Mitigation Monitoring and Reporting Program
MMT	million metric tons
MND	Mitigated Negative Declaration
MPG	Mile per gallon
MPO	Metropolitan Planning Organization
MS4	Municipal Separate Storm Sewer System
MT	Metric ton
MTD	Metropolitan Transit District
MW	megawatt
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NASA	National Aeronautics and Space Administration
NCP	National Contingency Plan
NCTS	New Cuyama Transfer Station
ND	Negative Declaration
NEHRP	National Earthquake Hazards Reduction Program
NEM	Noise Exposure Map
NEPA	National Environmental Policy Act

Acronyms	Meaning
NERHP	National Earthquake Hazards Reduction Program
NFPA	National Fire Protection Association
NHL	National Historic Landmarks
NHTSA	National Highway Traffic Safety Administration
NIDIS	National Integrated Drought Information System
NMFS	National Marine Fisheries Service
NO	Nitric oxide
NOA	Notice of Availability
NOAA	National Oceanic and Atmospheric Administration
NOD	Notice of Determination
NOI	Notice of Intent
NOP	Notice of Preparation
NO_X	nitrogen oxide
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
OEM	Office of Emergency Management
OES	County Office of Emergency Services
OHP	California Office of Historic Preservation
OHWM	ordinary high water mark
OLCI	California Governor's Office of Land Use and Climate Innovation
OMB	Office of Management and Budget
OPA	Orcutt Planning Area
OPR	Office of Planning and Research
OSHA	Occupational Safety and Health Administration
OWTS	onsite wastewater treatment system
P&D	Planning and Development Department
P&D	County of Santa Barbara Planning & Development Department
Pb	Lead
PCB	polychlorinated biphenyl
PEIR	program environmental impact report
PFAS	per- and polyfluoroalkyl substance
PFC	Perfluorocarbon
PFOA	perfluorooctanoic acid
PFOS	Perfluorooctane Sulfonate
PG&E	Pacific Gas and Electric
PI	Plasticity Index
PIC	pilot in command

Acronyms	Meaning
PPB	Parts per billion
PPM	Parts per million
PPV	Peak particle velocity
PRC	Public Resources Code
PRD	Planned Residential Development
Project	Santa Barbara County Recreation master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances
PRT	Parks, Recreation, and Trails
PV	photovoltaic
RBP	Recreation Benefit Project
RC	Riparian Corridor
RC-GOL	Riparian Corridor-Goleta
RCRA	Resource Conservation and Recovery Act
RCRIS	Resource Conservation and Recovery Act Information System
RdMAP	Road Maintenance Annual Plan
ReadySBC	Ready Santa Barbara County
REC	Recognized Environmental Condition
RFS	Renewable Fuels Standard
RHNA	Regional Housing Needs Assessment
RMS	root mean square
RMZ	Resource Management Zone
ROC	Reactive organic compound
ROG	Reactive organic gas
RPS	Renewables Portfolio Standard
RRWMD	Resource Recovery and Waste Management Division
RTDM	Regional Transportation Demand Model
RTP	Regional Transportation Plan
RV	recreation vehicle
RWMP	Regional Wildfire Mitigation Program
RWQCB	Regional Water Quality Control Plan
SAF	State Alternative Fuels
SAFE	Safer Affordable Fuel-Efficient
SB	Senate Bill
SBA	Santa Barbara Airport
SBCAG	Santa Barbara County Association of Governments
SBCAPCD	Santa Barbara County Air Pollution Control District
SBCEMSA	Santa Barbara County Emergency Medical Services Agency
SBCFCWCD	Santa Barbara County Flood Control and Water Conservation District

Acronyms	Meaning
SBCFD	Santa Barbara County Fire Department
SBCOEM	Santa Barbara County Office of Emergency Management
SBCPHD	Santa Barbara County Public Health Department
SBCWA	Santa Barbara County Water Agency
SCAQMD	South Coast Air Quality Management District
SCCAB	South Central Coast Air Basin
SCE	Southern California Edison
SCH	State Clearinghouse
SCRTS	South Coast Recycling & Transfer Station
SCS	Sustainable Communities Strategy
SDWA	Safe Drinking Water Act
SEMS	State Standardized Emergency Management System
SF	square foot
SFB	Space Force Base
SGMA	Sustainable Groundwater Management Act
SHMP	State of California Multi-Hazard Mitigation Plan
SHPO	State Historic Preservation Officer
SIP	State Implementation Plan
SLAMS	State and Local Air Monitoring Stations
SLF	Sacred Lands File
SLORTA	San Luis Obispo Regional Transit Authority
SMOOTH	Santa Maria Organization of Transportation Helpers
SMRT	Santa Maria Regional Transit
SMX	Santa Maria Airport
SOC	Statement of Overriding Considerations
SoCalGas	Southern California Gas Company
SOP	Standard Operating Procedures
SPCC	spill prevention, control, and countermeasure
SR	State Route
SRA	State Responsibility Area
STIP	State Transportation Improvement Program
SVP	Society for Vertebrate Paleontology
SWIS	Solid Waste Information System
SWMP	Storm Water Management Plan
SWP	State Water Project
SWPPP	Stormwater Pollution Prevention Plan
SWQMP	Storm Water Quality Management Plan
SWRCB	State Water Resources Control Board

Acronyms	Meaning
SWRP	Integrated Stormwater Resource Plan
SWTR	Surface Water Treatment Rule
SYVCPA	Santa Ynez Valley Community Plan Area
SYVRTS	Santa Ynez Valley Recycling & Transfer Station
SYVT	Santa Ynez Valley Transit
TAC	Toxic air contaminants
TCVGM	Transportation and Construction Vibration Guidance Manual
TDM	transportation demand management
TIP	Transportation Improvement Plan
TMDL	Total Maximum Daily Load
TTY/TTD	TeleTYpe/Telecommunications Device for the Deaf
UBC	Uniform Building Code
UC	University of California
US	United States
USA	United States of America
USACE	United States Army Corps of Engineers
USAF	United States Air Force
USAR	Urban Search and Rescue
USBR	United States Bureau of Reclamation
USC	U.S. Code
USCG	United States Coast Guard
USDA	United States Department of Agriculture
USEPA	United States Environmental Protection Agency
USFS	United States Forest Service
USFWS	United States Fish and Wildlife Service
USGS	United States Geologic Survey
USNAS	United States National Academy of Sciences
UST	underground storage tank
UV-B	Ultraviolent rays
UWMP	Urban Water Management Plan
UWMPA	Urban Water Management Planning Act
VCTC	Ventura County Transportation Commission
VdB	vibration velocity
VHFHSZ	Very High Fire Hazard Severity Zone
VMT	Vehicle Miles Traveled
VOC	Volatile organic compound
VSFB	Vandenberg Space Force Base
VTS	Ventucopa Transfer Station

Acronyms	Meaning
WEA	Wireless Emergency Alerts
WEF	Water Environment Federation
WMA	Western Management Area
WMO	World Meteorological Organization
WSA	water supply assessments
WSC	Water Systems Consulting, Inc.
WUI	wildland-urban interface
WWTP	waste water treatment plant
ZEV	Zero-emission vehicle

This page intentionally left blank.

1.0 INTRODUCTION

1.1 BACKGROUND AND PROJECT OVERVIEW

The County of Santa Barbara (County) Community Services Department, Parks Division (County Parks) proposes the adoption of the Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (Project). The goal of the Project is to enhance recreational access and experience for Santa Barbara County residents of all ages through near-term and long-term acquisitions and improvements to public parks, trails, and recreation facilities.

The Project includes the proposed Recreation Master Plan, a strategic long-range plan to fund and construct new public parks and trails to meet current and future recreation needs countywide. The Recreation Master Plan identifies recreation needs within five recreation planning regions and proposes capital improvements, programs, funding, and implementation strategies to guide the development of a range of public park, trail, and recreation facility projects over 10 to 20 years.

In summary, the Project 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
- 12 projects in partnership with other public agencies, including cities, the State of California, and the federal government.

Improved and expanded parks, trails, and recreation facilities would support the demands of a range of recreation users and activities through 2050. Improvements would be made through phases of funding, planning, and development. Project implementation would involve site preparation and grading, installation of new facilities, and construction of required recreation equipment and infrastructure.

In addition to public park, trail, and recreation facility projects proposed by County Parks, the Project would introduce the Recreation Benefit Project (RBP) Program, which would create a voluntary opportunity for private development projects to contribute directly to the County's public recreation system. The program would establish incentives for eligible projects that provide public recreation facilities as part of a proposed private development project.

To support the Recreation Master Plan and the RBP Program, the Project involves a General Plan Amendment (GPA) to update the Recreation Section of the Land Use Element and policies within the County's Comprehensive Plan, including the updates to the existing "Recreation" land use designation and the "Proposed Public or Private Park/Recreational Facility Overlay". The Project would also amend the County Land Use and Development Code (LUDC), the Montecito LUDC, and the Coastal Zoning Ordinance (CZO) to update the Recreation (REC)

zoning district to be consistent with the Comprehensive Plan and to implement the RBP and other related amendments, including allowing and regulating parks and trails as permitted uses in selected zoning districts. Finally, the Project includes updates to the County's Parks, Recreation, and Trails (PRT) Map and changes to the extent of the "Proposed Public or Private Park/Recreational Facility Overlay" either to improve the accuracy of the County's Land Use Map and/or Zoning Map or to support the implementation of the Recreation Master Plan.

The Project area includes unincorporated inland and coastal areas of Santa Barbara County. Project implementation actions would occur relative to the five Recreation Planning Areas defined by the proposed Recreation Master Plan to distinguish the different existing recreational facilities and identify and assess region-specific recreational needs. These recreation planning areas include Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, Cuyama Valley, and the South Coast (Figure 2-1). The Project area excludes areas owned and/or managed by federal agencies (i.e., Los Padres National Forest, Vandenberg Space Force Base, and Santa Rosa, Santa Cruz, and San Miguel Channel Islands).

1.2 PURPOSE AND INTENDED USE OF THIS EIR

The California Environmental Quality Act (CEQA) was enacted in 1970 by the California legislature to disclose to decision-makers and the public the significant environmental effects of proposed activities, including ways to avoid or reduce those effects by requiring the implementation of feasible alternatives or mitigation measures. CEQA applies to all California government agencies, including local agencies when making certain legislative acts and processing discretionary permits or other discretionary approvals for projects proposed by private applicants. As such, the County is required to undertake the CEQA process before deciding on a project.

The purpose of an Environmental Impact Report (EIR) is to inform decision-makers, responsible and trustee agencies, and the public of the potential environmental impacts that could result from a project. Under the provisions of CEQA, "the purpose of the environmental impact report is to identify the significant effects of a project on the environment, to identify alternatives to the project, and to indicate the manner in which significant effects can be mitigated or avoided" (Public Resources Code 21002.1[a]). The basic outcomes of CEQA include (14 CCR Section 15002[a]):

1. Inform governmental decision-makers and the public about the potential, significant environmental effects of proposed activities;
2. Identify ways that environmental damage can be avoided or significantly reduced;
3. Prevent significant, avoidable damage to the environment by requiring changes in projects using alternatives or mitigation measures when the governmental agency finds the changes to be feasible; and
4. Disclose to the public the reasons why a governmental agency approved the project in the manner the agency chose if significant environmental effects are involved.

While CEQA Guidelines Section 15021(a) requires that consideration be given to avoiding environmental damage, the Lead Agency (i.e., County) and other responsible public agencies must balance adverse environmental effects against other public objectives, including social and economic goals, in determining whether and in what manner a project should be approved. CEQA Section 15021(a) requires that major consideration be given to avoiding environmental damage. CEQA requires full disclosure and consideration of the unavoidable environmental risks, as applicable, against the economic, legal, social, or other benefits of the project as part of decision-maker approval proceedings.

1.3 AGENCIES AND ROLES

The County is the Lead Agency for the proposed Project, pursuant to Section 15367 of the CEQA Guidelines. This EIR has been prepared by and under the direction of the County Parks. This EIR was prepared in accordance with CEQA (Public Resources Code Section 21000 et seq.); the Guidelines for the Implementation of the California Environmental Quality Act (CEQA Guidelines) (California Code of Regulations Sections 15000 et seq.); and the County's environmental guidance documents (i.e., the Environmental Thresholds and Guidelines Manual, the Guidelines for the Implementation of CEQA, and the Guide to County of Santa Barbara Conditions of Approval and Mitigation Measures).

Responsible and trustee agencies are public agencies responsible for certain discretionary Project approvals or implementing specific onsite and/or offsite components of the Project. Under CEQA, a "responsible agency" includes all public agencies other than the Lead Agency which have discretionary approval power over the Project (CEQA Section 15381). A "trustee agency" is defined as a state agency having authority over certain resources held in trust for the people of California but does not have legal authority for approval of the Project (CEQA Section 15386).

Table 1-1. Agencies and Roles

Lead Agency	The County is the Lead Agency as it is the agency with principal responsibility for implementing the proposed Project (CEQA Guidelines Section 15367).
Responsible Agencies	Additional agencies with approval authority over aspects of the proposed Project include the California Coastal Commission (CEQA Guidelines Section 15381).
Trustee Agencies	State agencies with general management authority over specified natural resources of the State of California when the resources may occur within the Project area, including the California Department of Fish and Wildlife (CDFW) and the California Department of Parks and Recreation (CDPR) (CEQA Guidelines Section 15386).
Other Interested Agencies	Additional agencies that may be interested in the proposed Project and its impacts may include the Santa Barbara County Air Pollution Control District (SBCAPCD), California Department of Forestry and Fire Protection (CAL FIRE), State Water Resources Control Board (SWRCB), Central Coast Regional Water Quality Control Board (RWQCB), Native American Heritage Commission (NAHC), California Department of Transportation (Caltrans), and Santa Barbara County special districts.

1.4 PROGRAM-LEVEL EIR ANALYSIS

Program EIR Purpose

The purpose of this Program EIR is to inform public agencies, decision makers, and the public about the significant environmental impacts that would potentially result from Project implementation.

This Program EIR is prepared according to CEQA Guidelines Section 15168. The CEQA Guidelines clarify that a program EIR may be prepared on a series of actions that can be characterized as one large project and are related either 1) geographically, 2) as logical parts in the chain of contemplated actions, 3) in connection with the issuance of rules, regulations, plans, or other general criteria to govern the conduct of a continuing program, or 4) as individual activities carried out under the same authorizing statutory or regulatory authority and having generally similar environmental effects which can be mitigated in similar ways.

A program-level analysis for the proposed Project is appropriate in this EIR due to the following:

- Site-specific development and land use details for all potential future park, trail, and recreation development projects are not available currently, and the type, location, and intensity of recreation facilities are reasonably expected to evolve.
- The proposed Project covers a defined geographic area with regional subareas (i.e., Recreation Planning Areas) with similar land use characteristics. (See Chapter 2, *Project Description*),
- A program-level analysis provides the County with the opportunity to consider "broad policy alternatives and program-wide mitigation measures earlier in the planning process when the agency has greater flexibility to deal with basic problems or cumulative impacts" (CEQA Guidelines Section 15168[b][4]).

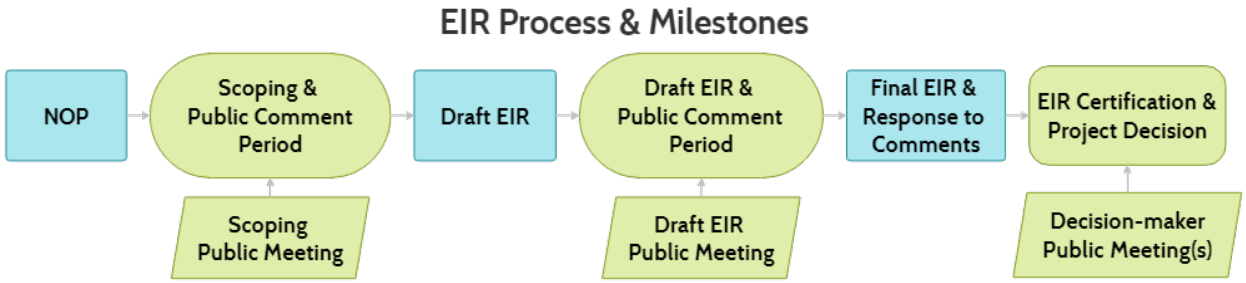
As a program-level EIR, the level of detail included in the project description and methodology for impact analysis is more general than a project-level EIR. The Project's site-level details are conceptual, rendering analysis too speculative for detailed evaluation. Further, this Program EIR considers regulatory changes to the County's Comprehensive Plan and zoning ordinances, including allowances for a range of recreation facilities and private development that could be developed under the proposed RBP Program. As a result, the Program EIR allows the County Board of Supervisors to consider broad implications and impacts associated with the proposed Project while not requiring a detailed evaluation of individual properties or limiting the potential for future parks, trails, and recreational development in the unincorporated county.

Per CEQA Guidelines Section 15168, the programmatic analysis and findings of this Program EIR may be incorporated by reference in subsequent environmental documents to describe regional settings, general effects, cumulative impacts, and other factors that may apply to future individual projects that implement the Project. If a subsequent activity is within the scope of this Program EIR and no new effects would occur or no new mitigation measures would be required, additional environmental documents may not be required if this Program EIR

adequately addresses the impacts of the subsequent activity under CEQA Guidelines Section 15168(c). When a program-level EIR is relied upon for a subsequent activity, the Lead Agency must incorporate applicable mitigation measures and alternatives developed in the program-level EIR into subsequent CEQA documentation (CEQA Guidelines Section 15168[c][3]). If a subsequent activity exceeds the scope of the proposed Project analyzed in this Program EIR and/or would have effects that are not identified in the Program EIR, an additional project-level environmental review would be required before the approval of the future project, as applicable. Given this Program EIR does not include the level of detail necessary to qualify as a project-level EIR, the County anticipates that some future projects pursued as implementation of the Project may require more detailed environmental review under CEQA.

1.5 EIR PROCESS

The CEQA process is initiated when the Lead Agency identifies a proposed project. The EIR process overview and key milestones are depicted here:



The proposed Project requires several discretionary approvals (see Section 2.0, *Project Description*). Therefore, the proposed Project is subject to environmental review requirements under CEQA. The Program EIR process for the proposed Project consists of the following steps, as specified in the CEQA Guidelines:

Table 1-2. Environmental Review Process

Notice of Preparation (NOP) / Public Scoping Hearing	The County issued an NOP on January 10, 2025, to request comments on the scope of the Program EIR. The NOP was published online and circulated to relevant agencies, community organizations, and interested individuals. The NOP was also posted in the County Clerk's office for a total of 60 days and sent to the State Clearinghouse at the Governor's Office of Planning and Research (OPR) to solicit statewide agency participation in determining the scope of the Program EIR. A virtual public scoping meeting was held on February 6, 2025. The 60-day public comment period closed on March 11, 2025. Appendix A contains the NOP and public comments received during the review period, which were considered in preparing the scope of this Program EIR (CEQA Guidelines Section 15082).

Table 1-2. Environmental Review Process (Continued)

Draft Program EIR and Public Review Period	The County prepared and distributed a Notice of Availability (NOA) for the Draft Program EIR to relevant agencies and interested parties on June 26, 2026. The NOA provides notice of a minimum 45-day public review and comment period for the Draft Program EIR, from June 26, 2026 to August 10, 2026, and the Draft Program EIR is made available on the County's website: https://www.countyofsb.org/1214/Recreation-Master-Plan (CEQA Guidelines Section 15087).
Final Program EIR	The County has prepared the Final Program EIR, which includes the Draft Program EIR with any necessary revisions, public comments received on the Draft Program EIR, a list of persons and entities who commented, and written responses to public comments submitted during the Draft Program EIR public review period. In total, 23 written comment letters were received from agencies, local advisory groups, non-governmental organizations, community groups, and the public on the Draft Program EIR. The Final Program EIR will be available to public agencies at least 10 days before the public hearing when the County Planning Commission and Montecito Planning Commission consider recommendations regarding the Final Program EIR, and the County Board of Supervisors considers certifying the Final Program EIR. The Final Program EIR will be available for public review on the County's website: https://www.countyofsb.org/1214/Recreation-Master-Plan (CEQA Guidelines Section 15089).
Program EIR Certification, Findings, and Statement of Overriding Considerations	The County will certify that the Final Program EIR is completed in compliance with CEQA. According to PRC Section 21081, when a Program EIR identifies significant environmental impacts that may result from a project, the lead agency's decision-making body must make specific findings and adopt a Statement of Overriding Considerations (SOC). The SOC must provide specific reasons in writing why the decision makers have determined that the benefits of the project make its unavoidable adverse environmental impacts acceptable (CEQA Guidelines Sections 15091-15093).
Mitigation Monitoring and Reporting Program (MMRP)	The County will adopt an MMRP for mitigation measures that are part of Project implementation (CEQA Guidelines Section 15097).
Notice of Determination (NOD)	The County will file an NOD with the State Clearinghouse within five working days of the agency's action on the Program EIR (CEQA Guidelines Section 15094).

1.6 PUBLIC OUTREACH & ENGAGEMENT

1.6.1 Notice of Preparation & Scoping

County Parks published a Notice of Preparation (NOP) and Environmental Scoping Document for the proposed Project on January 10, 2025, announcing the intent to prepare an Environmental Impact Report (EIR) and solicit comments on the scope of the analysis to be provided in the EIR (Appendix A). The CEQA Guidelines require the circulation of an NOP for a minimum 30-day review period. County Parks released the NOP for a 45-day comment period, from January 10, 2025, to February 24, 2025, then extended the comment period to March 11, 2025. The public comment period included a virtual public meeting on February 6, 2025, where

the Project was presented in English with live captions in Spanish and verbal public comment was recorded. The NOP was made available and published online at:

https://www.countyofsb.org/1214/Recreation-Master-Plan.

Appendix A contains the NOP/Environmental Scoping Document, a summary of the scoping process, and a record of all comments and input received during the review period, which was considered in preparing the scope of this EIR (CEQA Guidelines Section 15082). The County received approximately 239 sets of comments in the form of letters, emails, and verbal comments provided at public scoping meetings, from community residents, stakeholders, agencies, and organizations. These comments are provided in Appendix A. All comments were considered by County Parks during the preparation of this EIR.

1.7 SCOPE OF THE PROGRAM EIR

This EIR assesses the potential environmental impacts that would occur with the implementation of the Project. The EIR evaluates potentially significant environmental impacts, including issues raised in public comments received in response to the NOP/IS and at public scoping meetings (See Appendix B and C). This scoping process determined that the EIR should analyze the following issues (See Section 3.0, *Environmental Impact Analysis*.):

- Aesthetics & Visual Resources
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural & Tribal Cultural Resources
- Energy
- Geology & Soils
- Greenhouse Gas Emissions
- Hazards & Hazardous Materials
- Hydrology & Water Quality
- Land Use & Planning
- Noise
- Public Services
- Recreation
- Transportation
- Utilities & Service Systems
- Wildfire

This EIR addresses the issues referenced above and identifies potential environmental impacts associated with the Project, following the provisions of the State CEQA Guidelines. The EIR identifies feasible mitigation measures, where necessary, that would reduce or eliminate adverse environmental effects. A summary of cumulative impacts, which considers other projects or plans in the vicinity, is described in each CEQA resource analysis presented in Chapter 3.0, *Environmental Impact Analysis*. Cumulative project analyses represent a comprehensive assessment of potential impacts using a list of past, present, and probable future projects capable of producing related or compounded impacts. Per CEQA Guidelines Section 15128 (Effects Not Found to Be Significant), environmental impacts related to Mineral Resources, Forestry Resources, and Population & Housing would be insignificant and therefore are addressed in Section 5.0, *Other CEQA Considerations* of this EIR.

Consistent with CEQA Guidelines Section 15126.6(d), this EIR includes an assessment of a reasonable range of alternatives to the Project that could feasibly attain the Project objectives while avoiding or substantially lessening any of the significant effects of the Project. The alternatives analysis includes alternatives that were considered but discarded from further analysis, and two alternatives fully analyzed per the CEQA Statute and Guidelines. Please refer to Section 4.0, *Alternatives Analysis*.

1.7.1 Areas of Known Public Controversy

CEQA Guidelines Section 15123 states that an EIR shall identify areas of controversy known to the Lead Agency, including issues raised by the agency and the public. Based on comments received during the scoping public meetings and NOP/IS comment period, the following issues are known to be of concern and may be controversial. Each issue is further evaluated in the EIR:

- Direct and indirect impacts on biological resources, including sensitive habitats and species, wildlife corridors, and natural communities;
- Loss of trees and vegetation;
- Adverse effects on agricultural land, crops, and viability;
- Recreation impacts;
- Equestrian and other users safety on trails and in public parks, including equestrian users and off-leash dog recreation;
- Improved multi-modal access;
- Visual impacts in rural and natural areas;
- Discovery of cultural and/or tribal cultural resources during construction;
- Water use and conservation, including recycled water;
- Noise and light impacts on sensitive receptors;
- Air quality and GHG emissions from new recreation facilities; and
- Energy demands of new recreation facilities.

1.8 ORGANIZATION OF THE EIR

This EIR is organized into the following sections:

- **Executive Summary (CEQA Guidelines Section 15123)** presents a summary of the proposed Project and alternatives, potential impacts and mitigation measures, and impact conclusions regarding growth inducement and cumulative impacts.
- **Table of Contents (CEQA Guidelines Section 15122)** provides a list of the contents included within the Program EIR.
- **Chapter 1, Introduction,** provides an overview of the EIR process, describes the purpose and scope of this Program EIR, and outlines the required EIR contents and the organization of the Program EIR.

- **Chapter 2, Project Description (CEQA Guidelines Section 15124),** describes the Project area, the Project Objectives, and the details of the Project's implementation as a basis for the environmental impact analysis.
- **Chapter 3, Environmental Impact Analysis and Cumulative Project Scenario (CEQA Guidelines Sections 15125, 15126.2, 15126.4, 15128, and 15130),** describes the existing environmental conditions and regulatory framework for each environmental resource area, methods and assumptions used in the impact analysis, criteria for determining significance, impacts that would result from the Project, and feasible mitigation measures that would eliminate or reduce significant impacts. "Cumulative Impacts" (CEQA Guidelines Section 15130) are also discussed, which describe impacts that could occur from the combined effect of the proposed Project with other past, present, and reasonably foreseeable future projects. For each significant adverse impact identified, mitigation measures are presented where feasible to reduce the impacts to acceptable levels. "Residual Impacts" identify impact categories after mitigation is applied; in those instances, where mitigation measures cannot reduce adverse impacts to *insignificant* levels, impacts are categorized as *significant and unavoidable*.
- **Chapter 4, Alternatives Analysis (CEQA Guidelines Section 15126.6),** evaluates the environmental effects of feasible alternatives relative to the proposed Project, including the required No Project Alternative. It also identifies the environmentally superior alternative.
- **Chapter 5, Other CEQA (CEQA Guidelines Section 15126.2),** identifies insignificant issues areas, as well as secondary impacts, potential growth-inducement, and significant and unavoidable effects.
- **Chapter 6, List of Preparers (CEQA Guidelines Section 15129),** identifies the individuals and/or organizations involved in preparing this Program EIR.
- **Chapter 7, References (CEQA Guidelines Section 15129),** identifies the documents (printed and website references) and individuals (personal communications) consulted during the preparation of this Program EIR.
- **Chapter 8, Response to Comments (CEQA Guidelines Section 15088),** provides a copy of written response to all comments received from agencies, non-governmental organizations, community groups, and the public on the Draft Program EIR.
- **Chapter 9, Mitigation Monitoring and Reporting Program (CEQA Guidelines Section 15091),** provide a program for reporting on, or monitoring, the changes and measures that are either required as part of the adoption of the Project or made as conditions of approval to avoid or substantially lessen significant environmental effects.
- **Technical Appendices** provide information and technical studies that support the environmental analysis set forth in this Program EIR and include the NOP and responses to the NOP (Appendix A) and supporting technical information/studies.

1.9 REVISIONS TO THE DRAFT PROGRAM EIR

Changes made to the Draft Program EIR in response to public comments are included in this Final Program EIR. Changes to the Draft Program EIR include minor corrections, clarifications, additions, or deletions resulting from specific response to comments. These text revisions are provided in the body text of the EIR. Meaningful corrections, additions, and deletions to the EIR are provided in ~~strikethrough~~ and underline format, as needed, to indicate an addition or deletion, respectively.

Changes to the text of the Draft Program EIR are primarily presented in the following sections:

- *Executive Summary*
- Section 3.1, *Aesthetics and Visual Resources*
- Section 3.2, *Air Quality*
- Section 3.4, *Biological Resources*
- Section 3.5, *Cultural and Tribal Cultural Resources*
- Section 3.7, *Geology and Soils*
- Section 3.9, *Hazards and Hazardous Materials*
- Section 3.12, *Noise*

Changes to these sections include minor modifications to the details of the mitigation measures and clarifications to the existing setting discussion.

New information added to an EIR is not significant unless the EIR is changed in a way that deprives the public of meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect that the project's proponent has declined to implement. The minor clarifying revisions described above and presented in this Final Program EIR would not result in a new significant environmental impact, and substantial increase in the severity of an environmental impact, or a feasible project alternative or mitigation measure that would clearly reduce the significant environmental impacts. These clarifications ensure internal consistency with the EIR and proposed ordinance amendments, incorporate minor revisions or clarifications recommended by commenters, and would not substantially change any of the EIR's conclusions. Therefore, pursuant to CEQA Guidelines Section 15088.5, the County is not required to recirculate the Draft Program EIR.

2.0 PROJECT DESCRIPTION

This chapter of the Program Environmental Impact Report (EIR) describes the proposed Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (Project), including 1) the background related to the proposed Project; 2) the location and boundaries of the Recreation Planning Areas; 3) the goals and objectives of the proposed Project; 4) the individual Project components (i.e., Comprehensive Plan and Zoning Code amendments, planned park and trail projects); and 5) required actions and approvals associated with the Project. The purpose of this chapter is to identify the components and timing of implementation of the Project to inform the programmatic review of potential environmental impacts per the California Environmental Quality Act (CEQA) under Public Resources Code Sections 21000-21189.57 and the CEQA Guidelines under the California Code of Regulations, Title 14, Division 6, Chapter 3, Sections 15000-15387.

2.1 INTRODUCTION

In Santa Barbara County, recreation facilities and programs are provided by local, state, and federal agencies, as well as private recreation service providers. Each agency has a unique approach to planning for parks, recreation, and trails based on its adopted recreation planning framework, the facilities managed, and the user groups served. The County of Santa Barbara (County) provides the most park and open space acreage of any local agency, and the state and federal governments provide expansive lands for outdoor recreation. However, the eight cities in the county each provide more diverse parks and commonly provide robust recreation programs (e.g., sports leagues, fitness classes) to serve residents regionally. Two special districts also provide park facilities and/or recreation programming to meet local needs. The cities and special districts, along with private recreational service providers (e.g., youth sports leagues, YMCAs), are central to providing recreational services, particularly for children and seniors, as well as adult fitness and active sports. This diversity of demands and services requires interagency coordination to provide adequate parks and recreation, with each filling different needs in particular regions. Planning for recreation involves considering those unique needs in the adopted goals, policies, actions, and programs for the recreation service providers. As such, the County of Santa Barbara Community Services Department, Parks Division (County Parks) coordinated with a range of recreational service providers to initiate the Recreation Master Plan.

2.1.1 Background

A countywide Recreation Master Plan has never been done – the last time countywide recreational needs were analyzed was in 1980 during the development of the County

Comprehensive Plan. The Land Use Element from that time stated that in 1977 the population of the County was 288,900 residents. In 2020, the population was reported by the U.S. Census to be 448,229 residents, a nearly 36 percent increase in population size. This swell of residents over the last 40 years demonstrates the strain on existing recreational spaces within the county and the need for new and improved public spaces for the county's changing demographics and growing number of children.

In June 2019, the County kicked off the Recreation Master Plan with a recreation summit in the City of Buellton. Representatives from all eight cities, the County Board of Supervisors, the County Park Commission, California State Parks, Santa Barbara County Conservation Blueprint, the Land Trust of Santa Barbara County, Santa Barbara Trails Council, California Coastal Conservancy, Lompoc Trails Committee, Isla Vista Recreation and Parks District, Cuyama Valley Recreation District, California State Senate, Santa Barbara County Association of Governments, Vandenberg Space Force Base (VSFB), Santa Maria Valley Open Space, and the U.S. Forest Service were in attendance. This summit helped identify the preliminary goals of the Recreation Master Plan and fostered connections between stakeholders, a major goal of the Recreation Master Plan.

After the summit, a Steering Committee was formed to guide development of the Recreation Master Plan. Representatives from the eight cities, County Parks, the County Public Health Department, County Park Commission, California State Parks, Santa Barbara Trails Council, Los Padres ForestWatch, Santa Barbara County Conservation Blueprint, Los Amigos de Guadalupe, Cuyama Valley Recreation District, Isla Vista Recreation and Parks District, and Summerland Citizens Association served on the Steering Committee. County Parks presented to the Steering Committee six times between 2019 and 2022 during key junctions in the project.

In March 2020, the COVID-19 Pandemic hit, putting the Recreation Master Plan on pause and affecting public outreach for the following three years. The County launched a survey in October 2020 with 21 questions, and a kids' survey with four questions. The full survey had seven questions collecting the location of the survey taker and their demographics, and a mix of open-response questions and multiple-choice questions. The kids' survey had all open-response questions. Both surveys were available online and in print copies at public outreach events.

In 2021, the County realized that the majority of respondents were not representative of the larger County population and that South Coast residents were overrepresented in survey results. Although the median household income in Santa Barbara County at the time of the survey was approximately $73,602, 56 percent of survey respondents reported a combined household income above $100,000. While 45.1 percent of county residents identify as Hispanic or Latino, only 17 percent of survey respondents identified as Hispanic or Latino. In February 2022, the County Board of Supervisors approved additional funding for public outreach targeting non-English speakers and financially disadvantaged communities. A new, shorter survey was

developed in English and Spanish that was designed to be administered verbally. The County provided grants to five nonprofits to help administer the surveys: Guadalupe-Nipomo Dunes Center, El Centro Santa Barbara, Mixteco Indígena Community Organizing Project, People's Self Help Housing, and the Santa Barbara County Promotores Network. Representatives from these organizations were able to collect an additional 1,118 survey responses by hosting pop-up events, attending community events, and knocking on doors. In addition, the County hired three Spanish-speaking interns from the University of California, Santa Barbara (UCSB) to conduct additional pop-up events. The interns were able to collect an additional 503 surveys in spring 2022.

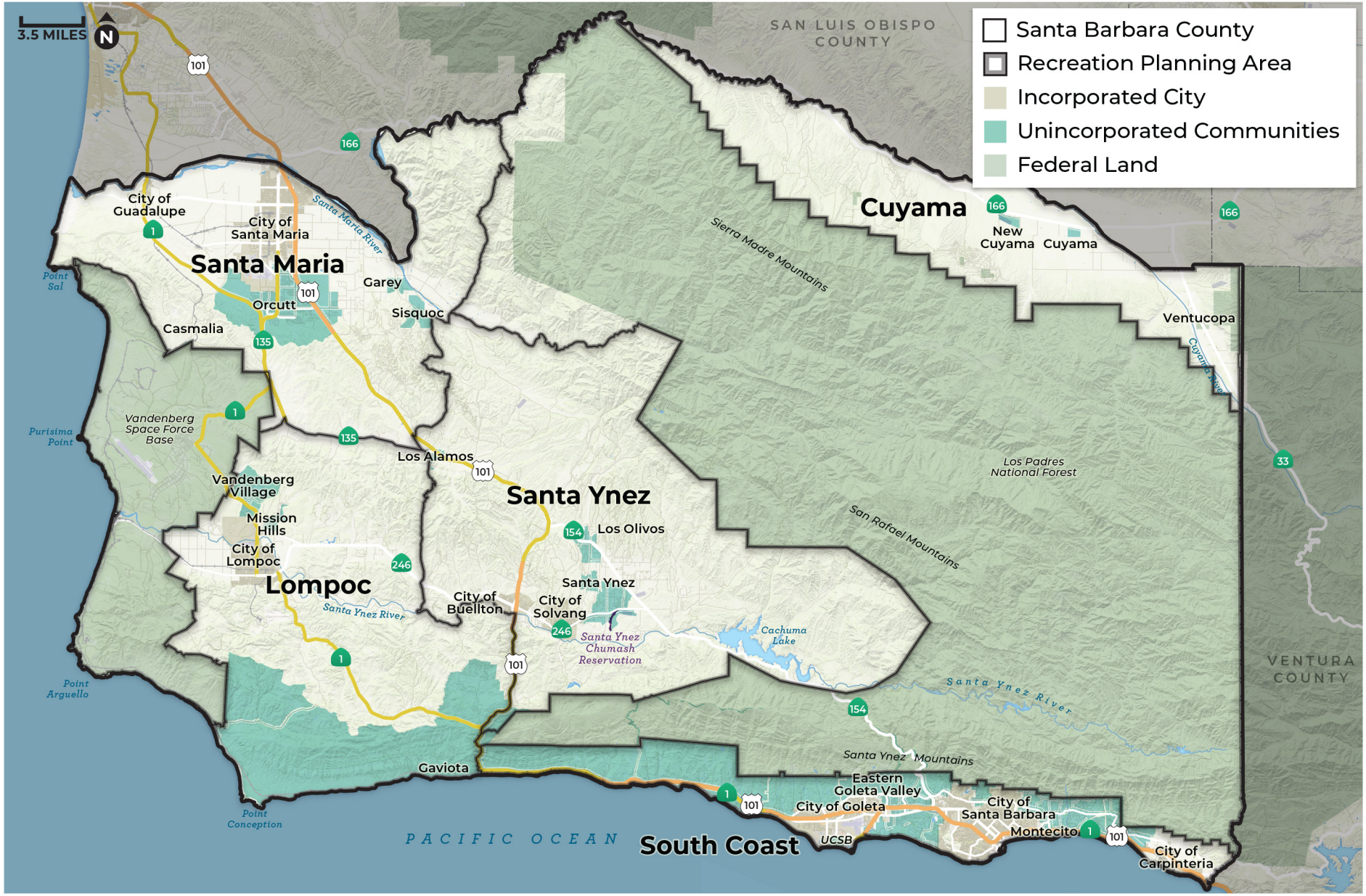
The survey closed in July 2022. In total, the full original survey received 5,822 responses, the kids survey received 875 responses, and the shorter, targeted survey received 1,299 responses, for a total of 7,996 total survey responses. The project team hosted 62 pop-up events, 11 virtual workshops, and 5 community-partner-led events. Feedback received during the extensive public outreach process was used to choose and prioritize projects in the Recreation Master Plan.

2.2 EXISTING SETTING

Recreation throughout the county is provided by County Parks, the eight incorporated cities, state and federal agencies, and private non-profits. Providing for recreation in a community involves several essential components, including governing documents identifying the community's goals for recreation, such as general plans or master plans, as well as budget documents and funding sources to implement capital improvements, acquisitions, and maintenance programs. Parks and recreation staff are also essential to plan for, seek funding for, and maintain the facilities to serve the community's needs and achieve adopted goals. Recreation agency planning documents include the County Comprehensive Plan, city general plans, community plans, and plans for specific areas published by the California Coastal Commission, California State Parks, Los Padres National Forest (LPNF), Santa Barbara County Association of Governments, U.S. Bureau of Land Management (BLM), U.S. Bureau of Reclamation, and U.S. National Parks Service.

2.2.1 County Setting and Characteristics

Santa Barbara County is located along the California coast, approximately 100 miles northwest of Los Angeles, and is bordered by Ventura County to the east and south, Kern County to the east, San Luis Obispo County to the north, and the Pacific Ocean to the west and south (Figure 2-1). The county extends approximately 45 miles in a north-south direction and approximately 65 miles from an east-west-facing coastline. The county has approximately 117 miles of coastline connecting to San Luis Obispo County in the north and Ventura County to the south. Approximately 195 square miles (7 percent) of the county's land area is part of the Channel Islands.



wsp

Santa Barbara County Regional Setting

FIGURE 2-1

Santa Barbara County contains eight small to medium-sized cities (i.e., Guadalupe, Santa Maria, Lompoc, Solvang, Buellton, Goleta, Santa Barbara, and Carpinteria) with populations ranging from approximately 5,100 (City of Buellton) to over 111,000 (City of Santa Maria) (U.S. Census Bureau 2025). The county also contains 19 unincorporated communities ranging in size from very small communities (e.g., Sisquoc and Garey), to small rural towns (e.g., Santa Ynez) with less than 5,000 residents each, to larger towns (e.g., Orcutt) and Census Designated Places (e.g., Eastern Goleta Valley) with more than 30,000 residents each (U.S. Census Bureau 2025).

Topography in the county is highly varied within the coastal terraces between the ocean and mountains, the scenic inland valleys with large expanses of cultivated farmlands and gently rolling hillsides, and the rugged terrain of the LPNF. There are three mountain ranges within the county. The Santa Ynez range divides North County from the South Coast, and the Sierra Madre and San Rafael Mountains run parallel with the LPNF to divide the Cuyama Valley from the Santa Maria and Santa Ynez Valleys. The county's elevations range from sea level to 6,803 feet at Big Pine Mountain.

Regional road access to Santa Barbara County is provided primarily by U.S. Highway 101 (Highway 101), which traverses the county north to south, connecting to San Luis Obispo County and Ventura County, and State Route (SR) 166, which connects Santa Barbara County with Kern County in the east. Additional access to San Luis Obispo County is provided by SR 1. SR 150 provides secondary access to Ventura County. Union Pacific Railroad (UPRR) maintains north-south train tracks supporting daily Amtrak passenger operations and regional freight trains. Passenger rail stations are located in Carpinteria, Santa Barbara, Goleta, Lompoc (Surf Beach), and Guadalupe. Municipal airports in Santa Maria and Santa Barbara provide regional and national flight services; the Santa Ynez Airport, Lompoc Airport, and New Cuyama Airport support regional aviation. Santa Barbara Harbor also supports boating, fishing, and periodic cruise ship activities.

The county contains 395 recreational properties spanning 917,183 acres. However, 35 properties, accounting for 848,486 acres, are federal- or state-owned properties. There are 83 properties spanning 5,311 acres in the unincorporated areas of the county. In addition, there are 1,190 miles of trails within the county.

Recreation Planning in the County

Recreation in the County is managed by County Parks, whose mission is to provide, protect, and enhance parks, recreation, and trails for the enjoyment, education, and inspiration of present and future generations in a safe and resilient environment. They provide recreation facilities and services to approximately 7.6 million visitors annually at 70 park and open space locations, two campgrounds, and a network of trails and coastal access easements. County Parks manages 24 day-use parks, 2 camping parks, 45 open spaces, and 12 beach areas for a

total of 8,595 acres, plus over 100 miles of trails and approximately 4,000,000 square feet of road and parking lot pavement.

County Parks is supported by the County Park Commission, as appointed by the County Board of Supervisors. Commissioners each represent one district in the county and serve a 3-year term. The Park Commission is tasked with reviewing projects and policies, meeting with the public, and serving as an advocate for the local park system. In addition to the County Park Commission, the County Riding and Hiking Trails Advisory Committee was established by the County Board of Supervisors in an advisory capacity to review programs, policies, and procedures affecting county recreational riding and hiking trails and their use. Committee members are selected by District Supervisors with 3 to 4 members from each District and are concerned with the location, development, and maintenance of the recreational trails system countywide, to provide public access and links to the LPNF, parks, beaches, and other public recreation areas.

Recreation planning in the County is guided by several interrelated documents that serve different purposes. Key recreation planning documents adopted by the County include the County Comprehensive Plan, Community Plans, and the Capital Improvement Program (CIP). The CIP is a multi-year planning tool used to identify and implement the County's short-term and long-term capital needs, including key recreation improvements and action items from the Comprehensive Plan and community plans. Recreation is handled in the County Comprehensive Plan in the Land Use Element. In unincorporated areas, parks and recreation areas are designated by the Land Use Element as follows:

> **Existing Public or Private Recreation and/or Open Space:** The purpose of this designation is to provide opportunities for various forms of outdoor recreation, of a public or private nature, which require access to open spaces and natural settings for their realization. These open space recreational uses include, but are not limited to, the following:
>
> - public parks containing facilities for picnicking, camping, riding, hiking, walking, biking, on a day or longer use basis;
> - flood control easements providing access to and along stream channels and other drainage areas; and
> - golf courses.
>
> Under the 1980 Land Use Element guidance, structures or other facilities shall be limited to those required to support the recreational activities. These may include parking areas, corrals and stabling areas, picnic and camping areas, trails, water and sanitary facilities, safety and first aid stations, ranger stations, and limited concession facilities. Other recreational structures and facilities of a more intensive nature, such as swimming and tennis clubs, may be permitted. More intense commercial recreational development

> shall be limited to areas classified as commercial. For example, fairgrounds, amusement parks, and large indoor recreational complexes shall be classified as commercial uses

There are 11,367 acres of land currently designated for Public or Private Recreation and/or Open Space in the unincorporated areas and generally include land owned by the County, California State Parks, the federal government, and some privately owned land. Most recreation land (37 percent) is designated in the South Coast recreation planning area. Cuyama has the least area designated for recreation (0.2 percent), followed by Santa Maria Valley (5 percent), Santa Ynez Valley (13 percent), and Lompoc Valley (33 percent). In addition, 11 percent of recreation-designated land lies within the LPNF, which includes campgrounds, as well as limited areas of VSFB. Examples of facilities designated for recreation include La Purísima State Historic Park and the Mission Club Golf Course in the Lompoc Valley, Lake Cachuma County Park in the Santa Ynez Valley, and El Capitán State Beach and Earl Warren Showgrounds on the South Coast.

The 1980 Land Use Element also includes an overlay to identify future sites to be designated for recreation, as follows:

> **Proposed Public or Private Park/Recreational Facility Overlay**: This designation identifies by an overlay those lands suitable for future inclusion within the recreational designation defined above. These lands include the following:
>
> - lands selected by the County Park Department from those sites designated as having the highest suitability for recreational use;
> - areas designated by advisory committees;
> - shoreline areas designated within the County coastal zone; and
> - additional access along creeks and drainage ways.

There are currently only four locations designated with the Proposed Public or Private Park/Recreational Facility Overlay, totaling 134 acres. In the South Coast, there are three sites with this overlay, including the Las Varas Ranch and Dos Pueblos Ranch on the Gaviota Coast, and a 23-acre vacant parcel in the center of the Eastern Goleta Valley that is planned for residential uses. The fourth site within this overlay lies in New Cuyama and currently supports Richardson Park. These sites have been designated with this overlay for decades, and only one (Richardson Park) has been developed with recreation uses.

Additionally, the following land use designation directly relates to the Parks and Recreation Area designation, providing visitor-serving commercial uses proximate to designated recreation areas:

> **Resort/Visitor Serving Commercial (V)**: This designation intends to cater to the needs of visitors to recreational areas. Visitor-serving commercial uses will normally be found adjacent to important recreational resource areas, at special points of interest, or in special neighborhoods or communities. The intensity of the commercial development

shall be subordinate to the character of the recreational setting. Uses shall include, but not be limited to, the following:

- resort hotels,
- motels,
- restaurants,
- country clubs,
- guest ranches,
- riding stables, and
- beach clubs.

Uses, buildings, and structures customarily incidental and accessory to such recreational facilities, including commercial uses and services, are also permitted. Uses not permitted under this designation include other retail services, unrelated office and professional services, highway-related services for transients normally found at major highway interchanges or highway exits.

There are currently 52.3 acres of land designated for Resort/Visitor Serving Commercial in the unincorporated areas, with 97 percent located in the South Coast recreation planning area, including sites such as San Ysidro Ranch, the Four Seasons Biltmore, and the Miramar Hotel and Resort in Montecito; no other planning area contains this land use designation. In addition, 3 percent of resort/visitor-serving commercial-designated land lies within the LPNF, which includes the northern portions of San Ysidro Ranch.

In unincorporated areas, the Park, Recreation, and Trail (PRT) maps were adopted in the 1980 Land Use Element and amended over time through the community plans. PRT maps show existing and proposed parkland and trail corridors throughout the county. The PRT maps include six subareas of the County, such as the Lompoc Valley or the Santa Barbara-Goleta area. The PRT maps depict recreation features independently from the land use designation map and are key planning tools used by the County to acquire new parkland and trails. Key elements of the PRT maps delineate parks, open areas, and various types of trails, including existing parks, open space areas, and joint use facilities; proposed parks, open areas, and joint use facilities; existing on-road and off-road trails; and proposed on-road and off-road trails. Notably, the level of detail and approach to identifying existing and proposed parks, recreation, and trails vary considerably by region and the precision of mapping. As a result, the PRT maps require careful review and consideration. Variations in approach exist within community plans as well, which were adopted from 1992 (Montecito) through 2018 (Gaviota Coast). Some community plans specifically reference the PRT maps in policy, while others are more general. Overall, detailed parks and trails planning is not consistently available in the unincorporated area, particularly for areas that do not have adopted community plans, such as Mission Hills and Vandenberg Village.

The County Land Use Development Code (LUDC; Chapter 35.20 through 28) carries out the policies of the Comprehensive Plan by classifying and regulating the uses of land within the County. Additionally, the Montecito Land Use Development Code (MLUDC), as well as the Coastal Zoning Ordinance (CZO), carry out the policies of the Comprehensive Plan by classifying and regulating the use of land per the Montecito Community Plan Area and the Coastal Land Use Plan, respectively. While land use designations characterize the physical uses and the intensity of that use, zoning designations legally define permitted uses and development guidelines for those uses. In the unincorporated areas, recreational uses and open spaces are designated under the Recreation (REC) zoning designation, which is applied to provide public or private open space areas that are appropriate for various forms of outdoor recreation, consistent with the Land Use Element. Zoning for planned development also provides a regulatory framework for park acquisitions and development as part of private property development in the County.

2.2.2 Recreation Planning Regions

The Project area is Santa Barbara County and includes all unincorporated lands countywide. The unincorporated county totals approximately 2,481 square miles (1.58 million acres), excluding the Channel Islands but including more than 1,232 square miles (more than 789,000 acres) of federal land within LPNF and VSFB. Residential uses are primarily associated with distinct unincorporated urban communities, including Eastern Goleta Valley, Orcutt, Isla Vista, Montecito, Vandenberg Village, Mission Hills, Santa Ynez, Los Alamos, and Los Olivos (Table 2-1). Outside urban communities, a majority of the land in the unincorporated areas is undeveloped and used for agriculture, recreation, and/or tourism, with extensive areas of open space within LPNF, VSFB, and several State Parks located primarily along the coastline and in the mountainous areas.

The county encompasses urban, semi-rural, and rural communities, which have their own identity, but for recreation planning purposes, there are essentially five recreation planning areas, including Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, Cuyama Valley, and the South Coast (2). These planning areas are centered on population hubs that residents tend to recreate at because they share recreational facilities and programs, such as regional parks, sports complexes, gymnasiums, trail systems, or public open spaces. For example, residents of the City of Santa Maria may utilize the Orcutt Hills hiking trails, while Orcutt residents may use the baseball fields at the City of Santa Maria Hagerman Sports Complex. Similarly, children in the City of Goleta may utilize the Ben Page Youth Sports Center in the Eastern Goleta Valley, which provides both ballfields and the only non-school-related gymnasium in these communities, while children from Eastern Goleta Valley may use Girsh Park in the City of Goleta for its several soccer fields.

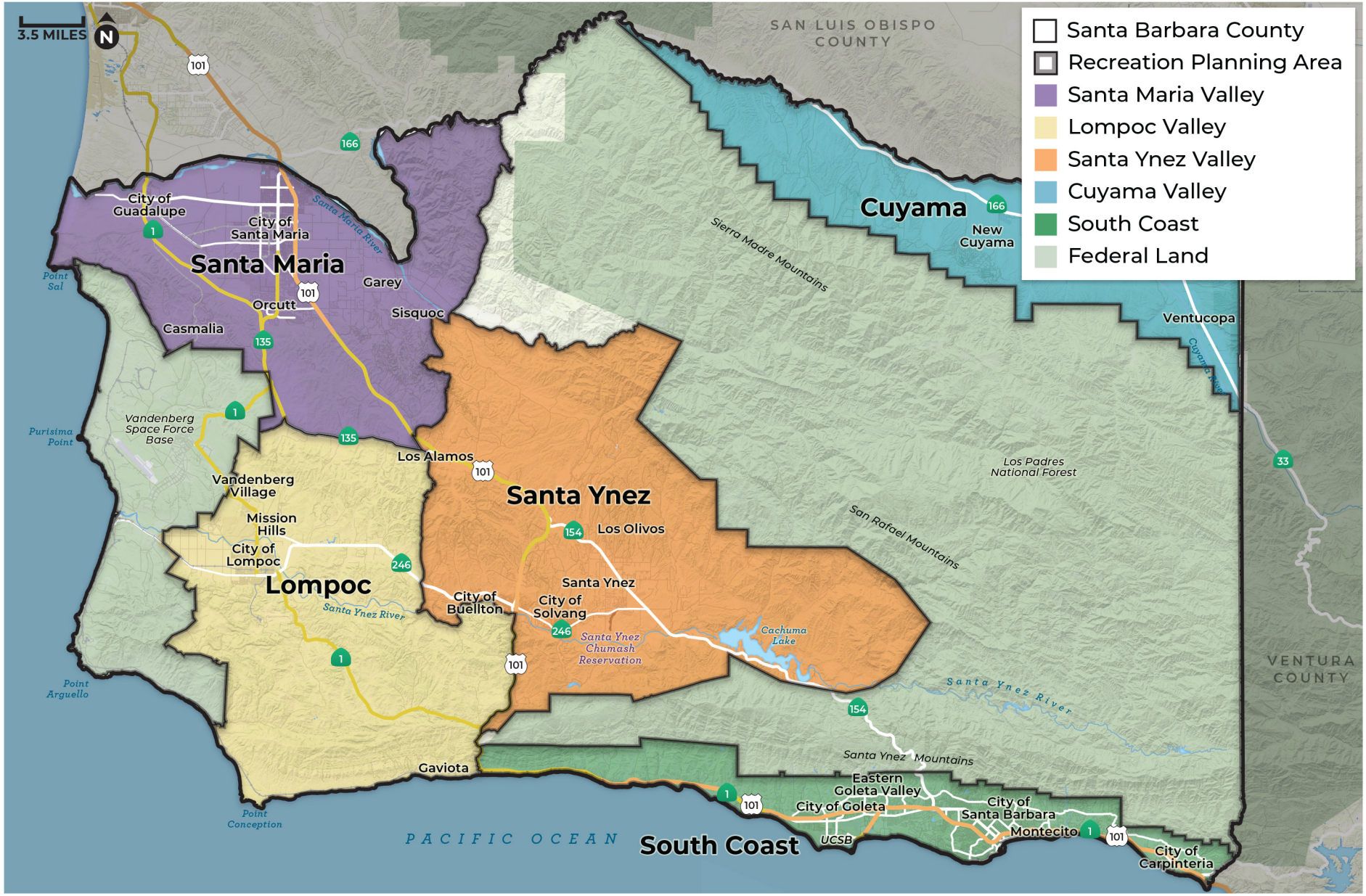
For recreation planning in Santa Barbara County, these five planning areas consist of:

- The **Santa Maria Valley**, including the cities of Santa Maria and Guadalupe, as well as the communities of Orcutt, Casmalia, Garey, and Sisquoc.
- The **Cuyama Valley**, including the communities of Cuyama and New Cuyama.
- The **Lompoc Valley**, including the City of Lompoc, and the communities of Vandenberg Village and Mission Hills.
- The **Santa Ynez Valley**, including the cities of Buellton and Solvang, as well as the communities of Ballard, Santa Ynez, and Los Olivos; although located in the San Antonio Valley, Los Alamos is also included in this planning area.
- 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, and Summerland, as well as the rural Gaviota Coast.

VSFB, LPNF, and Channel Islands National Park have unique recreation features and are managed outside of local agency jurisdictions. While the Recreation Master Plan recognizes and documents recreation in these areas, it does not apply to these areas.

Table 2-1. Summary of Public Parkland by Recreation Planning Area

Recreation Planning Region	Size of Region (Acres)	Acres of Public Parkland	Number of Public Parks	Incorporated Cities	Unincorporated Communities
Santa Maria Valley	178,146	509	45	Santa Maria, Guadalupe	Orcutt, Garey, Sisquoc, Casmalia
Cuyama Valley	112,783	29	2	N/A	Cuyama, New Cuyama
Lompoc Valley	195,287	389	19	Lompoc	Mission Hills, Vandenberg Village
Santa Ynez Valley	202,507	212	12	Buellton, Solvang	Los Olivos, Los Alamos, Ballard, Santa Ynez
South Coast	77,020	1,053	92	Goleta, Santa Barbara, Carpinteria	Gaviota Coast, Isla Vista, Eastern Goleta Valley, Mission Canyon, Montecito, Summerland, Toro Canyon



wsp

Recreation Planning Regions in Santa Barbara

FIGURE 2-2

Santa Maria Valley

The Santa Maria Valley encompasses 178,146 acres in the northwestern portion of Santa Barbara County, including areas inland from the county's northern coastline and south of the County of San Luis Obispo. This planning area is bound by the Santa Maria River to the north, the Pacific Ocean and Casmalia Hills to the west, the San Rafael Mountains to the east, and the Solomon Hills to the south. The Santa Maria River traverses the valley and drains into the Pacific Ocean west of Guadalupe. The area is accessed by Highway 101 from the north and south, SR 166 from the east and west, SR 1 from the northwest and southwest, and SR 135 from the south. Amtrak train service is available in the City of Guadalupe. The Santa Maria Airport provides regional and continental passenger flight services. Alan Hancock College's main campus provides higher educational services. The Santa Maria Valley is home to approximately 146,838 residents within the City of Santa Maria, the City of Guadalupe, and several unincorporated communities, including Orcutt, Garey, Sisquoc, and Casmalia, as well as rural residents. Santa Maria Valley communities are geographically distinctive from one another, with the exception of the City of Santa Maria and Orcutt, which physically combine as the population center of the Santa Maria Valley. The land use outside this urban hub is largely rural and dominated by cultivated agriculture, grazing, and open space.

There are 42 public parks in the Santa Maria Valley spanning 509 acres. The largest area for public recreation in the region is Waller Park (134 acres) and Hagerman Sports Complex (20 acres). Together, this area provides soccer and football fields, pickleball courts, a public pool and community center, a dog park, playgrounds, and a disc golf course. Community parks in the cities of Guadalupe and Santa Maria, such as Jack O'Connell Park (15 acres) and Jim May Park (24 acres), provide additional sports fields. In Orcutt, Orcutt Community Park (26 acres) provides sports fields as well. The City of Guadalupe has five parks spanning 21 acres, including recently renovated Leroy Park (4 acres), which has a playground, picnic benches, barbeques (BBQs), a community center, and basketball courts. Most public parks in the Santa Maria Valley are condensed in the City of Santa Maria (30 public parks). Coastal access is provided at Point Sal and Rancho Guadalupe Dunes Preserve. There are a total of 45 miles of trails in the region, including popular trails in the Orcutt Hills and at Point Sal.

Cuyama Valley

The Cuyama Valley constitutes the northeastern and eastern portion of the county, encompassing 112,783 acres and bound by the Caliente Mountain Range to the north and the Sierra Madre Mountains to the south. The valley is bisected by the Cuyama River and includes the unincorporated communities of Cuyama and New Cuyama. Access to the Cuyama Valley is provided by SR 166 from the northwest and SR 33 from the southeast. The area has a population of approximately 596, mostly concentrated in the community of New Cuyama. These communities are geographically isolated from regional urban centers in Santa Maria and Santa

Ynez by the LPNF and the mountainous areas of the county. The Cuyama Valley is predominantly rural and agricultural in use with small urban uses limited to Cuyama and New Cuyama.

There is only one recreational amenity in the Cuyama Valley: Richardson Park, which includes a County Park, parkland managed by the Cuyama Valley Recreation District, and the Montgomery Hall Building. This amenity spans 29 acres and includes a public pool, playgrounds, and walking trails. The Cuyama Valley has 4.1 miles of trails, including unnamed trails and a recreational trail on Bates Canyon Road.

Lompoc Valley

The Lompoc Valley encompasses 195,287 acres located in the mid-western portion of the county, bound by the Purísima, Santa Rita, Santa Rosa, and White Hills. The Santa Ynez River traverses the Lompoc Valley in a westerly direction and drains into the Pacific Ocean at Ocean Beach County Park. This planning area is accessed by SR 1 from the north and south and SR 246 from the east and west. Amtrak train services is available from Surf Beach on the coast approximately 10 miles west of the City of Lompoc. The Lompoc Airport provides regional aviation services. The Lompoc Valley is home to 50,806 residents primarily in the City of Lompoc and unincorporated communities of Vandenberg Village and Mission Hills. The unincorporated communities lie in low hills immediately north of the Santa Ynez River and City of Lompoc to form the population center of the Lompoc Valley. This urbanized core is surrounded primarily by agriculture and open space. La Purísima Mission State Historic Park lies immediately northeast of the City of Lompoc. VSFB lies to the west of this population center and separates these communities from the rural northern coastline and beaches.

There are 19 public parks in the Lompoc Valley spanning 389 acres. Of those, 13 public parks are within the City of Lompoc, the largest of which include Ken Adam Park (114 acres), River Park (46 acres), Riverbend Park (43 acres), and Beattie Park (43 acres). Beattie Park and Ken Adam Park both have soccer and football fields, as well as basketball courts. Riverbend Park has a baseball field and multiple soccer fields. Coastal access for Lompoc Valley residents is provided at Surf Beach and Ocean Beach Park (39 acres) and at Jalama Beach County Park. In Vandenberg Village, sports fields and basketball courts are available at Providence Landing Park (13 acres) and Vandenberg Hills Little League Fields (8 acres). There are 69.6 miles of trails in the region, including trails within Burton Mesa, Gaviota State Park, La Purísima Mission, and Jalama Beach.

Santa Ynez Valley

The Santa Ynez Valley comprises 202,507 acres located in central Santa Barbara County. The Santa Ynez Valley is located at the base of several converging mountain ranges, including the San Rafael and Santa Ynez mountains, and the Purísima and Santa Rita hills. The Santa Ynez River flows through the valley and into Lake Cachuma located centrally in the valley, providing

both water supplies and a key recreational amenity to the county. The area is accessible by the Highway 101 from the southwest and northwest, SR 246 from the west, and SR 154 from the southeast. The Santa Ynez Airport provides regional aviation services. This planning area is home to approximately 19,157 people who live in the cities of Buellton and Solvang, the unincorporated communities of Santa Ynez, Ballard, and Los Olivos, or in rural areas, as well as within the town of Los Alamos located 6 miles to the north. Population density is generally low in rural areas where land uses are predominantly ranches, grazing, agriculture, and open space.

There are 10 public parks in the Santa Ynez Valley spanning 212 acres. There are two parks in the City of Buellton and two in the City of Solvang. In the City of Solvang, Sunny Fields Park (7 acres) provides baseball and soccer fields, and Hans Christian Andersen Park (52 acres) provides basketball courts. In the City of Buellton, Buellton Park and PAWS Park (3 acres) provides a dog park. In Los Alamos, Los Alamos Park (50 acres) provides a disc golf course, BBQs, a playground, and picnic areas. The only sports fields in the region are provided at Sunny Fields Park (7 acres) in unincorporated Santa Ynez Valley. There are 65.7 miles of trails in the region, including at Lake Cachuma, within Sedgewick Reserve, and popular tourist sites like Nojoqui Falls.

South Coast

The South Coast constitutes 77,020 acres along the southern coastline of the county, including the cities of Santa Barbara, Goleta, and Carpinteria, and the unincorporated communities of Eastern Goleta Valley, Isla Vista, Mission Canyon, Toro Canyon, Montecito, and Summerland and the rural Gaviota Coast. This coastal area lies between the ridgeline of the Santa Ynez Mountains and the Pacific Ocean from Gaviota Pass to the Ventura County line. Highway 101 traverses the planning area west to east and parallels the UPRR. Amtrak train service is provided from stations in Carpinteria, Santa Barbara, and Goleta. The Santa Barbara Airport provides regional and continental flight services. The area's 208,530 residents are concentrated within the eastern reach of the South Coast between Goleta and Carpinteria, while the western extent along the Gaviota Coast is sparsely populated and rural in character. The South Coast is bordered by LPNF to the north and supports several state parks, including Carpinteria State Beach, El Presidio de Santa Barbara State Historic Park, El Capitán State Beach, Refugio State Beach, and Gaviota State Park. The UCSB campus is located on the coast adjacent to the community of Isla Vista and the City of Goleta, while another major educational institution, Santa Barbara City College is located within the City of Santa Barbara.

There are 90 public parks in the South Coast spanning 1,053 acres. Of those, 33 are within the City of Santa Barbara, 15 are within the City of Goleta, and 9 are within the City of Carpinteria. In the City of Santa Barbara, parks of all sizes provide space for a range of recreational activities. One of the largest includes privately owned Elings Park (225 acres), which has baseball and soccer fields, a dog park, a disc golf course, trails, playgrounds, restrooms, BBQs,

and picnic areas. In the City of Carpinteria, the Carpinteria Bluffs Nature Preserve (52 acres) and Carpinteria State Beach (58 acres) provide a major multi-use recreation area and coastal access point. Surrounding the City of Goleta, there are 17 public parks in Isla Vista and 7 in the Eastern Goleta Valley, including Tuckers Grove Park (114 acres), which provides a popular dog park. Outside of the cities, there is one public park in Montecito (Manning Park, 12 acres), one in Summerland (Ocean View Park, 11 acres), one in Toro Canyon (Toro Canyon Park, 89 acres), and two near Carpinteria (Santa Claus Lane Beach, 2 acres; and Rincon Point Carpinteria State Beach and Rincon Beach Park, 23 acres). There are 228 miles of trails in the region, including multi-purpose trails like the Goleta Bike Path, trails at state parks, and trails along beaches and bluffs.

2.3 PROJECT OVERVIEW

The Project includes the proposed Recreation Master Plan, a strategic long-range plan to fund and construct new public parks and trails to meet current and future recreation needs countywide. The Recreation Master Plan identifies recreation needs within five recreation planning regions and proposes capital improvements, programs, funding, and implementation strategies to guide the development of a range of public parks and trail projects over 10 to 20 years. In addition, the Project would introduce the Recreation Benefit Project (RBP) Program, which would create a voluntary opportunity for private development projects to contribute directly to the County's public recreation system. The program would establish incentives for eligible projects that provide public recreation facilities as part of a proposed private development project. To support the Recreation Master Plan and the RBP Program, the Project involves a General Plan Amendment to update the Recreation Section of the Land Use Element and policies addressing parks, recreation, and trails within the County's Comprehensive Plan. The Project would also amend the County LUDC, the MLUDC, and the CZO to update the REC zoning district consistent with the Comprehensive Plan, create standards for private applications for public parks and trails, and implement the RBP Program and other related amendments, including allowing and regulating parks and trails as permitted uses in selected zoning districts. Finally, the Project includes updates to the County's Parks, Recreation, and Trails (PRT) Map and the Private and Public Parks/Recreation Facilities Overlay in the County Comprehensive Plan's Land Use Element to accurately depict the County of Santa Barbara's existing and planned parks and trails in the unincorporated county.

2.4 PROJECT OBJECTIVES

The objectives of the Recreation Master Plan are:

1. Expand and improve parks, trails, and recreation facilities to help meet countywide needs for play, sports, leisure, exercise, and outdoor exploration.

2. Facilitate interagency cooperation and coordination to foster a countywide plan for public parks, recreation, and trails.
3. Address unmet and future recreation needs to help guide overall recreation through 2050 while retaining flexibility for each agency or service provider.
4. Develop funding and implementation programs for County Parks to support the construction and operation of existing and planned parks, trails, and recreation facilities.
5. Enact the Recreation Benefit Project Program to create opportunities for public-private partnerships to develop new public parks, trails, and recreation facilities.
6. Build upon existing and ongoing transportation planning efforts to increase access to parks and recreation facilities via transit and active transportation, such as bike paths and trails.
7. Update and modernize the County of Santa Barbara's policies and regulations to support public parks, trails, and recreation facilities, to meet the needs identified in the Recreation Master Plan.
8. Establish development standards for public parks and trails that foster streamlined and efficient permitting.

2.5 PROJECT COMPONENTS

The Project comprises the proposed Recreation Master Plan and a package of amendments to the County Comprehensive Plan and zoning ordinances, including the County LUDC, MLUDC, and Article II, CZO, to support the implementation of the Recreation Master Plan over 10 to 20 years. For purposes of the EIR, the Recreation Master Plan component includes the County's planned public park, recreation, and trail projects, as well as recognition of other public and nonprofit projects that would involve the County and contribute to meeting countywide recreation needs. This component also includes implementation recommendations, including near-term and long-term actions, funding strategies, and conceptual partnership programs described in the final Recreation Master Plan.

To foster the successful implementation of the Recreation Master Plan, the Project includes amendments to County policy and regulations to support public parks and recreation as a key component of sustainable communities and the County's One Climate program (https://sbco.mysocialpinpoint.com/oneclimatehome). As described further below, the Project would amend the Comprehensive Plan with updated policies for parks, recreation, open spaces, and trails that reflect current community input and more actively support the County's efforts and attention to recreation needs in the unincorporated area. The Project would also amend the County's zoning ordinances to support permitting public parks and trails by private entities. These changes would alter the regulatory environment for privately proposed recreation and trails projects, such as those proposed by the RBP Program. Lastly, the Project would create a new program called the Recreation Benefit Project Program to foster public-private

partnerships as a key strategy to acquire and construct new parks and trails in Santa Barbara County. Since the Project would foster the development of projects on private land with new regulations and development standards to implement them, this EIR analyzes the impacts of the projects outlined below and potential future projects on private land, enabled by changes to the regulatory environment described herein.

2.5.1 Planned County Parks, Recreation, and Trails Projects under the Recreation Master Plan

The Recreation Master Plan identifies opportunities for new and expanded parks and trails in Santa Barbara County within the five Recreation Planning Regions. This section describes each of County Parks' planned projects under the Recreation Master Plan. A digital map of the planned parks and improvements is available at www.sbcrecplan.com.

As part of the County Parks plan, proposed park and trail projects lie in the unincorporated area on properties that are either already owned by the County or another public agency, or are currently privately owned and would be acquired for public use as part of the Project. Some projects are brand-new concepts for existing or future parks developed through the Recreation Master Plan process, including community outreach and interagency coordination. Other projects are long-standing concepts in the County's community plans and CIP that are awaiting the right mix of funding, planning, and initiative to be realized. Some proposed park and trail projects may be wholly feasible as County Parks' efforts, while others require partnerships with other agencies or private landowners. Some projects are straightforward and attainable within the near term (5 to 10 years). Others are complex and require a longer planning timeframe (10 to 20 years).

Public park and outdoor recreation projects are planned primarily on public lands in unincorporated and incorporated areas to expand community access to competitive sports fields and courts, campgrounds, aquatic facilities (i.e., pools, splash pads, cooling centers), playgrounds, and gathering areas for community events. Public trail projects are proposed to meet long-standing needs for outdoor exploration, access to natural areas, and exercise.

Parks and trail projects planned on existing public properties would require site design, construction, and operation consistent with the Recreation Master Plan. Parks and trail projects identified entirely or partially on privately owned properties would require real estate acquisition for long-term public use, as well as site design, construction, and operation in alignment with the Recreation Master Plan. While each proposed project is unique and varies in complexity, vision, location, and users served, the Recreation Master Plan provides the framework and tools needed to support the development of park and trail projects to help meet countywide needs.

Provided below is a description of each of the planned park, recreation, and trail projects, by recreation planning region, that are proposed as part of the Project. The estimated total additional public parkland and miles of trails developed as a result of the project are summarized in Table 2-2.

Santa Maria Valley

Oak Knolls Park (a.k.a., Mud Lake)

This project would transform an existing flood control retention basin into a dual-purpose neighborhood park that provides Orcutt residents with new recreational opportunities while maintaining critical flood and stormwater management functions. The Project would introduce new recreational elements, including possible multi-purpose sports fields, basketball courts, pickleball/tennis courts, and a playground area. Other amenities could include shade structures and picnic tables. Walking paths would provide internal circulation and access to the surrounding neighborhood.

Oak Knolls Park	
Type	Neighborhood Park
Responsible Agencies	County Parks, Flood Control
Add'l Parkland	10 acres
Add'l Trails	0.5 miles
Timing	Near-term (5 to 10 years)

Orcutt Creek Trail

The Orcutt Creek Trail is a proposed multi-purpose trail traversing the Orcutt community. The trail would accommodate hikers, equestrians, and bicyclists throughout the community, with several connections to neighboring trails. Significant trail planning has been conducted on the Orcutt Creek Trail by the County, and several segments of the Orcutt Creek Trail have been acquired and developed, but many gaps in the trail remain. One major gap in the Orcutt Creek Trail is "Segment 10," a 1.6-mile-long segment of proposed trail along the south side of Orcutt Creek that would connect S. Bradley Road to Orcutt Road. Segment 10 fills a key gap in the greater proposed Orcutt Creek Trail and provides a recreational trail connection between existing developed trails, neighborhoods, and existing and proposed community/neighborhood parks. Further, the trail would have interpretive signage that educates residents about local wildlife, the riparian ecosystem, and the creek's role in stormwater management.

Orcutt Creek Trail	
Type	Community Trail
Responsible Agencies	County Parks
Add'l Parkland	0 acres
Add'l Trails	1.6 miles
Timing	Near-term (5 to 10 years)

Table 2-2. Summary of Planned Park, Recreation, and Trail Projects

No.	County Parks Projects	Add'l Public Parkland (Acres)	Add'l Miles of Trails
Currently Planned Projects			
1	Baron Ranch Trails	--	14
2	Lake Cachuma Campground and South Shore Facilities Improvements	--	--
3	Lake Cachuma North Shore Trails & Recreation Facilities Management Plan	--	15
4	Oak Knoll (aka Mud Lake) Neighborhood Park	10	0.5
5	Orcutt Creek Trail	--	1.6
6	San Marcos Foothills Open Space	--	3
7	Solomon Hills (Bonney) Trails	--	3.65
8	Vandenberg Village Park	1.5	--
9	Waller Park Regional Sports Fields	--	--
	Subtotal of Currently Planned Projects	**11.5 acres**	**37.75 miles**
New Planned Projects			
10	Ben Page Neighborhood Park	5	--
11	Drum Canyon Trail	--	8.8
12	Gaviota Marine Terminal Recreation Area	32	2
13	Glen Annie to Los Padres National Forest Trail	--	3
14	Goleta Community Sports Park	20	--
15	Mission Hills Community Trail	--	2
16	Mission Hills Mountain Bike Park	22	2
17	Mission Hills Neighborhood Park	3	--
18	Obern Trail Play & Skate Project	--	--
19	South Coast Aquatic Center	5	--
20	South Coast Foothill Mountain Bike Park	40	10
21	Sunrise Open Space	8	1.5

Table 2-2. Summary of Planned Park, Recreation, and Trail Projects (Continued)

No.	County Parks Projects	Add'l Public Parkland (Acres)	Add'l Miles of Trails
22	Vandenberg Village Community Trail	--	1
23	Guadalupe Community Park & Campground	40	--
24	Jalama Beach Campground Expansion & Upgrade Project	--	--
25	Jalama Bluff Trail	--	0.5
26	Point Sal Trails & Coastal Access Improvements	--	6
27	Surf Beach to Ocean Beach Boardwalk	--	0.65
	Subtotal of New Planned Projects	**175 acres**	**37.45 miles**
	TOTAL COUNTY PARKS PROJECTS	**186.5 acres**	**75.2 miles**

Solomon Hills (Bonney) Trails

This project would extend the existing Orcutt trail network into Solomon Hills in southeastern Orcutt. The proposed 3.65-mile trail system would include 9 trail segments of various lengths, difficulties, and elevations, accommodating users of all ages and abilities. Key features of the trail system would include new trailheads and trail alignments that preserve and protect existing biological resources while featuring significant views of the Santa Maria Valley oak woodland and chaparral landscape.

Solomon Hills (Bonney)Trails	
Type	Recreational Trail
Responsible Agencies	County Parks
Add'l Parkland	0 acres
Add'l Trails	3.65 miles
Timing	Near-term (5 to 10 years)

Waller Park Regional Sports Fields

This project is a critical element of the Waller Park Master Plan to expand the only County-owned regional park in the Santa Maria Valley, developing new sports fields designed for youth and adult play, regional tournaments, and other sports programs. The new fields would be accompanied by a new plaza featuring redeveloped picnic areas, an inclusive playground, and a gazebo.

Waller Park Regional Sports Fields	
Type	Regional Park
Responsible Agencies	County Parks
Add'l Parkland	0 acres
Add'l Trails	0 miles
Timing	Near-term (5 to 10 years)

Guadalupe Community Park & Campground

This project would create a multi-use community sports complex and campground on up to 40 acres of land adjacent to the City of Guadalupe. The site would border the existing Leroy Park at the northern limits of the City. The site currently supports undeveloped and inactive agricultural land.

The community park would provide sports facilities on up to 25 acres, including soccer/football fields and multi-purpose courts for basketball, tennis, and pickleball. Shaded seating, picnic areas, a playground, and restrooms would be provided.

The campground would provide up to 90 spaces on up to 15 acres for tent and recreational vehicle (RV) camping, as well as cabins or yurts. Each site would be accompanied by a fire pit

or BBQ, picnic table, nearby restrooms, communal water spigots, and a camp store, as well as potentially a pool or splash pad. The RV sites will feature level pads with full utility hookups and access to a centralized dump station

The Santa Maria River runs north of the site. The project includes a buffer between the site and the river for stormwater management and a habitat swale area. The sports fields and campground would be surrounded by a trail along the river for bikers and pedestrians.

The site is located on unincorporated County land. The site is partially designated to Agriculture I (5 or more acres minimum parcel size) (A-I), and partially designated to Agricultural II (40 or more acres minimum parcel size) (A-II). The site is not under Williamson Act contract under the County's Agricultural Preserve Program. However, unincorporated agricultural parcels located to the south and east are under Williamson Act contracts. The site is surrounded by urban uses to the south and east within the City of Guadalupe.

Guadalupe Community Park & Campground	
Type	Community Park/Campground
Responsible Agencies	County Parks, City of Guadalupe, property owners
Add'l Parkland	15 to 40 acres
Add'l Trails	0 miles
Timing	Near-term (5 to 10 years)

Point Sal Trails & Coastal Access Improvements

This project would improve beach and coastal access in northern Santa Barbara County to reach the spectacular, rugged coastline of Point Sal. Key access improvements would include reopening Point Sal Road, constructing new beach access parking, and building a new coastal access stairwell. The trailhead could be equipped with public restrooms and picnic areas. Further, the Project would include over 6 miles of new trail improvements through the 900 acres of Point Sal and Paradise Beach, including formalizing a key segment of the California Coastal Trail.

The Point Sal region, including the Point Sal Reserve (Reserve), Point Sal State Beach, and BLM land comprising over 960 acres of public land, supports access to over 2 miles of sandy beaches and access to almost 10 miles of existing trails/roads. However, access to these public lands and beaches is challenging, with an almost 10-mile round-trip hike with major elevation changes required to reach the area beaches, limiting public access to and along the shoreline for North County residents and visitors.

Point Sal Trails & Coastal Access Improvements	
Type	Recreational Trail
Responsible Agencies	County Parks, Public Works Department, General Services Department, Vandenberg Space Force Base
Add'l Parkland	0 acres
Add'l Trails	6 miles
Timing	Long-term (10 to 20 years)

Cuyama Valley

Under the Recreation Master Plan, the County would continue to maintain and improve recreation facilities in Richardson Park in coordination with the Cuyama Valley Recreation District. The Recreation Master Plan aims to maximize access to a wider variety of activities in the Cuyama Valley and put available spaces within the park to active uses for the community. The existing park has picnic tables with BBQ grills, hiking trails, and a playground. While the Project does not include a specific new park project in Cuyama Valley, the Recreation Master Plan supports the provision of facilities within the existing parks that would serve the greater Cuyama community.

Lompoc Valley

Vandenberg Village Park

This project would provide a modern, innovative public park in central Vandenberg Village. Designed with a focus on sustainability, inclusivity, and versatility, the park would provide a variety of amenities to serve residents of all ages while preserving and enhancing the site's natural features. The park will feature one tot-lot for 2-6-year-olds and one playground for 6-12-year-olds. For active recreation, the Project would include a basketball half-court and a dedicated skateboarding area with grind boxes and other features for users of various skill levels. The central corridor will serve as a dynamic, flexible-use space for community gatherings, events, and outdoor programming. Adjacent to this space would include a donor garden, a gazebo/pavilion, and an open lawn space for play, relaxation, and community events. A new stormwater basin would be constructed to capture and manage runoff from the site. An elevated boardwalk will traverse the basin. A designated natural zone with picnic areas would offer visitors space for respite and connection with nature while protecting Burton Mesa chaparral and mature tree canopies. Onsite parking and pedestrian connections would be provided.

Vandenberg Village Park	
Type	Neighborhood Park
Responsible Agencies	County Parks
Add'l Parkland	1.5 acres
Add'l Trails	0 miles
Timing	Near-term (5 to 10 years)

Mission Hills Community Trail

This project would result in system of approximately 2.0 miles of trails around the community of Mission Hills, providing recreational hiking and biking connections between existing neighborhoods, Los Berros Elementary School, and existing La Purisima Mission trails. The trails would be constructed on County-owned properties within and bordering residential neighborhoods, but portions of the proposed trail system would traverse or cross into properties owned by the Mission Hills Community Services District, State of California Public Works Board, Lompoc Unified School District, and private landowners. The trail network would feature unpaved multi-use segments for walking, jogging, dog walking (on-leash and potentially off-leash in some segments), and biking. The Project would prioritize trail connectivity to the surrounding neighborhoods and nearby parks, offering residents increased access to recreation options while supporting safe routes to schools.

Mission Hills Community Trail	
Type	Recreational Trail
Responsible Agencies	County Parks, County Flood Control District, Mission Hills Community Services District, property owners
Add'l Parkland	0 acres
Add'l Trails	2 miles
Timing	Long-term (10 to 20 years)

Mission Hills Mountain Bike Park

This project would develop a public trail network and neighborhood park on a 22-acre County-owned site in Mission Hills. The trail network would feature designated mountain bike trails, as well as multi-use segments for hikers. The Project would prioritize trail connectivity to the surrounding neighborhoods and nearby parks, offering residents increased access to recreation options in the community. A new playground and amenities would be provided, including picnic benches, shaded areas, bike parking, water fountains, and park restrooms.

Mission Hills Mountain Bike Park	
Type	Recreational Trail
Responsible Agencies	County Parks, General Services Department
Add'l Parkland	22 acres
Add'l Trails	2 miles
Timing	Long-term (10 to 20 years)

Mission Hills Neighborhood Park

This project would expand park facilities provided by the Mission Hills Community Services District to provide a multi-use community sports and recreation park that serves the Mission Hills and Mesa Oaks communities. The project would include a soccer field, a baseball/softball field, and tennis/pickleball courts. Amenities would include picnic tables, shade structures, drinking fountains, and restrooms.

Mission Hills Neighborhood Park	
Type	Neighborhood Park
Responsible Agencies	County Parks, County Flood Control District, Mission Hills Community Services District
Add'l Parkland	3 acres
Add'l Trails	0 miles
Timing	Long-term (10 to 20 years)

Vandenberg Village Community Trail

This project would create a multi-use pathway to connect areas of Vandenberg Village north and south of Hwy 1. The alignment would connect existing and proposed parks with local schools and neighborhoods to enhance safe, recreational riding in the community, as well as connect to existing Burton Mesa recreational trails in natural areas adjacent to neighborhoods.

Vandenberg Village Community Trail	
Type	Community Trail
Responsible Agencies	County Parks, Public Works Department, State of California, property owners
Add'l Parkland	0 acres
Add'l Trails	1 mile
Timing	Long-term (10 to 20 years)

Jalama Beach County Park Campground Expansion & Upgrade Project

Jalama Beach County Park serves as an essential coastal access point — one of only four in northern Santa Barbara County, and the only one classified as a Low-Cost Coastal Accommodation. The park provides visitors with a wide variety of activities, including camping, free access to the beach, a children's playground, and proximity to one of the County's most

popular surf breaks. However, the rising popularity of the campground over the past decade has constrained public access to this important beach by day visitors, and aging facilities struggle to accommodate increases in demand. Redevelopment and expansion of the campground is being considered to:

- Increase number and diversity of Low-Cost Coastal Accommodations and expand capacity of current campground facilities by approximately 30 percent;
- Increase the number of day-use parking spaces to improve beach access;
- Improve campground layout to separate campground and day-use facilities to increase efficiency and alleviate internal site congestion issues;
- Improve water supply, wastewater, electricity, and natural gas facilities to meet existing and future demands;
- Install renewable energy infrastructure to supplement energy demands and improve compliance with California New Zero Net Energy policy and County Strategic Energy Plan;
- Utilize recently acquired lands adjacent to the existing campground; and
- Increase access to coastal resources and recreational amenities in the North County to meet demand, particularly for nearby Disadvantaged Communities in the Lompoc Valley Planning Area.

This project would redevelop and expand the campground to increase the number of sites and day-use parking spaces, including redevelopment of 15 acres of the existing 23.5-acre campground and development of 2 acres of a newly acquired 5.4-acre parcel located inland east of UPRR (the "Upper Mesa"). Campground redevelopment would involve renovation of aging infrastructure, including water, wastewater and solar energy utility improvements and consideration of construction of a new package wastewater treatment plant to provide recycled water for landscaping. Campground improvements would increase the number of campsites/cabins from the existing 124 to a total of 140 and day use parking from 91 spaces to 141 spaces, based on conceptual plans. As plans remain preliminary and conceptual at this stage, these numbers may be subject to change and adjustment as more detailed plans are developed. Specific improvements considered under the conceptual plan are detailed below.

The proposed project would include redevelopment of the majority of the existing campground that would entail reconfiguration and upgrade of campsites and demolition and removal of many structures over 15 acres within the existing campground. Along the Park's 570 feet of level creek frontage, future uses would include one ranger residence/office and satellite storage area to the northeast along 60 feet of creek frontage, approximately 14 new/redeveloped campsites extending for 450 feet along the creek, and a new play park in the southwest corner fronting both the creek and dunes. Along the park's existing approximately 1,300 feet of beach and dune frontage, relocation of the Jalama Store and Grill and reconfiguration of day-use parking would permit installation of approximately 35 new beach and dune front campsites

along roughly 900 feet of frontage and a new centrally located Jalama Store and Grill, day-use parking area, play park, and comfort station along roughly 150 feet of beach frontage.

All new uses would entail redevelopment of existing developed areas of the park and the project would minimize or largely avoid development extending into previously undisturbed areas. Setbacks from riparian habitat and dunes would be a minimum of 50 feet from the edge of existing riparian vegetation and 25 feet from the edge of existing dunes. Native riparian plantings would include blackberries and other vines and shrubs along the creek to provide habitat and discourage entry. Such plantings would be extended between new campsites and into the main campground to expand the acreage of riparian habitat and provide better campsite privacy and shade. Dune restoration would extend over 800 feet of the park's beach frontage and would include removal of nonnative species (e.g., ice plant, myoporum), creation of enhanced dunes where minimal dune development currently exists, and planting of all native dune species (e.g., red sand verbena). The dunes would be protected by silt fencing on the landward side to minimize trampling and sand migration into the park and new boardwalks or roped walkways provided to channel beach goers through the dunes and avoid trampling of dune vegetation. Interpretive signage of the value of riparian and dune habitats would be posted.

To facilitate expansion of the number of camping spaces and consolidation of visitor-oriented and administrative uses within the existing campground, County Parks proposes to demolish the majority of administrative/support uses and ranger cabins and relocate these uses to the Upper Mesa. Approximately 2 acres of the new Upper Mesa site would be developed with residences for rangers, a new campground maintenance/machine shop, storage area, structures, visitor parking, a new campground kiosk/entrance booth, and space for several new guest cabins, while 3 acres would be left as natural, undeveloped open space to protect sensitive resources and allow for restoration of native habitats. Specifically, the Upper Mesa would conceptually be developed with the following uses:

- 4 detached, gated ranger residences
- 1 store manager residence
- 16 dedicated gated staff parking spaces
- Gated workshop, storage, trash, and recycling facilities
- Campground entrance kiosk, ranger office, and bailout lane
- 12 large campsites (RV or cabin conversion)
- 25 overflow parking spaces and temporary parking spaces
- Comfort station with showers
- Open space and play area

Development of the Upper Mesa site, particularly relocation of the park entrance kiosk/gate, would also entail additional roadway improvements to adjacent portions of Jalama Road.

Roadway improvements would allow for through travel lanes for resident and Nature Conservancy access to Cojo-Jalama Ranch and the Dangermond Preserve, ingress and egress into the Upper Mesa site, and vehicle queuing lanes for guests arrive at the park.

Jalama Beach Campground Expansion & Upgrade Project	
Type	Campground/Other
Responsible Agencies	County Parks, Environmental Health
Add'l Parkland	5.4 acres
Add'l Trails	0 miles
Timing	Near-term (5 to 10 years)

Jalama Bluff Trail

This project would offer new coastal and beach access from the Jalama Beach County Park and its campground. Following the blufftop, a new natural surface trail would be constructed, connecting the campground to a new stairway down to Jalama Beach from the bluff. This new trail would provide a significant new recreational activity at Jalama Beach and support coastal access in the region.

Jalama Bluff Trail Project	
Type	Recreational Trail
Responsible Agencies	County Parks, Public Works Department, Dangermond Preserve
Add'l Parkland	0 acres
Add'l Trails	0.5 miles
Timing	Long-term (10 to 20 years)

Surf Beach to Ocean Beach Boardwalk

This project would create a new approximately 0.65-mile boardwalk from Ocean Beach County Park south to Surf Beach near the Lompoc-Surf Amtrak Station. The boardwalk would be up to 8 feet wide and would be elevated to reduce impacts to dune habitat. Except for Jalama Beach County Park, Ocean Beach County Park and Surf Beach are the only public coastal access points in the Lompoc Valley, but can frequently be closed due to regulations protecting the threatened western snowy plover. The new boardwalk would be constructed largely on federally-owned lands or within the UPRR corridor along the beach, landward of existing dune habitat, to minimize impacts and disturbance to dune and western snowy plover nesting habitat. The boardwalk would provide a formal pedestrian connection between Ocean Beach and Surf Beach and a lateral accessway parallel to the beach, reducing disturbance to western snowy plover habitat and improving access and coastal recreation.

Surf Beach to Ocean Beach Boardwalk	
Type	Recreational Trail
Responsible Agencies	County Parks, Union Pacific Railroad
Add'l Parkland	0 acres
Add'l Trails	0.65 miles
Timing	Long-term (10 to 20 years)

Santa Ynez Valley

Lake Cachuma Campground & South Shore Facilities Improvements

County Parks is the U.S. Bureau of Reclamation's local managing partner for the Cachuma Lake Recreation Area and provides the Cachuma Lake Campground and associated recreation facilities. County Parks is planning several improvements to these existing facilities, as follows:

- **Cachuma Splash & Swim Project**. This project would replace two aging pools with a modern aquatic complex featuring recreation pools, slides, and water play features. The aquatic center would be available for day use for residents, as well as overnight campers at Cachuma Campground
- **Cachuma Campground Expansion**. This project would provide up to 32 new cabins or yurts, offering visitors unique and comfortable "glamping" lodging options. The new structures would be thoughtfully placed to blend in with the existing natural landscape of Lake Cachuma, with interspersed benches, tables, and communal restrooms and showers. The existing amphitheater will be renovated to include updated seating, improved lighting, and enhanced accessibility
- **Mohawk Point Trails Improvements**. This project would improve and potentially expand trails at Mohawk Point to support additional user groups, such as mountain bikers, while supporting existing users of the disc golf course and trails.

Lake Cachuma Campground & South Shore Facilities Improvements	
Type	Recreational Trails, Campground, Aquatic Facility
Responsible Agencies	County Parks, U.S. Bureau of Reclamation
Add'l Parkland	0 acres
Add'l Trails	2 miles
Timing	Near-term (5 to 10 years)

Lake Cachuma North Shore Trails & Recreation Facilities Management Plan

County Parks is the U.S. Bureau of Reclamation's local managing partner for the Cachuma Lake Recreation Area. Consistent with the Bureau's Cachuma Resource Management Plan, County Parks would prepare a Cachuma North Shore Trail System & Facility Management Plan to provide public recreational access to existing and potential future facilities while protecting natural resources, including water quality, biological resources, geology and soils, agriculture,

and public recreation. The plan would be prepared through a public process involving community input and environmental review in compliance with the California Environmental Quality Act (CEQA) and the National Environmental Policy Act (NEPA). Access to the north shore of Lake Cachuma would be subject to reservations, permits, and fees by County Parks. County Parks could limit access during and immediately after rain events to reduce damage to trails. County Parks could limit access during severe fire conditions when prolonged high temperatures, winds, or other factors that may prohibit entry occur to minimize the risk of wildfire in the Cachuma Lake Recreation Area. For planning purposes, the Recreation Master Plan anticipates that the following facilities could be provided within the northern and eastern shoreline areas of Lake Cachuma within existing developed campgrounds, trails, and associated recreation facilities.

- **Public Equestrian Facility**. To provide a "home base" for horses and their riders exploring Lake Cachuma, this facility would provide a public outdoor equestrian facility near Live Oak Campground, featuring an outdoor riding arena for training, recreation, and competitions, as well as trailer parking and equestrian trailhead access and signage. Potential overnight accommodations could be provided to support equestrian trail use. Through a fee-based program, equestrians would have access to stables and barns for day use, as well as memberships. Overnight use would require reservations and fees. The facility would include wash racks, tack rooms, and shaded rest areas for horses and riders. If additional camping sites are provided, hitching posts would be provided in addition to typical tent site amenities (i.e., no hookups or utilities). If feasible, boarding services for both short-term and long-term uses could be available through a concessionaire.
- **Pack-In/Pack-Out Campground**. As a destination on the North Shore Trails, a unique rural recreation experience would provide backcountry overnight accommodations on the northern shores of Lake Cachuma. The new primitive, self-contained campground would provide a rustic overnight stop for visitors exploring the North Shore of Lake Cachuma. From the existing Live Oak Campground, visitors could pack self-contained into a rustic tent-only campground (or sleep under the stars). Boating into the campground may be possible as well at appropriate unimproved landing locations. Sites would include picnic tables, rustic seating, and horse hitching posts. Fire rings or BBQs could be provided if feasible and consistent with wildfire management plans and requirements. Composting or other onsite toilets would be provided with no water or other services
- **North Shore Trails Project**. The existing equestrian trail network on the north side of Lake Cachuma would be improved and expanded to support equestrians with separate segments and facilities for other non-motorized users. The equestrian trail system would offer scenic routes in varying terrain for riders of various skill levels to encourage advancement of local equestrians. Non-equestrian trails would support hiking and non-motorized biking. Where trail conflicts could arise with other recreational users, horse-only bypasses would be

integrated into the trail design to ensure the safety and comfort of riders and horses. The trail system could provide an "out and back" experience or circumvent the north side of the lake if feasible. The trail system would connect to existing and planned facilities at Live Oak Campground and a proposed pack-in/pack-out campground.

Lake Cachuma North Shore Trails & Recreation Facilities Management Plan	
Type	Recreational Trails, Campground
Responsible Agencies	County Parks, U.S. Bureau of Reclamation
Add'l Parkland	0 acres
Add'l Trails	15 miles
Timing	Long-term (10 – 20 years)

Drum Canyon Trail

This project would create an approximately 8.8-mile-long on-road or road-parallel trail along Drum Canyon Road from Los Alamos County Park to Hwy 246. The new trail would primarily serve as a formal route for road cyclists. The project would involve road shoulder improvements, installation of signage notifying motorists of the potential presence of cyclists, and potentially some speed or traffic calming measures along Drum Canyon Road.

Drum Canyon Trail	
Type	Recreational Trail
Responsible Agencies	County Parks, Public Works Department
Add'l Parkland	0 acres
Add'l Trails	8.8 miles
Timing	Long-term (10 to 20 years)

South Coast

Baron Ranch Trails

This project would create additional outdoor recreation within the County-owned Baron Ranch. The proposed trail network would expand with approximately 14 miles of new recreational trails designated for multi-use by hikers, mountain bikers, and equestrians, with some trails designated for hiker and equestrian use only. Some proposed trail alignments would utilize existing agricultural access roads, while new trail segments would require new vegetation clearance and grading. The proposed trail routes would vary in terrain to provide access to unique, scenic, and natural spaces at Baron Ranch for different experience levels. A new mountain bike pump track and skills course, separated from the recreational trails, could also be built. The trail network would include a new pedestrian connection on the southern end of the property, connecting under the U.S. Hwy 101 and the UPRR corridor through to the beach at Arroyo Quemado. The connection under U.S. Highway 101 would improve an existing creek culvert to allow pedestrian access through an approximately 465-foot-long tunnel.

Baron Ranch Trails	
Type	Recreational Trails
Responsible Agencies	County Parks/ Resource Recovery
Add'l Parkland	0 acres
Add'l Trails	14 miles
Timing	Near-term (5 to 10 years)

San Marcos Foothills Open Space

This project would implement new trail and open space improvements including a Chumash ethno-botanical garden, an ADA accessible trail and ADA parking and a trail plan for the 100-acre West Mesa site added to the San Marcos Preserve. The Project would expand the existing trail network to support hiking and environmental education.

San Marcos Foothills Open Space	
Type	Recreational Trails
Responsible Agencies	County Parks
Add'l Parkland	0 acres
Add'l Trails	3 miles
Timing	Near-term (5 to 10 years)

Ben Page Neighborhood Park

This project would expand recreation facilities at the Ben Page Youth Center to provide a new neighborhood park. The project would provide a playground, new shade structures, and picnic tables to supplement the adult and youth programs hosted at the Ben Page Youth Center.

Ben Page Neighborhood Park	
Type	Neighborhood Park
Responsible Agencies	County Parks, County Flood Control District
Add'l Parkland	5 acres
Add'l Trails	0 miles
Timing	Long-term (10 to 20 years)

Gaviota Marine Terminal Recreation Area

This project would redevelop a former onshore oil and gas facility into an enhanced recreational site with beach access, trail connections, and a new campground. The recreation area would include designated pathways, stairways, and viewing areas that allow visitors to access the beach while protecting sensitive habitats along the shore. To fill a gap in the California Coastal Trail, the project would complete 2 miles of blufftop trail from the Gaviota Marine Terminal to Gaviota State Park. A full-service public campground for tent, RV, and cabin camping would provide low-cost overnight accommodations on the Gaviota Coast. The campsites would

include a firepit or BBQ, picnic tables, and nearby communal amenities, such as restrooms with showers, water spigots, and a camp store. The RV-designed campsites would include water, electricity, and sewer hookups.

Gaviota Marine Terminal Recreation Area	
Type	Campground, Beach Park, Recreational Trails, and CCT
Responsible Agencies	County Parks, State of California, property owners
Add'l Parkland	32 acres
Add'l Trails	2 miles
Timing	Near-term (5 to 10 years)

Glen Annie to Los Padres National Forest Trail

This project would create a new hiking and riding trail route along Glen Annie Road from Cathedral Oaks Road to Los Padres National Forest. The trail route would be approximately 3 miles in length, following Glen Annie Road in the existing road right-of-way for the majority of the alignment. The project would connect urban areas in the Goleta Valley with existing foothills trails in Los Padres National Forest. The County would also explore opportunities to separate the trail from the roadway by coordinating with private landowners for off-road trail easements.

Glen Annie to Los Padres National Forest Trail	
Type	Community Trail
Responsible Agencies	County Parks, Public Works Department
Add'l Parkland	0 acres
Add'l Trails	3 miles
Timing	Long-term (10 to 20 years)

Goleta Community Sports Park

This project would develop a new community park and outdoor sports complex to help meet the regional needs for community and competitive sports and recreation. The community park would provide new sports fields and courts. The multi-purpose sports fields would support organized sports, leagues, and competitions, such as youth and adult soccer, football, ultimate frisbee, lacrosse, and field hockey. Multi-sport courts would support basketball, volleyball, tennis, or pickleball. Other recreational amenities include a new playground, off-leash dog park, picnic tables, public restrooms, shade structures, and walking paths that connect to surrounding neighborhoods and the Obern Trail. A South Coast Aquatic Center is also being considered for the adjacent area.

Goleta Community Sports Park	
Type	Community Park
Responsible Agencies	County Parks, nonprofit organizations, property owners
Add'l Parkland	20 acres
Add'l Trails	0 miles
Timing	Near-term (5 to 10 years)

Obern Trail Play & Skate Project

This project would install trail-side structures such as ramps, rails, and curves to support skating, BMX, and creative play along the existing Obern Trail multi-use path in Eastern Goleta Valley. The structures would be integrated adjacent to the existing multi-use path, creating pockets of micro-recreation without changing the function of the existing trail. Creating a skate trail would support more diverse active transportation and outdoor recreation.

Obern Trail Play & Skate Project	
Type	Community Trail
Responsible Agencies	County Parks, Public Works Department, nonprofit organizations
Add'l Parkland	0 acres
Add'l Trails	0 miles
Timing	Long-term (10 to 20 years)

South Coast Aquatic Center

This project would develop a new regional aquatic center to help meet the needs of the South Coast for community and competitive sports and recreation. The proposed aquatic center would consist of a competitive lap pool and a diving pool. A separate recreational pool with a dedicated water slide area would support youth aquatic recreation. The facility would provide changing rooms, lockers, showers, and restrooms. The center would support competitive sports and community activities, such as classes, summer programs, public events, and special private events. This project is being considered for a location near Goleta Community Park. Partnerships with UC Santa Barbara, local non-profit aquatics organizations, and local school districts would support the operations and programming of the facility.

South Coast Aquatic Center	
Type	Community Park
Responsible Agencies	County Parks, nonprofit organizations, property owners
Add'l Parkland	5 acres
Add'l Trails	0 miles
Timing	Long-term (10 to 20 years)

South Coast Foothill Mountain Bike Park

This project would develop a nature-based mountain biking park in the South Coast foothills offering trails and features, including pump tracks, flow trails, technical courses, and jump lines. Each route would be designated for its features and difficulty, catering to riders of all interests and skill levels. The park's layout will maximize the natural terrain, integrating each riding trail with the natural landscape. Sustainable design practices would be employed to minimize environmental impacts, such as careful siting of trails, the use of erosion control measures, and designated natural resource conservation areas. Supporting amenities would include a parking area, restrooms, shaded seating areas, and trail signage. Potential locations could include public property owned by the County and the City of Santa Barbara, which could integrate with existing foothill trails.

South Coast Foothill Mountain Bike Park	
Type	Recreational Trail/Public Open Space
Responsible Agencies	County Parks, City of Santa Barbara, property owners
Add'l Parkland	40 acres
Add'l Trails	10 miles
Timing	Long-term (10 to 20 years)

Sunrise Open Space

This project would develop a new open space with walking paths to implement the Summerland Community Plan. The project would expand the community's trail system with connections from Ocean View Park and the Summerland Trail through the Summerland Greenwell Preserve.

Sunrise Open Space	
Type	Neighborhood Park
Responsible Agencies	County Parks
Add'l Parkland	8 acres
Add'l Trails	1.5 miles
Timing	Long-term (10 to 20 years)

Relationship of the Project to Non-County Parks Projects

In addition to the planned projects by County Parks described in Section 2.5.1, *Planned County Parks, Recreation, and Trails Projects under the Recreation Master Plan*, the Recreation Master Plan recognizes several planned recreation projects by other public agencies and nonprofit or nongovernmental organizations as an important part of meeting countywide recreation needs. These projects expand the recreation system beyond the County Parks capital program and help address needs for trails, neighborhood parks, community parks, aquatics, coastal access, and active transportation connections across the five recreation planning areas. In other words, the Recreation Master Plan acknowledges them as part of the broader countywide recreation

strategy and as projects that may require interagency coordination, County support, County permitting, County land participation, or partnership with County Parks.

While the County would not plan or implement these projects, the Recreation Master Plan and this EIR could assist local cities, special districts, non-profit organizations, and other private organizations in creating new public parkland and trails countywide (see Chapter 3, *Environmental Impact Analysis* for information about cumulative projects and the relationship of the Recreation Master Plan and this Program EIR to other non-County projects).

2.5.2 Comprehensive Plan Amendments for Parks, Recreation, and Trails

Funding and constructing parks and trails in sufficient numbers and locations to meet the needs identified in the Recreation Master Plan is challenging due to several factors, including land availability, land acquisition, site development, staffing, and ongoing maintenance costs. Park and trail projects are more feasible when land is either already owned by a public agency or is acquired through donation or other public-private agreement, when site development is supported with a clear, reliable permitting path and a variety of secured funding sources, and maintenance needs are accounted for in the project design and implementation. The County recognizes that the success of the Recreation Master Plan in fostering the development of new parks and trails to meet community needs hinges on the ability of the County to acquire and develop the land for parks, recreation, and trails, including in partnership with other agencies, such as cities and special districts in Santa Barbara County, as well as private entities, such as local foundations, non-profit organizations, and property owners.

To support the implementation of the Recreation Master Plan, the Project proposes amendments to the Land Use Element, amendments to the Parks, Recreation, and Trails (PRT) and Public and Private Parks/Recreation Overlay maps, and amendments to the Agricultural Element. The purpose of these amendments would be to:

1) Provide a more accurate and timely description of parks, trails, and open spaces in the county and the value of these resources for outdoor recreation, public health, and community sustainability.
2) Update the Comprehensive Plan's policy framework in support of public recreation goals and needs, as indicated by community outreach and engagement performed as part of the Recreation Master Plan planning process.

Land Use Element Amendments

The Land Use Element updates would include updating the Recreation Section (Section III), which was last amended in 1980, with up-to-date information collected for the Project. The updated section puts a renewed emphasis on the importance of County parks, recreation, and trails by acknowledging the health benefits, community sustainability, and the need for

equitable access and usage of recreational facilities. The proposed amendment to the Recreation Section entails a new policy framework for recreational land use and development, including the implementation of the Recreation Master Plan, to establish capital improvements planning, recreational development recommendations, and sources of both public and private funding and administration to address the County's evolving recreational needs.

The Land Use Element amendments would update and replace the existing Recreation Section with a modernized recreation policy framework that reflects current recreation needs and community input. The amendments would add or revise recreation goals, policies, definitions, and recreation land use descriptions to better support public parks, trails, recreation facilities, public-private partnerships, and implementation of the Recreation Master Plan. The draft amendments also address recreation in disadvantaged unincorporated communities and add definitions for public-private partnerships and Recreation Benefit Project.

The proposed amendments to the Land Use Element include a new Parks and Recreation Policies section, which establishes four new goals with policies that align with the community recreation needs, support implementation of the proposed Recreation Master Plan, and advocate for recreational uses and development over the long term. A summary of the proposed goals and policies is provided below:

Recreation Land Use Designation & Definition of Public and Private Parks/Recreation Facility Overlay

The Project would update the "Existing Public or Private Recreation and/or Open Space" designation with a modernized "Recreation" designation. This update would simplify and modernize the name of the designation, designate public parks, open space, and outdoor recreation facilities, reflect a broader range of public recreation uses, and align the Land Use Element designation with the Recreation Master Plan and related zoning amendments.

The Project would also relocate and revise the "Public or Private Park/Recreational Facility Overlay" definition so that it functions as a distinct overlay designation rather than as part of the base recreation land use designation. The overlay definition would recognize the potential for planned Recreation Benefit Projects, in addition to other future and planned parks, recreation, and trail projects.

Table 2-3. Summary of Proposed Recreation Goals & Policies in the Land Use Element of the County Comprehensive Plan

Recreation Goal	Recreation Policy Summary
Goal 1. Provide parks and recreational facilities that meet public recreation demands and are welcoming and convenient to all people and in all communities.	The policies under Goal 1 focus on providing a broad range of indoor and outdoor recreation opportunities throughout the county in locations that are accessible, equitable, and responsive to community needs. They emphasize preserving public parkland and recreation easements for recreation purposes, locating parks and trails near neighborhoods and schools where feasible, designing recreation facilities to serve all ages and abilities, expanding lower-cost camping opportunities, supporting rural recreation where compatible with agriculture, prioritizing acquisition of vacant land for public recreation, requiring new development to provide or fund recreation improvements, tying Recreation Benefit Projects to identified public recreation needs, and updating the Recreation Master Plan over time to respond to changing countywide demand.
Goal 2. Provide a network of attractive regional and local trails that offer convenient access to both urban and rural lands and beautiful natural areas.	The policies under Goal 2 are intended to create and preserve a connected countywide trail network serving urban and rural communities. They support providing trails in varied forms and locations, prioritizing interconnected regional trails with local connections, accommodating multiple trail user groups where feasible, preserving and maintaining trail corridors on the PRT map, supporting long-distance rural trails linked to services and overnight accommodations, coordinating with landowners and agencies to secure trail opportunities and easements, developing trails consistent with County Parks standards, designing development to protect public trail values, notifying users when trail access may be affected, and protecting historic trails as both recreation and cultural resources.
Goal 3. Coordinate public-private partnerships and interagency cooperation to support public parks, recreation, and trails for the benefit of all Santa Barbara County residents and visitors.	The policies under Goal 3 guide the County to work with cities, districts, nonprofits, and other organizations to site, acquire, and implement recreation facilities and regional trail connections, actively pursue public-private and interagency partnerships, use the Recreation Benefit Program to encourage significant public recreation contributions, require new development to address recreation demand generated by that development, coordinate with state and federal land managers on priority recreation facilities and trail systems, encourage nonprofit and private efforts to create and maintain publicly accessible recreation assets, and pursue joint use of schools and other publicly owned lands for recreation whenever possible.

Table 2-3. Summary of Proposed Recreation Goals & Policies in the Land Use Element of the County Comprehensive Plan (Continued)

Recreation Goal	Recreation Policy Summary
Goal 4. Provide parks, recreation and trails that are visually attractive, sustainable, and resilient components of both the urban and rural areas through careful design, economic viability, and consideration of the character and needs of the existing community, environmental justice, and natural environment.	The policies under Goal 4 focus on design quality, compatibility, sustainability, long-term funding, and resilience of parks and trails. They call for visually attractive and well-designed parks, recreation facilities, and trails that reflect community and rural character, incorporate interpretation of local history, culture, and natural features, minimize impacts in environmentally sensitive habitat areas, integrate with natural and agricultural resources where feasible, and be implemented through capital planning, budgeting, grants, partnerships, and other funding tools. They also support using parks and trails to assist with emergency operations and hazard mitigation, and allow renewable energy facilities in County parks where such facilities are supportive of the primary recreational use.

Parks, Recreation, and Trails (PRT) Map & Public and Private Parks/Recreation Facility Overlap Map Amendments

The Project would update the Land Use Element's recreation mapping framework by revising the PRT map and the Public and Private Parks/Recreation Facility Overlay map to align with the Recreation Master Plan. The County's PRT Maps depict existing and proposed County-owned parks and trails. The extent of the adopted Public or Private Park/Recreational Facility Overlay would also be depicted. The Project includes an update to the PRT map to depict existing and planned County Parks' facilities only based on the parkland and trail inventory prepared for the Recreation Master Plan. The Public and Private Parks/Recreation Facility Overlay map applies to planned public parks, recreation, and trails projects on private land that the County could acquire over the life of the Project. The overlay would be amended to remove it from four sites described in Section 2.2.1, *County Setting and Characteristics,* and apply it to nine sites, in alignment with the Recreation Master Plan. The nine sites that would receive the overlay include the following.

Table 2-4. Sites under the Updated Extent of the Public and Private Parks/Recreation Facility Overlay

Project	APN(s)
Guadalupe Community Park & Campground	115-020-036; 115-020-005
Gaviota Marine Terminal Recreation Area	081-130-060
Goleta Community Sports Park	071-190-004
South Coast Aquatic Center	071-190-004 + other parcels
Mission Hills Neighborhood Park	097-380-019; 097-380-017
Mariposa Reina Recreation Area	081-130-070 + other parcels
Old Town Orcutt Neighborhood Park	105-330-001
Southside Neighborhood Park	065-600-087
Lompoc Riverbend Sports Complex Concept Plan	093-051-010

Agricultural Element Amendments

The Project includes amendments to the Agricultural Element to align the Agricultural Element with the recreation-related amendments to the Land Use Element and the Recreation Master Plan while keeping agriculture as the primary land use priority in agricultural areas. In substance, the amendments allow outdoor recreation, trails, and related uses in agricultural areas where those uses complement farming operations, maintain rural character, and preserve agricultural productivity. Under the proposed policies, recreation is compatible only when agricultural viability is preserved. The proposed amendments also require siting, buffers, access controls, and consistency with Williamson Act contracts and County Uniform Rules. A summary of the proposed goals and policies is provided below:

Table 2-5. Summary of Proposed Recreation Goals & Policies in the Agricultural Element of the County Comprehensive Plan

Agricultural Goal	Agricultural Policy Summary
Goal VII: Encourage the integration of outdoor recreation within agricultural areas in ways that complement farming operations, maintain rural character, and preserve agricultural productivity.	The policies under Goal VII allow outdoor recreation in agricultural areas where recreation remains compatible with agriculture and does not interfere with agricultural productivity or operations. They recognize public recreation and trails as compatible when agricultural viability is preserved, allow agritourism and agricultural recreation uses where those uses preserve the viability of agriculture, and require recreation facilities, trails, and related uses to avoid fragmenting fields by siting them in disturbed areas, along parcel edges, or on existing linear features where feasible. They also require crop and livestock buffers, controlled public access, consistency with Williamson Act contracts and County Uniform Rules, and operational measures such as fencing, gates, signage, sanitation, and seasonal or time-of-day limits to protect agricultural operations and public safety.

2.5.3 Zoning Ordinance Amendments

The Project involves amendments to the County LUDC, MLUDC, and Article II, CZO, consistent with the Comprehensive Plan, as amended, and in support of the Recreation Master Plan, as summarized below:

Changes in Permitting Requirements for Parks and Trail Projects

The proposed zoning ordinance amendments would involve targeted updates to support permitting of public parks, recreation, and trails in unincorporated areas. Public parks/playgrounds and trails for hiking and riding are already allowed land uses in the County's zoning ordinances, but are not permitted in several zoning districts. In summary, the Project would:

1. Allow and regulate public parks/playgrounds and trails for hiking and riding as permitted uses in selected zoning districts where these uses are currently not permitted, including agricultural, resource protection, residential, commercial, industrial, and special purpose zones (Table 2-6).
2. Provide objective development standards for public parks/playgrounds and trails for hiking and riding to ensure high-quality, safe, and accessible facilities to enhance community sustainability and protect natural resources.

Table 2-6. Zones Allowing Public Parks/Playgrounds & Trails for Hiking and Riding

Zone Type	Public Parks/Playgrounds & Trails for Hiking and Riding Permitted by Zone
Agricultural	AG-I & AG-II
Resource Protection	MT-GAV, MT-GOL, MT-TORO, RMZ
Residential[1]	RR, R-1/E1, EX-1, R-2, DR, PRD, SLP, MHP, MHS
Commercial[2]	CN, C-1, C-2, C-3, C-S, CH, CM-LA, C-V, PI
Industrial[3]	M-RP
Special Purpose	PU

Notes:
[1] The Project would not allow public parks/playgrounds or trails for hiking and riding in the MR-O zone.
[2] The Project would allow trails for hiking and riding in the CH zone, but would not allow public parks/playgrounds in CH zone.
[3] The Project would not allow public parks/playgrounds or trails for hiking and riding in M-1, M-2, and M-CR zones.

Changes to Standards for Specific Land Uses: Parks, Playgrounds & Trails

The Project would add new specific use standards for parks and playgrounds and for trails for hiking and riding. These new standards would apply to private applicants for recreational projects in the county, including nonprofit organizations and private landowners. Because the County zoning ordinances do not apply to County projects, these new standards would not

apply to County Parks projects, but are consistent with County Parks' design and development standards for public facilities.

For parks and playgrounds, the standards focus on site access, parking for bicycles and vehicles, agricultural compatibility, siting in disturbed areas where feasible, avoidance or minimization of impacts to habitat, riparian areas, cultural resources, steep slopes, and hazards, preservation of natural features, adequate water and wastewater service, lighting controls, and materials and design that are compatible with the surrounding environment. For trails, the standards focus on sustainable trail design and construction, trailhead parking, public access controls, agricultural compatibility and buffers, siting along disturbed areas, parcel edges, and existing linear features where feasible, protection of habitat and cultural resources, preservation of natural features, and use of unpaved trails and natural materials. The trail standards also prohibit structural improvements and limit trails to non-motorized use. A summary of the proposed standards for these specific land uses is provided below:

Table 2-7. Summary of Proposed Standards for Development of Parks/Playgrounds and Trails

Land Use Type	Proposed Development Standards Summary
Parks and playgrounds	• Parks/playgrounds must have adequate road and site access that meets fire access standards or can be brought into compliance. • Parking is determined by the Director in consultation with County Parks based on the type and location of the facility, including vehicle and bicycle parking where needed. • Parks/playgrounds may not impair agricultural viability on productive agricultural land adjacent to the site. Parks/playgrounds must be outside a 200-foot buffer from active agriculture on adjacent properties, with a 1,000-foot buffer in the Limited Agricultural Enterprise Overlay unless the facility lies within the Public or Private Park/Recreational Facility Overlay. • Structures must be sited in previously disturbed areas where feasible. If development extends outside disturbed areas, it must avoid or minimize impacts to environmentally sensitive habitat, riparian corridors, historic and archaeological resources, slopes of 30 percent or greater, and flood, geologic, and fire hazards. • Projects must preserve natural features, landforms, and native vegetation such as mature trees where feasible. • Adequate water supply and wastewater disposal are required. • Lighting must be shielded and directed downward, with limits on lighting for outdoor recreational facilities. • Materials and colors must be compatible with the natural setting.

Table 2-7. Summary of Proposed Standards for Development of Parks/Playgrounds and Trails (Continued)

Land Use Type	Proposed Development Standards Summary
Trails for hiking and riding	• Trails must be unpaved, up to 14 feet wide, and limited to non-motorized users. • Trails must be designed and constructed as sustainable trails using USDA Forest Service standards or other guidance approved by County Parks. • Non-structural improvements such as signage, fencing and gates, sanitation, and benches are allowed, but structural improvements such as restrooms, lighting, drinking fountains, covered seating, and picnic or gathering areas are not allowed. • Trailhead parking is determined by the Director in consultation with County Parks and may be improved or unimproved. • Trails may not impair agricultural viability on productive agricultural land adjacent to the site. Trails must be outside a 200-foot buffer from active agriculture on adjacent properties, with a 1,000-foot buffer in the Limited Agricultural Enterprise Overlay unless the trail lies within the Public or Private Park/Recreational Facility Overlay. • Public access must be controlled to avoid trespassing and protect public safety through fencing, gates, signage, dog control, sanitation, and seasonal or time-of-day limits, including controls tied to harvest and livestock movements on agricultural land. • Trails must be sited in disturbed or developed areas, along parcel edges, and on existing linear features where feasible, and must comply with habitat and cultural resource protection standards. • Trails must preserve natural features and use natural materials and colors compatible with the surrounding environment.

Changes in Recreation (REC) Zoning Regulations

The Project would amend the REC zone to apply to public or private land intended for leisure, sports, fitness, social interaction, and outdoor activities, such as parks, swimming pools, hiking or riding trails, campgrounds, sports facilities, and beaches. The intent is to promote play, leisure, access to the outdoors, community engagement, and healthy lifestyles by providing opportunities for a variety of active and passive recreational uses. Consistent with the Land Use Element, as amended, recreational uses should complement and feature the natural characteristics of the site setting to the extent feasible.

Private development projects in REC zones currently require a Development Plan and Design Review under the County's zoning ordinances. The Project would eliminate the requirement for a Development Plan and Design Review in REC zoning and instead require permitting (CUP, Minor CUP, Land Use Permit, or Zoning Clearance), subject to proposed development standards for the REC Zone. The Project would reduce the minimum lot size for REC zones from 1 acre to 0.25 acres in support of pocket and neighborhood serving parks and set the maximum building height to 35 feet (~2.5 stories). All development and land uses within REC zones shall comply with the additional standards summarized in Table 2-8.

Table 2-8. Summary of Proposed Additional Standards in REC Zone

Topic	Standard Summary
Access	Recreation structures and buildings must have existing roads and site access that meet applicable fire agency roadway and access standards, or legal access can be established to roads and site access that meet those standards.
Agricultural viability	Development may not impair agricultural viability on productive agricultural land adjacent to the site. Development shall be sited within disturbed areas of the site to the extent feasible.
Siting	Structures must be sited within previously disturbed areas where feasible. If development outside disturbed areas is required, it must avoid or minimize impacts to environmentally sensitive habitat and buffers, riparian corridors and buffers, historic and archaeological sites, slopes of 30 percent or greater, and flood, geologic, and fire hazards.
Parking	The Director, in consultation with County Parks, determines whether vehicle parking or bicycle parking is needed based on the type and location of the proposed recreation structure or building. If parking is needed, the Director determines the required number of spaces, racks, or locking devices.
Preservation of site features	Development must preserve important natural features, landforms, and native vegetation, including mature trees, to the maximum extent feasible. Development shall be sited within disturbed areas of the site to the extent feasible.
Water supply	The site must have adequate water resources to serve interior and exterior needs, documented either by a letter of service from the appropriate district or mutual water company, or by a Public Health Department or State-approved water system.
Wastewater disposal	The site must be served by a public sewer system with a letter of available service from the appropriate district. If onsite wastewater treatment is proposed, the system must meet all applicable County permitting and installation requirements as determined by the Public Health Department.
Lighting	If lighting is provided, fixtures must be fully shielded and directed downward, except for lighting associated with an outdoor recreational facility. Lighting for an outdoor recreational facility may only be used to complete a specific organized recreational event in progress. To the extent feasible, lighting must be directed away from habitat areas, nearby residences, and public roads.
Materials and design	Building materials and colors must be compatible with the surrounding natural environment and use earth tones and non-reflective finishes to maximize visual compatibility with surrounding areas.

Moreover, a range of additional land uses would be allowed in the REC zone and AG-II zone to support community recreation needs identified in the Recreation Master Plan and compatible recreational activities in the rural areas of the county (Table 2-9). Of note, utility-grade photovoltaic facilities could be allowed in alignment with the Recreation Master Plan's proposed programs for sustainability and resilience in park and recreation facilities in accordance with the County's One Climate goals. Also, education and research facilities would be limited to those facilities needed for scientific research that relies on the natural features of the land, such as biological, water, cultural, and geologic resources, and could include field stations, access roads, and other low-impact facilities to support on-site research and education.

Table 2-9. Proposed Additional Allowed Land Use in the REC Zone and AG-II Zone

Zoning District	Additional Allowed Uses
Recreation (REC)	Outdoor aquatic centers, pools, water slides, and splash zones Outdoor amusement and recreational activities for a fee or admission charge, such as ropes course/zip line, BMX/mountain bike course, horseback riding, petting zoo, fishing, mini-golf, skate park, outdoor rink, and other non-motorized outdoor recreational activities Outdoor motorbike/All-terrain vehicle (ATV) trails and riding parks Outdoor education Outdoor theaters (e.g., amphitheaters) Education or research facility, Limited Rural recreation (only in rural areas) Outdoor shooting or archery range Photovoltaic facilities – utility-scale
Agricultural Zone (AG-II)	Education or research facility, Limited Outdoor shooting or archery range

2.5.4 Recreation Benefit Project (RBP) Program

As a key implementation program of the Recreation Master Plan, the County proposes to create and enact the RBP Program. The RBP Program would foster public-private partnerships to help fulfill the recreation needs identified by the Recreation Master Plan. To do so, the RBP Program would create voluntary opportunities in unincorporated areas for private developers to contribute directly to the County's public recreation system. As described below, the Public Recreation Component of an RBP must provide a substantial in-kind public recreational benefit that significantly expands the range and amount of available public parks, recreation, and/or trail facilities in Santa Barbara County. For eligible projects, the County could offer incentives to applicants who voluntarily provide needed public park, recreation, or trail projects as a part of proposed private development projects. The program would be available to eligible projects only within the unincorporated areas of the county.

To be processed as an RBP, a proposed project must have two components:

1) **A public recreation component**. The proposed RBP would offer needed public parks, trails, and/or recreation facilities or substantially contribute to the creation of needed public parks, trails, and recreational facilities identified in the Recreation Master Plan and/or at the discretion of County Parks. The proposed public recreation component must meet the needs identified in the Recreation Master Plan, must be permanent and open to the public, and must be provided either on-site or off-site within the same recreation planning area as the site. Physical improvements or donation of property are

mandatory for in-kind contributions, and a cash equivalent will not fulfill the requirement.

2) **A private use or development component**. The proposed RBP would involve a component of private use or development that could benefit from incentives offered by the County in exchange for the public recreation component. Private uses or development could include:
    a. Private recreation, such as campgrounds, RV parks, country clubs, community centers, equestrian facilities, golf courses, sports and outdoor recreation facilities, and rural recreation.
    b. Housing, including single-family and multifamily developments.
    c. Other private development projects, including mixed-use, commercial, industrial, and agricultural development (i.e., wineries).

County Parks would assess the public recreation component of the proposed RBP to determine eligibility. Criteria for the assessment would include whether the project would result in a public recreation project that meets community needs identified in the Recreation Master Plan and whether the public park or trail is consistent with the Comprehensive Plan, as amended. If County Parks qualifies the proposed project as an eligible RBP based on the public recreation project offered and the location of the project, the eligible RBP could access incentives from the County through its zoning ordinances and permitting regulations. County Planning & Development Department would grant any incentives based on County Parks' assessment of RBP eligibility.

The RBP Program of the Recreation Master Plan would be enacted through amendments to the County's zoning ordinances, consistent with the Comprehensive Plan as amended. Amendments to the zoning ordinances would include a new code section to provide the purpose, criteria for RBP eligibility, and incentives offered to eligible RBPs.

Under the Project, Recreation Benefit Projects would only be located within the following Zone Districts.

Table 2-10. Zones Allowing Eligible Recreation Benefit Projects[1]

Zone Type	RBPs Permitted by Zone
Agricultural	AG-I & AG-II
Resource Protection	MT-GAV, MT-GOL, MT-TORO, RMZ
Residential	RR, DR, PRD, OT-R
Commercial	C-1, C-2, C-3, CH, C-V, CM-LA
Industrial	M-RP
Special Purpose	MU, PU, OT-R/GC, OT-R/LC

Notes:
[1] Recreation Benefit Projects would only be permitted uses if found eligible by County Parks.

Only eligible Recreation Benefit Projects would be permitted under the Project. Eligible Recreation Benefit Projects means private development projects that have been determined by County Parks to substantially contribute towards, support, or provide access to a public recreational project or facility in alignment with the Recreation Master Plan. Under the Recreation Master Plan, County Parks would evaluate each proposed RBP using a standard scoring system that rates the project's features against all eligibility criteria and regulations of the RBP Program.

Eligible Recreation Benefit Projects would be eligible for one or more of the development incentives, including:

- Simplified permit processing as a Land Use Permit for currently allowed uses to reduce the cost and time required and streamline the review process.
- Allowing land uses that are otherwise not allowed within selected zoning districts (Table 2-11).
- Increased intensity of use (i.e., more square footage, increased density, or increased building height).
- Waiver or modification of site development standards (i.e., property line setbacks, parking, and landscaping).
- Waiver or reduction of fees (i.e., Development Impact Mitigation Fees/Quimby fees, permitting fees).

More detailed information for each type of incentive is provided below.

Simplified Permitting for Eligible RBPs

Eligible Recreation Benefit Projects may be processed under a single Land Use Permit in compliance with the County's zoning ordinances. When two or more permits are required for separate components of an Eligible Recreation Benefit Project, they may be combined under a single Land Use Permit. This benefit may also include permitting for legal uses that are physically present on a proposed site that would otherwise be disallowed and subject to enforcement under County zoning regulations. This incentive is not available for cannabis uses, mining, oil and gas, wind energy and cogeneration facilities, Tier III wineries, several industrial manufacturing and processing or wholesaling land uses, and all transportation, communication, and infrastructure land uses.

Additional Allowable Uses for Eligible RBPs

Eligible Recreation Benefit Projects may include one or more of the following uses as part of a Recreation Benefit Project. All additional allowable uses would be subject to the base zoning standards for the proposed site, as well as the REC Zone Additional Standards for development projects, summarized in Table 2-8 above, including setbacks and buffers to protect resource values in the county. All additional allowable uses would also be subject to all existing

regulations, including appropriate Public Health Department permits and authorizations as required; approval of the use by the County Fire Department or applicable fire protection district, if required; and issuance of a business license, if necessary.

In addition, specific use regulations are proposed to control the scale, size, location, and intensity of the use, in alignment with the County zoning ordinances and the Comprehensive Plan. Eligible RBPs that request an additional allowable use would be processed with a land use permit in compliance with the County's zoning ordinances.

Table 2-11. Summary of Additional Allowed Uses & Requirements for Eligible RBPs

Additional Allowable Land Use as RBP Incentive	Allowed Zone(s)	Allowed Use Description	Summary of Specific Use Standards

Campground & RV Parks	AG-I, AG-II, C-1, C-2, C-3, C-H, C-V	An area of land with one or more individual campsites for temporary occupancy by campers. May include accommodations for recreational vehicles unless prohibited within the applicable zone.	• In agricultural zones:
			  • Campgrounds and RV parks shall be designed and operated to rely on and benefit from the rural character of the surrounding area and to preserve agricultural viability on and adjacent to the site.
			  • The minimum lot size shall be 20 acres.
			  • The maximum number of campsites and RV sites combined shall be 160.
			  • Camping cabins in agricultural zones shall not exceed 25 percent of the total number of overnight accommodations on the site.
			  • Campsites, RV sites, parking, and accessory facilities shall be organized as a coordinated and clustered site plan that preserves open space and limits the visual spread of development across the property.
			  • Internal roads, drive aisles, and parking areas may be surfaced with gravel, decomposed granite, permeable pavers, asphaltic concrete, or similar materials.
			  • Outdoor amplified music shall not be allowed unless specifically approved through permit approval.
			  • Campground and RV park development in agricultural zones shall not include urban commercial site features inconsistent with the rural setting.
			• In commercial zones:
			  • Campgrounds and RV parks may be designed as urban/city-style or in-town campgrounds, RV parks, or auto camps intended to serve travelers and recreation users in a compact setting.
			  • The minimum lot size in commercial zones shall be 1 acre.
			  • The maximum density of overnight accommodations in commercial zones, including tent campsites, RV sites, and camping cabins, shall be ~~5~~ 10 sites per acre.

Table 2-11. Summary of Additional Allowed Uses & Requirements for Eligible RBPs (Continued)

Additional Allowable Land Use as RBP Incentive	Allowed Zone(s)	Allowed Use Description	Summary of Specific Use Standards
			• Camping cabins may be allowed in commercial zones as part of an urban or in town campground, RV park, or auto camp, provided that campsites or RV sites remain part of the overall project and represent at least 25 percent of the total number of overnight accommodations on the site. • The maximum building height for accessory buildings and camping cabins shall be 35 feet, except for an existing building or an addition to an existing building. • The minimum setback from any street or roadway in commercial zones shall be 20 feet; a lesser setback may be approved for an existing building on the site at the time of application and for an addition or improvement to an existing building. • The minimum setback from any other lot boundary in commercial zones shall be 20 feet, except that the minimum setback shall be 35 feet where the site abuts a residential zone. • Campground and RV park development adjacent to residential uses shall provide screening, fencing, landscaping, and operational controls sufficient to avoid adverse effects on surrounding properties. • Campsites, RV sites, camping cabins, accessory buildings, parking, and service areas shall be organized as a coordinated site plan with safe internal circulation and pedestrian access. • Campgrounds and RV parks may include paved or permeable internal roads, utility hookups, and other improvements connected to municipal services. • The site shall provide direct pedestrian access to adjacent sidewalks, public streets, and any trail, trailhead, park, recreation facility, transit stop, or neighborhood serving commercial services directly serving campground and RV park users. • Outdoor amplified music shall not be allowed in commercial zones unless specifically approved through permit approval. • All campgrounds or RV parks permitted as part of an RBP:

Table 2-11. Summary of Additional Allowed Uses & Requirements for Eligible RBPs (Continued)

Additional Allowable Land Use as RBP Incentive	Allowed Zone(s)	Allowed Use Description	Summary of Specific Use Standards
			• Campgrounds and RV parks shall provide transient overnight accommodations in tent campsites, RV sites, camping cabins, or a combination of these accommodations under unified ownership and management. • No campsite, RV site, or camping cabin shall be occupied by the same guest for more than 30 days within any 90-day period. • Camping cabins may be allowed as part of an approved campground or RV park, provided that they remain accessory to the overall campground or RV park use and operate under unified ownership and management as part of that use. • Camping cabins shall count toward the maximum number of overnight accommodations allowed on the site. • Camping cabins shall not be separately sold, subdivided, or used as permanent residences. • Each camping cabin shall not exceed 600 square feet of gross floor area. • A camping cabin may include sleeping space, a bathroom, heating, and similar amenities customarily incidental to overnight lodging, but shall not include a full kitchen. • Campgrounds and RV parks may include accessory facilities customarily incidental to the use, including a check-in office, restrooms, showers, laundry facilities, a camp store, picnic areas, play areas, recreation facilities, utility hookups, dump stations, internal circulation, parking, maintenance areas, and similar facilities. • Full-time on-site management, a camp host, or another responsible operator shall be provided while the campground or RV park is in operation.
Country Inn	AG-I, AG-II, REC	A small-scale visitor serving lodging establishment in a rural area that provides overnight accommodations for	• Country inns shall be designed and operated to rely on and benefit from the rural character of the surrounding area.

Table 2-11. Summary of Additional Allowed Uses & Requirements for Eligible RBPs (Continued)

Additional Allowable Land Use as RBP Incentive	Allowed Zone(s)	Allowed Use Description	Summary of Specific Use Standards
		guests in one or more rooms, suites, cottages, or similar lodging units under unified ownership or management. A country inn is intended to offer a distinctive lodging experience that relies on rural character, design, and access to recreation. A country inn may include accessory hospitality services and amenities customarily incidental to the lodging use, including food service for overnight guests, common indoor or outdoor gathering areas, guest services, and accessory retail or event space operated in conjunction with the lodging use.	• A country inn may be located within an existing building or in a new building. A country inn may operate in an inn, bed and breakfast, cottage lodging, or similar visitor-serving lodging format under unified ownership or management. • The minimum lot size shall be 5 acres. • The maximum number of guest rooms shall be 120 (i.e., estimated gross floor area between 30,000 sf and 50,000 sf). Guest rooms may include rooms, suites, cottages, and similar lodging units. Cottages and similar lodging units shall count toward the maximum number of guest rooms. • No guest shall stay longer than 30 days within any 90-day period. • The maximum building height for the main building shall be 35 feet, except for an existing building or an addition to an existing building. The maximum building height for any accessory building shall be 30 feet, except for an existing building or an addition to an existing building. • The minimum setback from any street or roadway shall be 50 feet, except that the decision maker may approve a lesser setback for an existing building on the site at the time of application and for an addition or improvement to an existing building. • The minimum setback from any other lot boundary shall be 75 feet, except that the decision maker may approve a lesser setback for an existing building on the site at the time of application and for a modification or addition to an existing building. • Food and beverage service may be provided as an accessory to the country inn. • Accessory guest amenities customarily incidental to the lodging use may be allowed, including indoor or outdoor gathering areas, dining areas, lounges, pools, saunas, fitness rooms, meeting rooms, and event lawns, provided that such amenities remain subordinate to the lodging use and are designed and operated to avoid adverse effects on surrounding properties and incompatibility with the rural character of the site and surrounding area.

Table 2-11. Summary of Additional Allowed Uses & Requirements for Eligible RBPs (Continued)

Additional Allowable Land Use as RBP Incentive	Allowed Zone(s)	Allowed Use Description	Summary of Specific Use Standards
			• Retail uses or services may be allowed only as an accessory use incidental to the operation of the country inn. • Full-time on-site management shall be provided while the Country Inn is in operation. A resident manager or employee residence shall not count toward the maximum number of guest rooms. • Guest rooms, cottages, common buildings, parking, and service areas shall be organized as a coordinated and clustered site plan that preserves open space and limits the visual spread of development across the property.
Trailside Café	AG-I, AG-II, REC	A trailside café is a small-scale visitor-serving food-and-beverage establishment located adjacent to, directly connected to, or within 100 feet of a public trail, trailhead, public park, or recreation facility, and intended primarily to serve users of local and regional trails and other recreation facilities. A trailside café may include indoor or outdoor seating, walk-up service, and accessory retail sales of food, beverages, and convenience items customarily incidental to the café's use and supportive of trail and recreation users.	• Trailside cafés shall be located adjacent to, directly connected to, or within 100 feet of a public trail, trailhead, public park, or recreation facility. • A trailside café shall be visible from the trail, trailhead, public park, or recreation facility it is intended to serve. • A trailside café shall provide a direct pedestrian and/or bicycle connection to the trail, trailhead, public park, or recreation facility it is intended to serve. • A trailside café shall be designed and operated primarily to serve trail and recreation users and shall remain compatible with the character of the site and surrounding area. • A trailside café may be located within an existing building or in a new building. • A trailside café may include indoor seating, outdoor seating, or both. • The minimum lot size shall be 0.5 acre. • The maximum gross floor area of a trailside café shall be 3,000 square feet, excluding outdoor seating areas. • The maximum building height shall be 35 feet, except for an existing building or an addition to an existing building. • The minimum setback from any street or roadway shall be 20 feet, except that the decision maker may approve a lesser setback for an existing

Table 2-11. Summary of Additional Allowed Uses & Requirements for Eligible RBPs (Continued)

Additional Allowable Land Use as RBP Incentive	Allowed Zone(s)	Allowed Use Description	Summary of Specific Use Standards
			building on the site at the time of application and for an addition or improvement to an existing building. • The minimum setback from any other lot boundary shall be 20 feet, except that the minimum setback shall be 35 feet where the site abuts a residential zone or agricultural zone. The decision maker may approve a lesser setback for an existing building on the site at the time of application, and for a modification or addition to an existing building. • Walk-up ordering windows may be allowed. Drive-through service shall not be allowed. • Food and beverage service may be provided for customers of the trailside café. Alcohol service may be allowed only as an accessory to food service and subject to all otherwise applicable permit requirements. A bar whose primary function is alcohol service shall not be allowed. • Accessory retail sales may be allowed only as incidental to the operation of the trailside café and intended to serve trail and recreation users. Accessory retail may include packaged food, beverages, maps, trail supplies, personal items, and similar convenience goods. Accessory retail sales area shall not exceed 20 percent of the gross floor area of the trailside café. • Outdoor amplified music shall not be allowed unless specifically approved through permit approval. • Parking areas, solid waste management, loading areas, and mechanical equipment shall be screened from public roads and adjacent properties. • Trailside cafés in rural areas shall be designed and operated to rely on and benefit from the rural character of the surrounding area. Trailside cafes in urban areas shall be designed to enhance and be compatible with neighborhood character and applicable design standards.
Visitor-Serving Commercial	AG-I, AG-II, RMZ, REC	Retail and service uses oriented to the needs of tourists, travelers, and recreation users.	• Visitor-serving commercial uses shall support and remain subordinate to the primary recreation use, public recreation facility, or public recreation component of the Recreation Benefit Project.

Table 2-11. Summary of Additional Allowed Uses & Requirements for Eligible RBPs (Continued)

Additional Allowable Land Use as RBP Incentive	Allowed Zone(s)	Allowed Use Description	Summary of Specific Use Standards
			• Visitor-serving commercial uses may include gift and souvenir sales, recreational apparel sales, recreational equipment rental, concessions, maps, personal items, and similar retail and service uses oriented to tourists, travelers, and recreation users. Visitor-serving commercial uses shall not include lodging, fuel sales, vehicle service or repair, drive-through facilities, general grocery stores, large format retail, or office uses other than accessory management or administrative space. • Restaurant, café, and bar uses open to the general public shall not be allowed as part of visitor-serving commercial unless separately authorized under another applicable use classification. • Visitor-serving commercial uses may be located within an existing building or in a new building. • The maximum gross floor area for all visitor-serving commercial uses on a site shall be 5,000 square feet. • Outdoor display and sales areas may be allowed only where they are accessory to the principal use, limited in area, and designed to avoid adverse effects on circulation, parking, neighboring properties, and the character of the site. • Visitor-serving commercial uses shall provide a direct pedestrian connection to the public trail, trailhead, public park, recreation facility, campground, or other public recreation facility they are intended to serve. • Vehicle parking and bicycle parking shall be provided as determined by the Director in consultation with County Parks based on the type, location, and expected level of use of the proposed visitor-serving commercial use. • In rural or agricultural areas, visitor-serving commercial uses shall be designed and operated to rely on and benefit from the rural character of the surrounding area. • Parking areas, loading areas, solid waste management, outdoor storage, and mechanical equipment shall be screened from public roads and adjacent properties.

Table 2-11. Summary of Additional Allowed Uses & Requirements for Eligible RBPs (Continued)

Additional Allowable Land Use as RBP Incentive	Allowed Zone(s)	Allowed Use Description	Summary of Specific Use Standards
On-site employee housing (non-agricultural)	AG-I, AG-II	On-site employee housing means one or more dwelling units, rooms, or similar living accommodations located on the same site as an approved campground, RV park, country inn, trailside café, recreation facility, or other approved Recreation Benefit Project use and intended solely for occupancy by employees who work on that site and their household members. On-site employee housing is accessory to the principal use and operated in conjunction with that use under unified ownership and management.	• On-site employee housing shall be accessory and subordinate to an approved campground, RV park, country inn, trailside café, recreation facility, or other approved Recreation Benefit Project use. • On-site employee housing shall be occupied only by employees who work on the site and their household members. • On-site employee housing shall not be used for transient occupancy, short-term rental, vacation rental, or any other visitor-serving lodging use. On-site employee housing shall not be separately sold, subdivided, or conveyed apart from the principal use. • On-site employee housing may be located within an existing building, within a new building, or within a detached building or buildings designed as part of the overall project. • On-site employee housing shall not establish independent residential density or development rights separate from the principal use. • The number, size, and configuration of employee housing units or rooms shall be limited to the amount reasonably necessary to support operation of the principal use, as demonstrated by a staffing and management plan submitted with the permit application and approved by the review authority. • On-site employee housing shall be clustered with the principal use and associated buildings to the maximum extent feasible and shall be sited to preserve open space and limit the visual spread of development across the property. • In rural and agricultural areas, on-site employee housing shall be designed and operated to rely on and benefit from the rural character of the surrounding area. • In rural and agricultural areas, on-site employee housing shall not impair agricultural viability. • On-site employee housing shall comply with the height, setback, parking, access, lighting, landscaping, water supply, wastewater disposal, and screening requirements otherwise applicable to the principal use and

Table 2-11. Summary of Additional Allowed Uses & Requirements for Eligible RBPs (Continued)

Additional Allowable Land Use as RBP Incentive	Allowed Zone(s)	Allowed Use Description	Summary of Specific Use Standards
			zone, except as modified through approval of the Recreation Benefit Project. • Parking for on-site employee housing shall be provided as determined by the Director based on the type, location, and occupancy of the employee housing and the operational needs of the principal use. • On-site employee housing shall be designed to be compatible with the principal use in building form, materials, colors, lighting, and site design. • A recorded restriction, housing management plan, or other legal instrument approved by the County shall limit occupancy of the housing to eligible employees and their household members and shall prohibit separate sale, lease as an independent residential use, or conversion to another use without County approval. • If the principal use ceases operation for a continuous period of 12 months, occupancy of the on-site employee housing shall cease unless a separate entitlement allowing continued residential use has first been approved by the County.
Commercial Recreational Facilities and Neighborhood-Serving Commercial Uses	DR, PRD	Small-scale commercial recreational facilities and neighborhood-serving commercial uses that are integrated into a Planned Residential Development or Design Residential development and intended primarily to serve residents of the development and the surrounding neighborhood through day-to-day goods, services, and recreation opportunities. These uses may include cafés, corner stores, convenience retail, small	• Commercial recreation and neighborhood-serving commercial uses shall be allowed only within a residential development. • Commercial uses shall be accessory and subordinate to the principal residential development and shall not function as a standalone commercial center. • Allowed neighborhood-serving commercial uses may include food service, convenience retail, pharmacy, personal services, small offices, and similar uses that serve daily neighborhood needs, provided that such uses are compatible with the residential setting. The same permit requirements that apply to the proposed use in the CN zone shall apply unless modified through the Recreation Benefit Project approval. • Allowed commercial recreational facilities may include small-scale indoor or outdoor recreation, fitness, wellness, instructional, or gathering uses that are accessory to and compatible with the residential development.

Table 2-11. Summary of Additional Allowed Uses & Requirements for Eligible RBPs (Continued)

Additional Allowable Land Use as RBP Incentive	Allowed Zone(s)	Allowed Use Description	Summary of Specific Use Standards
		fitness or recreation uses, and similar uses that are customarily incidental to and supportive of the residential development.	• The total gross floor area of all such uses on the site shall not exceed 10 percent of the total residential floor area of the development or 10,000 square feet, whichever is less. • The uses shall be an integral part of the development and shall be directly accessible by walking and bicycling from residences within the development. • The uses shall not be designed or operated in a manner that creates adverse effects on residential uses within or adjoining the development due to construction, lighting, location, hours of operation, noise, parking arrangements, signage, delivery activity, or other site or operational characteristics. • Drive through facilities shall not be allowed. • Outdoor amplified music shall not be allowed unless specifically approved through permit approval. • Parking shall be provided as determined by the Director based on the type, size, and expected use of the proposed commercial or recreational use and the ability of the development to support walking and bicycling access. • Bicycle parking shall be required unless the Director determines that bicycle parking is not needed based on the type and location of the use. • Parking areas, service areas, solid waste management, loading areas, and mechanical equipment shall be screened from adjacent residential uses and public streets. • Site planning, architecture, landscaping, lighting, and signage for these uses shall be compatible with and integrated into the overall design of the residential development.
Neighborhood-Serving Community Center or Office	DR, PRD	A small-scale community meeting place or professional or co-working office use integrated into a Planned Residential Development or	• Neighborhood serving community center or professional/administrative offices shall be accessory and subordinate to the principal residential development and its public recreation component.

Table 2-11. Summary of Additional Allowed Uses & Requirements for Eligible RBPs (Continued)

Additional Allowable Land Use as RBP Incentive	Allowed Zone(s)	Allowed Use Description	Summary of Specific Use Standards
– Professional/ Administrative		Design Residential development and intended primarily to serve residents of the development and surrounding neighborhood through cultural, public information, social, recreational, administrative, and similar neighborhood-serving functions. This use may include functionally related internal facilities such as kitchens, multipurpose rooms, meeting rooms, coworking offices, restrooms, storage, and accessory office space.	• The use shall be intended primarily to serve residents of the development and the immediate surrounding neighborhood. • The use may include community meeting space, coworking space, multipurpose rooms, kitchens, restrooms, storage, management offices, administrative offices, and similar functionally related internal facilities. • The use shall not function as a standalone regional office building, commercial office center, or private event venue. • The total gross floor area of the use shall not exceed 10,000 square feet. • The use shall be located and designed as an integral part of the development and shall be directly accessible by walking and bicycling from residences within the development. • The use shall not, by reason of its construction, lighting, location, hours of operation, parking arrangements, signage, delivery activity, or other site or operational characteristics, create adverse effects on residential uses within or adjoining the development. • Outdoor storage shall not be allowed. • Vehicle parking and bicycle parking shall be provided as determined by the Director based on the type, size, and expected level of use of the facility. • Parking areas, service areas, solid waste management, loading areas, and mechanical equipment shall be screened from adjacent residential uses and public streets. • Site planning, architecture, landscaping, lighting, and signage for the use shall be compatible with and integrated into the overall design of the residential development.
Outdoor Amusement and Recreational Uses	AG-I, AG-II	Outdoor amusement and recreational uses mean fee-based or admission-based outdoor recreation or amusement activities	• Outdoor amusement and recreational uses shall be designed and operated to rely on and benefit from the rural character of the surrounding area.

Table 2-11. Summary of Additional Allowed Uses & Requirements for Eligible RBPs (Continued)

Additional Allowable Land Use as RBP Incentive	Allowed Zone(s)	Allowed Use Description	Summary of Specific Use Standards

		conducted primarily outdoors and intended to serve visitors and recreation users as part of an approved Recreation Benefit Project. Outdoor amusement and recreational uses may include ropes courses, zip lines, BMX or mountain bike courses, horseback riding, petting zoos, fishing, mini golf, skate parks, outdoor rinks, non-motorized outdoor recreation activities, outdoor motorbike or ATV trails and riding parks, outdoor aquatic centers, pools, water slides, splash zones, outdoor theaters, amphitheaters, and outdoor shooting or archery ranges.	• Outdoor amusement and recreational uses shall remain subordinate to and supportive of the overall Recreation Benefit Project and its public recreation component and the primary agricultural use of the property.
			• The minimum lot size shall be 20 acres.
			• Outdoor amusement and recreational uses shall be organized as a coordinated and clustered site plan that preserves open space and limits the visual spread of development across the property.
			• Hours of operation shall be limited through permit approval based on the location of the use and compatibility with surrounding properties, nearby agricultural operations, and rural character.
			• Outdoor amplified sound shall not be allowed unless specifically approved through permit approval.
			• Food and beverage service, concessions, equipment rental, restrooms, check-in areas, seating areas, shade structures, storage, and similar facilities customarily incidental to the approved use may be allowed as accessory facilities.
			• Overnight lodging shall not be allowed as part of this use except where separately approved under another applicable Recreation Benefit Project use classification.
			• The following additional standards shall apply to specific activity types.
			  • Outdoor motorbike or ATV trails and riding parks shall be limited to specifically designated riding areas and circulation routes approved through permit approval. The site plan shall identify riding areas, spectator areas, parking, staging areas, dust control measures, noise control measures, and safety separation from adjoining properties and agricultural operations.
			  • Outdoor shooting or archery ranges shall provide controlled access, perimeter fencing where needed for safety, clearly marked firing or activity areas, and operational controls sufficient to protect public safety and avoid adverse effects on surrounding properties.

Table 2-11. Summary of Additional Allowed Uses & Requirements for Eligible RBPs (Continued)

Additional Allowable Land Use as RBP Incentive	Allowed Zone(s)	Allowed Use Description	Summary of Specific Use Standards
			• Outdoor theaters and amphitheaters shall identify seating areas, stage or performance areas, parking, lighting, sound management measures, and maximum event capacity through permit approval. Outdoor theaters and amphitheaters shall have a maximum capacity of 2,000 seats. • Outdoor aquatic centers, pools, water slides, and splash zones shall provide adequate water supply, wastewater disposal, changing and restroom facilities, and operational controls sufficient to protect public health and safety. • Equestrian uses, petting zoos, and animal-related recreation uses shall provide animal containment, sanitation, and operational controls sufficient to protect public health and safety and avoid conflicts with surrounding agricultural operations. • All uses involving admission charges, scheduled events, organized group activities, or equipment rental shall provide a management and operations plan addressing staffing, parking, circulation, emergency access, sanitation, hours of operation, and site maintenance.

Modification of Development Standards and Specific Use Standards

The proposed Recreation Benefit Project Program would allow an eligible project to request limited modification of otherwise applicable development standards or specific use standards where the modification would support the public recreation component of the project. This incentive is intended to provide modest flexibility in site planning and project design, including adjustments to standards such as height, setbacks, parking, lot coverage, or similar quantitative requirements, where needed to improve the layout of the project, preserve open space, reduce nonrecreational paved areas, or avoid sensitive resources. The maximum modification available under this incentive would be limited to 20 percent above or below the otherwise applicable base zone standard or specific use standard. This incentive would not apply to standards related to fire and emergency access, public health and safety, utilities, hazards, agricultural buffers, biological or cultural resource protection, required public access, or other requirements imposed by state or federal law.

Reduction of County Parks Development Impact Mitigation Fees or Similar Fees

The proposed Recreation Benefit Project Program would allow an eligible project to request a reduction in County Parks development impact mitigation fees, or other recreation-related fees, where the project provides public recreation improvements that offset the recreation demand generated by the project. This incentive is intended to recognize that a project that directly provides public park, trail, or recreation amenities may reduce the need for separate fee-based mitigation. For eligible RBPs, a project that provides public recreation could receive a 1:1 cost-to-fee reduction, and a project that provides a significant public recreation benefit could receive a 1:1.2 reduction. Further, a housing project that provides a significant public recreation benefit and 20 percent or more affordable units could receive a 1:1.3 reduction.

2.6 RECREATION MASTER PLAN ADOPTION AND IMPLEMENTATION

As described in Chapter 1, *Introduction*, the County is the Lead Agency for the Project, consistent with CEQA Guidelines Section 15065(b). Accordingly, the County will use this Program EIR to evaluate the potential environmental impacts that could result from the implementation of the proposed Project and implement mitigation measures that would address those impacts.

In addition to the required CEQA actions (e.g., certification, findings, and statement of overriding considerations), the following supplemental regulatory and/or legislative actions are required:

The County Planning Commission will consider the proposed Comprehensive Plan amendments, County LUDC, and Article II, CZO Amendments, and provide a recommendation to the Board of Supervisors regarding these components of the Project. The Planning Commission will need to take action on the following:

1) Recommend that the Board of Supervisors adopt environmental findings, certify the EIR as applicable, and, if needed, adopt a Statement of Overriding Considerations for any unavoidable, significant environmental impacts that will result from the applicable Recreation Amendments; and
2) Recommend that the Board of Supervisors adopt amendments to the Comprehensive Plan and the County LUDC, as proposed.

The Montecito Planning Commission will consider the Comprehensive Plan Amendments, MLUDC amendments, and potential Zoning Map Updates that would affect the Montecito community plan area and provide a recommendation to the Board of Supervisors regarding these components of the Project. The Montecito Planning Commission will need to take action on the following:

1) Recommend that the Board of Supervisors adopt environmental findings, certify the EIR as applicable, and, if needed, adopt a Statement of Overriding Considerations for any unavoidable, significant environmental impacts that will result from the applicable Recreation Amendments; and
2) Recommend that the Board of Supervisors adopt amendments to the Comprehensive Plan and MLUDC, as proposed.

The Board of Supervisors will consider all components of the Project, including the County Planning Commission and Montecito Planning Commission's actions on the components identified above, and will take action on the following to adopt and implement the Project:

1) Adopt the environmental findings, certify the EIR, and, if needed, adopt a Statement of Overriding Considerations for any unavoidable, significant environmental impacts that will result from the Project;
2) Adopt the Santa Barbara County Recreation Master Plan; and
3) Adopt amendments to the Comprehensive Plan, County LUDC, MLUDC, and Article II, CZO, as proposed.

The Recreation Master Plan includes areas within the Coastal Zone. Project implementation in the Coastal Zone would be subject to California Coastal Commission review and permitting requirements and compliance with the County's Local Coastal Program.

This page was intentionally left blank.

3.0 ENVIRONMENTAL IMPACT ANALYSIS

3.0.1 Introduction and Approach to Analysis

This chapter of the Program Environmental Impact Report (EIR) analyzes the potential environmental impacts that could occur from implementation of the Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances Project (Project) as proposed by the County of Santa Barbara (County). As described in Chapter 2, *Project Description*, the Project proposes to implement planned park, recreation, and trail projects, some of which are straightforward projects that are attainable in the near term (5 to 10 years), while others are complex and require a longer planning timeframe (10 to 20 years). The Project also comprises a package of amendments to the County Comprehensive Plan and zoning ordinances to support the implementation of the Recreation Master Plan. This Program EIR evaluates the reasonably foreseeable environmental consequences of development proposed or enabled under the Project and identifies mitigation measures and alternatives to the proposed Project that could avoid or reduce potentially significant adverse environmental impacts. Where mitigation is not feasible to reduce or avoid a potentially significant adverse environmental impact, the lack of feasible mitigation is discussed. This chapter of the Program EIR discusses the approach to the organization of the environmental impact analysis, methodology for assessing impacts, and the cumulative scenario for analysis of the proposed Project.

3.0.2 Impact Analysis Guidelines

The California Environmental Quality Act (CEQA) requires an EIR analysis to "identify and focus on the significant environmental effects of a proposed project" (CEQA Guidelines Section 15126.2[a]). The emphasis of the EIR should be placed on the potential "physical" adverse effects of a proposed project. CEQA Guidelines Section 15360 defines "environment" as the physical conditions that exist within the area that would be affected by a proposed project, including, but not limited to, land, air, water, minerals, flora, fauna, ambient noise, and objects of historical or aesthetic significance. CEQA Guidelines Section 15360 further defines the "area involved" as the area in which significant effects would occur either directly or indirectly as a result of the project. The "environment" includes both natural and man-made conditions.

CEQA Guidelines Section 15382 clarifies the definition of "significant effect on the environment" as a substantial, or potentially substantial, adverse change in any of the *physical* conditions within the area affected by the project. An economic or social change by itself shall not be considered a significant effect on the environment. However, economic or social change that may have a *physical* impact (e.g., urban decay) should be considered in an EIR (*Bakersfield Citizens for Local Control v. City of Bakersfield [2004] 124 Cal.App.4th 1184*).

For each environmental issue area, thresholds for determining impact significance are identified based on the CEQA Guidelines and County-adopted thresholds described in the County's *Environmental Thresholds and Guidelines Manual* (2024), along with descriptions of the methodologies used for conducting the impact analysis.

3.0.3 Organization of Environmental Impact Analysis

Each section of this chapter (Sections 3.1 through 3.17) addresses an environmental issue area and sets forth the following information for each component of the proposed Project:

- **Introduction.** Introduces the issue area and provides a general approach to the assessment.
- **Environmental Setting.** Describes the baseline conditions within unincorporated areas, including conditions by Recreation Planning Region as appropriate, as they relate to the environmental resource area under review. According to the CEQA Guidelines, the existing setting normally constitutes the physical baseline conditions by which the lead agency determines whether an impact is significant. The existing environmental setting includes all developed and undeveloped lands that may be affected by the proposed Project.
- **Regulatory Setting.** Summarizes the federal, state, and local regulations, plans, and standards that apply to the proposed Project and relate to the specific issue area under review.
- **Environmental Impact Analysis.** Discusses the significance criteria, the environmental impact analysis, and mitigation measures that may be necessary to reduce environmental impacts and the residual impacts following the implementation of recommended mitigation measures.
    - **Thresholds of Significance.** Identifies the significance criteria or, where applicable, the thresholds of significance that will be used to evaluate impacts. The criterion or threshold for a given environmental effect is the level at which the County finds the effect to be significant. The significance criteria can be a quantitative or qualitative standard, or set of criteria, pursuant to which the significance of a given environmental effect may be determined (CEQA Guidelines Section 15064.7).
    - **Methodology.** Outlines the general approach taken in evaluating the individual environmental resource area, if applicable. The methodology is laid out to provide a context for the analysis of impacts.
    - **Project Impacts.** The environmental analysis considers the potential impacts resulting from short-term construction and long-term operational activities associated with the proposed Project. While the criteria for determining significant impacts are unique to each issue area, the analysis applies a uniform classification of the impacts based on the following definitions from the County's 2020 revised *Guidelines for the Implementation of the California Environmental Quality Act of 1970*:

- *Significant and Unavoidable Impacts*: Potentially significant impacts that cannot be feasibly mitigated or avoided. No measures could be taken to avoid or reduce these adverse effects to insignificant levels. Even after the application of feasible mitigation measures, the residual impact would be significant. If the proposed Project is approved with significant and unavoidable impacts, decision-makers must adopt a Statement of Overriding Considerations (SOC) pursuant to CEQA Guidelines Section 15093 explaining why the benefits of the proposed Project outweigh the potential damage caused by these significant unavoidable impacts.
- *Significant but Mitigable Impacts*: Potentially significant adverse impacts that can be feasibly mitigated or avoided. If the proposed Project is approved with significant but mitigable impacts, decision-makers are required to make findings pursuant to CEQA Guidelines Section 15091, stating that impacts have been mitigated to the maximum extent feasible and the residual impact would not be significant.
- *Insignificant Impacts*: These adverse but insignificant impacts do not require mitigation, and they do not require findings to be made. Mitigation measures may still be recommended to improve consistency with policies in the County's Comprehensive Plan.
- *No Impacts*: No adverse changes in the environment would result from the implementation of the proposed Project.
- *Beneficial Impacts*: Implementation of the proposed Project would result in impacts that would be beneficial to the environment.

- **Cumulative Impacts.** This section describes impacts that could occur from the combined effect of other past, present, and reasonably foreseeable future projects.
- **Mitigation Measures.** For each significant adverse impact identified, mitigation measures are presented where feasible to reduce the impacts to acceptable levels (Section 3.0.7, *Cumulative Impacts Analysis*) (CEQA Guidelines Section 15130).
- **Secondary Impacts.** This section identifies secondary effects resulting from the implementation of proposed mitigation measures that could generate a significant adverse impact on the environment or exacerbate impacts caused by the implementation of the proposed Project.
- **Residual Impacts.** This section identifies impact categories after mitigation is applied. (See also, Section 3.0.6, *Mitigation Measures and Monitoring*). Based on the criteria above, the environmental impact analysis assesses each issue area to determine the significance level. In those instances where mitigation measures cannot reduce adverse impacts to significant but mitigable levels, impacts are categorized as significant and unavoidable impacts.

3.0.4 Impact Assessment Methodology

Key CEQA Principles Guiding the Program EIR Analysis

The CEQA Guidelines identify key principles that allow for a complete understanding of the environmental context, impact analysis methods, and conclusions presented in this Program EIR. These principles are intended to inform the reader and facilitate objective and sound interpretation of the analyses and conclusions presented in the Program EIR by decision-makers. According to CEQA Guidelines Section 15021, public agencies must avoid or minimize environmental damage where feasible but also balance a variety of public objectives, including economic, environmental, and social factors. In determining the significance of potential environmental effects, CEQA Guidelines Section 15064 requires findings of significance of each adverse effect and indicates that findings shall be based on scientific and factual data and in consideration of substantial evidence in the whole record before a lead agency. CEQA Guidelines Section 15144 notes that drafting an EIR necessarily involves some degree of forecasting, and while foreseeing the unforeseeable is not possible, an agency must use its best efforts to discover and disclose all that it reasonably foresees using a general “rule of reason." CEQA Guidelines Section 15145 notes that if, after a thorough investigation, a lead agency finds that a particular impact is too speculative for evaluation, the agency should note its conclusion and terminate the discussion of the impact. This section deals with a difficulty in forecasting where a thorough investigation is unable to resolve an issue, and the answer remains purely speculative.

Establishing the Baseline Environmental Conditions

Baseline conditions are defined as the existing environmental setting that may be affected by the proposed Project (CEQA Guidelines Section 15125[a]). Baseline conditions are the local and regional conditions as they existed at the time of the proposed Project’s Notice of Preparation (NOP), which was published on January 10, 2025. Project impacts are defined as changes to the environmental setting that are attributable to the implementation of the proposed Project. Physical changes that could ultimately result from the implementation of the proposed Project, including from the physical development of planned park, recreation, and trail projects or other recreational development enabled under the proposed zoning ordinance amendments, would affect the existing environmental setting (e.g., loss of active crops, increases in air emissions, noise, or vehicle miles traveled [VMT], and potential for ground disturbance and associated erosion).

Each resource section of this chapter describes existing conditions for the resource that may be affected by the proposed Project. Information on the existing environmental baseline has been obtained from desktop reviews (e.g., review of the California Natural Diversity Database [CNDDB], National Wetland Inventory [NWI], EnviroStor database), existing literature reviews (e.g., Natural Resources Conservation Service [NRCS] soil surveys of Santa Barbara County),

existing EIRs for other projects in the county, and the preparation of technical analyses prepared specifically for the County to analyze the potential impacts of the proposed Project and/or key planned parks, recreation, and trails projects.

Assumptions for Programmatic Impact Analysis

Under the proposed Project, the planned projects, parks, trails, recreation facilities, and Recreation Benefit Projects would occur on dispersed sites throughout the county. This programmatic EIR considers this distribution and recognizes that planned projects would generally not overlap with one another. The programmatic EIR also recognizes that planned projects would be located generally within the five recreation planning areas. Recreation Benefit Projects may result in impacts from both private development and the development of planned public recreation facilities. For example, a recreation benefit project proposing a public trail or park be permitted to construct a country inn or trailside café as an incentive of the public-private partnership agreement. Because the details of future projects, such as location, mix of uses, development specifications, or recreation benefits, are unknown and speculative at this point, this programmatic EIR considers the reasonably foreseeable worst-case scenario for the proposed Project's components in the analysis. This approach allows the programmatic impact analysis to anticipate the potential for significant impacts and mitigate for the reasonable worst-case scenario, in compliance with CEQA. In doing so, the programmatic EIR can apply to future actions and approvals under the adopted Recreation Master Plan and amendments to the Comprehensive Plan and zoning ordinances, including the Recreation Benefit Project program.

To determine whether a potentially significant impact could occur as a result of the Project, the analysis considers the potential construction and operations of the Project components using reasonable worst-case assumptions, including:

1. The public park, recreation, and trail projects planned by County Parks, as described in Section.2.5.1, *Planned County Parks, Recreation, and Trails Projects*. The analysis assumes a maximum disturbance area of up to 50 acres as the most impactful planned park and recreation facilities.
2. The proposed amendments to the Comprehensive Plan and zoning ordinances that could enable the development of planned parks, trails, and recreational facilities. The analysis assumes that the amendments, including the updated Public and Private Parks/Recreation Facility Overlay and the Recreation Benefit Project Program, could enable the following concepts as the most impactful potential development scenarios under the proposed Project’s development standards:
    a. A maximum 160-site campground/RV park on a minimum 20-acre site
    b. A maximum 120-room country inn on a minimum 5-acre site

c. A maximum 2,000-seat outdoor amphitheater

The environmental impact analysis presumes these maximized development concepts, subject to all development standards required for the recreation uses and Recreation Benefit Project uses as part of the proposed Project, as described in Section 2.5.3, *Zoning Ordinance Amendments* and Section 2.5.4, *Recreation Benefit Project Program* of this EIR. Development enabled by the proposed Project would also be subject to all existing development standards and zoning regulations adopted by the County of Santa Barbara. Each resource analysis provided in Chapter 3.0 identifies specific assumptions and development standards that would apply and affect the outcome of the impact analysis. The impact analysis also describes potential examples of projects that could result in the impact described. This approach helps qualify the significance of each impact, even though the project-level details of future development projects are not known at this point.

3.0.5 Environmental Resource Areas Analyzed in the Program EIR

The Program EIR is based on the Project Description outlined in Chapter 2, *Project Description*, and evaluates potentially significant environmental impacts, including issues raised in public comments received in response to the NOP and at public workshops/hearings (Appendix A). This Program EIR evaluates the potential for environmental impacts on the following resource areas:

- Section 3.1, Aesthetics and Visual Resources
- Section 3.2, Agricultural Resources
- Section 3.3, Air Quality
- Section 3.4, Biological Resources
- Section 3.5, Cultural Resources and Tribal Cultural Resources
- Section 3.6, Energy
- Section 3.7, Geology and Soils
- Section 3.8, Greenhouse Gas Emissions
- Section 3.9, Hazards and Hazardous Materials
- Section 3.10, Hydrology and Water Resources
- Section 3.11, Land Use and Planning
- Section 3.12, Noise
- Section 3.13, Public Services
- Section 3.14, Recreation
- Section 3.15, Transportation
- Section 3.16, Utilities and Water Supply
- Section 3.17, Wildfire

Sections 3.1 through 3.17 provide a detailed discussion of the environmental setting, impacts associated with the proposed Project, and mitigation measures designed to reduce potentially significant impacts where required and when feasible. The residual impacts following the implementation of any mitigation measures and cumulative impacts are also discussed. The secondary impacts that could result from the implementation of any mitigation measures are also discussed. Additionally, Chapter 5, *Other CEQA Considerations,* identifies other environmental resource areas. In accordance with CEQA Guidelines Section 15128 (Effects Not Found to Be Significant), environmental impacts related to Forestry and Mineral Resources would be insignificant; therefore, environmental impacts associated with these resources are addressed in Chapter 5, *Other CEQA Considerations*. Chapter 5 also addresses the growth-inducing effects of the proposed Project.

3.0.6 Mitigation Measures and Monitoring

Pursuant to CEQA Guidelines Section 15126.4, where potentially significant environmental impacts have been identified in the Program EIR, feasible mitigation measures that could avoid or minimize the severity of those impacts are also identified. The mitigation measures are identified as part of the analysis of each impact topic in Sections 3.1 through 3.17 of this Program EIR.

Feasible means "capable of being accomplished in a successful manner within a reasonable period of time, taking into account economic, environmental, legal, social, and technological factors" (CEQA Guidelines Section 15364). A lead agency must impose mitigation measures unless findings can be made that the mitigation measures are found to be infeasible or within the jurisdiction of another agency (City of Marina v. Board of Trustees of the California State University [2006] 39 Cal.4th 341). Mitigation measures must be fully enforceable and may involve various means of implementation, such as:

- Measures incorporated into the County's Comprehensive Plan and zoning ordinances as policies or development standards that will be applied to future individual projects that implement the Recreation Master Plan.
- Measures incorporated as standard conditions of approval for individual projects that implement the Recreation Master Plan.
- Measures implemented in multi-year County programs or development impact fee programs.

CEQA requires that the implementation of adopted mitigation measures or any revisions made to the proposed Project by the lead agency to mitigate or avoid significant environmental effects be monitored for compliance. Accordingly, CEQA Guidelines Section 15097 requires that a public agency adopt a Mitigation Monitoring or Reporting Program (MMRP) for those adopted mitigation measures and project revisions. That is, the monitoring plan may consist of policies

included in plan-level documents (CEQA Guidelines Section 15097[b]). The MMRP is provided as Chapter 9, *Mitigation Monitoring and Reporting Program*.

3.0.7 Cumulative Impacts Analyses

CEQA Guidelines Section 15130 requires that cumulative impacts be analyzed in an EIR when the resulting impacts are cumulatively considerable and, therefore, potentially significant. Cumulative impacts refer to the combined effect of project impacts with the impacts of other past, present, and reasonably foreseeable future projects. The discussion of cumulative impacts must reflect the severity of the impacts as well as the likelihood of their occurrence. However, the discussion need not be as detailed as the discussion of environmental impacts attributable to the project alone. Further, the discussion should remain practical and reasonable in considering other projects and related cumulatively considerable impacts. According to CEQA Guidelines Section 15355:

> *"'Cumulative impacts' refer to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts.*
>
> *a) The individual effects may be changes resulting from a single project or several separate projects.*
>
> *b) The cumulative impact from several projects is the change in the environment that results from the incremental impact of the project when added to other closely related past, present, and reasonably foreseeable probable future projects. Cumulative impacts can result from individually minor but collectively significant projects taking place over a period of time."*

Further, according to CEQA Guidelines Section 15130(a)(1)

> *"...a 'cumulative impact' consists of an impact that is created as a result of the combination of the project evaluated in the EIR together with other projects causing related impacts. An EIR should not discuss impacts which do not result in part from the project evaluated in the EIR."*

In addition, as stated in the CEQA Guidelines Section 15064(i)(5), "[t]he mere existence of significant cumulative impacts caused by other projects alone shall not constitute substantial evidence that the Proposed Project's incremental effects are cumulatively considerable." Therefore, the cumulative impact discussion focuses on whether the impacts of the proposed Project are cumulatively considerable within the context of combined impacts caused by other past, present, or future projects.

The main determinant for purposes of inclusion and evaluation in the cumulative impact analysis is whether an individual project, program, policy initiative, or conceptual future project would contribute to an impact on an environmental resource or issue area to which the

proposed Project would also have an impact. Generally, projects that are located within geographical proximity to each other (e.g., two or more projects located within the same watershed, or utilizing the same roadways) have the potential to contribute to cumulative impacts on an environmental resource or issue area. However, given the geographical distribution and extent of the environmental resource or issue area, projects do not necessarily need to be located within proximity to one another to be included in the cumulative impacts analysis.

The CEQA Guidelines allow for the use of two different methods to determine cumulative impacts:

- **List Method** – A list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency (CEQA Guidelines Section 15130).
- **General Plan Projection Method** – A summary of projections contained in an adopted General Plan or related planning document, or in a prior environmental document that has been adopted or certified, which describes or evaluates regional or area-wide conditions contributing to the cumulative impact (CEQA Guidelines Section 15130).

Consistent with the CEQA Guidelines methodology for cumulative impact analysis, the County's 2020 revised *Guidelines for the Implementation of the California Environmental Quality Act of 1970* provide that various methods can be utilized for assessing a project's contribution to cumulative impacts, depending on the nature of the impact and its area/extent. The County of Santa Barbara Planning & Development Department (P&D) generally employs or recommends that the cumulative impact evaluation be based on a specific cumulative project list (i.e., List Method). The list should be extensive enough to contain all projects that could have a substantial effect on the resource to be significantly impacted by the project. The County guidelines state that the cumulative project list should include the following:

1. Projects that are partially occupied or under construction;
2. Projects approved by decision-makers;
3. Projects deemed "complete" for processing and are currently undergoing review by lead agencies;
4. Projects that have submitted a pre-application assessment with a lead department and contain a high degree of specificity and probable time frame; and
5. Public projects that are partially occupied, under construction, approved, under review, or proposed, including projects that are included in a capital improvement program, or are reasonably expected to be funded and scheduled.

To develop the cumulative projects list for use in CEQA documents for which the County is the Lead Agency, the County reviewed current work plans to consider program and policy initiatives, and discretionary and ministerial projects throughout the county to identify projects that may have a cumulative effect on the environment. The list of cumulative projects that are applicable to the cumulative analysis for the proposed Project is presented in Table 3-2.

Of note, the Recreation Master Plan recognizes planned park and recreation projects by other agencies or entities, as described in Section 5.2, *Planned Recreation Projects by Other Public Agencies & Private Organizations*, and Section 6.1, Table 6-1. *Conceptual Public Recreation Projects Potentially Assisted by the Recreation Benefit Project Program*, of the Recreation Master Plan, as recreation projects that will address recreation needs countywide. These planned projects are also recognized as cumulative projects for the purposes of environmental review. The Recreation Master Plan recognizes a range of projects planned by other agencies, organizations, and entities that may occur concurrently with County Parks' planned parks, recreation, and trails projects described in Section 2.5.1, *Planned County Parks, Recreation, and Trails Projects*. Because County Parks is not the proponent of these projects, they are considered cumulative projects for the purpose of this EIR. It is foreseeable that County Parks may play a role in the implementation of certain projects that lie in the unincorporated area or on County-owned property, including potential permit authority, approvals, funding, or other roles, but the impacts of these projects would be the responsibility of their respective lead agency under CEQA. Therefore, this EIR acknowledges their potential impact collectively with the impacts of the proposed Project, as well as examples of potential impacts that could occur from implementation of the proposed Recreation Benefit Project Program.

Consistent with the County's 2020 revised *Guidelines for the Implementation of the California Environmental Quality Act of 1970* and recommendations for assessment of cumulative impacts, programs, and policy initiatives excluded from the cumulative impact analysis include:

- County policy initiatives and ordinance amendments that are unfunded and not included in a County Board of Supervisors adopted work program.
- County policy initiatives and ordinance amendments that do not cause related impacts to resources evaluated in this Program EIR.
- County policy initiatives and procedural ordinance amendments.
- A County policy initiative or ordinance amendment project description that is unspecified, uncertain, loosely defined, or speculative. This criterion would apply to programs that have not undergone environmental review or been formally initiated by the County Board of Supervisors.
- Projects undertaken by or proposed within other jurisdictions, such as the eight incorporated cities, State Parks, and the University of California, Santa Barbara (UCSB), that would otherwise not affect the environmental resource areas analyzed in this Program EIR.

- Projects that are located outside of the area of potential effect or projects that would otherwise not affect the environmental resource areas analyzed in this Program EIR.

CEQA Guidelines Section 15130(b)(2) further states that a program EIR should define the geographic scope of the area affected by the cumulative effect and provide a reasonable explanation for the geographic limitation used. The geographic scope for the analysis of cumulative impacts in this Program EIR varies by each environmental impact topic (e.g., jurisdiction, air basin, watershed, service area). For most of the impact topics analyzed in this Program EIR, the geographic scope was determined to be limited to the unincorporated areas of the county where planned and future park, recreation, and trail projects are proposed or would be enabled by the Project. However, regional issues regarding the adequacy of public services, the supply of water, and the treatment of wastewater also take into account regional projections, such as those provided by the Santa Barbara Association of Governments (SBCAG) in the Connected 2050 Regional Transportation Plan/Sustainable Communities Strategy (Connected 2050 RTP/SCS). The cumulative analyses for air quality, GHG emissions, and energy also include the full extent of the county and beyond. The cumulative analyses for each environmental issue, including a discussion regarding the identification of relevant cumulative projects, are provided in their applicable sections in Chapter 3, *Environmental Impact Analysis*.

Table 3-1. Geographic Context for Cumulative Analysis

Environmental Resource Area	Geographic Context for Cumulative Analysis
Aesthetics and Visual Resources	Santa Barbara County
Agricultural Resources	Santa Barbara County
Air Quality	South Central Coast Air Basin
Biological Resources	Santa Barbara County
Cultural Resources and Tribal Cultural Resources	Santa Barbara County
Energy	Electricity – Pacific Gas & Electric Company (PG&E) and Southern California Edison (SCE) service areas Natural Gas – Southern California Gas Company (SoCalGas) service area
Geology and Soils	Santa Barbara County
Greenhouse Gas Emissions and Climate Change	Global
Hazards and Hazardous Materials	Santa Barbara County
Hydrology and Water Quality	Santa Barbara County
Land Use and Planning	Santa Barbara County and SBCAG Planning Area
Noise	Santa Barbara County
Public Services (e.g., Fire, Police, Parks, Schools, Libraries)	Santa Barbara County
Recreation	Santa Barbara County
Transportation	Santa Barbara County and SBCAG Planning Area
Utilities	**Water** – Carpinteria Valley Water District (CVWD), City of Santa Barbara, Goleta Water District, Golden State Water Company, La Cumbre Mutual Water Company, Montecito Water District, Santa Ynez River Water Conservation District, Los Alamos Community Service District (CSD), Cuyama CSD, Casmalia CSD, Mission Hills CSD, and Vandenberg Village CSD **Wastewater** – 12 wastewater service providers/districts across the County- Carpinteria Sanitary District, County Service Area 12, Goleta West Sanitary District, Goleta Sanitary District, Montecito Sanitary District, Cuyama CSD, Laguna County Sanitation District, Los Alamos CSD, Mission Hills CSD, Santa Ynez CSD, Summerland Sanitary District, and Vandenberg Village CSD. **Solid Waste** – Waste Management (North County) and MarBorg Industries (South Coast); Tajiguas Landfill, Lompoc Landfill, Santa Maria Regional Landfill, Los Flores Integrated Regional Waste Management Facility (Planned), South Coast Recycling & Transfer Station, Santa Ynez Valley Recycling & Transfer Station, New Cuyama Transfer Station, Ventucopa Transfer Station
Wildfire	Santa Barbara County

Table 3-2. Cumulative Project List

No.	Project	Description	Location/agency	CEQA document/process	Status
1	Buellton 2023-2031 Housing Element	6th Cycle Housing Element addressing Buellton's RHNA allocation of 165 units through housing sites, programs, ADUs, multifamily infill, and mixed-use strategies.	City of Buellton	Negative Declaration, SCH No. 2023030526.	Adopted and HCD certified
2	Carpinteria 2023-2031 Housing Element	General Plan Housing Element update addressing housing needs, opportunity sites, constraints, fair housing, and housing production, rehabilitation, and preservation programs.	City of Carpinteria	CEQA exemption under CEQA Guidelines Section 15061(b)(3) for Housing Element adoption. Later implementing zoning actions may require separate CEQA documentation.	Re-adopted and HCD certified
3	Goleta 2023-2031 Housing Element	Housing Element and implementing General Plan and zoning amendments to accommodate Goleta's RHNA allocation of 1,837 units.	City of Goleta	CEQA Addendum to the Goleta General Plan/Coastal Land Use Plan EIR, SCH No. 2005031151.	Adopted and HCD certified
4	Guadalupe 2023-2031 Housing Element	6th Cycle Housing Element addressing Guadalupe's RHNA allocation of 431 units through a sites inventory and implementation programs.	City of Guadalupe	Initial Study/Negative Declaration.	Adopted and HCD certified
5	Lompoc 2023-2031 Housing Element	Housing Element planning for 2,248 units, including housing needs, sites, constraints, fair housing, and housing preservation and production programs.	City of Lompoc	Addendum to the Final 2030 General Plan EIR.	Adopted and HCD certified
6	Santa Barbara 2023-2031 Housing Element	6th Cycle Housing Element establishing goals, policies, programs, and housing opportunity	City of Santa Barbara	CEQA Guidelines Section 15061(b)(3) exemption for Housing Element adoption.	Adopted and HCD certified

Table 3-2. Cumulative Project List (Continued)

No.	Project	Description	Location/agency	CEQA document/process	Status
		sites for the City's RHNA allocation of 8,001 units.		Separate Housing Plan Program EIR prepared for implementation programs and code amendments.	
7	Santa Maria 2023-2031 Housing Element	Comprehensive Housing Element update for Santa Maria's RHNA allocation of 5,418 units, including sites, constraints, affordable housing conservation, objectives, policies, and programs.	City of Santa Maria	Negative Declaration, SCH No. 2022120394.	Adopted
8	Solvang 2023-2031 Housing Element	6th Cycle Housing Element addressing Solvang's RHNA allocation of 191 units, including programs for housing law compliance, fair housing, and removal of housing constraints.	City of Solvang	Initial Study/Mitigated Negative Declaration for Housing Element implementation.	Adopted and HCD certified
9	County of Santa Barbara 2023-2031 Housing Element Update	6th Cycle Housing Element for the unincorporated county addressing a RHNA allocation of 5,664 units through needs analysis, sites inventory, rezoning programs, and County-owned opportunity sites.	Unincorporated Santa Barbara County	Final Program EIR, SCH No. 2022070490.	Adopted and HCD certified
10	Environmental Justice Element of the Santa Barbara County Comprehensive Plan	State-mandated Comprehensive Plan element with goals, policies, objectives, and implementing actions to reduce pollution exposure and compounded health risks, improve public facilities, food access, housing quality, physical activity, and civic engagement in identified environmental justice communities.	Countywide and unincorporated Santa Barbara County, including Cuyama, New Cuyama, Ventucopa, Sisquoc, Casmalia, Los Alamos, and Isla Vista	Notice of Exemption under CEQA Guidelines Section 15061(b)(3), SCH No. 2026030811.	Adopted
11	County of Santa Barbara Open Space Element Update	Comprehensive Plan Open Space Element update addressing open space for public health and safety,	Unincorporated Santa Barbara County	CEQA process not yet identified in sources reviewed.	In process

Table 3-2. Cumulative Project List (Continued)

No.	Project	Description	Location/agency	CEQA document/process	Status
		managed production of resources, outdoor recreation, equitable access, climate resilience, and preservation of natural resources.			
12	Seismic Safety and Safety Element Update Phase One	Comprehensive Plan amendment updating wildfire hazard information and policies in the County Seismic Safety and Safety Element, with related direction to update maps and text references after revised State Fire Hazard Severity Zone Maps are adopted.	Unincorporated Santa Barbara County	Notice of Exemption under CEQA Guidelines Section 15061(b)(3), Case No. 22GPA-00000-00005.	Adopted
13	Agricultural Enterprise Ordinance	County ordinance expanding the range of small-scale, ancillary agricultural enterprise uses on rural agricultural lands, including uses such as farmstays, campgrounds, low-impact camping areas, educational experiences, small-scale special events, incidental food service at winery tasting rooms, and small-scale agricultural processing.	Unincorporated rural Santa Barbara County	Environmental Impact Report and Notice of Determination, SCH No. 2021110353.	Adopted
14	County of Santa Barbara Utility-Scale Solar Comprehensive Plan and Ordinance Amendments	Countywide amendments to the Comprehensive Plan, Coastal Land Use Plan, zoning ordinances, and Uniform Rules to allow utility-scale solar outside the existing Cuyama Valley overlay, allow projects by Conditional Use Permit on various zoned lands, and create a community-scale solar category.	Countywide and unincorporated Santa Barbara County	Draft EIR, SCH No. 2024110254.	In process
15	Solomon Hills Specific Plan Project	Proposed mixed-use specific plan with up to 4,000 residential units, commercial and office space, public	Unincorporated North County between Orcutt and Los Alamos	Notice of Preparation for Draft EIR.	In process

Table 3-2. Cumulative Project List (Continued)

No.	Project	Description	Location/agency	CEQA document/process	Status
		and institutional uses, park and recreation space, and open space.			
16	Rice Ranch Development Plan	Residential development plan with 725 residential units.	Orcutt Community Plan area	Prior project-level CEQA not identified in sources reviewed.	Under construction
17	Richards Ranch LLC Multifamily Housing and Commercial Development Project	Mixed residential and commercial project with 750 residential units, commercial uses, car wash, gas and convenience uses, and personal storage.	Orcutt Community Plan area	County Development Plan review. Project-specific CEQA document not identified in sources reviewed.	In process
18	Tatum Multifamily Housing Development Project	Multifamily housing project with 517 units.	Eastern Goleta Valley, South Coast	County zoning and application review. Project-specific CEQA document not identified in sources reviewed.	In process
19	San Marcos Ranch LLC Housing Development Project	Housing development with 957 units.	Hollister Avenue and South San Marcos Road area, Eastern Goleta Valley	County CEQA notice search identifies a Notice of Exemption.	In process
20	5381 Ekwill LLC SB 330 Project	SB 330 preliminary application for 343 residential units.	Ekwill Street area, Eastern Goleta Valley	SB 330 preliminary application. CEQA document not identified in sources reviewed.	Proposed
21	Perkins Place Mixed-Use Development Project	Affordable housing project with 33 residential units.	Cuyama Valley	County Development Plan review. CEQA document not identified in sources reviewed.	Approved
22	Santa Barbara Ranch Project	Agricultural, equestrian, public access, and residential components, including equestrian facilities, agricultural support buildings, public parking, horse stalls, restrooms, picnic areas, and residential units.	Gaviota Coast Plan Area	County Development Plan and related appeal or compliance proceedings. Current CEQA document not identified in sources reviewed.	In process

Table 3-2. Cumulative Project List (Continued)

No.	Project	Description	Location/agency	CEQA document/process	Status
23	Dangermond Preserve Water Wells Project	Legalization and permitting of existing water wells serving preserve operations, cattle operations, conservation, and research activities.	Dangermond Preserve, Gaviota Coast	Mitigated Negative Declaration.	In process
24	Patel Housing Development on Apollo Way	Pre-application for 440 residential units.	Apollo Way, Lompoc Valley	Pre-application. CEQA document not identified in sources reviewed.	Proposed
25	Constellation Land Development LLC Parcel Map	Tentative parcel map associated with extended-stay hotel and rental residential development.	Lompoc Valley	Parcel map review. CEQA document not identified in sources reviewed.	In process
26	Plaza de la Bandera AB 2162 Supportive Housing Project	Supportive housing project with 47 units, including one manager's unit.	Lompoc Valley	AB 2162 supportive housing process. CEQA document not identified in sources reviewed.	Approved
27	Bodger Housing Development and Vesting Tract Map	Housing development and vesting tract map with 340 residential units.	Lompoc Valley	Development Plan and Vesting Tract Map review. CEQA document not identified in sources reviewed.	In process
28	Imerys Lompoc Solar PV and Battery Storage Project	Solar photovoltaic and battery storage project.	Lompoc Valley	EIR case listed.	Proposed
29	Legacy Estates Tract Map	Residential tract map with 59 units or lots.	Los Alamos area	Tract Map review. Prior CEQA document not identified in sources reviewed.	Under construction
30	Los Alamos Investments LLC Tract Map	Tract map with 67 residential units or lots.	Los Alamos Community Plan area	Tract Map review. CEQA document not identified in sources reviewed.	In process
31	Gordon Sand Company Reclamation Plan	Mining reclamation plan.	Santa Maria Valley	Negative Declaration case listed.	Proposed

Table 3-2. Cumulative Project List (Continued)

No.	Project	Description	Location/agency	CEQA document/process	Status
32	OUSD Senior Housing, Key Site 17 Development Plan	Senior housing and related community-serving uses, including community center, daycare, public park, and senior or special care housing.	Orcutt Community Plan area	Development Plan review. CEQA document not identified in sources reviewed.	Approved
33	Key Site 3 Development Plan and Multifamily Residential Project	Approved 119-unit development plan and separate in-process 160-unit multifamily residential project.	Orcutt Community Plan area	Development Plan and zoning clearance/application review. CEQA document not identified in sources reviewed.	Approved and in process
34	Central Park Orcutt Mixed-Use Development and Orcutt Marketplace on Key Site 1	Mixed-use project with 262 residential units and 100,000 square feet of commercial space.	Orcutt Community Plan area	Development Plan and Tract Map review. CEQA document not identified in sources reviewed.	Proposed and in process
35	The Neighborhoods of Willow Creek and Hidden Canyon Specific Plan	Specific plan with 143 residential units.	Orcutt Community Plan area	Specific Plan review. CEQA document not identified in sources reviewed.	In process
36	Orchard Terrace Apartments Development Plan, Key Site H	Affordable housing development with 99 units.	Orcutt Community Plan area	Development Plan review. CEQA document not identified in sources reviewed.	Approved
37	Novatt Equestrian Facility	Equestrian facility with event and reception uses and related agricultural development.	Santa Ynez Valley Plan Area	Conditional Use Permit and Development Plan review. CEQA document not identified in sources reviewed.	Under construction
38	Landon Equestrian LLC Equestrian Arena	Equestrian arena and related existing equestrian facilities.	Santa Ynez Valley	Negative Declaration case listed.	In process
39	Rincon Beach Multi-Use Trail	Multi-use trail project.	Rincon Beach, South Coast	Development Plan review. CEQA document not	In process

Table 3-2. Cumulative Project List (Continued)

No.	Project	Description	Location/agency	CEQA document/process	Status
				identified in sources reviewed.	
40	The Orchard, Giorgi, SB 330 Housing Development	SB 330 housing development with 1,096 residential units and associated nonresidential components.	Eastern Goleta Valley, South Coast	SB 330 housing development review. CEQA document not identified in sources reviewed.	In process
41	CA Calle Real Owner LLC SB 330 Housing Development	SB 330 housing development with 360 units.	Calle Real area, Eastern Goleta Valley	SB 330 housing development review. CEQA document not identified in sources reviewed.	In process
42	5050 Hollister SB 330 Pre-Application	SB 330 pre-application with 206 residential units, including 43 affordable apartments and 163 townhomes.	Hollister Avenue area, Eastern Goleta Valley	SB 330 preliminary application. CEQA document not identified in sources reviewed.	In process
43	Caird Vesting Tract Map and Multi-Unit Housing Development	Vesting tract map and multi-unit housing development with 1,198 residential units.	Eastern Goleta Valley, South Coast	Vesting Tract Map review. CEQA document not identified in sources reviewed.	In process
44	Van Wingerden Family Trust Housing Development	Housing development with 40 residential units.	South Coast, outside a community or specific plan area	Development Plan review. CEQA document not identified in sources reviewed.	In process
45	Hope Villas	Housing project with 50 residential units.	South Coast, outside a community or specific plan area	Zoning/application review. CEQA document not identified in sources reviewed.	In process
46	HASBCRO Red Tail Multifamily LLC Multifamily Housing Development	Mixed-income rental housing project with 196 residential units.	South Coast, outside a community or specific plan area	Coastal Development Permit case listed. CEQA document not identified in sources reviewed.	In process
47	Goerner New SFD, Guest House, and Grading	New single-family dwelling, guest house, pool, grading, access	1017 Hot Springs Road, Montecito Community Plan area	Mitigated Negative Declaration. Current	Proposed

Table 3-2. Cumulative Project List (Continued)

No.	Project	Description	Location/agency	CEQA document/process	Status
		improvements, retaining walls, and bridge improvements.		County list also shows NGD/EIR case entries.	
48	California State Parks General Plan Update for El Capitán State Beach, Refugio State Beach, and Gaviota State Park	Consolidated State Parks General Plan update to guide long-term management, infrastructure modernization, climate adaptation, resource protection, coastal access, camping, and sustainable recreation.	El Capitán State Beach, Refugio State Beach, and Gaviota State Park, Gaviota Coast	Program EIR in preparation. State Parks issued a Notice of Preparation for the General Plan Update EIR.	In process
49	City of Santa Barbara Parks and Recreation Master Plan	Long-range systemwide plan to inventory and assess parks, recreation facilities, programs, community needs, and future development priorities.	City of Santa Barbara	CEQA process not yet identified in sources reviewed.	In process
50	Goleta Parks, Facilities and Playgrounds Master Plan	Master plan providing a roadmap for upgrades, expansions, maintenance, accessibility, funding, and potential additions to Goleta's park and playground system.	City of Goleta	CEQA document not identified for the master plan itself. Individual implementation projects may require project-level CEQA.	Approved
51	City of Solvang Parks and Recreation Master Plan	New Parks and Recreation Master Plan intended to guide improvements to parks, trails, recreational programs, and open spaces.	City of Solvang	CEQA process not yet identified in sources reviewed.	In process
52	Goleta Stow Grove Park Master Plan	Renovation master plan for Stow Grove Park, an approximately 11.75-acre park.	City of Goleta	Mitigated Negative Declaration.	Approved
53	Goleta San Jose Creek Multipurpose Path Project	Multipurpose bicycle and pedestrian path connecting Calle Real, Old Town Goleta, neighborhood parks, the Atascadero Creek Bikeway, Goleta Beach, UCSB, and Santa Barbara.	City of Goleta, San Jose Creek corridor	Environmental permits noted. CEQA document not identified in sources reviewed.	Under construction

Table 3-2. Cumulative Project List (Continued)

No.	Project	Description	Location/agency	CEQA document/process	Status
54	City of Santa Barbara Ortega Park Revitalization Project	Major park revitalization including a year-round sports field, community pool, all-wheel skatepark, playground, community plaza, sports courts, splash pad, and related improvements.	Ortega Park, City of Santa Barbara	Mitigated Negative Declaration, SCH No. 2020100179.	Active City parks project
55	City of Santa Barbara Reimagining Franceschi House	Project to replace the deteriorated Franceschi House with an open-air public overlook or landscape-based public space honoring the site's horticultural and historic legacy.	Franceschi Park, City of Santa Barbara	Multi-year environmental review anticipated.	In planning
56	City of Santa Barbara Parma Park Sustainable Trails Project	Multi-phase trail and habitat restoration project improving and expanding trails in one of Santa Barbara's largest open-space parks.	Parma Park, City of Santa Barbara	CEQA document not identified in sources reviewed.	Completed
57	Isla Vista Recreation and Park District Children's Park Renovation Project	Major renovation with new play equipment, community gathering and staff space, demonstration garden, picnic areas, barbecues, bathrooms, and nature-based play features.	Children's Park, Isla Vista	CEQA document not identified in sources reviewed.	In planning/design
58	Isla Vista Recreation and Park District Pardall Gardens Renovation Project	Renovation of a small park parcel with seating, deck, walkways, xeriscape planting, stormwater features, and gathering space.	6514 Pardall Road, Isla Vista	Development plan approval and permitting referenced. CEQA document not identified in sources reviewed.	Under construction
59	Isla Vista Recreation and Park District Measure O Capital Projects	Districtwide capital and operational improvements funded by Measure O, including facility updates, park lighting, recycled water infrastructure, murals, waste receptacles, and other park improvements.	Isla Vista Recreation and Park District	CEQA process varies by project and was not identified for the overall program in sources reviewed.	Ongoing

Table 3-2. Cumulative Project List (Continued)

No.	Project	Description	Location/agency	CEQA document/process	Status
61	City of Santa Barbara State Street Master Plan	Public realm and circulation master plan for the 400 through 1300 blocks of State Street, including street design, access, district strategies, implementation priorities, landscaping, transportation, and civil analyses.	Downtown Santa Barbara	CEQA process not identified in sources reviewed.	Draft released for public review
62	Buellton Library, Children's Museum, and Open Space	In 2020, the City of Buellton acquired the former home and remaining agricultural property (about 24 acres total) of Jake and Jeannette Willemsen. The Buellton Public Library opened in the Willemsen house. Some uses have been conceptually approved, but formal plans have not yet been approved, such as the Santa Ynez Valley Children's Museum on the area just east of the barn.	Santa Ynez Valley; City of Buellton	Project-level CEQA/documentation TBD	In Process
63	Buellton Median 3 Avenue of Flags Public Plaza	Median 3 is at the center of the envisioned downtown core, planned to be a unique public gathering space that functions as a town plaza and park.	Santa Ynez Valley; City of Buellton	Project-level CEQA/documentation TBD	In Process
64	Calle Real @ Vega Neighborhood Park	With the new residential development near Los Carneros Road, an increased demand for parks and recreational facilities in this “park-poor“ area will occur. The 1.1-acre city-owned vacant land at the corner is perfect for a new neighborhood park to serve this area.	South Coast; City of Goleta	Project-level CEQA/documentation TBD	In Process
65	Carpinteria Living Shoreline Project	This project would construct a nature-based solution to protect the	South Coast; City of Carpinteria	Project-level CEQA/documentation TBD	In Process

Table 3-2. Cumulative Project List (Continued)

No.	Project	Description	Location/agency	CEQA document/process	Status
		shoreline and landward infrastructure against coastal hazards (e.g., tidal inundation, coastal flooding, and erosion) and future sea level rise.			
66	Central Park Renovation	Construct a new dog park, skate park, half basketball court, bocce ball court, fitness equipment, board game area, picnic/BBQ areas, swings/spinners and climbing feature, public art including a painted water tower and mural, perimeter wall, restroom building, and lighting and landscaping throughout the park. Renovate existing sidewalks/paths and fencing.	Santa Maria Valley; City of Guadalupe	Project-level CEQA/documentation TBD	In Process
67	College Park Renovation & Skate Park	Construct a new skate park with lighting, two half basketball courts with lighting, a playground and game area with lighting, a picnic area with shade structure, a mural wall that will block wind, a restroom building, and landscaping throughout the park.	Lompoc Valley; City of Lompoc	Project-level CEQA/documentation TBD	In Process
68	Deckers Park Expansion	This city-owned parcel is adjacent to the existing Deckers Park, a privately owned park located near the airport. The parcel is 2.3 acres in size and currently occupied by a corporation yard, but almost half of the space remains undeveloped. This land opportunity makes the potential expansion of Deckers Park possible, although it depends on further study and cooperation with the developer of Deckers Park.	South Coast; City of Goleta	Project-level CEQA/documentation TBD	In Process

Table 3-2. Cumulative Project List (Continued)

No.	Project	Description	Location/agency	CEQA document/process	Status
69	Dwight Murphy Field Renovation	The park renovation includes the construction of a 36,000 square foot all-inclusive playground	South Coast; City of Santa Barbara	Project-level CEQA/documentation TBD	In Process
70	Goleta City Hall Park	This county-owned parcel is adjacent to Calle Real and a retail complex. The 1.1-acre vacant land at the corner is perfect for siting a neighborhood park to serve this “park-poor“ area.	South Coast; City of Goleta	Project-level CEQA/documentation TBD	In Process
71	Guadalupe to the Dunes Trail	This project would comprise an approximately 6.2-mile-long multi-use path connecting the City of Guadalupe to the beach at the Rancho Guadalupe Dunes County Park, providing much-needed coastal access in North County, a community aspiration for many years.	Santa Maria Valley; California Coastal Conservancy	Project-level CEQA/documentation TBD	In Process
72	Ken Adam Park Discontinuance & Space Base California	Lompoc voters passed Measure R2024 to discontinue the use of Ken Adam Park to allow the possible sale and development of the site for a potential space-themed educational and recreational development.	Lompoc Valley; City of Lompoc	Project-level CEQA/documentation TBD	In Process
73	Leroy Park Renovation	The LeRoy Park Community Center and Park was provided with a complete renovation and substantial addition of a future flexible use space. The redesigned community center includes recreation rooms, classrooms, offices, a commercial kitchen, bathrooms, and large multi-purpose areas. The facility was designed to be an operations center	Santa Maria Valley; City of Guadalupe	Project-level CEQA/documentation TBD	In Process

Table 3-2. Cumulative Project List (Continued)

No.	Project	Description	Location/agency	CEQA document/process	Status
		in the case of emergencies and has many sustainable features.			
74	Linden Plaza Project	The Linden Plaza Project focuses on enhancing the Linden Avenue beach-end to create a more inviting and visually appealing urban park that seamlessly transitions to Carpinteria Beach. The improvements aim to beautify the area, enriching the visitor experience while preserving its coastal charm.	South Coast; City of Carpinteria	Project-level CEQA/documentation TBD	In Process
75	Lompoc Riverbend Sports Complex Concept Plan	The 37-acre community park would include 4 baseball/softball fields; 3 soccer fields; a children's play environment with tot lot, splash pad, and shade shelter; a 7,000 square-foot restaurant building with office and locker space below; outdoor patio space; a concession/restroom/storage area; 450-capacity concrete bleachers; and a ticket booth building	Lompoc Valley; City of Lompoc, County of Santa Barbara	Project-level CEQA/documentation TBD	In Process
76	Pioneer Park Renovation	Renovations at the park include the construction of a new playground, fitness stations, and baseball fields.	Lompoc Valley; City of Lompoc	Project-level CEQA/documentation TBD	In Process
77	Rincon Multi-Use Trail	The Rincon Multi-Use Trail Project involves a new 0.5-mile-long multi-use trail connection between the City of Carpinteria near the Rincon Bluffs Preserve and Rincon Beach County Park. The proposed shared-use trail would be 16 feet wide (10-foot-wide path with 3-foot-wide shoulder) and would include a 160-foot clear-span	South Coast; City of Carpinteria, County of Santa Barbara	Project-level CEQA/documentation TBD	In Process

Table 3-2. Cumulative Project List (Continued)

No.	Project	Description	Location/agency	CEQA document/process	Status
		pedestrian/bicycle bridge over the UPRR alignment.			
78	Santa Maria Community Sports Park	Create the new Santa Maria Community Sports Park adjacent to Adam/Minami Park. Acquire 19.7 acres of land in the City of Santa Maria. Construct four new soccer fields, four half-court basketball courts, a walking/jogging trail with exercise stations, a playground, a plaza with an art wall, a restroom building, a maintenance area, a parking lot, and lighting and landscaping throughout the park.	Santa Maria Valley; City of Santa Maria	Project-level CEQA/documentation TBD	In Process
79	Santa Ynez River Trail	This project would create a new 4.5-mile-long multi-use trail corridor along the Santa Ynez River, extending from near Alisal Road in the City of Solvang to River View Park in the City of Buellton. The trail would be paved to serve pedestrians and bicyclists, and a separate, protected dirt trail would serve equestrians. Several alignment options have been developed by SBCAG in the Trail Suitability Analysis.	Santa Ynez Valley; Santa Barbara County Association of Governments, County of Santa Barbara, City of Solvang, City of Buellton, private landowners	Project-level CEQA/documentation TBD	In Process
80	Stow Canyon Open Space/San Pedro Creek Trail	This county-owned parcel is currently a linear natural area along the San Pedro Creek that is unimproved. It is adjacent to the existing Stow Tennis Courts, which is a community park. This is a good opportunity for a dirt trail along the creek bank to connect Stow Canyon Rd and Covington Way,	South Coast; City of Goleta, County of Santa Barbara	Project-level CEQA/documentation TBD	In Process

Table 3-2. Cumulative Project List (Continued)

No.	Project	Description	Location/agency	CEQA document/process	Status
		although further study and coordination with the county would be needed to test feasibility.			
81	UCSB/QAD Summerland Park & Trails	This potential project includes an outdoor amphitheater, pickleball courts, and a lighted walking path connecting the sidewalks from the mobile home park to this site. Within steps of the amphitheater, there would be food and beverages, as well as public restrooms, including ADA-compliant facilities. This would include some shaded seating areas.	South Coast; UCSB	Project-level CEQA/documentation TBD	In Process
82	Veterans Memorial Park Renovation	The renovation of Veterans Memorial Park included a park redesign that consists of adding exercise stations, walking paths, a playground with inclusive features, and picnic areas. Renovations also included a memorial garden with a monument, benches, and a masonry wall with a mural. The parking area between the park and the Veterans Memorial Community Center was transformed to create an event plaza.	Santa Maria Valley; City of Santa Maria	Project-level CEQA/documentation TBD	In Process
83	Bill Wallace Trail Improvements	This project would improve the existing Bill Wallace Trail within El Capitan State Park and connect with the historic abandoned Gato Trail in the Los Padres National Forest to create a new 8- to 9-mile-long trail extending from US Hwy 101 to West Camino Cielo.	South Coast; Santa Barbara County Trails Council, County of Santa Barbara, California State Parks, private landowners	Project-level CEQA/documentation TBD	In Process

Table 3-2. Cumulative Project List (Continued)

No.	Project	Description	Location/agency	CEQA document/process	Status
84	Las Flores & Corral Canyons Trails	This project would convert the existing major oil processing facility to a regional park, campground, and trail system when this facility is decommissioned over the next 20-25 years. After the cleanup of any contamination, the major graded pads that support oil operations could be repurposed to regional park facilities and a campground.	South Coast; Santa Barbara County Trails Council, County of Santa Barbara, private landowners	Project-level CEQA/documentation TBD	Conceptual project
85	Lompoc (Bodger) Trails	This project would construct approximately 5 miles of single-track dirt hiking and biking trails on an 82.22-acre parcel owned by the Lompoc Valley Parks, Recreation & Pool Foundation. The Project would restore and expand the existing trails, which were washed out during winter storms in 2023 and were only temporarily restored.	Lompoc Valley; County Parks, Lompoc Trails	Project-level CEQA/documentation TBD	In Process
86	Mariposa Reina Recreation Area & Trails	This project would entail a new public open space with a trail system and recreation facilities, such as a campground and visitor center, along the Gaviota Coast. The project would lie north of US Hwy 101 at the former oil processing and support facilities for the Gaviota Marine Terminal.	South Coast; Santa Barbara County Trails Council, County of Santa Barbara, California State Parks, private landowners	Project-level CEQA/documentation TBD	Conceptual project
87	Old Town Orcutt Neighborhood Park	This project would develop and dedicate a neighborhood park as part of a pending private development. The park would include a new inclusive playground, open lawn play area, and sports fields and courts, as	Santa Maria Valley; County Parks, Planning & Development	Project-level CEQA/documentation TBD	Conceptual project

Table 3-2. Cumulative Project List (Continued)

No.	Project	Description	Location/agency	CEQA document/process	Status
		well as walking paths connecting to surrounding neighborhoods.			
88	Refugio Road Trail	This project would provide expanded trails along Refugio Road on the Gaviota Coast.	South Coast; Santa Barbara County Trails Council, County of Santa Barbara, private landowners	Project-level CEQA/documentation TBD	Conceptual project
89	San Antonio Creek Trail Connector to San Marcos Foothills	This project would involve new pedestrian safety and trail improvements to provide pedestrian and mountain biking access between the San Antonio Creek Trail and the San Marcos Foothills Preserve.	South Coast; County Parks, Caltrans, private landowners	Project-level CEQA/documentation TBD	Conceptual project
90	Santa Maria Valley Rim Trails	This project is a conceptual vision for the completion of 100 miles or more of trails ringing the Santa Maria Valley. The proposed trail system would extend from the Pacific Ocean at Rancho Guadalupe Dunes County Park and the County's Point Sal Open Space more than 35 miles inland, roughly to Tepusquet Canyon Road.	Santa Maria Valley; Santa Maria Valley Open Space, Santa Barbara County Trails Council, City of Santa Maria, County of Santa Barbara, private landowners	Project-level CEQA/documentation TBD	Conceptual project
91	Santa Ynez Aquatics Complex	This planned aquatics complex will be located on the Santa Ynez Valley Union High School campus and feature two pools: a 33-meter competition pool for student athletes, local clubs, and lap swimmers, and a smaller 25-yard warm-water pool for swim instruction, aqua therapy, senior wellness, and low-cost public swim sessions.	Santa Ynez Valley; Santa Ynez Valley Community Aquatics Foundation, City of Solvang, County of Santa Barbara	Project-level CEQA/documentation TBD	In Process

Table 3-2. Cumulative Project List (Continued)

No.	Project	Description	Location/agency	CEQA document/process	Status
92	Southside Neighborhood Park	This project would develop a much-needed neighborhood park in the southern neighborhoods of Eastern Goleta Valley. To meet the needs of surrounding families, the project would include a tot lot designed for two-to-five-year-old children and a playground for children five years and up. The tot lot would include a low-to-the-ground play structure, small slides, and crawling spaces.	South Coast; County Parks, homeowners' associations, private landowners	Project-level CEQA/documentation TBD	Conceptual project
93	Chumash Triangle Camping & Sports Park	This project would provide a new playground equipped with swings and slides. The site would also support outdoor social gatherings with shaded picnic areas, water fountains, and restrooms. A new park in Santa Ynez would meet the needs of existing neighborhoods and future housing development.	Santa Ynez Valley; Santa Ynez Band of Chumash Indians, County Parks	Project-level CEQA/documentation TBD	Conceptual RBP
94	Foxen Canyon Winery Trail	This project would consist of new on- and off-road trail improvements parallel to Foxen Canyon Road, from Los Olivos to Sisquoc, a distance of approximately 22 miles. The Foxen Canyon Wine Trail is proposed as a multi-purpose trail connecting wineries and estates along the route. The trail would provide recreational opportunities while helping to support agricultural tourism in the region.	Santa Ynez Valley; County Parks, private landowners	Project-level CEQA/documentation TBD	Conceptual RBP

Table 3-2. Cumulative Project List (Continued)

No.	Project	Description	Location/agency	CEQA document/process	Status
95	Jalama Beach to Point Conception Lighthouse Trail	This project would create a new coastal trail extending from Jalama Beach County Park toward Point Conception. In support of the California Coastal Trail, the County would pursue partnership opportunities with The Nature Conservancy's Dangermond Preserve to advance public programming on the Preserve from Jalama Beach County Park and develop appropriate public access mechanisms.	Lompoc Valley; County Parks, The Nature Conservancy/Dangermond Preserve	Project-level CEQA/documentation TBD	Conceptual RBP
96	Los Alamos Community Plaza	This project would create a new community gathering space in the heart of Los Alamos. A new plaza would feature a patio, grassy area, gazebo, and outdoor seating. Adjacent to the plaza would be an open play area with an interactive water feature, picnic benches, shade structures, and restrooms. No location is currently identified for this needed project.	Santa Ynez Valley; County Parks, private landowners	Project-level CEQA/documentation TBD	Conceptual RBP
97	Los Olivos Park	This project would provide a small park nestled into existing neighborhoods in Los Olivos, which currently does not have a children's park. The new park would provide a playground, a small open lawn area, and shaded seating areas with natural landscaping. A natural surface trail could be provided to improve neighborhood connections to the new park. No location is currently identified for this needed project.	Santa Ynez Valley; County Parks, private landowners	Project-level CEQA/documentation TBD	Conceptual RBP

Table 3-2. Cumulative Project List (Continued)

No.	Project	Description	Location/agency	CEQA document/process	Status
98	Los Olivos to Los Alamos (LOLA) Trail	This project would create an 8.4-mile-long trail extending from Zaca Station Road near the community of Los Olivos to Los Alamos. The trail would traverse private agricultural lands and winery estates along the north side of U.S. Hwy 101. The trail would be predominately off-road natural surface hiking, biking, and equestrian trail, though the trail would likely follow existing private ranch roads in some segments.	Santa Ynez Valley; County of Santa Barbara, private landowners	Project-level CEQA/documentation TBD	Conceptual RBP
99	Orcutt Creek Neighborhood Park	This project would provide a neighborhood park as part of future development along the Orcutt Creek Trail.	Santa Maria Valley; County Parks, private landowners	Project-level CEQA/documentation TBD	Conceptual RBP
100	Santa Ynez Valley Sports Complex	This project would create a multi-purpose destination for recreation, fitness, and leisure in Santa Ynez Valley. The proposed sports complex would include multiple softball/baseball fields, multi-use fields suitable for soccer and football, and indoor and outdoor courts for basketball, tennis, and pickleball courts. This project could be potentially collocated with the planned Santa Ynez River Trail.	Santa Ynez Valley; County Parks, City of Solvang, Santa Ynez Band of Chumash Indians, private landowners	Project-level CEQA/documentation TBD	Conceptual RBP
101	Toro Canyon Neighborhood Park	This project would develop approximately 3 acres into Toro Canyon's first neighborhood park. To adequately serve the surrounding community, the project would provide a modern playground	South Coast; County Parks, private landowners	Project-level CEQA/documentation TBD	Conceptual RBP

Table 3-2. Cumulative Project List (Continued)

No.	Project	Description	Location/agency	CEQA document/process	Status
		designed for all ages and abilities with such features as inclusive swings, ramps, and spinners. The park would feature an open lawn area, shaded picnic and seating areas, and potentially a restroom.			
102	Winchester Canyon Hidden Trails	This project would create a publicly accessible hiking/walking trails in Winchester Canyon.	South Coast; private landowners	Project-level CEQA/documentation TBD	Conceptual RBP
103	Santa Maria Valley Amphitheater	This project would create a new outdoor event and performance space in Santa Maria Valley accessible by planned regional trails.	Santa Maria Valley; private landowners	Project-level CEQA/documentation TBD	Conceptual RBP

This page was intentionally left blank.

3.1 AESTHETICS AND VISUAL RESOURCES

3.1.1 INTRODUCTION

This section describes potential impacts on aesthetics and visual resources that could occur from the implementation of the Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (Project). Visual resources addressed in this section include public scenic vistas and corridors, scenic highways, and light and glare, which all contribute to the visual quality and aesthetic character of Santa Barbara County. This section describes these existing resources and reviews applicable state and local policies and standards addressing the protection of visual resources. The analysis addresses impacts from both temporary construction and permanent changes in the visual character and setting from future parks, trails, and related development enabled under the Project.



Santa Barbara County's visual character is defined by its distinct urban communities in a coastal setting with rugged mountains and rural agricultural valleys. State Route (SR) 154 is one of three designated Scenic State Highways traversing the county.



County parks contribute to the visual quality of regions and neighborhoods, protecting natural resources and providing public access to beautiful places and the outdoors, such as Rocky Nook Park (above) and Jalama Beach (below).



Photo: Top, DiscoverCentralCalifornia.com; Middle, County Parks; Bottom, County Parks

3.1.2 ENVIRONMENTAL SETTING

Santa Barbara County is visually diverse, comprising both the built and natural environment. Distinct urban communities are surrounded and separated by expansive rural lands. These open lands provide high visual quality with distinctive public views from roadways, trails, and public open spaces. The inland North County areas are characterized by rural open spaces of chaparral hillsides, oak woodlands, grassland meadows, and agricultural and pastoral landscapes containing farmlands, vineyards, and ranch-style

development surrounding distinct urban communities. The South Coast contains an undisturbed natural environment on the periphery of urban areas in the foothills and along the coastline. The coastline contains estuaries, sandy beaches, sea cliffs, and views of the surrounding mountains, Channel Islands, and Pacific Ocean. The county's coastal setting provides diverse views of the Pacific Ocean and Channel Islands from viewpoints in both urban communities and rural areas. Several County Parks, such as Jalama Beach County Park, Guadalupe Dunes County Park, Goleta Beach County Park, and Arroyo Burro County Park, provide public coastal access and maintain valuable views of coastal resources. Taken together, the county provides sweeping ocean views, rural mountainous areas, expansive agricultural lands, and natural open space, all of which contribute to the county's visual resources.

3.1.2.1 Existing Visual Character by Region

The visual and aesthetic characteristics of each of the five Recreation Planning areas, as defined by the Recreation Master Plan, vary significantly. In general, greater concentrations of urban development surround the incorporated cities in the South Coast, while the more rural agricultural areas of the North County are characterized by lower-density suburban development. However, in recent years, there has also been an increase in residential and commercial development in North County, particularly in the community of Orcutt. Characteristics of each region are described in detail in the sections below.

Santa Maria Valley

The Santa Maria Valley is largely rural and agricultural except for urban development in the cities of Santa Maria and Guadalupe, and along major transportation corridors in the unincorporated community of Orcutt. Unincorporated rural agricultural communities include Casmalia, Garey, and Sisquoc in the Santa Maria Valley. The visual character of the Santa Maria Valley is defined by expansive agricultural valleys and plains with low- to medium-density urban centers and distant views of the surrounding mountains and foothills available across open fields and grazing lands. Public open space in the Orcutt Foothills and Orcutt Community Park provides visual contrast to the urban community and supports public trails affording beautiful views of Santa Maria Valley.



The Santa Maria Valley supports a variety of community characteristics ranging from low-density suburban neighborhoods to historic mixed use downtowns, as well as neighborhood, community, and regional parks such Waller Park in Orcutt.
Photo: Santa Maria Times

Existing communities are suburban centered on traditional shopping centers and historic downtowns, such as Old Town Orcutt. The Santa Maria Valley also contains San Antonio Creek, Cuyama River, and Sisquoc River, which become the Santa Maria River and add to the scenic value of the region.

Prominent natural scenic resources in the Santa Maria Valley include rolling hills at the southern edge of the Santa Maria Valley near Orcutt, the northern slopes of the Solomon and Casmalia Hills, the natural landscapes and coastal wilderness setting of Point Sal, and the expansive coastal dunes of the Rancho Guadalupe Dunes Preserve. Natural scenic features also include the drainage corridors and canyons of Orcutt, Pine Canyon, and Graciosa Creeks, which provide a natural vegetated open space corridor through the community. Undeveloped land east, south, and west of Orcutt and the City of Santa Maria, which provides a distinct pastoral setting, oak woodlands, eucalyptus, pine windrows, and Waller Park - a regional park providing natural public open space and wooded areas – are some of the prominent scenic resources that provide a significant visual backdrop to the urban areas within the region.

The primary travel corridors in the Santa Maria Valley are U.S. Highway 101, which is eligible for designation as a State Scenic Highway in this region, and State Route (SR) 1, which is classified as "moderately scenic" in the Orcutt Planning Area (County of Santa Barbara Planning and Development Department [P&D] 2022). Several properties along the major transportation corridors in the region (i.e., U.S. Highway 101, SR 135, and SR 1) serve as "gateway" properties to the community, giving Orcutt a semi-rural character. Additionally, local roads in Orcutt provide visual corridors. For example, Clark Avenue is a designated scenic corridor and visual resource in the Orcutt Community Plan area as it offers views of public viewsheds provided in the Orcutt/Solomon Hills, Casmalia Hills, and Orcutt Creek.

Lompoc Valley

Unincorporated communities in the Lompoc Valley include Vandenberg Village, Mission Hills, and Mesa Oaks north of the City of Lompoc, which are suburban residential and do not have defined downtowns or large commercial areas. Scenic resources in the Lompoc Valley relate to the Santa Ynez River, which flows between the Purisma and Santa Rita Hills to create extensive natural areas within the watershed. Some of the prominent scenic resources and viewing areas within the region include La Purisima Mission State Park, Burton Mesa Ecological



The Lompoc Valley generally includes low-density suburban neighborhoods north of Lompoc and adjacent to wilderness areas in the Burton Mesa Ecological Preserve. Rural areas include Jalama Beach and the pristine coastline north of Point Conception. Photo: County Parks

Preserve, River Park, Jalama Beach County Park and Campground, and Surf Beach and Ocean Beach Park. Agricultural lands of low to moderate scenic value border Lompoc to the east and west. These lands support mostly row crops and vineyards.

SR 1, a designated State Scenic Highway, traverses north-south through the Lompoc Valley. SR 1 in this portion winds through low-lying peaks and foothills of the Santa Ynez Mountains.

Santa Ynez Valley



Santa Ynez Valley encompasses rural vineyards and ranchlands that surrounds distinct historic unincorporated communities of Santa Ynez, Ballard, Los Olivos, and Los Alamos, as well as Lake Cachuma Recreation Area
Photo: Santa Ynez Valley Star

Santa Ynez Valley has a substantial amount of land with high scenic value (County of Santa Barbara 2009d). The Santa Ynez Valley is defined by the San Rafael Mountains to the north and east, the Santa Ynez Mountains to the south, and the Purisima Hills to the west. The character of the valley is largely defined by ranchette, rural, agricultural, and open space uses. Much of this high scenic value land corresponds with the numerous creeks, rivers, and hills in the northern portion of the valley, as well as vineyards, ranches, and other rural features.

The rural, scenic qualities unique to the Santa Ynez Valley are highly valued by the county's residents and visitors. Visually scenic features include the varying topography of peaks, valleys, ridgelines, the Santa Ynez River and its tributaries traversing east-west across the valley floor, oak woodlands, grassland meadows, rural agricultural landscapes, ranches, and vineyards. Nojoqui Falls County Park, Lake Cachuma, Zaca Lake Station, Sedgewick Natural Reserve, and the Santa Ines Mission are some of the prominent scenic resources that attract many visitors to this region. In addition to high-quality scenic views, the rural nature of the Santa Ynez Valley and the lack of light pollution allows for clear views of the nighttime sky and unique opportunities for astronomical observations. This quality is of value to residents within the Santa Ynez Valley and regionally in Santa Barbara County.

Travel routes provide the broadest range and greatest visual access to the various aesthetic resources within the Santa Ynez Valley, offering important viewing areas and scenic corridors. Within the Santa Ynez Valley, SR 154 is an officially designated State Scenic Highway, while U.S. Highway 101 is considered eligible. They are two of the main routes through the Santa Ynez Valley. Other major scenic roadways passing through rural and agricultural areas include Highway 246, Happy Canyon Road, Foxen Canyon Road, Ballard Canyon Road, and Zaca

Station Road. Panoramic views, ridgelines, oak forests, and chaparral vegetation are common elements that influence the aesthetic quality of these roads.

Cuyama Valley

The Cuyama Valley comprises arid agricultural land, rural residential structures, and hillsides and ridgeline of the Caliente Range and Sierra Madre Mountains surrounding the three distinctive unincorporated communities of Cuyama, New Cuyama, and Ventucopa. The varying topography, ridgelines, and canyons associated with the Sierra Madre Mountain Range provide visual interest to the flat valley floor. The County's Open Space Element describes that the Sierra Madre Mountains and foothills and Cuyama River have high scenic value (County of Santa Barbara 2009a).



Cuyama Valley is set in the arid open valley in the eastern area of the county where the communities of Cuyama, New Cuyama, and Ventucopa are small unincorporated communities surrounded by ranches and wilderness, with connections to the Los Padres National Forest.
Photo: Los Padres National Forest

SR 33 and SR 166 are eligible scenic highways. SR 166 from Cuyama to Twitchell Reservoir is designated as Scenic Level One, Segment Category 4, which is defined as the most scenic, having minor capacity, and a secondary destination route (County of Santa Barbara 2009a).

South Coast

The South Coast contains coastal communities bordered to the south by the Pacific Ocean and to the north by the foothills of the Santa Ynez Mountains. This setting creates dramatic views of the mid-and upper elevations of the mountains throughout the region. Coastal views are also afforded from public vistas, trails, beaches, and coastal access points throughout the region. Both urban and rural areas on the South Coast have distant views of the northernmost Channel Islands (i.e., Santa Cruz, Santa Rosa, and San Miguel) on clear days, especially from higher elevation ridges and hillsides, and scenic views of the Pacific Ocean. Scenic value is also derived from the dozens of creeks, tributaries, and watersheds that drain the foothills and southern faces of the Santa Ynez Mountains. In addition, the South Coast supports three State Parks, natural preserves, and beaches, which are some of the most prominent scenic resources that attract visitors to the region. These include but are not limited to Gaviota State Park, Arroyo Hondo Preserve, Refugio State Beach, El Capitan State Beach, Goleta Beach County Park, Arroyo

Burro Beach County Park, Butterfly Beach, Lookout Park, Toro Canyon Park, Carpinteria Salt Marsh Nature Park, and Rincon Beach Park.

The officially designated State Scenic Highways are U.S. Highway 101 from the City of Goleta's western boundary to Route 1 at Las Cruces and SR 154. SR 150 is eligible for a Scenic Highway Designation, which merges into U.S. Highway 101 at the easternmost boundary of the region.



The South Coast region includes urban areas from Goleta in the north to Carpinteria in the south, characterized by views of the Pacific Ocean and the Santa Ynez Mountains, as well as coastal access such as Goleta Beach County Park.
Photo: Getty Images, George Rose

Eastern Goleta Valley contains a multitude of public scenic resources, such as mountain viewpoints along the SR 154 corridor; island/ocean and coastal views along SR 154 from Painted Cave Road to the intersection with State Street; 360 views provided from locations such as More Mesa and San Antonio Creek Road to its intersection with SR 154; the community 'gateway' at State Street and SR 154; and local scenic routes, including North San Marcos Road from Cathedral Oaks Road to SR 154, SR 154 from Camino Cielo Road (ridgeline) to State Street, Turnpike Road from Hollister Avenue to Cathedral Oaks Road, and North Fairview Avenue to its terminus.

As with the other unincorporated areas on the South Coast, the Carpinteria Valley provides scenic coastal views from the foothills of the Santa Ynez Mountains. There are no designated scenic highways; however, SR 150 and U.S. Highway 101 are eligible for designation (California Department of Transportation [Caltrans] 2019).

3.1.2.2 Viewer Groups and Visual Sensitivity

Residents and Other Landowners

The rural and urban residents viewer group includes all permanent and seasonal residents within urban and rural areas of the county. Rural residents could be highly sensitive to changes in views because they generally experience views with relatively less dense development than urban areas, within the context of panoramic views of open lands. Differently, urban residents are also sensitive to changes to visual character and quality since visual resources are more limited to public vistas and corridors. However, urban residents may not be as sensitive to visual changes associated with new development within previously developed areas as rural

residents. All residents are susceptible to light pollution affecting nighttime views and skyline alterations, such as degrading the visual quality of scenic vistas.

Motorists and Cyclists

Residents, commuters, recreationists, and freight haulers compose both local and regional traffic passing through the county. At standard roadway speeds, motorists' views of individual parcels along roadways are of moderate duration. Views for cyclists are of greater duration within visually scenic surroundings. Motorists on smaller, local roadways have slightly longer views of the surrounding landscape due to slower travel speeds. Motorists and cyclists can be sensitive to changes since the passing landscape may be familiar to users of the local road network and users could be sensitive to physical changes to that landscape.

Visitors and Recreationists

Visitors primarily come to Santa Barbara County for purposes of tourism, wine-tasting, beach-going, bicycling, hiking, equestrian, cultural events, and other recreational activities. Visitors and recreationists using trails, visiting County Parks, or using other outdoor facilities are considered a sensitive group to visual impacts. This group would be susceptible to physical changes to the surrounding landscape, where a change in the quality of visual resources can diminish the experience for these users.

3.1.2.3 Existing Visual Resources

Santa Barbara County Scenic Values Mapping

Scenic values mapping within the County Comprehensive Plan Open Space Element identifies the visual quality of lands as seen from major roadways and edges of developed areas. Scenic areas are defined by features from the Conservation Element that can generally be regarded as having high levels of scenic quality and visual interest. Such areas include rivers, streams, watersheds, reservoirs, and select vegetative communities. Steep slopes and high elevation are also included for their potential to provide scenic vistas. The Open Space Element describes three general levels of scenic value:

- High: Warrant strong consideration for open space designation and preservation.
- Moderate: Advisability of prescribing special design standards, and subjecting plans to design review by the Planning Commission before development is permitted.[1]
- Low: No standards are put forth for protection in the Open Space Element.

[1] It should be noted that areas with moderate and low ratings, while appropriate for development from the standpoint of scenic quality, may not be developable because of the presence of other factors, such as geologic constraints, flood hazards, or extreme fire danger (County of Santa Barbara 2009c).

Approximately 10.5 percent of lands countywide are classified as having high scenic value, while nearly 58 percent have low scenic value (County of Santa Barbara 2009a).[1]

A concept discussed in the County's Open Space Element, termed "urban perimeters," is relevant to the rural and coastal areas of the county. Urban perimeters are peripheral open space that gives a sense of place and scale within the Urban Area. Where the open edges can be seen from the built environment of the community, the psychological advantages are enhanced. Even where they cannot be seen from homes or workplaces, peripheral open spaces can give a sense of openness and offer visual resources close to home or work. The natural scenic beauty of the county affords communities a range of valuable benefits, including environmental protection, economic appeal, community character, and enhanced quality of life.

Scenic Vistas and Corridors

A public scenic vista or corridor is an area of land that has natural beauty and is visible from a public area, such as a roadway, trail, or park. The ocean, mountains, and open spaces provide



The coastal setting of Santa Barbara County is characterized by scenic views of the Pacific Ocean and rural mountainous landscape interspersed with distinct urban and suburban environments within the cities and unincorporated communities.
Photo: Independent.



Scenic corridors, vistas, and gateways offer public views of the high-value visual resources in the county, including the Pacific Ocean, mountains, and rural agricultural valleys such as SR 154 (pictured) and U.S. Highway 101.
Photo: Google Earth

high-quality visual resources as viewed from public vistas and scenic corridors. Often, these visual resources stem from other valuable watershed resources, such as hillsides and ridgelines, riparian corridors, environmentally sensitive habitat areas, and coastal resources. Collectively, these visible features help define the character of the community, a natural backdrop to the built environment within the County's Urban Area. Undeveloped rural lands, mountains, and coastal resources provide a significant visual backdrop for existing communities, particularly from public gathering spaces in the Urban Area.

The County's Scenic Highway Element in the Comprehensive Plan identifies and protects scenic highways and corridors in the county. According to the Scenic Highway Element, a scenic vista or corridor is an area of land that is visible from, adjacent to, and outside the highway right-of-way and is comprised primarily of scenic and natural features (County of Santa Barbara 2009b). Further, the County's Open Space Element designates scenic travel routes based on destination routes and traffic capacity, as well as scenic value; major roadways were evaluated and identified for their scenic values and are included in the Open Space Element. The County deems travel corridors of high scenic value to be worthy of prime consideration for scenic highway designation, while moderate travel corridors warrant careful development if development is permitted. An analysis of scenic values in travel corridors was included in the County's Open Space Element and Scenic Highways Element.

The Environmental Resources Management Element (ERME) combines the results of these two analyses and identifies the following routes as having the highest scenic values within the county:

North County

- U.S. Highway 101: Los Alamos-Buellton
- SR-1: Lompoc-U.S. 101
- SR-154: Los Olivos-U.S. 101
- SR-154: Lake Cachuma-Santa Barbara
- SR-166: Santa Maria-Cuyama
- SR-176: Santa Maria-Los Olivos
- Jalama Road: SR- l-Jalama County Park
- Jalama County Park-Gaviota Beach State Park
- Drum Canyon Road: Los Alamos-Lompoc-Buellton

South Coast

- U.S. Highway 101: Gaviota Beach-South Coast Urban Complex
- U.S. Highway 101: Montecito-Rincon Point
- U.S. Highway 101: Goleta North-Junction of Highway 1
- Toro Canyon Park-Serena Park

Scenic vistas and corridors are also addressed in the County's adopted community plans. For example, the Eastern Goleta Valley Community Plan designates local scenic routes along segments of key public roads and public vistas that afford views of the mountains, undeveloped skyline, coastal resources, open space, natural areas, watershed resources like creeks and wetlands, and rural agricultural and mountainous areas. Key priority public vistas and view corridors are mapped, including on Hollister Avenue near Turnpike Road, Ben Page Youth Recreation Center, Goleta Beach County Park, and the intersection of SR 154 with State Street; the plan also designates a gateway to Eastern Goleta Valley at the intersection of SR 154/U.S. Highway 101 and State Street as a local visual resource. An additional example lies in the Orcutt Community Plan, which designates local scenic corridors that afford views of the Solomon, Casmalia, and Orcutt Hills, including Clark Avenue through Old Town Orcutt. Further, the County's community plans include policies and programs to protect and enhance the character of the community, such as designating scenic resources and corridors, preserving viewsheds, coastal views, agricultural and rural character, and hillsides/ridgelines, and regulating building design, signage, and lighting (Section 3.1.3, *Regulatory Setting*).

Scenic Highways

Highway travel gives residents and visitors exposure to the county's visual attributes. At present, three state highways in the county have been officially designated as State Scenic Highways as part of the Caltrans' State Scenic Highway Program (Figure 3.1-1; Caltrans 2023).

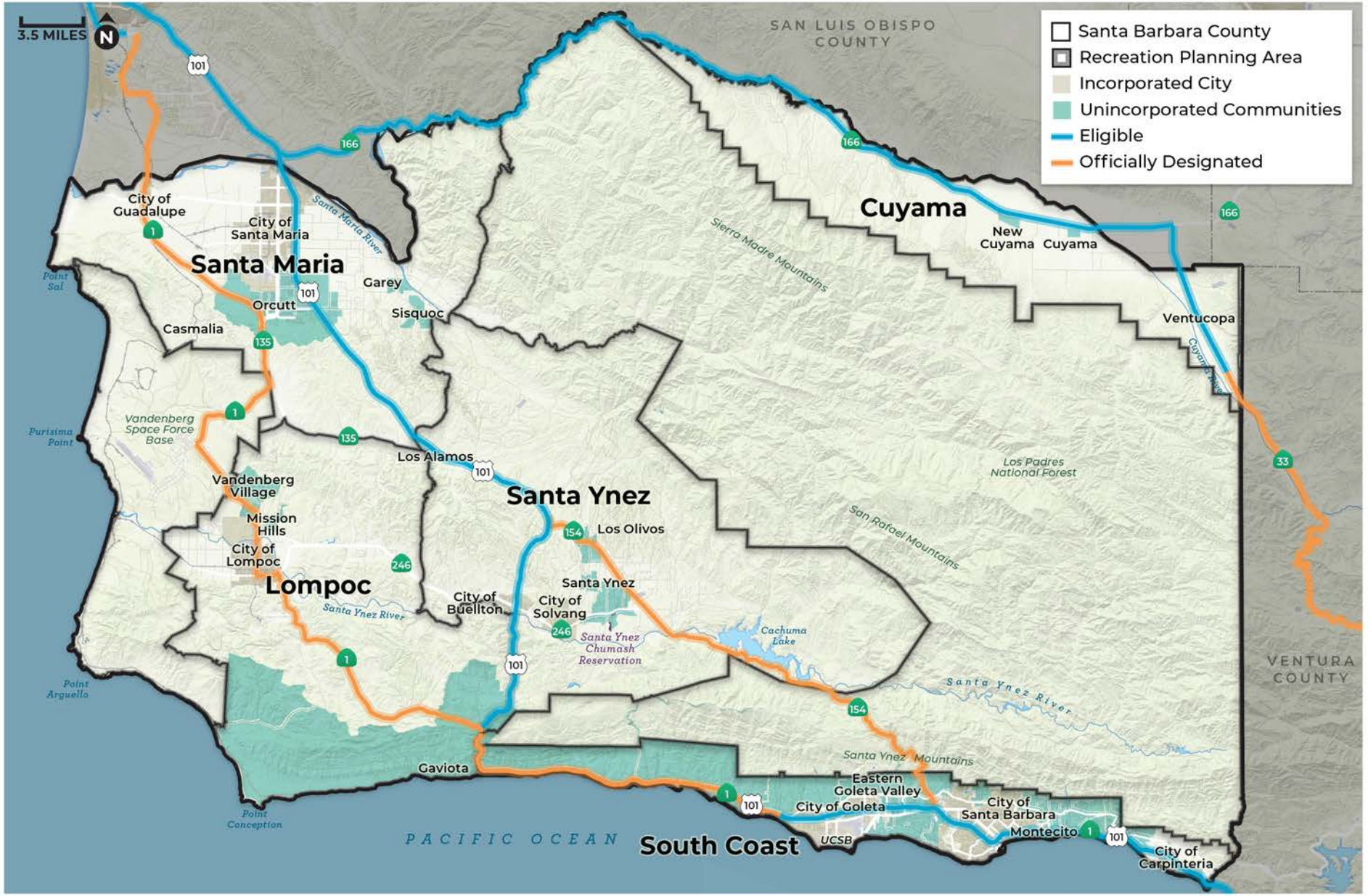
Designated State Scenic Highways

- SR 1 (between the intersection of U.S. Highway 101 and Las Cruces and the City of Lompoc);
- SR 154 (entire length); and
- U.S. Highway 101 (from the City of Goleta's western boundary to SR 1 at Las Cruces).



Three state highways in the county have been officially designated as State Scenic Highways by Caltrans as part of the State's Scenic Highway Program, including SR 154 (pictured) and segments of SR 1 and U.S. Highway 101.
Source: Estately.com

Portions of other state highways traversing the county are identified in the state's master plan of highways eligible for a State Scenic Highway designation. These eligible highways may become official State Scenic Highways when the County implements a plan of preservation (Caltrans 2023; County of Santa Barbara 2009b)



wsp

Santa Barbara County Scenic Highways

FIGURE 3.1-1

Eligible State Scenic Highways

- SR 33 from the junction of SR 166 to the City of Ojai in Ventura County;
- SR 166 from Highway 33 west through Santa Barbara and San Luis Obispo counties to U.S. Highway 101;
- U.S. Highway 101 throughout its entire length in Santa Barbara County; and
- SR 150 from U.S. Highway 101 to the City of Ojai in Ventura County (County of Santa Barbara 2009b).

3.1.2.4 Light and Glare

New sources of outdoor, artificial lighting can be a nuisance to ~~sensitive~~ viewers ~~through light spill~~ because of light pollution (glare and light trespass). ~~or can create an ambient light glow that emanates upward and diminishes views of the clear night sky. If uncontrolled, light spill and ambient light glow can disturb wildlife in natural habitat areas and negatively affect nighttime views in urbanized areas. Glare~~ Both can cause unwanted and potentially objectionable sensations as ~~observed~~ experienced by a viewer as they look toward a surface that creates glare. It can create an ambient light glow (sky glow) that emanates upward and diminishes views of the clear night sky. Light pollution and ambient light glow can impair the health of wildlife in natural habitat areas and negatively affect nighttime sky views in urbanized and more rural areas. Glare can be caused by a direct light source (direct glare) or, more commonly, by the reflection of the sun, moon, or artificial light source from a reflective surface (reflective glare).

The primary sources of ~~light and~~ glare and light trespass from artificial lighting differ between rural and urban areas. The primary sources of such light in urban areas include interior and exterior building lighting, landscape lighting, security lighting, illuminated signs, streetlights, and vehicle headlights~~. , airplanes, and~~ Particularly relevant to this EIR in both urban and more rural areas is outdoor lighting for parks and playgrounds, sports fields, courts, and other recreation facilities. Sources of glare in these areas include windows and reflective building materials, such as metal roofs as well as reflections from vehicle windshields and airplanes.

In rural and semi-developed areas, there are fewer sources of artificial light, including exterior and interior building and landscape lighting, illuminated signs, streetlights, vehicle headlights, airplanes, vehicles, and farm equipment. Sources of glare in these areas include windows and reflective building materials, such as metal roofs; however, natural sources and farmlands are often the primary sources of glare. A source of glare can be natural in the form of water surfaces, such as rivers and land cover. Glare from water is not usually perceived as a negative aesthetic quality and can often be associated with high-quality and memorable visual experiences. Land cover can be exposed soil, seedlings, mature row crops, orchards, pasture, forest, and urban land cover, such as paved streets, sidewalks, and reflective roofing. These

different cover types can produce different amounts of glare based on the amount of surface area and its roughness, reflectiveness, and coloring. For example, ~~the~~ plastic hoop greenhouses in the Santa Maria Valley and other areas can produce glare due to the reflective material. The presence of permanent vegetation can reduce glare and light trespass from artificial light.

Lastly, light and glare can be affected by the absence of vegetation because vegetation acts to screen and filter light and soften the intensity of glare. For example, in areas of intense development that lack mature landscaping or where land has been denuded of natural vegetation for agriculture, there will be a notable increase in light and glare when compared to areas of development with mature landscaping or natural, vegetated areas.

3.1.3 REGULATORY SETTING

State and local regulations have been enacted to protect aesthetic and visual resources in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future housing development under the Project and its associated impacts. There are no federal regulations that pertain to this aesthetics and visual resources analysis.

3.1.3.1 State

California Scenic Highways Program

California's Scenic Highways Program was designed to preserve and protect scenic highway corridors. Jurisdictions nominating a Scenic Highway for official designation have in place or adopt ordinances to preserve the scenic quality of the corridor, including policies to preserve scenic resources through land use regulations, site planning, control of outdoor advertising (including a ban on billboards), grading, and measures to direct structural design and appearance (California Streets and Highways Code §260 et seq.). Suitability for designation as a State Scenic Highway is based on three criteria described in Caltrans' Guidelines for Official Designation of Scenic Highways (2008) (Caltrans 2022):

- **Vividness.** The extent to which the landscape is memorable. This is associated with the distinctiveness, diversity, and contrast of visual elements.
- **Intactness.** The integrity of visual order and the extent to which the natural landscape is free from visual intrusions (e.g., buildings, structures, equipment, grading).
- **Unity.** The extent to which development is sensitive to and visually harmonious with the natural landscape.

California Building Code and California Electrical Code

The California Building Code (Title 24, Part 1) and the California Electrical Code (Title 24, Part 3) stipulate minimum light intensities for pedestrian pathways, circulation ways, parking lots, and paths of egress.

California Energy Code

The California Energy Code (Title 24, Part 6) stipulates allowances for lighting power and provides lighting control requirements for various lighting systems, with the aim of reducing energy consumption through efficient and effective use of lighting equipment. Section 130.2 sets forth requirements for outdoor lighting controls and luminaire cutoff requirements. This requirement does not apply to streetlights for the public right-of-way, signs, or building façade lighting.

Section 140.7 establishes outdoor lighting power density allowances in terms of watts per area for lighting sources other than signage. The lighting allowances are provided by the Lighting Zone, as defined in Section 10-114 of the California Energy Code. Additional allowances are provided for Building Entrances or Exits, Outdoor Sales Frontage, Hardscape Ornamental Lighting, Building Facade Lighting, Canopies, Outdoor Dining, and Special Security Lighting for Retail Parking and Pedestrian Hardscape.

Section 130.3 stipulates sign lighting controls for any outdoor sign and Section 140.8 of the California Energy Code sets forth lighting power density restrictions for signs.

California Coastal Act

Coastal Act Policy 30251 identifies scenic and visual qualities of coastal areas as a resource of public importance. It states that permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, and, where feasible, to restore and enhance visual quality in visually degraded areas. New development in highly scenic areas such as those designated in the California Coastline Preservation and Recreation Plan prepared by the Department of Parks and Recreation and by local government shall be subordinate to the character of its setting.

3.1.3.2 Local

County of Santa Barbara Comprehensive Plan

The County Comprehensive Plan's Land Use, Open Space, Environmental Resource Management, and Scenic Highways Elements contain descriptions, policies, and goals that both recognize scenic qualities and provide guidance for their protection. These plans and policies promote the protection of important visual resources and ensure that new development is compatible with the community and the surrounding environment.

Land Use Element

The Land Use Element of the Comprehensive Plan contains policies to protect and enhance visual resources. The land uses proposed within the Land Use Element, and depicted on land use maps, are to be used to guide the public and the decision-makers as to what uses are appropriate if and when development occurs. New development must generally be consistent with the Land Use Element's visual resource policies. The Hillside and Watershed Protection Policies address development on slopes to minimize grading, disruption of natural vegetation, and erosion. Visual resource policies include measures to ensure structures are subordinate to the surrounding natural environment and/or compatibility with the community through structural design review and landscaping requirements, limitations on signs that disrupt public views, and requirements for undergrounding of new utilities.

- **Visual Resource Policy 2:** In areas designated as rural on the land use plan maps, the height, scale, and design of structures shall be compatible with the character of the surrounding natural environment, except where technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms; shall be designed to follow the natural contours of the landscape; and shall be sited so as not to intrude into the skyline as seen from public viewing places.
- **Visual Resource Policy 3:** In areas designated as urban on the land use plan maps and in designated rural neighborhoods, new structures shall be in conformance with the scale and character of the existing community. Clustered development, varied circulation patterns, and diverse housing types shall be encouraged.
- **Visual Resource Policy 4:** Signs shall be of size, location, and appearance so as not to detract from scenic areas or views from public roads and other viewing points.
- **Visual Resource Policy 5:** Utilities, including television, shall be placed underground in new developments in accordance with the rules and regulations of the California Public Utilities Commission, except where cost of undergrounding would be so high as to deny service.

Open Space Element

The Open Space Element identifies the county's scenic beauty as a principal factor in the attraction of visitors and residents and evaluates the visual quality of natural resources, travel corridors, and parameters of urban and rural areas within the county. The Open Space Element employs a scenic values model to map visual quality and uses factors of development intensity, siting, natural features, and vegetation as criteria for the protection of visual resources. Significant visual resources as noted in the Open Space Element include:

- Scenic highway corridors
- Parks and recreational areas

- Views of coastal bluffs, streams, lakes, estuaries, rivers, watersheds, mountains, and cultural resource sites
- Scenic areas

Environmental Resources Management Element (ERME)

The ERME presents the County's policies for air quality, biology, geology, surface and groundwater resources, noise, and visual resources protection based upon on the ERME factors maps. The ERME factor maps translate the summarized environmental factors information into a general expression of County policy on environmental resources management. Additionally, the factor maps categorize areas to direct future development. For instance, within "Category C" the ERME policies describe that urbanization could be permitted only in appropriate instances, subject to project plan review and imposition of specific conditions to protect against hazards and to preserve the integrity of the land and environment including areas of high scenic value and scenic corridors.

Scenic Highway Element

The Scenic Highway Element of the Comprehensive Plan presents the County's policies and procedures for scenic highways and their designation. This element specifically presents the County's scenic highway goals, evaluation standards, preservation measures, and procedures for obtaining official "Scenic Highway" designation for State-owned and County-owned roads in the county. The County's Scenic Highway Element contains preservation measures for eligible scenic routes (County of Santa Barbara 2009a). Such measures include the application of the Design Control Overlay District to require a design review of structures or other development, additional grading and landscaping regulations, and control of outdoor signage.

Community Plans

Santa Barbara County has 10 community or area plans. Each community plan contains goals, policies, and standards guiding the development of the community it serves and supplements the policies and goals of the Comprehensive Plan. Community plans with key recreational design or development policies pertaining to new development related to the proposed Project are described below.

Eastern Goleta Valley Community Plan

- **Policy VIS-EGV-1.1:** Development should minimize impacts to open space views as seen from public vistas and scenic local routes and avoid impairment of significant visual resources.
- **Policy VIS-EGV-1.2**. Public Vistas and Scenic Local Routes: Prominent views to and from the following Public Vistas and along and through Scenic Local Routes shall be preserved and enhanced:

  - Santa Ynez Mountains and rural foothills
  - Undeveloped skyline
  - Coastal resources, including sloughs, beaches, wetlands, bluffs, mesas, the Santa Barbara Channel, and islands
  - Open space, or other natural area
  - Natural watershed resources, such as creek/riparian corridors, wetlands, vernal pools, habitat areas, etc.
  - Rural agricultural and mountainous areas

- **Policy VIS-EGV-1.3**. Gateway to the Community: The County shall enhance the gateway to Eastern Goleta Valley at the intersection of SR 154/U.S. Highway 101 and State Street as a local visual resource. Urban design and roadway improvements should indicate the transition to the Eastern Goleta Valley community through a combination of features including, but not limited to:

  - Landscaping.
  - Signage.
  - Public art and monuments.
  - Decorative pavement and streetscape installations.
  - Building façade and interface design.
  - Multimodal transportation amenities.

- **Policy VIS-EGV-1.4**. Priority Public Vistas, Scenic Local Routes, and Gateway Map: The scenic value of visual resources, public vistas, and scenic local routes and view corridors shall be preserved and enhanced. The Priority Public Vistas, Scenic Local Routes, and Gateway Map shall be updated periodically to depict the extent and location of visual resources defined through Policy VIS-EGV-1.2 and Policy VIS-EGV-1.3.
- **Policy VIS-EGV-1.6:** Development shall be compatible in design and scale with the surrounding built environment and shall not impair public visual resources.
- **Policy VIS-EGV-1.8:** The night sky shall be protected from excessive and unnecessary light associated with development as a strategy to promote safety, save money, conserve resources, help retain the community's character, eliminate light trespass onto adjacent properties or other sensitive areas, and reduce health risks.

Lompoc Area Interpretive Guidelines

- **Policy A-12:** All development, including buildings, understories, fences, water tanks and retaining walls adjacent to designated natural open space areas should be sited and designed to protect the visual character of these areas and blend in with natural landforms through the use of such methods as setbacks, building orientation, materials and colors (earth tones and non-reflective paints), landscape buffers, shielded exterior lighting,

screening of parking areas and inclusion of perimeter roads to allow maintenance of open space corridors.

Orcutt Community Plan

- **Policy VIS-O-1:** Significant scenic and visual natural resources in Orcutt shall be protected in order to preserve the semi-rural character of the OPA.
- **Policy VIS-O-2:** Prominent public view corridors (U.S. Highway 101, SR 1 & 135, Clark Ave., Santa Maria Way, and Union Valley Parkway) and public viewsheds (Orcutt/Solomon Hills, Casmalia Hills, and Orcutt Creek) should be protected.
- **DevStd VIS-O-2.1**: Development shall be sited and designed to minimize disruption of important public view corridors and viewsheds through building orientation, minimization of grading on slopes, landscaping, and minimization of sound walls.
- **Policy VIS-O-5**: The historic, small-town character of Old Town Orcutt should be preserved and enhanced.
- **Policy VIS-O-6:** Outdoor lighting in Orcutt shall be designed and placed so as to minimize impacts on neighboring properties and the community in general.

Santa Ynez Community Plan

- **Goal VIS-SYV-1:** Protect the Rural/Agricultural Character and Natural Features of the Planning Area, Including Mountain Views, Scenic Corridors and Buffers, Prominent Valley Viewsheds, and the Quality of the Nighttime Sky.
- **Policy VIS-SYV-1:** Development of property should minimize impacts to open space views as seen from public roads and viewpoints and avoid destruction of significant visual resources.
- **Policy VIS-SYV-2**. All plans for new or altered buildings and structures within the Design Control Overlay shall be reviewed by the County Board of Architectural Review.

County of Santa Barbara Land Use and Development Code

The County's Land Use and Development Code (LUDC), Chapter 35, Zoning, of the Santa Barbara County Code, includes development standards protecting visual resources. Section 35.30.120 (Outdoor Lighting) of the LUDC provides restrictions on outdoor lighting to protect against spillover onto adjacent properties and to minimize interference with vehicular traffic on private/public streets from lighting. The LUDC contains height and size limits, including guidelines for development that regulate the design of future development, in some cases, through a review of project plans by the regional Board of Architectural Review (BAR). The North County BAR has review authority over the Santa Maria and Cuyama Planning Areas. The Central County BAR reviews projects in the Lompoc, Santa Ynez, the western half of the South Coast, and the southwest quarter of the Cuyama Planning Areas. The South County BAR reviews projects in the southeast quarter of the Cuyama Planning Area and the eastern half of the South

Coast Planning Area, excluding the area that is subject to the Montecito Community Plan. The Montecito BAR reviews projects in the area that are subject to the Montecito Community Plan.

35.28.150 Highway 101 Corridor Overlay Zone

The Highway 101 Corridor Overlay (HC) includes areas along U.S. Highway 101 in the South Coast urbanized area. Each project must be evaluated to determine the potential of the proposed development to impact the visual qualities of the area. To the maximum extent feasible, all development, including expansions of U.S. Highway 101, must incorporate provisions for landscaping to preserve the scenic and visual amenities that exist along the affected transportation corridor or to replace such landscaping with comparable scenic and visual amenities.

35.30.060 Design Compatibility Standards

Chapter 35.30 (Standards for All Development and Land Uses) of the LUDC expands upon the standards for zones and allowed land uses in the county by addressing the details of site planning and project design. Section 35.30.060 establishes design compatibility standards for development within the rural and urban areas, as well as within Existing Developed Rural Neighborhoods (EDRNs), as follows:

Rural. Within Rural areas as designated on the Comprehensive Plan maps, the height, scale, and design of each structure shall be compatible with the character of the surrounding natural environment, as determined by the review authority, except where the review authority determines that technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms, shall be designed to follow the natural contours of the landscape, and shall be sited so as not to intrude into the skyline as seen from public viewing places.

Urban and Existing Developed Rural Neighborhoods. Within Urban areas and EDRNs as designated on the Comprehensive Plan maps, new structures shall conform with the scale and character of the existing community. Clustered development, varied circulation patterns, and diverse housing types shall be encouraged.

35.30.120 Outdoor Lighting

Section 35.30.120 establishes standards for outdoor lighting that minimize light pollution caused by inappropriate or misaligned light fixtures. These standards conserve energy, preserve the nighttime sky, and protect neighbors and wildlife while maintaining night-time safety, utility, security and productivity. These provisions are intended to preserve and protect the nighttime environment of the County by regulating unnecessary and excessive outdoor lighting.

County of Santa Barbara Local Coastal Program

The County Local Coastal Program (LCP) is required by the California Coastal Act to govern projects in the Coastal Zone. The County's LCP includes the Coastal Land Use Plan (CLUP) and Article II Coastal Zoning Ordinance (CZO), which implements the CLUP.

Coastal Land Use Plan

The purpose of the CLUP is to protect coastal resources and provide greater access and recreational opportunities for the public's enjoyment while allowing for orderly and well-planned urban development and the siting of coastal-dependent and coastal-related industries. The CLUP establishes land uses within the Coastal Zone. The other elements of the County's Comprehensive Plan are applicable within the Coastal Zone; however, where conflicts exist, the LCP takes precedence. The plan includes numerous policies applicable to development projects. Sections 3.4.3 and 3.4.4 of the County of Santa Barbara CLUP provide policies that protect coastal visual resources. These policies are intended to help implement the Coastal Act at the county level. Section 3.4.4 focuses on visual resource protection in the View Corridor Overlay, specifically vistas from scenic U.S. Highway 101.

- **Visual Resources Policy 4-3:** In areas designated as rural on the land use plan maps, the height, scale, and design of structures shall be compatible with the character of the surrounding natural environment, except where technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms; shall be designed to follow the natural contours of the landscape; and shall be sited so as not to intrude into the skyline as seen from public viewing places.
- **Visual Resources Policy 4-4:** In areas designated as urban on the land use plan maps and in designated rural neighborhoods, new structures shall be in conformance with the scale and character of the existing community.
- **Visual Resources Policy 4-9:** Structures shall be sited and designed to preserve unobstructed broad views of the ocean from Highway 101 and shall be clustered to the maximum extent feasible.
- **Visual Resources Policy 4-10:** A landscaping plan shall be submitted to the County for approval. Landscaping, when mature, shall not impede public views.
- **Visual Resources Policy 4-11:** Building height shall not exceed one story or 15 feet above average finished grade, unless an increase in height would facilitate clustering of development and result in greater view protection, or a height more than 15 feet would not impact public views to the ocean.

Coastal Zoning Ordinance

The CZO applies to the unincorporated coastal zone. It implements the CLUP by classifying and regulating the uses of land, buildings, and structures in the coastal zone.

Section 35-62 Recreation and Visitor Serving Uses

1. Recreational uses on oceanfront lands, both public and private, that do not require extensive alteration of the natural environment (i.e., tent campgrounds) shall have priority over uses requiring substantial alteration (i.e., recreational vehicle campgrounds).

2. Visitor-serving commercial recreational development that involves construction of major facilities, i.e., motels, hotels, restaurants, should be located within urban areas, and should not change the character or impact residential areas.

3. Visitor-serving commercial recreational development in rural areas should be limited to low intensity uses, i.e., campgrounds, that are designed to protect and enhance visual resources, and minimize impacts on topography, habitats, and water resources.

Section 35-139 – Exterior Lighting states that all exterior lighting shall be hooded and no unobstructed beam of exterior lighting shall be directed toward any area zoned or developed residential, or toward any environmentally sensitive habitat areas. Further, no lighting shall be so designed as to interfere with vehicular traffic at any portion of a street.

Section 35-144 – Ridgeline and Hillside Development Guidelines state that the development standards are intended to ensure compatibility with surrounding land uses to protect visual resources.

Section 35-179.6 – Permit Procedures states the project is compatible with the neighborhood and does not create an adverse impact on community character, aesthetics, or public views.

Section 35-191.9 – Exterior Lighting states All outside illumination for aesthetic and/or decorative purposes for any structure and/or surrounding landscape, public or private, and for outdoor recreational facilities that are not fully shielded shall be prohibited between 9:00 p.m. and sunrise. All illumination of exterior areas between 9:00 p.m. and sunrise shall be shielded.

3.1.4 ENVIRONMENTAL IMPACT ANALYSIS

This section discusses the potential aesthetics and visual resource impacts associated with the proposed Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed, and the residual impact after mitigation is determined.

3.1.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

Appendix G of the California Environmental Quality Act (CEQA) Guidelines states that a project would be considered to have a significant impact related to aesthetic and visual resources if it would:

a. Have a substantial adverse effect on a scenic vista;

b. Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic highway;

c. In nonurbanized areas, substantially degrade the existing visual character or quality of public views of the site and its surroundings.[2] If the project is in an urbanized area, would the project conflict with applicable zoning and other regulations governing scenic quality; and/or

d. Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area.

County of Santa Barbara Environmental Thresholds and Guidelines

The County Visual Aesthetics Impact Guidelines that are set forth in the County's *Environmental Thresholds and Guidelines Manual* (2024) discuss the subjective nature of aesthetic and visual impacts and present questions that guide visual impact analyses, rather than provide defined significance thresholds. Affirmative answers to the following guiding questions would indicate potentially significant impacts on aesthetic and visual resources.

1a. Does the Project area have significant visual resources by virtue of surface waters, vegetation, elevation, slope, or other natural or man-made features which are publicly visible?

1b. If so, does the proposed Project have the potential to degrade or significantly interfere with the public's enjoyment of the site's existing visual resources?

2a. Does the Project have the potential to impact visual resources of the Coastal Zone or other visually important areas (i.e., mountainous areas, public parks, urban fringe, or scenic travel corridors)?

2b. If so, does the Project have the potential to conflict with the policies set forth in the County's CLUP, the Comprehensive Plan, or any applicable community plan to protect the identified views?

3. Does the Project have the potential to create a significant adverse aesthetic impact through obstruction of public views, incompatibility with surrounding uses, structures, or intensity of development, removal of significant amounts of vegetation, loss of important open space, substantial alteration of natural character, lack of adequate landscaping, or extensive grading visible from public areas?

[2] Public views are those that are experienced from a publicly accessible vantage point.

Methodology

As described in Chapter 2, *Project Description*, the Project plans for parks, trails, and recreational facilities in unincorporated areas within the county. The Project also includes amendments to the County's policies and regulations to support long-term development of recreation facilities, including Recreation Benefit Projects (RBPs), to meet recreation needs within five recreation planning regions. Project-level siting and design details are not known, so the impact analysis provided below does not evaluate impacts on visual resources at a project- or site-specific level. The programmatic analysis provided by this Program EIR addresses the potential for future parks, recreation, trails, and related development under the Project to have a significant adverse effect on visual resources and scenic quality or character within the county. Wherever possible, illustrative examples are provided to describe particular areas of the county (e.g., along designated scenic corridors) where the implementation of the Project could have adverse impacts. The information and analysis presented in this section are based on available long-range planning documents, EIRs, and related technical studies that apply to the Project area. This section is derived from the existing evaluations and mapping of visual resources by the Santa Barbara County Comprehensive Plan and associated community plans. Additionally, this section integrates relevant information from the 2023-2031 Santa Barbara County Housing Element Update EIR. The impact determinations are based on consistency with the CEQA thresholds, the County's Visual Aesthetic Impact Guidelines (Section 19 of the 2021 *Environmental Thresholds and Guidelines Manual*), and the County's existing policies and regulations related to aesthetics and visual resources.

3.1.4.2 Project Impacts

Table 3.1-1 provides a summary of the proposed Project's impacts related to aesthetics and visual resources. A detailed discussion of each impact follows.

Table 3.1-1. Summary of Aesthetics and Visual Resources Impacts

Aesthetics and Visual Resources Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact AV-1. The Project could result in changes to public scenic vistas and visual resources, such as trees and rock outcroppings, along State Scenic Highways.	Insignificant	No mitigation measures required.	Insignificant
Impact AV-2. The Project could degrade the existing visual character or quality of public views in the Rural Area.	Insignificant	No mitigation measures required.	Insignificant
Impact AV-3. The Project would support the visual quality of neighborhoods and communities,	Beneficial	No mitigation measures required.	Beneficial

consistent with policies and regulations governing scenic quality in the Urban Area.			
Impact AV-4. Potential future development facilitated by the proposed Project could result in a new source of substantial light or glare that may adversely affect day or nighttime views in the area.	Insignificant	No mitigation measures required.	Insignificant
Cumulative Impacts	Insignificant	No mitigation measures required.	Insignificant

Impact AV-1. The Project could result in changes to public scenic vistas and visual resources, such as trees and rock outcroppings, along State Scenic Highways.

As stated in Section 3.1.2.3, *Existing Visual Resources*, three designated State Scenic Highways are present within Santa Barbara County: U.S. Highway 101 or Gaviota Coast State Scenic Highway (from the City of Goleta's western boundary to SR 1 at Las Cruces); SR 1 (between the intersection of Highway 101 and Las Cruces and the City of Lompoc); and the entire length of SR 154 (County of Santa Barbara 2009c). Additionally, portions of four state highways with the county are identified in the State's master plan of highways as eligible for a State Scenic Highway designation. These eligible highways may become official State Scenic Highways when the County implements a plan of preservation and therefore are considered as visual resources (Caltrans 2023; County of Santa Barbara 2009b). Public parks and trails planned under the Project would not substantially alter public views, vistas, and visual resources from State Scenic Highways.

The Project would result in new recreational development (e.g., sports fields and courts, public parks, aquatic facilities, and public trails) and improvements to existing recreational facilities. The Project would also enable the development of public recreation facilities and related development through zoning changes to allow public parks and trails and create the RBP Program. Alterations or expansions to existing parkland or trail networks or the installation of smaller pocket or neighborhood parks and trails would not substantially alter existing scenic vistas or the character or quality of designated visual resources and may improve visual resources with the installation of landscaping, trees, pathways, and other site improvements, along with ongoing maintenance. Proposed recreational development that may be visible from State Scenic Highways would primarily comprise the construction, expansion, or improvement of recreational trails. Some potential trail projects enabled by the Project fall within the right-of-way or adjacent to U.S. Highway 101 or SR 154 such as the Los Olivos to Los Alamos Trail, Baron Ranch Trails and Campground, and San Antonio Creek Trail Connector to San Marcos Foothills. The Santa Ynez River Trail may be visible from SR 246 between Solvang and Buellton.

Public parks provide vegetated open space, trees, and landscaping that are visually consistent with the visual character and quality of rural and agricultural landscapes and improve visual resource values within developed urban areas. Public parks and trails also provide public scenic vistas. For example, San Marcos Foothills Preserve protects public views of open space and trails from SR 154 in Eastern Goleta Valley and provides scenic vistas of the Santa Ynez Mountains and the Pacific Ocean. Similarly, Baron Ranch protects public open space along U.S. Highway 101 on the Gaviota Coast and offers scenic vistas of the Pacific Ocean. Public parks, trails, recreation facilities, and related development visible from State Scenic Highways would be limited and would involve small-scale development of outdoor recreation uses in generally natural settings with limited signage or lighting. Therefore, new or expanded parks, trails, or related recreation facilities would not be substantially visible from public scenic vistas or viewing areas and State Scenic Highways. Moreover, if a proposed recreation facility is visible from a highway or route, it would not involve the development of a scale or type that would restrict or block surrounding vistas. Some parks and trails would create new public vistas such as Jalama Beach Blufftop Trail and Campground Expansion, Point Sal Trails, Gaviota Marine Terminal Recreation Area, and South Coast Foothill Mountain Bike Park.

Proposed recreational development and new structural development enabled under the Project, including RBPs, may also be visible along designated or eligible scenic highways or roadways but would also conform to existing and proposed development standards that avoid or minimize adverse effects to a nominal degree. For example, the County's zoning ordinances include the U.S. Highway 101 Corridor Overlay (HC) along U.S. Highway 101 in the South Coast urbanized area. Proposed projects that fall within this overlay must incorporate, to the maximum extent feasible, provisions for landscaping to preserve the scenic and visual amenities that exist along the affected transportation corridor or must replace such landscaping with comparable scenic and visual amenities. Further, to minimize adverse effects of public parks, trails, recreation facilities, and related development, the Project includes proposed development standards for public parks and trails, as well as any development in the REC zoning district, that requires building materials and colors (earth tones and non-reflective paints) to compatible with the surrounding natural environment to maximize the visual compatibility of the development with surrounding areas. Development enabled by the Project must also preserve important natural features, landforms, and native vegetation such as mature trees to the maximum extent feasible and avoid or minimize impacts to habitat areas and riparian corridors and known historic and archaeological sites and structures. Lighting would also be limited to fully shielded, downward lighting directed away from habitat areas, nearby residences, and public roads. Outdoor recreation facilities that require sports field or court lighting may only be illuminated during recreational events. Further, all parks, trails, recreation facilities, and related development must be consistent with the Comprehensive Plan's visual resource protection policies. Development of public parks, trails, recreation facilities, and RBPs

must also comply with all provisions of the zoning ordinances, including limits to allowed uses, setbacks, and other design standards. Thus, with compliance with County policies and regulations, the Project would not substantially alter public scenic vistas or visual resources along State Scenic Highways, and related impacts are considered *insignificant*.

Impact AV-2. The Project could degrade the existing visual character or quality of public views in the Rural Area.

The Project would result in new recreational development (e.g., sports fields and courts, public parks, aquatic facilities, and public trails) and improvements to existing recreational facilities. The Project would also enable the development of public recreation facilities and related development through zoning changes to allow public parks and trails, as well as RBPs where eligible. As analyzed in Impact AV-1, public parks provide vegetated open space, trees, and landscaping that are visually consistent with the visual character and quality of rural and agricultural landscapes. Public trails within open spaces are also visually compatible uses that do not degrade the scenic quality of rural areas while preserving natural vegetation and topographic features. Parks and trail projects that adhere to the surrounding character would serve as scenic and aesthetic enhancements and have *beneficial* impacts in rural areas.

However, the Project would permit public parks and trails within agricultural zones and resource conservation zones, which could contain recreational facilities that are visually distinctive from the natural and agricultural setting of the county. Recreational facilities such as campgrounds, sports fields and courts, and aquatic facilities within rural areas may change the visual character and quality of rural areas as these facilities can require the development of structures, roads, lighting, and parking areas. To minimize adverse effects of public parks, trails, recreation facilities, and related development, the Project includes proposed development standards for public parks and trails, as well as any development in the REC zoning district, that requires building materials and colors (earth tones and non-reflective paints) to compatible with the surrounding natural environment to maximize the visual compatibility of the development with surrounding areas. Recreation development must also preserve important natural features, landforms, and native vegetation such as mature trees to the maximum extent feasible and avoid or minimize impacts to habitat areas and riparian corridors and known historic and archaeological sites and structures. Lighting would also be limited to fully shielded, downward lighting directed away from habitat areas, nearby residences, and public roads. Outdoor recreation facilities that require sports field or court lighting may only be illuminated during recreational events. Further, all parks, trails, recreation facilities, and related development must be consistent with the Comprehensive Plan's visual resource protection policies. These requirements would ensure recreational structures and facilities would maintain the visual character of rural areas.

The proposed Project would also enact the RBP Program through amendments to the County's zoning ordinances, which would allow additional land uses for eligible RBPs, subject to County permitting under the zoning ordinances. These include, but are not limited to, campgrounds, recreational vehicle (RV) parks, and small-scale lodging facilities. Large, paved areas, outdoor facilities and lighting, and new structures that could result from the implementation of the RBP Program would differ from the existing visual characteristics of the Rural Area. However, mandatory compliance with the County's existing permitting process would ensure that all new recreational developments remain visually attractive and emulate the character of the existing community and surrounding natural environment. Moreover, additional land uses allowed for eligible RBPs would be subject to all applicable regulations and development standards to ensure compatibility with each zoning district's regulations and all applicable Comprehensive Plan policies. For example, all projects in the Rural Area must ensure the height, scale, and design of structures are compatible with the character of the surrounding natural environment, and that structures are subordinate in appearance to natural landforms, designed to follow the natural contours of the landscape, and sited so as not to intrude into the skyline as seen from public viewing places, per the Comprehensive Plan. Further, the Project would amend the County's zoning ordinances with development standards for all RBPs that would protect the visual character of the Rural Area, including protection of agricultural lands, natural vegetation, and topography.

Development of public parks, trails, recreation facilities, and RBPs must comply with all provisions of the zoning ordinances to preserve the visual character of the Rural Area, including limits to allowed uses, setbacks, and protection of agricultural lands, natural vegetation, and lighting. Further, any new structural development proposed or enabled by the Project would be subject to the County's permitting process, including requirements for Design Review, which address site design and visual quality. With proposed development standards for new recreational uses and RBPs included in the Project, the Project would ensure the protection of visual character and quality of public views within rural areas. Thus, impacts would be considered *insignificant*.

Impact AV-3. The Project would support the visual quality of neighborhoods and communities, consistent with policies and regulations governing scenic quality in the Urban Area.

Recreational development projects in the Urban Area would enhance the visual quality and surroundings of existing communities. Public parks provide trees, landscaping, pathways, gathering areas and facilities, playgrounds, pools and aquatic facilities like splash pads, and lighting that visually blend into and enhance neighborhood visual character. In the Urban Area, recreational development would primarily consist of improvements to existing recreational facilities and the development of public parks ranging from small neighborhood parks to larger community parks providing recreation facilities such as sports fields and courts, aquatic

facilities, and community trails. Public parks, trails, recreation facilities, and related uses such as parking areas, landscaping, and open space are visually compatible elements of urban areas and neighborhoods and are considered important visual resources in development areas. Projects that increase public parkland and provide parks and trails as public amenities would improve the visual character of the urban area and would be consistent with the County's policies for visual resources. Further, as summarized in Impact AV-2, each recreational development project proposed or enabled by the Project would be subject to the County's existing policies and zoning ordinance requirements, which address the visual consistency of new development and the existing scenic character or quality of the Urban Area. For example, County Land Use Element Visual Resource Policy 3 requires new structures to be in conformance with the scale and character of the existing community in areas designated as urban on the land use plan maps and in designated rural neighborhoods. Furthermore, all independent recreational development resulting from the Project would be subject to all existing and proposed policies and development standards of the County's Comprehensive Plan, Coastal Land Use Plan, and Community Plans to ensure visual compatibility and protection of scenic quality, including building materials and colors (earth tones and non-reflective paints) compatible with the surrounding natural environment. Therefore, the proposed Project would not conflict with the applicable zoning and regulations governing the scenic character within Urban Areas. Rather, the Project would improve the visual quality of the Urban Area with new public parks, trails, and recreation facilities constructed consistent with proposed development standards and impacts would be considered *beneficial*.

Impact AV-4. The proposed Project could result in a new source of substantial light or glare that may adversely affect day or nighttime views.

In the Urban Area, existing sources of light and glare are common as a result of existing urban development. However, recreational development could increase nighttime light and glare in both the Urban and Rural Area as a result of additional public recreational facilities that require lighting for evening or nighttime functionality. Recreational developments that may increase light sources include, but are not limited to, sports fields and courts, outdoor aquatic centers, and other outdoor recreation facilities. Additionally, the proposed zoning ordinance amendments would allow additional recreation and educational uses in agricultural zones (e.g., education or research facilities [limited], outdoor shooting or archery range) to support compatible recreational activities in rural areas of the county. These additional allowed uses could introduce new sources of light in areas where less light occurs, such as rural agricultural areas. Additionally, as summarized in Impact AV-2 and AV-3, the Project includes implementation of the RBP Program, which would allow for private developers to contribute to public recreation by incorporating a recreational component that meets the community needs identified in the Recreation Master Plan. Future recreational development occurring under an RBP is likely to involve development that introduces new sources of light in areas such as

agricultural or resource management zones where recreational activities have previously been limited.

As described in Impact AV-3, public parks, trails, and recreation facilities would be required to comply with existing and proposed development standards and policies addressing lighting and glare. Specifically, as part of the Project, lighting for public park and trail projects shall be fully shielded (full cutoff) and shall be directed downward, except for lighting associated with an outdoor recreational facility. Lighting associated with an outdoor recreational facility may only be illuminated to complete a specific organized recreational event, in progress and under illumination. To the extent feasible, lighting shall also be directed away from habitat areas, nearby residences, and public roads so as not to direct light or glare upward into the sky or interfere with vehicular traffic on any portion of a street. All new developments resulting from the Project would be required to comply with the lighting standards such as County Code Chapter 35.30.120, *Outdoor Lighting*, which requires that lighting fixtures be installed, controlled, or directed so that the light would not cause glare, or be blinding to pedestrians or vehicular traffic or on adjoining properties. Therefore, the Project would not result in a new source of substantial light or glare that would adversely affect day or nighttime views of the area. Through compliance with the County Code and implementation of proposed zoning ordinance amendments and development standards addressing lighting, potential spillover would be minimized, and the impact considered *insignificant.*

3.1.4.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis*, the cumulative setting for the Project involves a range of recreation projects proposed in cities and State Parks, housing development enabled under recently adopted housing elements, and a variety of long-range plans for land use and transportation countywide. Project impacts along with potential impacts from pending and current planning or development projects inform the cumulative impacts analysis.

Certain proposed uses and related development could result in site disturbance, grading, or site improvements, as well as the introduction of temporary visiting populations, which could result in slight changes to topographical features, obstruction of potential scenic resources, and additional sources of light and glare. These activities, as well as the construction and operation of other cumulative development projects in the county, could result in adverse effects on scenic vistas and scenic resources, as well as changes to the existing visual character due to additional development or introduction of substantial sources of new light or glare. However, as stated above, all recreational development is subject to all applicable regulations and development standards to ensure compatibility with existing zoning regulations and policies governing visual character, quality, and compatibility. Therefore, the Project would not substantially contribute to a cumulatively significant impact on aesthetics and visual resources, and cumulative impacts would be *insignificant.*

3.1.4.4 Proposed Mitigation

No mitigation measures would be required.

3.1.4.5 Secondary Impacts

No mitigation measures are required to reduce impacts associated with the proposed Project. Therefore, no direct secondary impacts would occur.

3.1.4.6 Residual Impacts

Impact AV-1. The Project would not result in adverse effects on public scenic vistas and visual resources, such as trees and rock outcroppings, along State Scenic Highways, and impacts would be *insignificant*.

Impact AV-2. The Project would not degrade the existing visual character or quality of public views of a site and its surroundings in the Rural Area, and therefore impacts would be considered *insignificant*.

Impact AV-3. The Project would not conflict with other regulations governing scenic quality in the Urban Area, including policies and development standards of the County's Comprehensive Plan, Coastal Land Use Plan, and Community Plans. The Project would support visual resource policies and additional public parks, trails, and recreation facilities would improve the visual quality of urban areas and neighborhoods. Therefore, residual impacts would be *beneficial*.

Impact AV-4. All new recreational developments would be required to comply with existing and proposed lighting standards for recreational development, which requires that lighting fixtures be installed, controlled, or directed so that the light will not glare or be blinding to pedestrians or vehicular traffic or on adjoining property. Additionally, each independent project would be subject to all applicable regulations and development standards for each proposed use to ensure compatibility with zoning district regulations and between the proposed private development and public recreation components. Therefore, residual impacts would be *insignificant*.

3.2 AGRICULTURAL RESOURCES

3.2.1 INTRODUCTION

This section describes potential impacts on agricultural resources that could result from the implementation of the Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (Project). The analysis considers direct, indirect, and cumulative impacts on agricultural resources, including the potential for direct conversion of agricultural lands, potential for conflicts with agricultural operations, and loss of agricultural viability. The analysis also assesses consistency with agricultural zoning, agricultural policies, and Williamson Act contracts, which are guided by the County's *Uniform Rules for Agricultural Preserves and Farmland Security Zones* (County of Santa Barbara 2024a).

3.2.2 ENVIRONMENTAL SETTING

Agricultural resources include any farmland with the potential for agricultural productivity based on soil and other physical characteristics. The California Environmental Quality Act (CEQA) defines "agricultural land" as inclusive of prime farmland, farmland of statewide importance, or unique farmland, as defined by the U.S. Department of Agriculture (USDA) and as modified for California (Public Resources Code [PRC] Section 21060.1). Prime Farmland is ideal for agriculture and is characterized by having the best combination of physical and chemical features, and can sustain long-term agricultural production. Prime Farmland has soil quality, growing season, and moisture supply needed to produce sustained high yields. As described further in Section 3.2.2.3, *Farmland Mapping and Monitoring Program Categorization*, Other Important Farmland – including Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance – is similar to Prime Farmland but includes minor shortcomings (e.g., steeper slopes, lesser quality soils) (California Department of Conservation 2023; Section 3.2.3, *Regulatory Setting*). Unique Farmland can also be used for the production of specific high-value food and fiber crops, with a special combination of soil quality, growing season, moisture supply, temperature, humidity, drainage, and elevation to economically produce sustainable high-yield crops. Unique Farmland is common in areas where this is a special microclimate, such as wine country in California (U.S. Department of Agriculture 2025). Agricultural resources also include land zoned for agriculture, land with existing agricultural uses, and land with agricultural potential that may not be zoned for agriculture. Agricultural land may be defined and protected by the County's Agricultural Preserve Program or by Williamson Act contracts to prevent conversion to non-agricultural use. The Agricultural Preserve Program enrolls land in Agricultural Preserve or Farmland Security Zone contracts

where the land is restricted to agricultural, open space, or recreational uses in exchange for reduced property tax assessments. The Agricultural Preserve Contract List sorts the number of parcels that are within a Williamson Act Contract managed by the Agricultural Preserve Advisory Committee (APAC) (County of Santa Barbara 2025). A Williamson Act contract is an agreement between private landowners and the government to restrict specific parcels of land to agricultural or related open space uses in return for reduced property tax assessments (California Department of Conservation 2025b)

3.2.2.1 Agricultural Productivity in Santa Barbara County

The county has a mild Mediterranean climate with average rainfall between 8 and 36 inches (depending on the region) and over 300 days of sunshine per year. The county also has a wide variety of soils that facilitate ideal growing conditions and long growing seasons for a diversity of crops and other agricultural products. The county's inland topography of mountain ranges and intermountain valleys allows for cool ocean air to flow inland, creating moderate temperatures conducive to high-value crops, such as premium wine grapes and subtropical fruits.



Agricultural production is a major contributor to the local economy According to the 2023 Crop & Livestock Report, the value of agricultural production in the county was estimated at $1.8 billion.
Photo Source: Santa Barbara Independent and Rodeo Farms

Agricultural commodities produced a gross production value of $1.8 billion in 2023, with the highest-producing crops consisting of strawberries ($775 million), nursery products ($122 million), wine grapes ($98 million), broccoli ($86 million), cauliflower ($84 million), head lettuce ($77 million), and leaf lettuce ($68 million) (Table 3.2-1; County of Santa Barbara Agriculture Commissioner's Office 2023). Through a multiplier effect, county agriculture has an estimated local economic impact in excess of $2.8 billion (Agricultural Impact Associates 2016). Through the multiplier effect – including the economic activity associated with inter-industry "business-to-business" supplier purchases as well as "consumption spending" by employees – the agricultural industry has a much greater local economic impact. A robust study prepared by Agricultural Impact Associates in 2016 demonstrated an additional $1.0 billion contribution to the local economy as a result of the multiplier effect.

The county's agricultural production occurs on approximately 704,310 acres of agricultural lands, including 67,805 acres of Prime Farmland, 13,647 acres of Farmland of Statewide Importance, 37,699 acres of unique farmland, and 8,346 acres of Farmland of Local Importance

under the Farming Mapping and Monitoring Program (FMMP), as further described in Section 3.2.2.2, *Farmland Mapping and Monitoring Program Categorization* (California Department of Conservation 2023; Tables 3.2-2 and 3.2-3). Approximately 512,476 acres of agricultural lands within the county are enrolled in Williamson Act contracts (County of Santa Barbara 2024b). A substantial amount of agricultural lands are also non-irrigated grazing and pasture lands, where the prevalence of steep slopes and less fertile, drier lands may limit their agricultural use (California Department of Conservation 2023).



While rural agriculture, such as grazing land makes up the majority of the agricultural acreage within the county, the highest production value is associated with nursery products and cut flowers, which are agricultural uses anchored in urban agricultural greenhouses on the South Coast.
Source: Por La Mar Nursery

While grazing land makes up the bulk of the agricultural acreage in the county, irrigated crops produce the greatest total value. For example, fruit and nut production generated over $932 million, which represents almost half of the county's overall production value, and vegetables generated over $615 million in 2023. Further, per acre harvested, the highest-value crops in the county are nursery products and cut flowers/foliage, which generated $122 million and $36 million, respectively. Nursery products and cut flower/foliage are produced on only 9 percent of the county's harvested acreage, and a majority of this industry is supported by urban agricultural lands and greenhouses in the Eastern Goleta Valley and Carpinteria on the South Coast (Table 3.2-1). The county's agricultural industry continues to grow and change over time, with trends of converting grazing lands to more intensive farming uses with higher-value irrigated crops and increasing pressure to convert urban agricultural lands to urban development, particularly on the South Coast, where housing needs and job availability are highest. For example, it is anticipated that the planned conversion of substantial portions of the urban agricultural areas to housing under the County's adopted 6th Cycle Housing Element Update will reduce the productivity and value of nursery products and cut flower/foliage in the county over time in the Eastern Goleta Valley and Carpinteria. Grazing land is not recorded in the table below because it does not meet the county's definition of "harvested acreage." However, grazing land covers approximately 580,000 acres in Santa Barbara County as of 2016 (California Department of Conservation 2016).

Table 3.2-1. Summary of Agricultural Production in Santa Barbara County (2023)

Agricultural Production/Crop	Harvested Acreage[1]	Production Value[2]	Percentage of Total Production Value	Production Value Per Acre Harvested
Fruit and Nuts	23,272	$932,467,000	50	$40,068
Vegetables	51,726	$615,524,000	33	$11,899
Wine Grapes	11,168	$98,562,000	5	$8,825
Nursery Products	218	$122,301,000	7	$561,014
Cut Flower & Cut Foliage	659	$36,142,000	2	$54,843
Livestock and Apiary[4]	N/A	$49,140,000	2	N/A
Field, Seed, & Cannabis	580,118	$21,842,000	1	$37
TOTAL	66,806	**$1,826,838,000**	**100.0**	$2,740

Notes:
[1] Harvested acreage is not reflective of land area, but of acres harvested, where, in some cases, crops may be harvested more than once per year. Vineyards and orchards that are not yet producing are not included in the harvested acreage.
[2] Represented as gross values.
[3] Dairy and Apiary Products were separated starting in 2018.
[4] Livestock and Apiary does not have a recorded harvested acreage because it does not fit the definition of "harvested acreage" in the 2023 Crop and Livestock Report.
Source: Santa Barbara County Agricultural Commissioner's Office 2023.

Table 3.2-2. Summary of Agricultural Lands within the Unincorporated Areas of the County

County Region	Total Agricultural land under FMMP[1] (acres)	Total land zoned for Agriculture[2] (acres)	Williamson Act Contracts (acres)
Santa Maria	134,641	147,491	97,308
Lompoc	201,997	275,501	118,669
Santa Ynez	164,317	247,456	133,755
Cuyama	175,243	361,771	129,925
South Coast	28,132	53,399	25,860
TOTAL	**704,310**	**1,085,618**	**505,517**

Notes:
[1] Acreage of total agricultural lands represents lands surveyed by the FMMP and includes prime farmland, farmland of statewide importance, unique farmland, farmland of local importance, and grazing farmland.
[2] Total land zoned for agriculture differs from agricultural land that is zoned AG-I or AG-II, which may include built-up land, roads, water, or other non-cultivation uses.
Source: California Department of Conservation 2023.

3.2.2.2 Agricultural Productivity within Santa Barbara County Regions

Santa Maria Valley



The Santa Maria Valley produces the majority of Santa Barbara County's agricultural value and contains the largest concentration of prime agricultural lands. High yield crops produced in this region include strawberries, broccoli, lettuce, cauliflower, and celery.
Photo Source: Santa Maria Times

Over half of the county's agricultural production value is produced in the Santa Maria Valley, producing the majority of the county's high-yield crops, including strawberries, broccoli, lettuce, cauliflower, and celery. The hills to the south and east of the valley are primarily used for vineyards and cattle grazing. Approximately 147,491 acres are zoned for agricultural land (AG) within the region, including AG-I, AG-I-10, AG-I-20, AG-II, AG-II-40, AG-II-100, and AC (Agricultural Commercial) (County of Santa Barbara Planning & Development Department [P&D] 2018). Of these agricultural lands, 97,308 acres are enrolled under Williamson Act contracts in the Agricultural Preserve Program, approximately 66 percent of the region's agricultural lands.

The Santa Maria Region contains the largest concentration of Prime Farmlands (27,721 acres). This is, in part, because the Santa Maria and Sisquoc River flood plains provide level fields and highly fertile soils. The majority of agriculturally zoned lands near larger communities, such as Santa Maria, Guadalupe, and Orcutt, are on the outskirts of developed areas and are zoned AG-II. A few parcels to the east of Santa Maria are zoned AG-I-10. Prime Farmland and Farmland of Statewide Importance are also concentrated on the outskirts of these developed areas, with a few exceptions located within the City of Santa Maria. Smaller communities, such as Sisquoc, Garey, and Casmalia, consist primarily of small blocks of residential-zoned land surrounded by land zoned as AG-II. In Garey, two AG-I zoned blocks exist to the north and south of residential areas. Most land in and around these communities is classified as Prime Farmland and Farmland of Statewide Importance. The land surrounding Casmalia is either Grazing Lands or not designated as Important Farmland (California Department of Conservation 2025a; County of Santa Barbara P&D 2025).

Orcutt

The community of Orcutt is located directly south of the City of Santa Maria and north of Solomon Hills, Los Alamos, and the Santa Ynez Valley. All of the agriculturally zoned land in Orcutt is located outside of the concentrated urban areas and residential neighborhoods. West Orcutt contains the largest concentration of cultivated agriculture, encompassing roughly

830 acres on the outskirts of the residential areas. Agriculture in and around Orcutt is predominantly non-irrigated livestock grazing and strawberries. Several areas designated as Unique Farmlands and Farmlands of Statewide Importance are located west of Orcutt and southwest of the Santa Maria Airport. Land to the east of the more concentrated residential areas in Orcutt is designated as Farmland of Statewide Importance and Unique Farmland and is zoned as agriculture (California Department of Conservation 2025a; County of Santa Barbara P&D 2025)

Lompoc Valley

Approximately 275,501 acres of the unincorporated areas within Lompoc Valley are designated for agricultural land uses. Of these agricultural lands, 118,669 acres are enrolled under Williamson Act contracts in the Agricultural Preserve Program, equating to approximately 43 percent of the region's agriculturally zoned lands. The Lompoc Valley contains 13,125 acres of Prime Farmlands associated with the Santa Ynez River watershed. The majority of agriculturally zoned lands in this region are located outside of the developed residential areas of Lompoc and are zoned as AG-II-40 and AG-II-100 (County of Santa Barbara P&D 2025). Large areas of Prime Farmland are located to the west and northeast of Lompoc and are zoned as AG-II-40, AG-II-100, and AG-I-5. Agriculturally zoned lands in the Mission Hills and Vandenberg Village areas are on the outskirts of developed residential areas. Most of this land is designated as Grazing Land or Other Land, with a small area of Unique Farmland south of Celestial Way in Vandenberg Village (California Department of Conservation 2025a; County of Santa Barbara P&D 2025).

Santa Ynez Valley

The Santa Ynez Valley has approximately 247,456 acres designated for agricultural land uses. Approximately 133,755 acres in the unincorporated areas of the valley are enrolled under Williamson Act contracts in the Agricultural Preserve Program, equating to approximately 54 percent of the region's agricultural lands. Much of the agricultural production occurs on the 7,361 acres of Prime Farmland surrounding the developed communities and along the Santa Ynez River. Wine grapes are particularly well suited to the soil and climate throughout the valley, and vineyards have expanded rapidly over the last decades (County of Santa Barbara 2009a). Growing tourism and residential popularity of this region have led to conflicts with agricultural resources resulting from the expansion of ranchette, residential, and visitor-serving commercial land uses (County of Santa Barbara 2009a).

Most agriculturally zoned land within the unincorporated area of the county is located outside of the developed, urban areas. South of the urban areas, blocks of Prime Farmland and Unique Farmland are found in areas zoned AG-I and AG-II. The unincorporated community of Ballard consists of a small block of land zoned as residential, with surrounding lands primarily zoned as AG-I. Small areas of Prime Farmland, Farmland of Statewide Importance, and Unique

Farmland are found to the north of the residential area along Alamo Pintado Road in areas zoned as AG-I-10 and AG-I-40. Additional areas of Prime Farmland and Farmland of Statewide Importance are located south of the residential area in areas zoned as AG-I-20. Lands to the east and west of the community are primarily Grazing Lands zoned as agriculture (California Department of Conservation 2025a; County of Santa Barbara P&D 2025)

Cuyama Valley

Agricultural activity in the Cuyama Valley consists primarily of irrigated row crops in level or gently sloping areas, with livestock grazing in foothill areas. Agricultural land uses are dominant within the region, comprising approximately 361,771 acres in the Cuyama Valley, with approximately 16,554 acres of Prime Farmland, though water availability has notably limited agricultural expansion. Irrigated crops include alfalfa, apples, carrots, garlic, deciduous fruit orchards, pistachios, wine grapes, hay/grain, peppers, potatoes, and onions. Rangeland livestock grazing of cattle and calves, sheep, and horses, as well as a small-scale dairy operation, also occurs in the Cuyama Valley (County of Santa Barbara 2024a). Approximately 129,925 acres of agricultural land are enrolled in Williamson Act contracts in the County Agricultural Preserve Program within this region, equating to roughly 36 percent of the region's agriculturally zoned lands. Most of this land is located well outside of residential areas.

In the community of Cuyama, a small block of residential and commercial land is surrounded by agricultural lands, most of which are zoned as AG-II. One block of land in the southeastern portion of Cuyama is zoned as AG-I/Educational Facility and is home to Cuyama Elementary School. The land surrounding Cuyama is predominantly Prime Farmland, and Unique Farmland and Farmland of Statewide Importance are also present on the northern side. A block of land zoned AG-II-100 is also designated Grazing Land. In the community of New Cuyama, agriculturally zoned lands are located on a large block bordered to the north by State Route (SR) 166 and to the west by Perkins Road. These lands host several different types of land uses, such as residential and industrial development, in addition to agriculture. Nevertheless, much of the land is in active agricultural production. Grazing Land is located to the south and west of the developed residential areas of New Cuyama. Prime Farmland, Farmland of Statewide Importance, and Unique Farmland are located to the north and south of developed areas (California Department of Conservation 2025a; County of Santa Barbara P&D 2025)

South Coast



The former South Patterson Agricultural Area provides over 400 acres of land designated for agricultural uses. Inland areas are undergoing conversion to residential uses to accommodate regional housing needs in compliance with the 6th Cycle Housing Element Update.
Photo Source: Santa Barbara Independent

The South Coast contains approximately 53,399 acres of land designated for agricultural uses, including 3,045 acres of Prime Farmland in the Eastern Goleta Valley and Carpinteria Valley. Most soils found on the valley floor are prime, and soils in the foothills are relatively adaptable. The South Coast contains agricultural lands bordering urban areas in the foothills of the Santa Ynez Mountains from Goleta to Carpinteria, as well as rural agricultural regions located along the Gaviota coast. Agriculture along the South Coast, from Goleta to Carpinteria, is primarily made up of smaller parcels engaged in high-value irrigated crops, such as tropical and sub-tropical fruit orchards and flowers. Most of the county's greenhouses exist within the South Coast. Approximately 25,860 acres of agricultural land are enrolled in Williamson Act contracts in the County Agricultural Preserve Program within this region, equating to roughly 48 percent of the region's 53,399 acres of agriculturally zoned lands (California Department of Conservation 2025a; County of Santa Barbara P&D 2025).

However, the County's adopted 6th Cycle Housing Element Update enables the conversion and development of all urban agricultural areas in Eastern Goleta Valley within inland (i.e., non-Coastal Zone) areas to residential development. This conversion created an isolated agricultural area surrounded by residential development with several nursery and row crop operations adjacent to Atascadero Creek, the Obern Multi-Use Trail, and More Mesa. This remainder area is zoned AG-I-5 and AG-I-10 in the Coastal Zone and provides a combination of prime and non-prime soils. The Eastern Goleta Valley also supports several properties that are not currently zoned for agriculture but support existing agricultural uses. For example, Lane Farms covers 3.37 acres south of Hollister Avenue and Walnut Lane. The area is zoned Residential (10-R-I) but operates as an urban farm growing row crops and specializing in strawberries, sweet corn, lettuce, tomatoes, and squashes. They also operate a produce stand (County of Santa Barbara 2015; Lane Farms 2022). Another 1.5-acre site at the corner of Calle Real/North Patterson Avenue is currently being used for orchard crops but is not zoned for agricultural purposes. This site contains Class II (Prime) soils. Other agricultural use areas include the Mistletoe/Carter Seed property, located adjacent to the southwest corner of the former South Patterson Agricultural Area, which includes 35 acres and is leased from Southern California Gas Company. The parcels are zoned for public utility but are used to grow flowers

for seed. The Rancho Tecolote Parcel includes 6 acres and is located in More Mesa. The parcel is zoned Residential but is used to grow avocados and lemons, and has Unique and Prime Farmland (County of Santa Barbara 2015).

Carpinteria's agriculture revolves around orchards, open-field agriculture, and greenhouses. The Carpinteria Valley produces more than half of the county's cut flowers and nursery products and comprises the largest and most concentrated area of agricultural greenhouses in the county, which support chrysanthemums, orchids, roses, and potted plants. In the unincorporated county, AG-I zoned land surrounds the City of Carpinteria, with AG-II zoned lands located further from the city in the Rural Area. Most of the land to the north, northeast, and northwest of the City of Carpinteria is Prime or Unique Farmland or Farmland of Statewide Importance. There is no agriculturally zoned land located within the Urban Area of the unincorporated county in the Carpinteria Valley (California Department of Conservation 2023; County of Santa Barbara P&D 2018). Greenhouse development (including shade structures and hoop structures) within the Carpinteria Valley is guided by the Carpinteria Agricultural Overlay District (Santa Barbara County Code Section 35-102F). As of 2017, there were approximately 449 acres of greenhouse-type structures within unincorporated Carpinteria Valley (east of Nidever Road). Of those, 333 acres were considered "true" greenhouses (pursuant to the County definition in the Santa Barbara County Land Use and Development Code [LUDC]), 61 acres were hoop structures, and 58 acres were shade structures (County of Santa Barbara 2017). A total of 122 acres of greenhouse-type structures are on lands with Williamson Act contracts, representing approximately 27 percent of the total amount of Carpinteria greenhouses (County of Santa Barbara 2017). Avocados, as well as exotics, such as sapotes and cherimoyas, are grown on the unincorporated hillsides north of the City of Carpinteria. With the adoption of the Licensing of Cannabis Operations Ordinance (Chapter 50 of the Santa Barbara County Code), several commercial cannabis cultivation operations have been permitted in existing greenhouses in the Carpinteria area. As of 2022, the County approved 166 acres of the maximum 186 acres allowed for greenhouse cannabis in the Carpinteria Valley (Santa Barbara Independent 2022). Further, the County's adopted 6th Cycle Housing Element Update enables the conversion and development of agricultural areas in the Carpinteria Valley to residential development. This pending conversion will reduce the crop and greenhouse production in this area.

3.2.2.3 Farmland Mapping and Monitoring Program Categorization

The FMMP was developed by the Department of Conservation, Division of Land Resource Protection in 1982. Important Farmland Maps, a hybrid of resource quality (soils), irrigation status, and land use information, are produced by the FMMP. The Department of Conservation,

Division of Land Resource Protection divides land into seven general categories,[1] with Important Farmland comprising the first four categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance (California Department of Conservation 2023). Important Farmland contains soils best suited for producing food and forage, particularly for producing high-yield crops. The total area of FMMP lands throughout the unincorporated county varies by Recreation Planning Area (Table 3.2-3).

Table 3.2-3. Summary of FMMP Lands within the Unincorporated Areas of the County

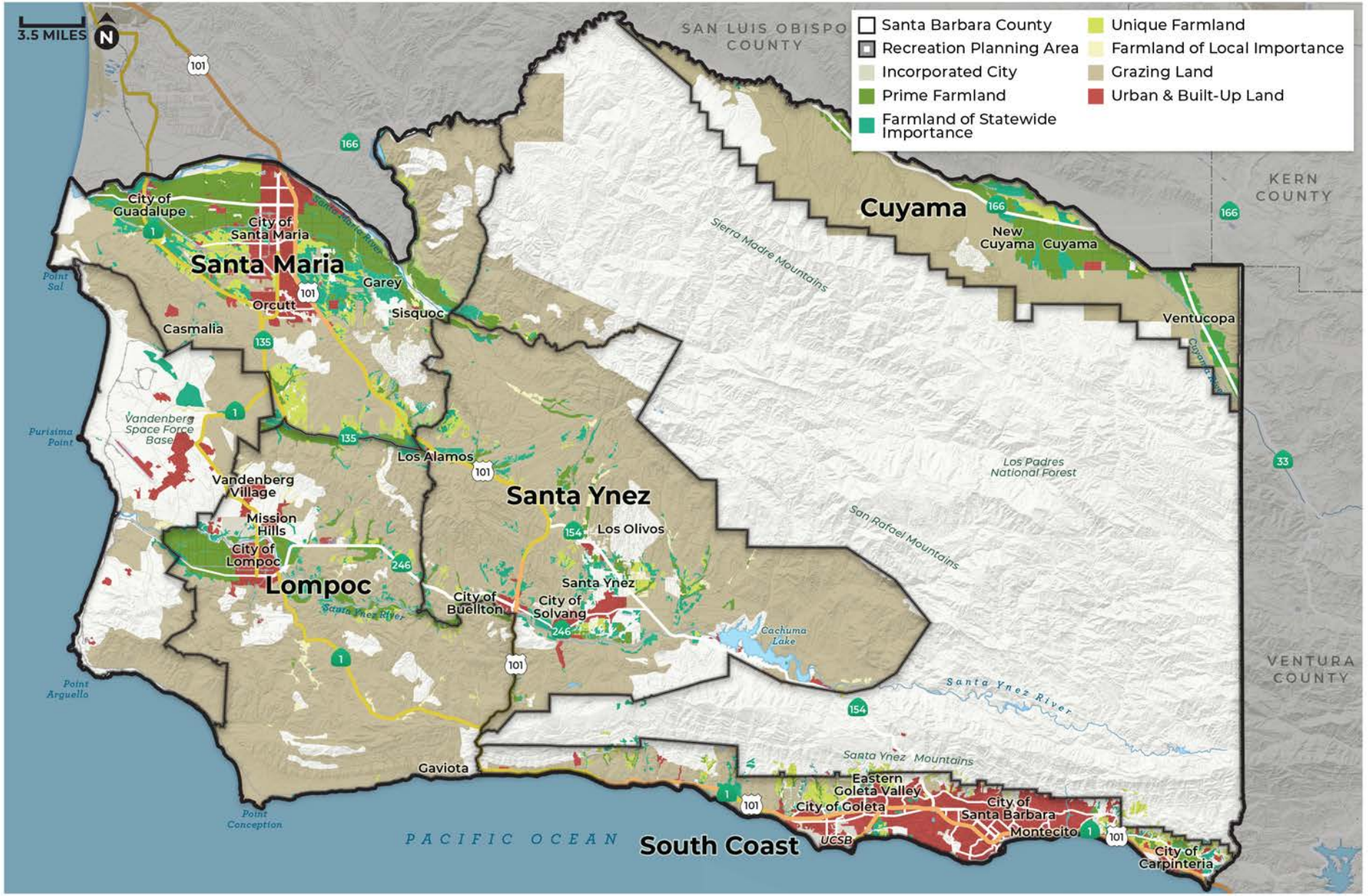
FMMP Designation	Santa Maria Valley (acres)	Lompoc Valley (acres)	Santa Ynez Valley (acres)	Cuyama Valley (acres)	South Coast (acres)
Farmland of Local Importance	762	3,192	3,455	875	62
Farmland of Statewide Importance	8,573	1,295	1,041	2,158	580
Grazing Land	79,422	181,308	146,842	153,343	15,899
Prime Farmland	27,721	13,125	7,361	16,554	3,045
Unique Farmland	18,164	3,057	5,617	2,313	8,548
TOTAL	**134,641**	**201,977**	**164,317**	**175,243**	**28,132**

Notes:
[1] Acreage of total agricultural lands represents lands surveyed by the FMMP and includes Prime Farmland, Farmland of Statewide Importance, Unique Farmland, Farmland of Local Importance, and Grazing Land.
[2] Total land zoned for agriculture differs from agricultural land that is zoned AG-I or AG-II, which may include built-up land, roads, water, or other non-cultivation uses.
Source: California Department of Conservation 2023.

3.2.2.4 Other Benefits of Agriculture in Santa Barbara County

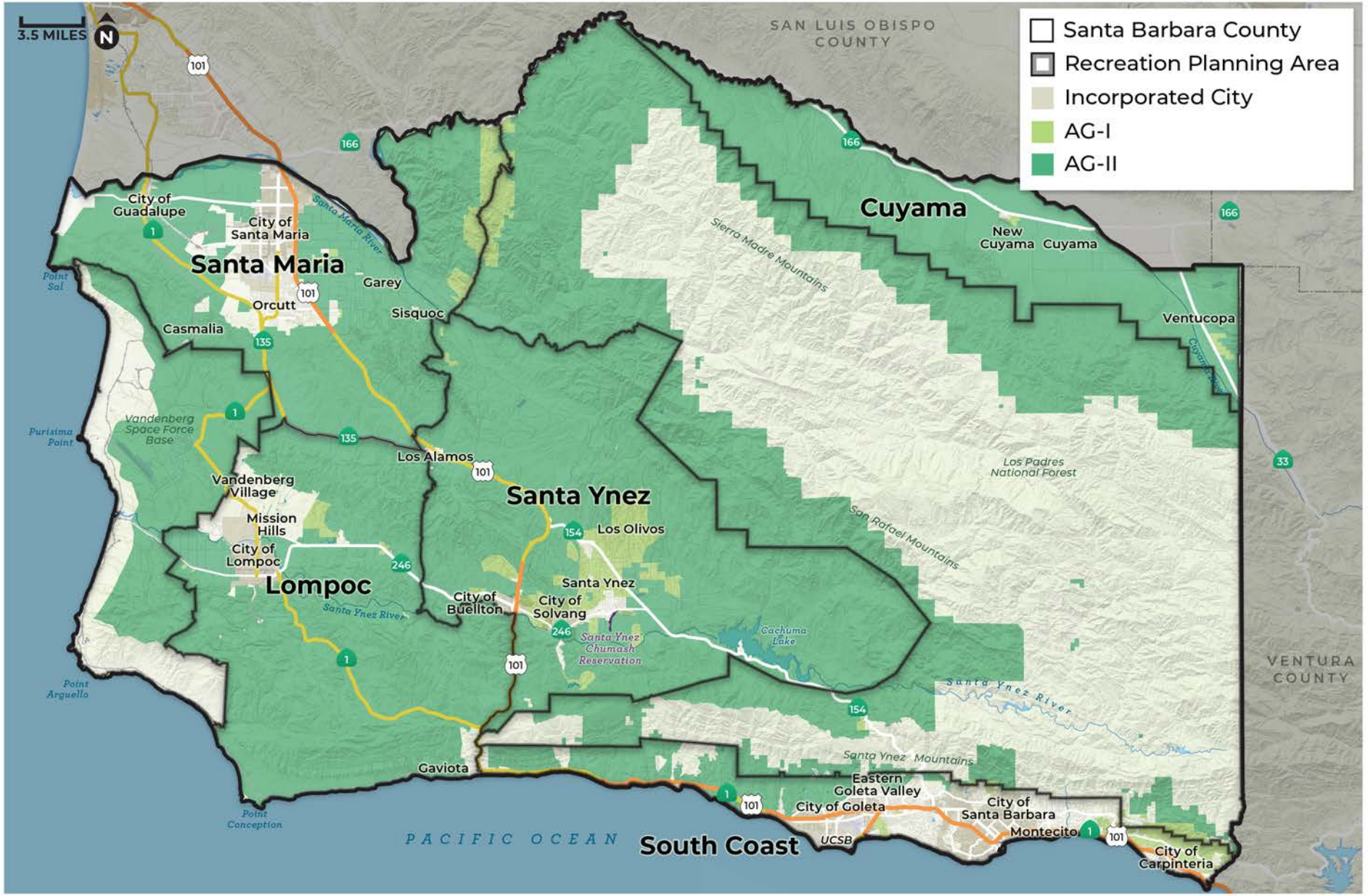
Agriculture provides many benefits to the county beyond the economic value. For instance, the presence of farms and ranches has been deemed to yield significant aesthetic and visual resource benefits to the residents of the county (County of Santa Barbara 2009a; Section 3.1, *Aesthetics and Visual Resources*). Other environmental values of agriculture include the preservation of ecosystems and habitat for special status species, enhancements to soil fertility and water quality, and contributions to carbon sequestration that can offset global warming (American Farmland Trust 2007). Developed agricultural land in the county is often occupied by standard commercial agricultural operations, such as irrigated and fallow cropland, nurseries, vineyards, greenhouses, pasture and grazing land, and orchards, as well as industrial agricultural development such as wineries and food processing facilities. Over the last 20 years, the general trend has been toward conversion of grazing, dry-farmed, or open land to more intensive agricultural production, such as orchards, irrigated row crops, and vineyards, which

[1] The remaining land categories include: 1) grazing land; 2) urban and built-up land; and 3) other land. Please see Section 3.2.3.2, *Regulatory Setting* for further information on the Department of Conservation's land categories.



Santa Barbara County FMMP Lands

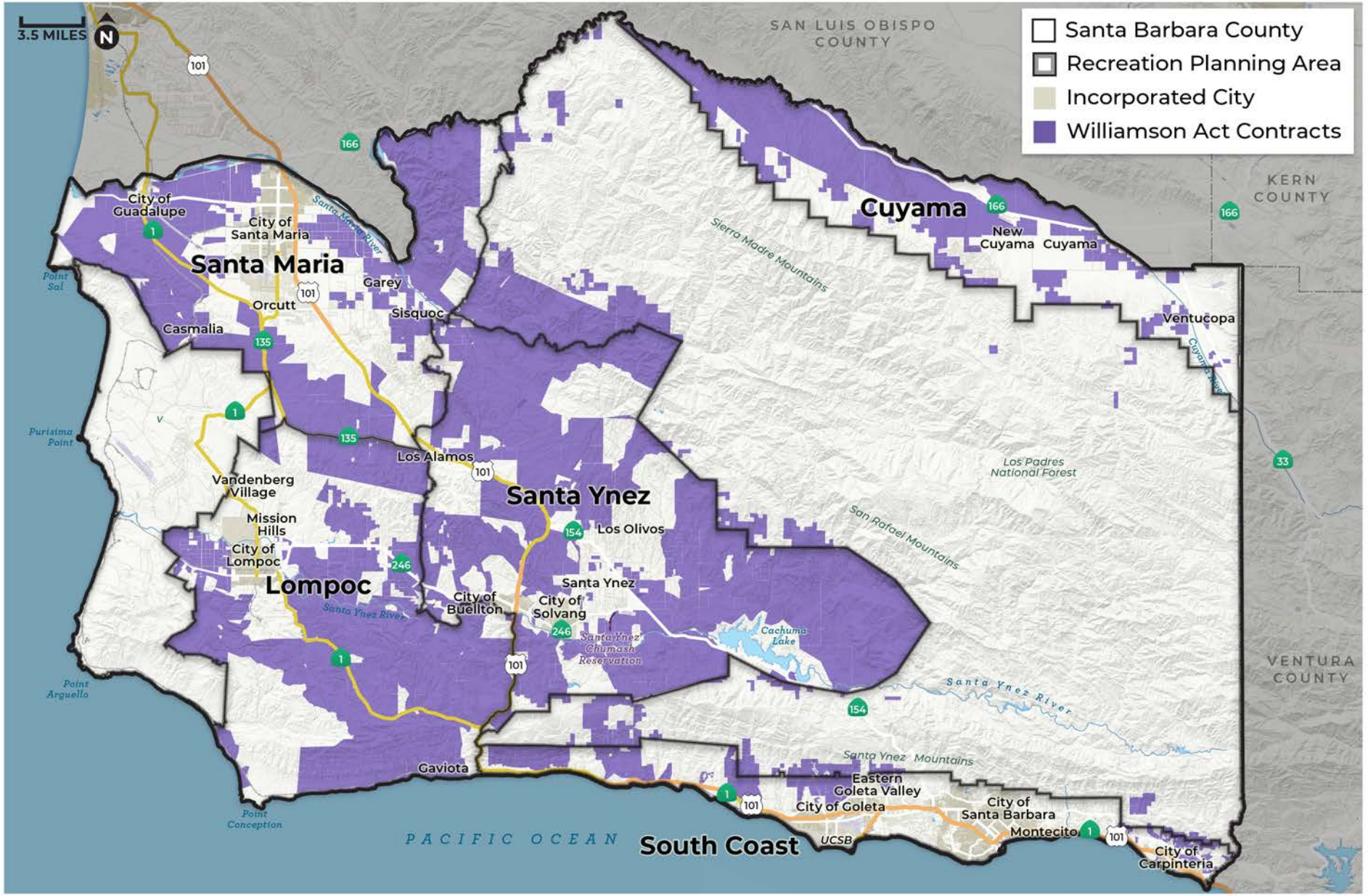
FIGURE 3.2-1



wsp

Santa Barbara County Agricultural Zoning

FIGURE 3.2-2



wsp

Santa Barbara County Williamson Act Contracts

FIGURE 3.2-3

generally have higher production values per acre. Several factors have led to agricultural intensification, including high land values when compared to the relatively low economic yield of the cattle business, advances in water delivery technology, the emergence of vineyards as a profitable alternative to grazing on non-prime soils, and the availability of large capital investment (County of Santa Barbara 2009). Rising land values and the cost of inputs have also contributed to an increase in the conversion of agricultural land to non-agricultural uses.

3.2.3 REGULATORY SETTING

Federal, state, and local regulations have been enacted to protect agricultural resources. The following section summarizes applicable policies and regulations that may be applicable to the Project and the associated impacts.

3.2.3.1 Federal

Farmland Protection Policy Act of 1981

The USDA administers the Farmland Protection Policy Act of 1981. The Act is intended to minimize the extent to which federal programs contribute to the unnecessary conversion of farmland to non-agricultural uses. The Act also requires these programs to be compatible with state, local, and private efforts to protect farmland.

Land Evaluation and Site Assessment (LESA)

The USDA administers the Land Evaluation and Site Assessment (LESA) system to help state and local officials make sound decisions about land use. Combined with Forest measures and Rangeland parameters, LESA can provide a technical framework to numerically rank land parcels based on local resource evaluation and site considerations (USDA 2023).

3.2.3.2 State

Department of Conservation, Division of Land Resource Protection

As previously described, the Department of Conservation established the FMMP in 1982 to assess the location, quality, and quantity of agricultural lands and analyze the conversion of these lands throughout California. The FMMP is non-regulatory and was developed to inventory land, provide categorical definitions of Important Farmland, and present consistent and impartial data to decision-makers to assess the present status, review trends, and plan for the future of California's agricultural land resources. The FMMP's Important Farmland Maps base the land quality for agricultural use on a series of factors, including soils, irrigation status, and land use information. The Department of Conservation, Division of Land Resource Protection divides land into seven general categories, with Important Farmland comprising the first four categories: Prime Farmland, Farmland of Statewide Importance, Unique Farmland, and

Farmland of Local Importance (California Department of Conservation 2023). The best quality land for agricultural use is Prime Farmland. The descriptions of each category are as follows:

- **Prime Farmland.** Farmland that has the best combination of physical and chemical features and is able to sustain long-term agricultural production. This land has the soil quality, growing season, and moisture supply needed to sustain high yields. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
- **Farmland of Statewide Importance.** Farmland similar to prime farmland but with minor shortcomings, such as greater slopes or less ability to store soil moisture. Land must have been used for irrigated agricultural production at some time during the four years prior to the mapping date.
- **Unique Farmland.** Farmland with lower-quality soil that is used for the production of leading crops in the state. This land is usually irrigated but may include non-irrigated orchards or vineyards, which are found in some climatic zones in California. Land must have been used for crops at some time during the four years prior to the mapping date.
- **Farmland of Local Importance.** Land of importance to the local agricultural economy, as determined by each county's board of supervisors and a local advisory committee.
- **Grazing Land.** Land where existing vegetation is suited to the grazing of livestock. This category was developed in cooperation with the California Cattlemen's Association, the University of California Cooperative Extension, and other groups interested in grazing activities. The minimum mapping unit for Grazing Land is 40 acres.
- **Urban and Built-up Land.** Land occupied by structures with a building density of at least 1 unit to 1.5 acres, or about six structures within a 10-acre parcel. This land is used for residential, industrial, commercial, institutional, and public administrative purposes, railroad and other transportation yards, cemeteries, airports, golf courses, sanitary landfills, sewage treatment facilities, water control structures, and other developed purposes.
- **Other Land.** Land not included in any other mapping category. Common examples include low-density rural developments; brush, timber, wetland, and riparian areas not suitable for livestock grazing; confined livestock, poultry, or aquaculture facilities; strip mines and borrow pits; and water bodies smaller than 40 acres. Vacant and non-agricultural land surrounded by urban development and greater than 40 acres is mapped as Other Land.

California Land Conservation Act of 1965 (Williamson Act)

The California Land Conservation Act of 1965, commonly referred to as the Williamson Act, is promulgated in California Government Code Section 51200-51297.4. The Williamson Act enables local governments to enter into contracts with private landowners to restrict specific parcels of land to agricultural or related open space uses in return for reduced property tax assessments. Specifically, this legislation enables landowners who voluntarily agree to

participate in the Williamson Act program to receive assessed property taxes according to the income-producing value of their property in agricultural use, rather than on the property's assessed market value. This saves landowners from 20 percent to 75 percent in property tax liability each year (Department of Conservation, Division of Land Resources Protection 2019).

The Williamson Act program is administered by the California Department of Conservation in conjunction with local governments, which administer the individual contract arrangements with landowners. The landowner commits the parcel to a 10-year "rolling" period wherein no conversion out of agricultural use is permitted. Each year, the contract automatically renews unless a notice of non-renewal or cancellation is filed. In return, the land is taxed at a rate based on the actual use of the land for agricultural purposes, as opposed to its unrestricted market value. An application for immediate cancellation can also be requested by the landowner, provided that the proposed immediate cancellation application is consistent with the cancellation criteria stated in the California Land Conservation Act and those adopted by the affected county or city. Non-renewal or immediate cancellation does not change the zoning of the property. Participation in the Williamson Act program is dependent on county adoption and implementation of the program and is voluntary for landowners.

Under Government Code Section 51238.1, uses approved on contracted lands shall be consistent with all of the following principles of compatibility:

- The use will not significantly compromise the long-term productive agricultural capability of the subject contracted parcel or parcels on other contracted lands in agricultural preserves.
- The use will not significantly displace or impair current or reasonably foreseeable agricultural operations on the subject contracted parcel or parcels on other contracted lands in agricultural preserves. Uses that significantly displace agricultural operations on the subject contracted parcel or parcels may be deemed compatible if they relate directly to the production of commercial agricultural products on the subject contracted parcel or parcels or neighboring lands, including activities such as harvesting, processing, or shipping.
- The use will not result in the significant removal of adjacent contracted land from agricultural or open space use.

California Right to Farm Act (California Civil Code Section 3482.5)

The California Right to Farm Act (California Civil Code Section 3482.5) – enacted in 1981 – provides that a farming activity cannot be a public nuisance if all of the following factors are met:

- The activity is in support of the production of an agricultural commodity;
- The agricultural activity is commercial in nature;

- The activity is conducted in a manner consistent with proper and accepted customs and standards as established and followed by similar agricultural operations in the same locality;
- The farming activity must have been in operation for at least 3 years; and
- The farming activity was not a nuisance at the time it began.

The California Right to Farm Act does not require "best management practices" but instead simply allows adherence to "accepted" customs and practices. In addition, the statute specifically states that it prevails over any contrary provision of a city or county ordinance or regulation, but does allow cities and counties to require disclosures to be given to prospective home buyers that a dwelling is near an agricultural operation.

Farmland Security Zone Act

The Farmland Security Zone Act was passed by the California legislature in 1999 to ensure that long-term farmland preservation is part of public policy. Under the provisions of this act, a landowner already under a Williamson Act contract can apply for Farmland Security Zone status by entering into a contract with the county. Farmland Security Zone classification automatically renews each year for an additional 20 years. In return, for a further 35 percent reduction in the taxable value of land and growing improvements (in addition to Williamson Act tax benefits), the owner agrees not to convert agricultural land for nonagricultural uses.

Public Resources Code (PRC) Section 21060.1

PRC Section 21060.1 defines agricultural land to assess environmental impacts under the FMMP. As stated previously, the FMMP was established in 1982 to assess the location, quality, and quantity of agricultural lands and analyze the conversion of these lands. The FMMP looks at agricultural land use and land use changes throughout California.

3.2.3.3 Local

County of Santa Barbara Comprehensive Plan

The County's Comprehensive Plan provides a framework for development and growth in the unincorporated county. The Agricultural, Environmental Resource Management, and Land Use Elements of the County's Comprehensive Plan, along with the Coastal Land Use Plan (CLUP) and local community plans, contain various goals and policies that address agricultural resources, including the preservation and expansion of agricultural land use within the county for the cultivation of crops and the raising of animals. Under the County's Comprehensive Plan, agricultural lands are designated A-I, A-II, or AC by the Land Use Element and provide opportunities for a range of commercial agricultural operations. A-I parcels must be 5 acres or larger and include prime or non-prime farmlands and areas with agricultural uses that are located within Urban, Inner Rural, and Rural Neighborhood areas. A-II parcels must be 40 acres

or larger and include farmlands and areas with agricultural uses located outside Urban, Inner Rural, and Rural Neighborhood areas. In lands designated A-II lands, general agriculture is permitted, including but not limited to livestock operations, grazing, and beef production, as well as more intensive agricultural uses.

The policies in the Comprehensive Plan outline the County's priority to preserve and, where feasible, expand and intensify agricultural land uses. Agricultural operations are encouraged in areas containing both prime and non-prime soils. Consistency with Comprehensive Plan goals and policies is further discussed in Section 3.10, *Land Use and Planning*. Relevant goals and policies are summarized below.

Agricultural Element

The Agricultural Element of the County's Comprehensive Plan serves as a guide for addressing the future use of agricultural lands and resources. It includes the following goals and policies applicable to the proposed Project governing the use, protection, and improvement of agricultural lands within the county.

Goal I: Santa Barbara County shall assure and enhance the continuation of agriculture as a major viable production industry in Santa Barbara County. Agriculture shall be encouraged. Where conditions allow (taking into account environmental impacts), expansion and intensification shall be supported.

> **Policy I.A:** The integrity of agricultural operation shall not be violated by recreational or other non-compatible uses.
>
> **Policy I.B:** The County shall recognize the rights of operation, freedom of choice as to the methods of cultivation, choice of crops or types of livestock, rotation of crops and all other functions within the traditional scope of agricultural management decisions. These rights and freedoms shall be conducted in a manner which is consistent with: (1) sound agricultural practices that promote the long-term viability of agriculture and (2) applicable resource protection policies and regulations.
>
> **Policy I.D:** The use of the Williamson Act (Agricultural Preserve Program) shall be strongly encouraged and supported. The County shall also explore and support other agricultural land protection programs.
>
> **Policy I.E:** The County shall recognize that the generation of noise, smoke, odor, and dust is a natural consequence of the normal agricultural practices provided that agriculturalists exercise reasonable measures to minimize such effects.
>
> **Policy I.F:** The quality and availability of water, air, and soil resources shall be protected through provisions including but not limited to, the stability of Urban/Rural Boundary

Lines, maintenance of buffer areas around agricultural areas, and the promotion of conservation practices.

Policy I.G: Sustainable agricultural practices on agriculturally designated land should be encouraged in order to preserve the long-term health and viability of the soil.

Goal II. Agricultural lands shall be protected from adverse urban influence.

Policy II.C: Santa Barbara County shall discourage the extension by the Local Agency Formation Commission (LAFCO) of urban spheres of influence into productive agricultural lands designated Agriculture II (A-II) or Commercial Agriculture (AC) under the Comprehensive Plan.

Policy II.D: Conversion of highly productive agricultural lands, whether urban or rural, shall be discouraged. The County shall support programs which encourage the retention of highly productive agricultural lands.

Goal III: Where it is necessary for agricultural lands to be converted to other uses, this use shall not interfere with remaining agricultural operations.

Policy III.A: Expansion of urban development into active agricultural areas outside of urban limits is to be discouraged, as long as infill development is available.

Policy III.B: It is a County priority to retain blocks of productive agriculture within Urban Areas where reasonable, to continue to explore programs to support that use, and to recognize the importance of the objectives of the County's Right to Farm Ordinance.

Goal IV: Recognizing that agriculture can enhance and protect natural resources, agricultural operations should be encouraged to incorporate such techniques as soil conservation and sound fire risk reduction practices.

Policy IV.C: Grading and bush clearing for new agricultural improvements on hillsides shall not cause excessive erosion or downslope damage.

Environmental Resource Management Element (ERME)

The Environmental Resource Management Element (ERME) states that existing croplands on prime soils should be preserved. Agricultural lands on less than prime soil should be preserved insofar as possible. Under Category A, urbanization should be prohibited where existing croplands have a high agricultural suitability rating, a Class I or II soil capability classification, or where agricultural preserves are subject to Williamson Act agreements. Under Category B, urbanization should be prohibited except where existing croplands have a moderate or low agricultural suitability rating, a Class III or IV soil capability classification, or with lands highly suitable for expansion of cultivated agriculture. It is noted that agricultural preserves, although not subject to environmental constraints, are included in Category A. The reason is that in entering into Williamson Act agreements, the County has made a legal commitment that the

land will remain in agricultural use for a minimum of 10 years, subject to automatic annual renewal.

Land Use Element

The Land Use Element of the County's Comprehensive Plan has four fundamental goals relating to the environment, urbanization, agriculture, and open lands. These goals aim to steer growth at a rate that can be sustained by available resources; to prevent scattered urban development and balance housing and jobs; to preserve cultivated agriculture and lands with both prime and non-prime farmland; and to prioritize open lands for non-urban uses where not suitable for agriculture. The following goals of the Land Use Element are most applicable to the Project.

> **Regional Goal, Agriculture:** In the Rural Areas, cultivated agriculture shall be preserved and, where conditions allow, expansion and intensification should be supported. Lands with both prime and non-prime soils shall be reserved for agricultural uses.

2.3.3.5.1.1.1.1 Community Plans

Santa Barbara County has 10 community or area plans. Each community plan contains goals, objectives, policies, action/programs, and development standards guiding the development of the community it serves and supplements the policies and goals of the Comprehensive Plan. A policy is a specific statement that guides decision-making. Development standards are measures that will be applied to development projects consistent with relevant policies of the community plan. Development standards typically specify how and where development is designed and constructed. Several community plans – including the Eastern Goleta Valley Community Plan, the Orcutt Community Plan, and the Santa Ynez Valley Community Plan, include polices related to agricultural lands and agricultural production.

Eastern Goleta Valley Community Plan

As described in the Eastern Goleta Valley Community Plan,

> *"...the two remaining blocks of urban agriculture [in the Eastern Goleta Valley Community Plan area] present opportunities for innovative and productive cultivation and agriculture-based business. Sustaining urban agriculture as a land use, a local industry, and a character is a goal for the South Patterson Agricultural Area and the San Marcos Agricultural Area. Combined, these areas provide nearly 500 acres of land in the Urban Area for agricultural enterprises... Overall, this Plan retains agricultural land use designations for urban agricultural operations, and provides policies supporting the agricultural industry in Eastern Goleta Valley."*

The relevant agricultural policies from the Eastern Goleta Valley Community Plan are provided below:

- **Policy LUA-EGV-1.1:** Agricultural resources, agricultural land uses and operations, and distinctive urban and rural agricultural characteristics shall be preserved to the greatest extent feasible.
- **Policy LUA-EGV-1.2:** Non-agricultural development adjacent to agriculturally-designated property shall include buffers to protect agricultural land, operations, and characteristics.
- **Policy LUA-EGV-1.3: (INLAND)** Atascadero and Maria Ygnacio Creeks shall be maintained appropriately to serve as buffers between agricultural areas, recreational uses and adjacent commercial, industrial and residential uses.
- **Policy LUA-EGV-1.5: Urban Agricultural Land Uses:** Agricultural land within the Urban Area shall be preserved for urban agricultural uses to the greatest extent feasible.
- **Policy LUA-EGV-1.6: Urban Agricultural Land Use Conversion:** To the greatest extent feasible, any general plan amendment and/or rezone proposal in the Urban Area which results in a change of land use designation from agricultural to non-agricultural shall:

    1. Require a factual and substantive finding by the County that (a) the land is no longer appropriate for urban agricultural land uses following due consideration consistent with all policies of the Plan, or (b) there is an overriding public need for conversion to other uses. As part of the finding the County will:

        a. Evaluate and document factually and substantively the quality and extent of agricultural resources onsite and adjacent to the property, including, but not limited to, prime agricultural land, land in existing agricultural use, lands with prime soils, grazing land, land with agricultural potential, and lands under Williamson Act contracts.

        b. Require proposed land uses that:

            i. Are consistent with all policies of this Plan.

            ii. Are compatible with each other and with neighboring land uses—whether agricultural or non-agricultural.

            iii. Avoid partitioning or interrupting contiguous blocks of agriculturally-designated lands.

            iv. Preserve and enhance environmental resources, including, but not limited to coastal bluff geology, habitat areas, visual resources, and watershed resources, and community characteristics, particularly with regard to agricultural heritage and natural environmental resources, and/or minimize environmental impacts.

            v. Include provisions for the community's social, economic and cultural well-being, and health and safety, such as public parks, open spaces, trails, habitat protection or restoration, and/or community gardens.

vi. Dedicate public open space for habitat preservation and/or public recreation and indicate the amount and extent.

vii. Provide public coastal access, parking, recreational trails, bike paths, and/or pedestrian routes.

viii. Confine and cluster non-agricultural development adjacent to existing developed areas and transportation facilities to maximize preservation of open space, with the exception of passive public recreation improvements such as trails, signs and park facilities.

Coastal Land Use Plan (CLUP)

The CLUP is an element of the County's Comprehensive Plan that outlines future goals and policies for Santa Barbara County's Coastal Zone. Generally, the Coastal Zone extends inland 1,000 yards from the mean high tide line but is broadened in specific locations to include nearby habitat and recreational and agricultural resources. The CLUP for Santa Barbara County was adopted in 1982 in response to the passage of the California Coastal Zone Conservation Act. The legislature established goals for future activity in the Coastal Zone, including the prioritization of Coastal Zone-dependent land uses over other uses; enhancement and restoration of natural and man-made resources; orderly and balanced utilization and conservation of resources (accounting for local social and economic needs); and recreational opportunities and public access. Policies 8-1 through 8-12 are generally applicable to agricultural uses within the Coastal Zone, particularly in the Rural Area, and restrict the conversion of agricultural uses to protect agriculture as a coastal resource under the California Coastal Act. In the urban area, the Coastal Land Use Plan requires prime agricultural lands and lands in existing agricultural production to be designated for agricultural use unless agricultural viability is already severely impaired by conflicts with urban uses.

Article II, Coastal Zoning Ordinance (CZO)

Article II, Coastal Zoning Ordinance (CZO), a part of Chapter 35 (Zoning) of the Santa Barbara County Code, applies to the unincorporated Coastal Zone within Santa Barbara County as well as the Channel Islands. The CZO implements the CLUP by classifying and regulating the uses of land, buildings, and structures in the Coastal Zone. Pursuant to PRC Section 30500 of the California Coastal Act of 1976, the County must prepare a Local Coastal Plan for the unincorporated areas of the county within the Coastal Zone. The ordinance contains the coastal zoning district maps, which apply the regulations of the ordinance to the properties in the coastal areas.

- **Section 35-64**

1. If a lot is zoned for agricultural use and is located in a rural area not contiguous with the urban/rural boundary, rezoning to a non-agricultural zone district shall not be

permitted unless such conversion of the entire lot would allow for another priority use under the Coastal Act (e.g., coastal dependent industry, recreation and access, or protection of an environmentally sensitive habitat). Such conversion shall not be in conflict with contiguous agricultural operations in the area and shall be consistent with PRC Sections 30241 and 30242 of the Coastal Act.

2. If a lot is zoned for agricultural use and is located in a rural area contiguous with the urban/rural boundary, rezoning to a non-agricultural zone district shall not be permitted unless:

    a. The agricultural use of the land is severely impaired because of physical factors (e.g., high water table), topographical constraints, or urban conflicts (e.g., surrounded by urban uses which inhibit production or make it impossible to qualify for agricultural preserve status), and

    b. Conversion would contribute to the logical completion of an existing urban neighborhood, and

    c. There are no alternative areas appropriate for infilling within the urban area or there are no other lots along the urban periphery where the agricultural potential is more severely restricted.

Santa Barbara County Uniform Rules for Agricultural Preserves and Farmland Security Zones

The Uniform Rules are used to implement the Williamson Act and administer the Agricultural Preserve Program in the county. The Uniform Rules define eligibility requirements and compatible uses to which each participating landowner must adhere to receive a reduced tax assessment, based on the acreage of prime and nonprime farmlands. The Uniform Rules' eligibility criteria require that an agricultural preserve consist of no less than 100 acres for non-prime agricultural lands, 40 acres for prime agricultural lands, or a combination of 40 acres that may consist of a combination of 20-acre prime agricultural lands, or 5-acre minimum super prime agricultural lands. The County also enforces Williamson Act contract requirements to ensure that tax assessments for contracted lands are appropriate.

Land enrolled in the County's Agricultural Preserve Program is to be used principally for commercial agricultural production, except for land enrolled for open space or recreational purposes. Uniform Rule 2 provides general compatibility principles, as established under the Williamson Act (Government Code Section 51238.1), to be applied to all land uses and activities occurring within contracted land, including both Williamson Act and Farmland Security Zone contracts. The remaining sections provide more specific criteria and requirements for specific land uses and activities that the Board of Supervisors has determined must be met for the use or activity to be considered compatible with agriculture and consistent with the Williamson Act

The Uniform Rules also establish standards for the termination of Williamson Act contracts and the withdrawal of land from the Agricultural Preserve program, without impairing the integrity of the program. Uniform Rule 6 provides standards for the termination of contracts via several methods, which include non-renewal, cancellation, annexation, public acquisition, and rescission. Uniform Rule 6-1.1 Nonrenewal, states,

> *"[w]ithdrawal by a notice of nonrenewal is the preferred method considered in all instances, whether for all or part of the contracted land where whole parcels are involved. This method is open to either party to the contract, does not require a finding of fact, and provides for an adjustment in land assessed values, pursuant to Section 426 of the Revenue and Taxation Code."*

Upon serving a notice of non-renewal, the existing contract remains in effect for the balance of the period remaining, typically 10 years. Uniform Rule 6-1.2 Cancellation outlines the process for a landowner to petition the Board of Supervisors for the cancellation of his or her Williamson Act or Farmland Security Zone contract. The Board of Supervisors may grant tentative approval for cancellation of a Williamson Act contract only if it can make all of the findings for either Government Code Section 51282 (a)(1)(b), or Government Code Section 51282(a)(2)(c).

The following rules apply:

2-1. Principles of Compatibility

A. Uses approved on contracted lands shall be consistent with all of the following principles of compatibility:

   1. The use will not significantly compromise the long-term productive agricultural capability of the subject contracted parcel or parcels or on other contracted lands in agricultural preserves.

   2. The use will not significantly displace or impair current or reasonably foreseeable agricultural operations on the subject contracted parcel or parcels or on other contracted lands in agricultural preserves. Uses that significantly displace agricultural operations on the subject contracted parcel or parcels may be deemed compatible if they relate directly to the production of commercial agricultural products on the subject contracted parcel or parcels or neighboring lands, including activities such as harvesting, processing, or shipping.

   3. The use will not result in the significant removal of adjacent contracted land from agricultural or open-space use. In evaluating compatibility, the Board of Supervisors shall consider the impacts on non-contracted lands in the agricultural preserve or preserves.

2-1.2. Other Compatibility Criteria

1. The use does not result in a significant increase in the density of the temporary or permanent human population that could hinder or impair agricultural operations on the subject property and/or other agricultural lands in the vicinity.
2. The use does not require and will not encourage the extension of urban services such as sewer or the upgrade of public roads to urban standards that could encourage premature conversion of agricultural land to non-agricultural uses.

Agricultural Nuisances and Consumer Information Ordinance, Article V, §3-23 et seq. ("Right-to-Farm Ordinance")

The County's Right-to-Farm Ordinance protects agricultural land uses from conflicts with nonagricultural land uses that may result in financial hardship to agricultural operators or the termination of their operation. The purpose of the ordinance is to preserve and protect agricultural zoned lands for exclusive agricultural use; to support and encourage continued agricultural operations in the county; and to forewarn prospective purchasers or residents of property adjacent to or near agricultural operations of the inherent potential problems associated with such purchase or residence including, but not limited to, the sounds, odors, dust, and chemicals that may accompany agricultural operations.

Projects that are proposed and/or approved in the county proximate to agriculturally zoned lands are often required to provide notice to future residents, tenants, and users of the Right-to-Farm.

County of Santa Barbara Agricultural Advisory Committee

The County of Santa Barbara's Agricultural Advisory Committee (AAC) was established in 1995. The duty of the AAC is to provide advice to the Board of Supervisors, Planning Commission, and other County departments on matters related to agriculture. The AAC may review matters that have agricultural resource issues (i.e., land use, economics, pesticides, legislation, water, regulatory issues, property rights, and agricultural practices) or may affect agricultural resources including but not limited to policy and ordinance changes, departmental projects or programs, annexation requests by cities, other agency programs, and specific projects that have broad implications to agriculture. The AAC is advisory in nature and has no authority to approve, deny, or require modifications to any matter or project under the committee's consideration. The AAC consists of 12 members and represents the interests of the Board of Supervisors; the Santa Barbara County Flower and Nursery Center Association; the Central Coast Wine Growers Association; the Santa Barbara County Farm Bureau; the Grower-Shipper Vegetable Association; the Santa Barbara County Cattlemen's Association; the California Strawberry Commission/Santa Barbara County Strawberry Growers; and California Women for Agriculture (AAC 2022).

County of Santa Barbara Land Use and Development Code

The LUDC constitutes a portion of Chapter 35 of the Santa Barbara County Code. The LUDC conducts the policies of the County's Comprehensive Plan and Local Coastal Program by classifying and regulating the uses of land and structures within the County. The LUDC is adopted to protect and promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents and businesses in the County (Section 35.10.010 – Purpose of LUDC).

Section 35.21.030 lists allowable land uses on agriculturally zoned lands. Development within agricultural zones should be designed, constructed, and established in compliance with the requirements in Section 35.21.050 of the LUDC and all applicable standards in Article 35.3 through Article 35.7 of the LUDC.

Agricultural Buffer Ordinance

Agricultural buffer regulations (Section 35.30.025 of the LUDC and Section 35-144O of the Article II CZO, adopted in 2013 and 2015 respectively) implement Comprehensive Plan policies by establishing development standards between agricultural uses and new non-agricultural development and uses. Buffers are used to minimize potential conflicts between agricultural and adjacent land uses that result from noise, dust, light, and odor incidental to normal agricultural operations, as well as potential conflicts originating from residential and other non-agricultural uses such as domestic pets, insect pests, and invasive weeds. This ordinance applies to inland and coastal areas of the county when there is a discretionary application for non-agricultural development which: 1) is located within an Urban or Inner Rural Area, on an Existing Developed Rural Neighborhood (EDRN), or located on property zoned industrial that is located in the Rural Areas; and 2) is a project site located immediately adjacent to agriculturally zoned land that is located in a Rural Area. The ordinance does not apply to agriculture in the Urban Area. The agricultural buffer width can range from 100 to 400 feet, depending on the type of agriculture and proposed non-agricultural use or development. The buffer is required to be located on the lot that contains the non-agricultural project, adjacent to the common lot line between the project site and the adjacent agricultural lot.

Carpinteria Agricultural Overlay District, County Code Section 35-102F.2

The Carpinteria Agricultural Overlay District identifies areas where future development of greenhouses shall be regulated in accordance with this overlay district to control the extent and proliferation of greenhouses in the area. The provisions of this overlay district that apply to greenhouses shall also apply to shade structures and hoop structures unless expressly stated otherwise. The provisions of this overlay district apply to AG-I-zoned lands in the Coastal Zone of the Carpinteria Valley.

3.2.4 ENVIRONMENTAL IMPACT ANALYSIS

This section discusses the potential agricultural resource impacts associated with the Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed, and the residual impact after mitigation is determined.

3.2.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purposes of this Program EIR, implementation of the proposed Project may have a significant adverse impact relating to agricultural resources if it would:

a. Convert prime farmland, unique farmland, or farmland of statewide importance to non-agricultural use.

b. Conflict with existing zoning for agricultural use, or a Williamson Act contract.

c. Involve other changes in the existing environment which, due to their location or nature, could result in the conversion of farmland to non-agricultural use.

County of Santa Barbara Environmental Thresholds and Guidelines

The County Agricultural Resource Guidelines that are set forth in the County's *Environmental Thresholds and Guidelines Manual* (2024c) supplement Appendix G of the CEQA Guidelines at the local level.

As described in the County's Environmental Thresholds and Guidelines Manual, the County Initial Study form contains two questions pertaining to impacts on agricultural resources. The first is as follows:

> *10.d. Will the proposal result in the conversion of prime agricultural land to nonagricultural use, impairment of agricultural land productivity (whether prime or nonprime), or conflict with agricultural preserve programs?*

The following weighting system is provided to perform a preliminary screening of a project's agricultural impacts during the initial study process. The initial study screening assesses the value of a site's agricultural suitability and productivity to determine whether the project's impact on the loss or impairment of agricultural resources would be potentially significant. These are guidelines to be used flexibly in application to specific sites, taking into account specific circumstances and agricultural uses. The weighted point system is utilized to assign relative values to particular characteristics of a site's agricultural productivity (e.g., soil type, water supply). Where the points from the following formula total 60 or more, the following types of projects will be considered to have a potentially significant impact:

- A division of land (including Parcel and Final Maps) which is currently considered viable but would result in parcels which would not be considered viable using the weighting system.
- A Development Plan, Conditional Use Permit, or other discretionary act which would result in the conversion from agricultural use of a parcel qualifying as viable using the weighting system.
- Discretionary projects which may result in substantial disruption of surrounding agricultural operations.

If a potentially significant impact is identified using these criteria, a detailed, site-specific evaluation of agricultural impacts is completed in an EIR. This analysis should focus upon the factors and criteria, but not the points, in the weighting system of these guidelines, and any other relevant factors such as the history of agricultural use on the site, land use trends, etc. Final determination of the project's level of impact will be based on this analysis.

A second question on agricultural land resources is included in the County's Initial Study under Land Use:

3. *Will the proposal result in any effect [potentially significant adverse effect] upon any unique or other farmland of State or Local Importance?*

The State Important Farmlands Map is used in answering this question. The map is also considered in applying points under the "Agricultural Suitability" category.

Methodology

As described in Chapter 2, *Project Description*, the Project would facilitate the development of parks, recreational facilities, and trail projects within the county. The Project includes planned capital improvements for public parks, recreation, and trails projects and amendments to the County's policies and regulations to support the long-term development of recreation facilities, including Recreation Benefit Projects, to meet recreation needs within five recreation planning regions. This programmatic analysis reviews whether the potential changes would directly or indirectly affect agricultural resources in the Project area. The impact analysis considers the potential for projects enabled by the Project to occur on agricultural properties or adversely affect agricultural resources. Wherever possible, illustrative examples are provided to describe particular areas of the county (e.g., agricultural zoned properties) where the Project could cause agricultural impacts.

The following analysis discloses and addresses the programmatic impacts related to the Project's potential to directly or indirectly affect agricultural resources within county unincorporated areas, particularly within areas mapped as Prime Farmland or Other Important Farmland, including Farmland of Statewide Importance, Unique Farmland, and Farmland of Local Importance. Additionally, this analysis addresses the potential for direct conversion of

agricultural lands, the potential for conflicts with agricultural operations, and the loss of agricultural viability. The impact analysis also assesses consistency with agricultural zoning, agricultural policies, and Williamson Act contracts, which are guided by the County's *Uniform Rules for Agricultural Preserves and Farmland Security Zones*. (Land use and policy consistency issues are also addressed in Section 3.10, *Land Use and Planning*.) While the analysis considers the County's scoring system to determine the agricultural viability of areas potentially affected by the Project, as a programmatic analysis, a site-specific calculation is not feasible. Instead, wherever possible, examples of potential recreation projects are identified to illustrate programmatic impacts associated with the Project.

As described in Section 3.0.4, *Impact Assessment Methodology*, to determine whether a potentially significant impact could occur as a result of the Project, the analysis considers the potential construction and operations of the Project components using reasonable worst-case assumptions, including:

1. The public park, recreation, and trail projects planned by County Parks, as described in Section.2.5.1, *Planned County Parks, Recreation, and Trails Projects*. The analysis assumes a maximum disturbance area of up to 50 acres as the most impactful planned park and recreation facilities.
2. The proposed amendments to the Comprehensive Plan and zoning ordinances that could enable the development of planned parks, trails, and recreational facilities. The analysis assumes that the amendments, including the updated Public and Private Parks/Recreation Facility Overlay and the Recreation Benefit Project Program, could enable the following concepts as the most impactful potential development scenarios under the proposed Project's development standards:
    a. A maximum 160-site campground/RV park on a minimum 20-acre site
    b. A maximum 120-room country inn on a minimum 5-acre site
    c. A maximum 2,000-seat outdoor amphitheater

The information and analysis presented in this section are based on available long-range planning documents, EIRs, and related technical studies that apply to the Project area. Key resources and data used in the preparation of this section include the Agricultural Element and the Land Use Element of the County's Comprehensive Plan, the County's Agricultural Enterprise Ordinance (AEO), relevant community plans (e.g., Eastern Goleta Valley Community Plan), Santa Barbara County Code, U.S. Natural Resources Conservation Service (NRCS) Soil Survey Maps, FMMP maps, and County GIS data.

3.2.4.2 Project Impacts

Table 3.2-4 provides a summary of the proposed Project's impacts related to agricultural resources. A detailed discussion of each impact follows.

Table 3.2-4. Summary of Agricultural Resources Impacts

Agricultural Resources Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact AG-1. The Project would potentially convert Prime Farmland, Unique Farmland, Farmland of Local Importance, and Farmland of Statewide Importance to non-agricultural uses.	Potentially significant	No mitigation is feasible.	Significant and unavoidable
Impact AG-2. The Project would potentially convert existing agriculturally zoned lands to non-agricultural uses, impair agricultural productivity, and potentially conflict with existing zoning, but would not conflict with Williamson Act contracts or the County's agricultural preserve programs.	Potentially significant	No mitigation is feasible.	Significant and unavoidable
Cumulative Impacts	Potentially significant	No mitigation is feasible.	Significant and unavoidable

Impact AG-1. The Project would potentially convert Prime Farmland, Unique Farmland, Farmland of Local Importance, and Farmland of Statewide Importance to non-agricultural use.

As described in Section 3.2.2.3, *Farmland Mapping and Monitoring Program*, the county includes approximately 704,310 acres of FMMP lands throughout the unincorporated area, including 67,806 acres of Prime Farmland, 37,699 acres of Unique Farmland, 13,647 acres of Farmland of Statewide Importance, and 8,346 acres of Farmland of Local Importance. The Project would facilitate new park, recreation, and trail projects that would entail new facilities or the expansion of existing facilities that may require the conversion of agricultural lands to non-agricultural uses. As described below, the impact on agricultural resources would vary depending on the location and type of project and improvements. However, the severity and/or permanence of agricultural conversion would vary on a project-by-project basis. Depending on the location, design, and scope of the project, certain projects would have the potential to preserve soil viability for future agricultural operations. For example, neighborhood parks, trails, and open space projects that consist of natural landscapes and minimal building foundations preserve the soil integrity for potential future agricultural uses. In contrast, sports

complex projects, such as those with structural recreational facilities, parking, and requiring substantial earthwork, would likely result in the permanent conversion of agriculturally zoned lands. Project construction would likely involve the excavation of topsoil, loss of organic matter, and soil compaction/stabilization. Similarly, Project operations may impair agricultural viability through soil compaction from foot traffic or soil degradation from certain material uses, such as artificial turf that could leach microplastics into the soil, hinder soil microbe processes, and alter drainage patterns.

To help meet recreation needs in Santa Barbara County, the Project includes planned public parks, recreation, and trail projects that would develop new facilities or expand existing facilities in unincorporated areas in the county. The potential for the Project to directly impact agricultural land is extremely low because the proposed County parks projects (listed in Section 2.5.1) do not overlap or otherwise interact with agricultural resources. However, as described in Chapter 2, *Project Description*, the Project plans for two community parks that would convert agricultural land into recreational facilities. The proposed South Coast Aquatic Center and Goleta Community Sports Park would discontinue row crops and develop approximately 50 acres of Farmland of State Importance into a new regional aquatic center and multi-purpose sports complex with public recreation facilities. Similarly, the planned Guadalupe Community Park and Campground project would convert 15 to 40 acres of inactive agricultural land, comprising both Prime Farmland and Unique Farmland, to a community park providing sports fields and courts, as well as a new campground with campsites and other visitor-serving amenities. Both community parks are located immediately adjacent to existing urban development and neighborhoods. Guadalupe Community Park and Campground would expand recreation facilities within Leroy Park to the north and west and would lie immediately adjacent to the City of Guadalupe's northwestern boundary. Goleta Community Sports Park and the South Coast Aquatic Center would be surrounded by existing and planned residential development to the west and east, by existing light industrial uses to the north and northwest, and the Obern Multi-Use Pathway and Southern California Edison's La Goleta Natural Gas Field to the south. These projects have the potential to convert up to 65 to 90 acres of farmland to public recreational uses. Additionally, the Recreation Master Plan recognizes and could enable the Lompoc Riverbend Sports Complex Concept Plan, which would convert up to 42 acres of Prime Farmland.

Additionally, the construction and operation of trails has the potential to traverse agricultural land, though the potential for agricultural conversion is nominal. For example, the Project plans for a roadside trail along Glenn Annie Road to connect Goleta with the Los Padres National Forest. While this trail would traverse Prime Farmland and Unique Farmland, the roadside alignment of the trail would avoid any disturbance of agricultural resources. Similarly, the planned Drum Canyon Trail from Los Alamos would follow an existing road to avoid impacts to adjacent Unique Farmland along some segments. Additionally, future trails planned by the

Project could traverse Grazing Land, including along the foothills of the Santa Ynez Mountains in the South Coast, in the Orcutt Foothills, in Mission Hills, and rural areas outside of Lompoc, and surrounding Lake Cachuma. While trails in Grazing Land would not result in a significant impact on farmland, trail construction and use could be disruptive to grazing operations and animals, particularly related to trail noise and other disturbances. However, the proposed trail development standards under the Project would ensure that trails are sited to avoid adverse impacts to grazing operations. Under the Project, trails may not impair agricultural viability or fragment agricultural fields. Trails must be outside a 200-foot buffer from active agriculture on adjacent properties, with a 1,000-foot buffer in the Limited Agricultural Enterprise Overlay unless the trail lies within the Public or Private Park/Recreational Facility Overlay. Trail projects that cannot achieve this standard would not be permitted under a land use permit or zoning clearance under the Project. Therefore, conversion of agricultural lands due to trail construction and use would not occur under the Project.

The Project would also amend the County's zoning ordinances to establish land use regulations for parks, trails, and Recreation Benefit Projects (RBP) and all related developments on unincorporated agricultural lands. Uses enabled by the Project only for eligible RBPs could include overnight accommodation with small-scale campgrounds or country inns, small trailside cafes, outdoor amphitheaters, and other non-agricultural uses. These additional uses would only be possible on sites where public recreation is needed per the Recreation Master Plan and subject to eligibility verification by County Parks, which substantially limits the opportunity for development of these uses. These proposed uses and related development would be required to be located within existing disturbed areas to the extent feasible, maintain a minimum of 200-foot setbacks from productive agriculture on adjacent properties, and shall not impair agricultural viability on productive agricultural lands adjacent to the development site. Therefore, conversion of agricultural lands due to private development of parks, trails, and RBPs would be limited; however, it is foreseeable that RBPs could result in limited conversion of farmland to non-agricultural uses related to development of proposed public recreation uses such as sports fields and recreation facilities, as well as private campgrounds, country inns, trailside cafes, amphitheaters, and other structural development. Additionally, future development on Williamson Act contracted lands would be required to comply with the Uniform Rules, with review by APAC to ensure that agricultural productivity is not significantly compromised. Such a review would substantially reduce the potential for impacts from future projects subject to permits, as a substantial majority of the County's agricultural lands are enrolled in Williamson Act contracts.

The Project's proposed zoning ordinance amendments promote agricultural viability on future parks and trails projects and encourage the siting of development within previously disturbed areas to the maximum extent feasible. This provision would ensure impacts to agricultural resources are largely avoided countywide. Even so, the Project would potentially result in the

conversion of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance to non-agricultural uses in the Goleta, Guadalupe, and Lompoc areas. Therefore, the impact on agricultural resources is considered potentially significant. The loss of between 107 and 132 acres of agricultural land with and directly adjacent to designated urban areas represents a nominal portion of agricultural resources in the County. Further, only the planned location for Goleta Community Sports Park and the South Coast Aquatic Center and Lompoc Riverbend Sports Complex are currently cultivated with row crops.

The Project would result in the conversion of Prime Farmland, Unique Farmland, and Farmland of Statewide Importance to outdoor recreational uses. This could occur from the development of County Parks projects, as well as private proposals for parks, trails, and RBPs on agricultural land, resulting in the loss of farmland. Mitigating the direct loss of agriculture typically involves offsetting the loss with conservation of agricultural land off-site. However, given the location of these three planned parks within urbanized areas, and the uncertainty of mitigation options for future RBPs that have impacts to agriculture, there are no suitable sites to preserve that would match the existing conditions. It is also impossible to foresee the amount or location of farmland lost to future recreation development projects or RBPs and whether mitigation would be sufficient to offset the potential loss. Therefore, impacts would be *significant and unavoidable.*

Impact AG-2. The Project would potentially convert existing agriculturally zoned lands to non-agricultural uses, impair agricultural productivity, and potentially conflict with existing zoning, but would not conflict with Williamson Act contracts or the County's agricultural preserve programs.

As described in Impact AG-1, the Project would facilitate new park, recreation, and trail projects that would entail new facilities or the expansion of existing facilities that may require the conversion of agricultural lands to non-agricultural uses. As a result, the Project would involve the direct and indirect conversion of agriculturally zoned lands to recreational uses.

The potential for the Project to directly convert agriculturally zoned land to non-agricultural uses is extremely low because most of the proposed County parks projects (listed in Section 2.5.1) do not overlap or otherwise interact with agricultural resources, including parks and trails. However, as described in Chapter 2, *Project Description*, the Project plans for two community parks that would convert land zoned for agriculture to recreation uses. The proposed South Coast Aquatic Center and Goleta Community Sports Park would convert approximately 50 acres of land zoned AG-I-10 in the designated Urban Area and Coastal Zone to recreation uses. Similarly, the planned Guadalupe Community Park and Campground project would convert 15 to 40 acres of land zoned AG-I-10 in the Urban Area and AG-II-40 in the designated Rural Area to recreation uses. Both community parks are located immediately adjacent to existing urban development and neighborhoods. Guadalupe Community Park and Campground would expand recreation facilities within Leroy Park to the north and west and

would lie immediately adjacent to the City of Guadalupe's northwestern boundary. Goleta Community Sports Park and the South Coast Aquatic Center would be surrounded by existing and planned residential development to the west and east, by existing light industrial uses to the north and northwest, and the Obern Multi-Use Pathway and Southern California Edison's La Goleta Natural Gas Field to the south. These projects have the potential to convert up to 65 to 90 acres of agriculturally zoned land to public recreational uses, which would be potentially significant.

Currently, public parks and trails are not permitted uses in AG-I and AG-II zones and require discretionary approvals if proposed by private applicants. The Project would amend the County's zoning ordinances to permit public parks and trails in both AG-I and AG-II zoning districts, subject to rigorous development standards to avoid and minimize impacts on agricultural resources and ensure consistency with all provisions of the base zoning district. Further, the Project amends the existing Public or Private Park/Recreation Facility Overlay in the Land Use Element of the Comprehensive Plan to support conversion of the agricultural land to recreational uses for Goleta Community Sports Park/South Coast Aquatic Center (APN 071-190-004), Guadalupe Community Park and Campground (APNs 115-020-036 and 115-020-005), and Lompoc Riverbend Sports Complex Concept Plan (APN 093-051-010). As amended, the Project would foster the development of public parks, trails, and recreation facilities such as campgrounds, pools, community centers, sports and outdoor recreation facilities, and outdoor education and community gathering spaces, which would support the Project's planned facilities to meet local recreation needs. The conversion of these agricultural lands to recreation uses would impair agricultural productivity and potentially conflict with existing zoning.

These planned community parks and trails would be implemented consistent with the County's Comprehensive Plan and Coastal Land Use Plan. For example, the planned Goleta Community Sports Park and South Coast Aquatic Center would expand public coastal recreation, a key resource under the Coastal Act, while only converting urban agricultural land consistent with conversion policies of the County Coastal Land Use Plan, which allow conversion when agricultural viability is already severely impaired by conflicts with urban uses. This conversion would also be consistent with the Eastern Goleta Valley Community Plan, which prioritizes land uses for the community's social, economic, and cultural well-being, and health and safety, such as public parks, open spaces, trails, habitat protection or restoration, and/or community gardens. The planned location of Goleta Community Sports Park and the South Coast Aquatic Center contains productive agriculture but is surrounded by existing and planned urban development, as enabled by the County's 6th Cycle Housing Element Update and State housing law, leaving only an isolated 50-acre parcel of row crops that was determined not to be viable agriculture in the long-term by the Program EIR for the 6th Cycle Housing Element Update. In the context of the former South Patterson Agricultural Area, the Housing Element Update

rezoned or enabled the development of all agricultural properties in the Inland Area of Eastern Goleta Valley. The Housing Element Update's Program EIR analyzed the impacts of rezoning these sites from agricultural to residential uses and concluded that such rezoning would facilitate the urbanization of the remaining urban agricultural land, given that the rezoning would interrupt contiguous farmland, limit access, and surround the areas with incompatible urban uses. The Housing Element Update also concluded that the planned housing sites would substantially reduce, or possibly eliminate, the viability of the remaining agricultural lands, including the site planned for Goleta Community Sports Park and the South Coast Aquatic Center. Therefore, subsequent projects, such as the South Coast Aquatic Center and Goleta Community Sports Park projects, would be considered to have a substantially reduced impact related to agricultural conversion. Further, conversion of this remaining AG-I-10 area into public recreation uses would ensure future housing development is served adequately by public recreation land, consistent with the County's Comprehensive Plan and zoning ordinances, as amended by the Project. In another example, the planned site for the Guadalupe Community Park and Campground is currently fallowed and not agriculturally productive. While the recreation development would impair future agricultural productivity and potentially conflict with existing zoning, conversion of the AG-I-10 and/or AG-II-40 zoned parcels to recreational uses would not substantially result in a loss of existing agricultural productivity currently onsite. Lastly, the Lompoc Riverbend Sports Complex Concept Plan would convert land zoned AG-II-40 to recreation use, resulting in a loss of existing agricultural productivity and a potential conflict with zoning.

The Project would also amend the County's zoning ordinances to establish land use regulations for parks, trails, and RBPs and all related developments on unincorporated AG-I and AG-II lands. Uses enabled by the Project only for eligible RBPs could include overnight accommodation with small-scale campgrounds or inns, small cafes, outdoor amphitheaters, and other non-agricultural uses. These proposed non-agricultural uses and related development would only be permitted as part of eligible RBPs. All projects would be subject to zoning code requirements, including locating within existing disturbed areas to the extent feasible. Trail and park development would require a minimum 200-foot buffer from adjacent productive agriculture. The proposed amendments also require development to be sited within previously disturbed areas to the maximum extent feasible. However, even with robust development standards for parks, trails, recreation facilities, and RBPs, the Project could result in development on agriculturally zoned land, conversion of agricultural land, impairment of agricultural productivity, and conflicts with existing agricultural zoning standards, which currently do not allow recreational development.

Lastly, the Project may adversely affect agricultural resources but would not conflict with Williamson Act contracts or the County's agricultural preserve programs. Based on the list of contract lands from the Santa Barbara County 2024 Agricultural Preserve Contract List, the

Project does not propose a County Park project on an active Williamson Act Contract. Future private development of parks, trails, and RBPs on Williamson Act contracted lands would be required to comply with the Uniform Rules, with review by APAC to ensure that agricultural productivity is not significantly compromised and that the projects comply with all development standards for recreational uses. Such a review would substantially reduce the potential for impacts from future projects subject to permits, as a substantial majority of the County's agricultural lands are enrolled in Williamson Act contracts. County decision-makers, in partnership with the APAC, would review the individual permit application on a case-by-case basis, evaluating the scope, scale, and necessary permit approvals needed. Adherence to these policies and regulations would reduce any adverse effects related to conflicts with agricultural preserve programs.

The Project would include the conversion of existing agriculturally zoned land to support two community parks and a potential sports complex concept plan. The proposed amendments to the County's zoning ordinances with development standards for parks, trails, recreation facilities, and RBPs would help ensure agricultural productivity is not impaired and that future development under the Project is consistent with the County's zoning ordinances, as amended. However, it is foreseeable that conversion of agriculturally zoned land to recreation uses would adversely affect agricultural productivity. There are no mitigation measures that would reasonably avoid or minimize these impacts as conversion of agriculturally zoned land would be required to support aspects of the proposed Project. Therefore, the Project is inconsistent with current zoning and could cause a substantial loss of agricultural productivity for three planned sites for public recreation projects, and this impact is *significant and unavoidable*.

3.2.4.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis*, the cumulative setting for the Project involves a variety of policies and initiatives in the county, as well as development projects in the unincorporated county and surrounding incorporated cities. The Project's direct and indirect impacts, along with potential impacts from pending and current planning or development projects, inform the cumulative impacts analysis. As such, this includes parks and trail projects within incorporated cities, state parks, and federal properties; master plan projects, such as those under the Active Transportation Plan and the California Coastal Trail Plan; programmatic plan projects, such as those under general plans, the County's Housing Element Update, and the County's Agricultural Enterprise Ordinance (AEO); and the County Planning & Development's cumulative project list.

As described in Impact AG-1 and Impact AG-2, the Project would potentially involve the direct and indirect conversion of agricultural land, including FMMP lands and agriculturally zoned lands. Similarly, the cumulative projects would involve construction and operational activities that also contribute to decreased farmland viability and loss of agricultural resources (e.g.,

incompatible urban uses, loss of topsoil and organic matter, soil degradation). While certain cumulative projects, such as the Housing Element Update, may account for a significant portion of impacts on the agricultural resources, the Project also has the potential to exacerbate these impacts and substantially contribute to additional loss of agricultural land. Therefore, the Project's cumulative impacts on agricultural resources are considered *significant and unavoidable.*

3.2.4.4 Proposed Mitigation

No mitigation measures are feasible to reduce impacts.

3.2.4.5 Secondary Impacts

No mitigation measures are proposed to reduce impacts associated with the proposed Project. Therefore, no direct secondary impacts would occur.

3.2.4.6 Residual Impacts

Impact AG-1. The Project would potentially convert sites that are existing agricultural lands that are designated Prime Farmland, Unique Farmland, and Farmland of Statewide Importance, and sites that are designated prime agricultural lands to non-agricultural uses. Given that there is nowhere in the County that can regain the agricultural acreage lost to planned community parks and potential parks, trails, recreation facilities, and RBPs, direct impacts from the loss of FMMP land would remain *significant and unavoidable*.

Impact AG-2. The Project would include the conversion of existing agriculturally zoned land to support two community parks and a planned sports complex. Other planned parks and trails projects and eligible RBPs would be permitted to avoid conversion of agricultural lands and/or zoning to the extent feasible, but it is reasonably foreseeable that non-agricultural land uses could impair agricultural productivity. Therefore, this impact is *significant and unavoidable*.

This page was intentionally left blank.

3.3 AIR QUALITY

3.3.1 INTRODUCTION

This section describes potential impacts related to air quality that could occur from implementation of the Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (Project). This section describes existing air quality conditions within the Project area, provides a topical overview of criteria air pollutants and their health impacts, and reviews applicable federal, state, and local plans, policies, and regulations pertaining to air pollutant emissions. This analysis addresses air pollutant emissions of sufficient nature and magnitude to cause significant impacts on the environment relative to public health and nuisance that could result from future parks, trails, and related development as a result of the Project. Issues relating to the generation of greenhouse gas (GHG) emissions and contribution to the global effects of climate change are discussed in Section 3.8, *Greenhouse Gas Emissions.*

3.3.2 ENVIRONMENTAL SETTING

The California Air Resources Board (CARB) has divided California into 15 regional air basins that correspond to topographic features that influence regional air quality conditions. Each basin is further divided into Air Pollution Control Districts (APCD), which are responsible for managing and enforcing air quality regulations within their districts.

The Project area includes the unincorporated area of Santa Barbara County, which is located in the South Central Coast Air Basin (SCCAB). The SCCAB comprises three air districts: San Luis Obispo County APCD, Santa Barbara County Air Pollution Control District (SBCAPCD), and Ventura County APCD. The Project area, which includes the five Recreation Planning Areas (Lompoc Valley, Santa Maria Valley, Santa Ynez Valley, Cuyama Valley, and South Coast), is within the jurisdiction of SBCAPCD.

3.3.2.1 Topography and Meteorology

The county's air quality is influenced by both local topography and meteorological conditions. Meteorological and topographical influences that affect air quality in the Project area include the semi-permanent high-pressure cell that lies off the Pacific Coast, which leads to limited rainfall (approximately 16 inches per year), warm dry summers, and relatively cold dry winters. Temperatures in the winter range from an average low of 33°F at night to an average high of 55 degrees Fahrenheit (°F) during the day. In the summertime, the daytime highs range in the 70s and 80s, with lows ranging in the 50s and 60s. Nighttime average minimum temperatures are 50°F to 55°F over most of the county (County of Santa Barbara 2021). Most of the total

annual precipitation in the county occurs during migratory storms. Precipitation occurs primarily in the winter, with 90 percent of the annual precipitation occurring between November and April. Annual precipitation averages are as low as six inches at some inland measuring stations, and as high as 30 inches in some areas of the coast. Summer months are generally quite dry, with thundershowers providing occasional rainfall. Large fluctuations in annual rainfall are common, which is typical for regions that receive small amounts of precipitation. Precipitation inland varies considerably as a function of distance from the coast, elevation, and topography (County of Santa Barbara 2021).

Temperature inversion conditions are common in the county and can affect the mixing and dispersion of pollutants. Temperature inversions result when cool, stable air lies below warmer air aloft. Inversions also tend to confine horizontal flow through passes and valleys that are below the inversion height. Surface temperature inversions (0 to 500 feet) are most frequent during the winter, and subsidence inversions (1,000 to 2,000 feet) are most frequent during the summer. Inversions increase temperature with height and are directly related to the stability of the atmosphere. Inversions act as a cap to the pollutants that are emitted below or within them, and ozone (O_3) concentrations are often higher directly below the base of elevated inversions than they are at the Earth's surface. For this reason, elevated monitoring sites will occasionally record higher O_3 concentrations than sites at lower elevations. Generally, the lower the inversion base height and the greater the rate of temperature increase from the base to the top, the more pronounced effect the inversion will have on inhibiting vertical dispersion.

Santa Ana winds are also a frequent occurrence in the county and are an important factor in air quality conditions. Santa Ana winds are northeasterly winds that occur primarily during fall and winter, but occasionally in spring. These are warm, dry winds that blow from the high inland desert and descend the slopes of a mountain range. Wind speeds associated with the Santa Ana winds are generally 15 to 20 miles per hour (mph), though wind speeds can sometimes exceed 60 mph. During Santa Ana conditions, air pollutants emitted within the county are moved out to sea. These pollutants can then be moved back onshore into the county in what is called a "post-Santa Ana condition."

Measurements of surface wind speed and direction are made at numerous airports and air quality monitoring stations throughout the county. The air quality monitoring stations that are equipped to measure wind speed and direction are described in Section 3.3.2.5, *Ambient Air Monitoring*. Poor air quality is usually associated with air stagnation (i.e., periods of high stability and restricted air movement). Therefore, it is reasonable to expect a higher frequency of air pollution events in the southern portion of the county where light winds and unique climactic conditions that affect air quality are more common (i.e., inversions, Santa Ana winds), as opposed to the northern part where the prevailing winds are usually strong and persistent.

3.3.2.2 Sensitive Receptors

Infants and children, the elderly, individuals with pre-existing health problems, those who are close to the emissions source, and those who are exposed to air pollutants for longer periods are considered more sensitive to air pollutants than others. Land uses such as primary and secondary schools, hospitals, and convalescent homes are considered to be relatively sensitive to poor air quality because children, seniors, and people with some health issues are more susceptible to respiratory infections and other air quality-related health problems than the general public. Residential land uses are considered sensitive to poor air quality because people in residential areas are often at home for extended periods and are therefore subject to extended exposure to the type of air quality present at the residence. Recreational land uses offer individuals a location to exercise and are therefore considered moderately sensitive to air pollution. Vigorous exercise places a high demand on the human respiratory function, and poor air quality could add potentially detrimental stresses to the respiratory function. Sensitive receptors in the Project area include parks, residences, hospitals, long-term care facilities, daycare centers (including public and private childcare centers, and worksites with onsite childcare facilities), and schools.

3.3.2.3 Common Air Pollutants

Air pollution emissions within the county are generated from several stationary, mobile, and natural sources – from large power plants and manufacturing facilities to residential water heaters and consumer products. Stationary sources can be divided into two major subcategories: 1) point sources, and 2) area sources. Point sources occur at an identified location and are usually associated with manufacturing and industry. Examples include boilers or combustion equipment that produce electricity or generate heat. Area sources are widely distributed and produce many small emissions in a region. Examples of area sources include residential and commercial water heaters, landscaping (e.g., lawnmowers), agricultural operations, landfills, and consumer products such as barbecue lighter fluid, hair spray, etc. Mobile sources are transportation-related emissions, including vehicles, aircraft, trains, and heavy construction equipment. Within the SCCAB, the primary source of emissions may vary depending on the pollutant.

The federal and state governments have identified criteria pollutants and a host of air toxics that have substantial adverse effects on human health and the environment in concentrations, and established air quality standards to control those concentrations through the Federal Clean Air Act (CAA) and the California Clean Air Act (CCAA). The criteria pollutants for which federal and state standards have been promulgated and which are most relevant to air quality planning and regulation in the SCCAB include ozone (O_3), carbon monoxide (CO), nitrogen dioxide (NO_2), inhalable particulate matter (PM_{10}), fine inhalable particulate matter ($PM_{2.5}$), reactive organic compounds (ROCs), volatile organic compounds (VOCs), sulfur dioxide (SO_2),

and lead (Pb). In addition, there are additional toxic air contaminants (TACs) that are of concern in the SCCAB (Section 3.3.2.4, *Toxic Air Contaminants*). The following is a general description of the physical and health effects of these governmentally regulated air pollutants.

Ozone (O_3). O_3 occurs in two layers of the atmosphere. The layer surrounding the Earth's surface is the troposphere. The troposphere extends approximately 10 miles above ground level, where it meets the second layer, the stratosphere. The stratospheric (i.e., the "good" O_3) layer extends upward from about 10 to 30 miles and protects life on Earth from the Sun's harmful ultraviolet rays (UV-B). "Bad" O_3 is a photochemical pollutant and is formed from complex chemical reactions involving VOCs, nitrogen oxides (NO_x), and sunlight; therefore, VOCs and NO_x are O_3 precursors. VOCs and NO_x are emitted from various sources throughout the county. Significant O_3 formation generally requires an adequate amount of precursors in the atmosphere and several hours in a stable atmosphere with strong sunlight. High O_3 concentrations can form over large regions when emissions from motor vehicles and stationary sources are carried hundreds of miles from their origins.

Many respiratory ailments, as well as cardiovascular disease, are aggravated by exposure to high ozone levels. O_3 also damages natural ecosystems (e.g., forests and foothill plant communities) and damages crops and some human-made materials (e.g., rubber, paint, and plastics). Societal costs from ozone damage include increased healthcare costs, the loss of human and animal life, accelerated replacement of industrial equipment, and reduced crop yields.

Within the SCCAB, the primary source of O_3 and O_3 precursor emissions comes from marine shipping (42 percent), followed by on-road and other mobile emissions (30 percent), area sources (14 percent), and stationary sources (14 percent) (SBCAPCD 2023b).

Carbon Monoxide (CO). CO is a colorless, odorless, relatively inert gas. It is a trace constituent in the unpolluted troposphere and is produced by both natural processes and human activities. In remote areas far from human habitation, CO occurs in the atmosphere at an average background concentration of 0.04 parts per million (ppm), primarily as a result of natural processes such as forest fires and the oxidation of methane. Global atmospheric mixing of CO from urban and industrial sources creates higher background concentrations (up to 0.20 ppm) near urban areas. The major source of CO in urban areas is the incomplete combustion of carbon-containing fuels, mainly gasoline.

Individuals with a deficient blood supply to the heart are the most susceptible to the adverse effects of CO exposure. The effects observed include earlier onset of chest pain with exercise and electrocardiograph changes indicative of worsening oxygen supply to the heart. Inhaled CO has no direct toxic effect on the lungs but exerts its effect on tissues by interfering with oxygen transport by competing with oxygen to combine with hemoglobin present in the blood to form carboxyhemoglobin. Hence, conditions with an increased demand for oxygen supply

can be adversely affected by exposure to CO. Individuals most at risk include patients with diseases involving the heart and blood vessels, fetuses (unborn babies), and patients with chronic hypoxemia (oxygen deficiency) as seen in high altitudes.

Within the SCCAB, the primary source of CO emissions comes from on-road and other mobile emissions (80 percent), area sources (11 percent), stationary sources (5 percent), and marine shipping (4 percent) (SBCAPCD 2023b).

Nitrogen Dioxide (NO_2). NO_x comprises a family of highly reactive gases that are a primary precursor to the formation of ground-level O_3 and react in the atmosphere to form acid rain. NO_2 (often reported as total nitrogen oxides, NO_x) is a reddish-brown gas that can cause breathing difficulties at high levels. It is formed from nitrogen (N_2) and oxygen (O_2) under conditions of high temperature and pressure, which are generally present during the combustion of fuels (e.g., motor vehicles); nitric oxide (NO) reacts rapidly with the oxygen in air to form NO_2. The two gases, NO and NO_2, are referred to collectively as NO_x. In the presence of sunlight, atmospheric NO_2 reacts and splits to form an NO molecule and an oxygen atom. The oxygen atom can react further to form O_3, via a complex series of chemical reactions involving hydrocarbons.

Population-based studies suggest that an increase in acute respiratory illness, including infections and respiratory symptoms in children (not infants), is associated with long-term exposures to NO_2 at levels found in homes with gas stoves. In healthy subjects, an increase in resistance to airflow and airway contraction is observed after short-term exposure to NO_2. Larger decreases in lung functions are observed in individuals with asthma and/or chronic obstructive pulmonary disease (e.g., chronic bronchitis, emphysema) than in healthy individuals, indicating a greater susceptibility of these sub-groups. More recent studies have found associations between NO_2 exposures and cardiopulmonary mortality, decreased lung function, respiratory symptoms, and emergency room asthma visits.

Within the SCCAB, the primary source of NO_x emissions comes from marine shipping (66 percent), on-road and other mobile emissions (26 percent), stationary sources (7 percent), and area sources (1 percent) (SBCAPCD 2023b).

Inhalable Particulate Matter (PM_{10}). PM_{10} refers to suspended particulate matter, which is smaller than 10 microns or 10 one-millionths of a meter. Major sources of PM_{10} include crushing or grinding operations; dust stirred up by vehicles traveling on roads; wood-burning stoves and fireplaces; dust from construction, landfills, and agriculture; wildfires and brush/waste burning; industrial sources; windblown dust from open lands; and atmospheric chemical and photochemical reactions. PM_{10} scatters light and significantly reduces visibility. In addition, these particulates penetrate the lungs and can potentially damage the respiratory tract.

Respirable particles (i.e., particles less than 10 microns in diameter, denoted as PM_{10}) can accumulate in the respiratory system and aggravate health problems such as asthma,

bronchitis, and other lung diseases. Children, the elderly, exercising adults, and those suffering from asthma are especially vulnerable to the adverse health effects of PM.

Within the SCCAB, the primary source of PM_{10} emissions comes from construction activities (38 percent), fugitive dust from roadways (27 percent), agricultural operations (12 percent), on-road and other mobile emissions (7 percent), residential fuel consumption (6 percent), marine shipping (3 percent), stationary sources (3 percent), and other sources (4 percent) (SBCAPCD 2023b).

Fine Inhalable Particulate Matter ($PM_{2.5}$). Due to recent increased concerns over health impacts related to fine particulate matter (i.e., particulate matter 2.5 microns in diameter or less), both Federal and State $PM_{2.5}$ standards have been created. Emissions of $PM_{2.5}$ result from fuel combustion (e.g., motor vehicles, power generation, and industrial facilities), residential fireplaces, and wood stoves. In addition, $PM_{2.5}$ can be formed in the atmosphere from gases such as sulfur dioxide (SO_2), NO_x, and VOCs.

Particulate matter primarily affects infants, children, the elderly, and those with pre-existing cardiopulmonary disease. A consistent correlation between $PM_{2.5}$ levels and an increase in mortality rates, respiratory infections, the number and severity of asthma attacks, and the number of hospital admissions has been observed in different parts of the U.S. and various areas around the world. Studies have reported an association between long-term exposure to air pollution dominated by $PM_{2.5}$ and increased mortality, reduced lifespan, and increased risk of lung cancer.

Daily fluctuations in $PM_{2.5}$ concentration levels have also been related to hospital admissions for acute respiratory conditions, school and kindergarten absences, a decrease in respiratory function in normal children, and increased medication use in children and adults with asthma. Studies have also shown that lung function growth in children is reduced with long-term exposure to PM. In addition to children, the elderly and people with pre-existing respiratory and/or cardiovascular disease appear to be more susceptible to the effects of PM_{10} and $PM_{2.5}$.

Within the SCCAB, the primary source of $PM_{2.5}$ emissions comes from residential fuel consumption (21 percent), on-road and other mobile emissions (17 percent), construction activities (14 percent), fugitive dust from roadways (12 percent), marine shipping (9 percent), agricultural operations (7 percent), stationary sources (6 percent), and other sources (14 percent) (SBCAPCD 2023b).

Reactive Organic Compounds (ROCs) and Volatile Organic Compounds (VOCs). ROCs and VOCs are organic gases that are formed solely of hydrogen and carbon. ROCs and VOCs are emitted from the incomplete combustion of hydrocarbons or other carbon-based fuels. The major sources of hydrocarbons are combustion engine exhaust, oil refineries, and oil-fueled power plants; other common sources are petroleum fuels, solvents, dry cleaning solutions, and paint (via evaporation). These gases contribute to the formation of tropospheric ozone and

smog and can cause adverse health effects in high concentrations, particularly indoors. These include eye, nose, and throat irritation, headaches, loss of coordination, nausea, and even severe damage to the liver, kidneys, and central nervous system.

Sulfur Dioxide (SO_2). SO_2 is a colorless gas with a sharp odor. It reacts in air to form sulfuric acid, which contributes to acid precipitation, and sulfates, which are components of particulate matter. The main sources of SO_2 include coal and oil used in power plants and industries. Exposure for a few minutes to low levels of SO_2 can result in airway constriction in some asthmatics. All asthmatics are sensitive to the effects of SO_2. In asthmatics, an increase in resistance to airflow, as well as a reduction in breathing capacity leading to severe breathing difficulties, is observed after acute higher exposure to SO_2. In contrast, healthy individuals do not exhibit similar acute responses, even after exposure to higher concentrations of SO_2.

Within the SCCAB, the primary source of SO_2 emissions comes from marine shipping (74 percent), stationary sources (16 percent), on-road and other mobile emissions (7 percent), and area sources (3 percent) (SBCAPCD 2023b).

Lead (Pb). Pb in the atmosphere is present as a mixture of several lead compounds. Leaded gasoline and lead smelters have been the main sources of lead emitted into the air. Due to the phasing out of leaded gasoline, there has been a dramatic reduction in atmospheric Pb over the past three decades. Exposure to low levels of Pb can adversely affect the development and function of the central nervous system, leading to learning disorders, distractibility, inability to follow simple commands, and lower intelligence quotient. Fetuses, infants, and children are more sensitive than others to the adverse effects of Pb exposure. In adults, increased Pb levels are associated with increased blood pressure. Pb poisoning can cause anemia, lethargy, seizures, and death. There is no evidence to suggest that there are direct effects of Pb on the respiratory system.

3.3.2.4 Toxic Air Contaminants

Toxic air contaminants (TACs) are defined in Section 39655 of the California Health and Safety Code as air pollutants that may cause or contribute to an increase in mortality or an increase in serious illness or may pose a present or potential hazard to human health. In addition, substances that have been listed as federal hazardous air pollutants (HAPs) pursuant to Section 7412 of Title 42 of the U.S. Code are TACs under the air toxics program pursuant to Section 39657(b) of the California Health and Safety Code. Health impacts include an increased risk of cancer due to continual inhalation of TACs. Most of the estimated health risks from TACs can be attributed to relatively few compounds, the most important being particulate matter from diesel-fueled engines (i.e., diesel particulate matter [DPM]). Based on estimated ambient statewide DPM levels in 2012, DPM is believed to be responsible for approximately 70 percent of California's estimated known cancer risk attributable to TACs. According to CARB, DPM

exposure contributes to numerous health impacts, including increased hospital admissions for heart disease, respiratory failure, and premature death (CARB 2023b). Studies have also shown that approximately 22 percent of known cancer risk is due to other TACs associated with mobile sources – including benzene, butadiene, and formaldehyde – and approximately 10 percent of the risk is attributed to stationary sources (including industries and other certain businesses, such as dry cleaners and chrome plating operations) (South Coast Air Quality Management District [SCAQMD] 2015).

CARB indicates that one of the highest public health priorities is the reduction of DPM generated by vehicles on California's freeways and highways, as it is one of the primary TACs with the most direct and common implications for respiratory health problems. Per CARB criteria, heavily traveled roadways where annual average daily trips (AADT) exceed 100,000 can be sources of particulate emissions, particularly from diesel-fueled engines such as those associated with heavy haul trucks and other heavy construction equipment. CARB's Air Quality and Land Use Handbook: A Community Health Perspective (2005) makes specific recommendations to consider existing sensitive uses when locating new TAC-emitting facilities or consider TAC-emitting sources when siting sensitive receptors. CARB recommends that the following buffer distances be observed when locating these types of TAC emitters or sensitive land uses:

- Freeways or major roadways – 500 feet
- Dry cleaners – 500 feet
- Auto body repair services – 500 feet
- Gasoline dispensing stations with an annual throughput of less than 3.6 million gallons – 50 feet; gasoline dispensing stations with an annual throughput at or above 3.6 million gallons – 300 feet; and
- Gasoline dispensing stations with an annual throughput at or above 3.6 million gallons – 300 feet.

In Santa Barbara County, U.S. Highway 101 is the only roadway considered a "high-volume roadway," defined as a roadway that has average daily traffic above 100,000 vehicles in an urban area or 50,000 vehicles in a rural area (SBCAPCD 2017). In 2023, based on the California Department of Transportation (Caltrans) Traffic Census Program data, U.S. Highway 101 in unincorporated areas carried more than 120,000 AADT at its intersection with State Route (SR) 154 and El Sueno Road in the Eastern Goleta Valley on the South Coast (Caltrans 2025).

3.3.2.5 Ambient Air Monitoring

The SBCAPCD is responsible for monitoring air quality in Santa Barbara County within SCCAB to determine whether pollutant concentrations meet federal and state air quality standards. The SBCAPCD has 12 air monitoring stations in the county. Monitoring stations measure several

different variables, including wind direction, wind speed, outdoor temperature, relative humidity, barometric pressure, solar radiation total hydrocarbons, O_3, NO_x, CO, SO_2, hydrogen sulfide (H_2S), $PM_{2.5}$, and PM_{10}. The stations are categorized as Industrial Monitoring Stations (IMS) and State and Local Air Monitoring Stations (SLAMS). IMS stations are used to determine baseline air quality and the impacts of specific operations. A SLAMS measures urban and regional air quality. Table 3.3-1 identifies and describes the monitoring stations found in the county. Figure 3.3-1 shows the locations of air quality monitoring stations throughout the county (SBCAPCD 2024a).

Figure 3.3-1. Air Quality Monitoring Station Locations

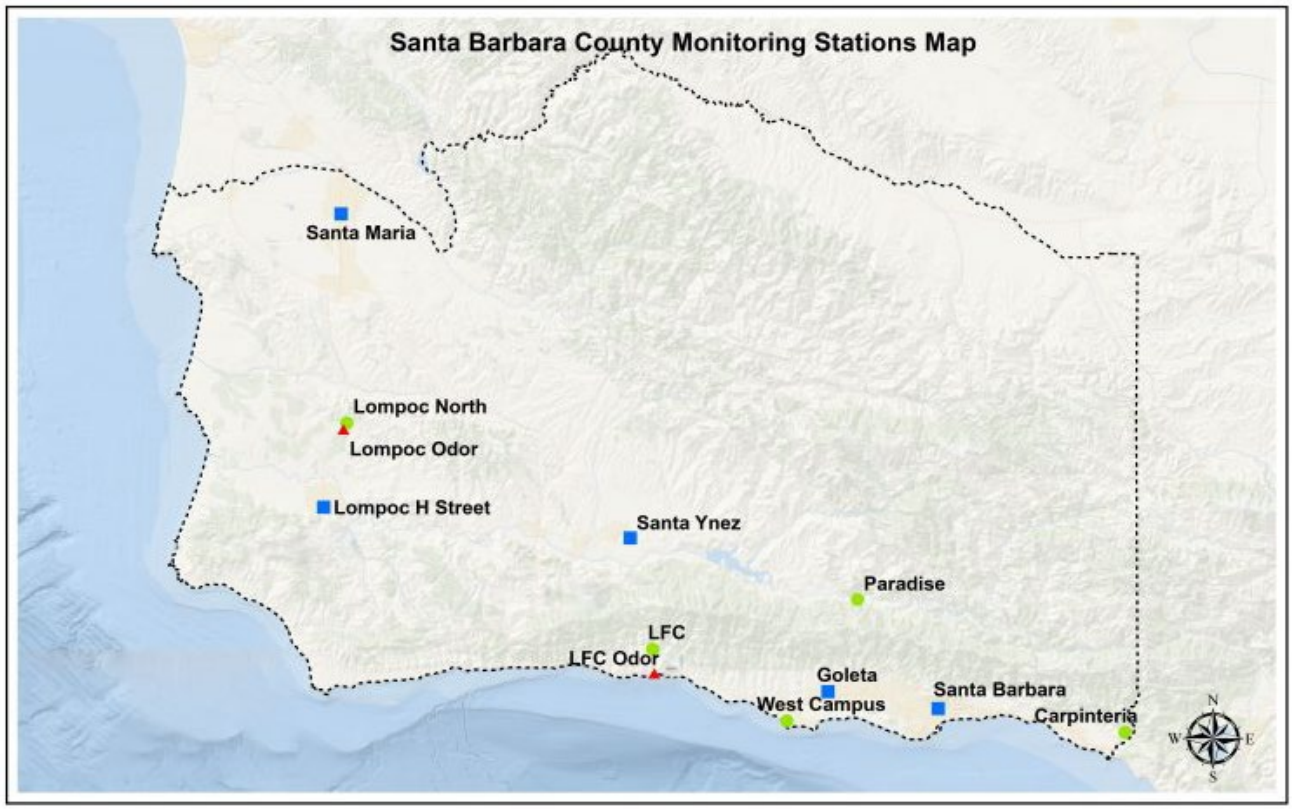


Table 3.3-1. Santa Barbara County Air Quality Monitoring Stations

	Station Names	Type	Monitoring
1	Carpinteria	Industrial/ SLAMS[1]	O_3, NO_2, Wind Speed, Wind Direction, Ambient Temperature
2	Goleta	SLAMS	O_3, PM_{10}, $PM_{2.5}$, Wind Speed, Wind Direction, Ambient Temperature
3	Las Flores Canyon	Industrial/ SLAMS[1]	O_3, NO_2, SO_2, CO, Total Hydrocarbons, PM_{10}, Wind Speed, Wind Direction, Ambient Temperature
4	Las Flores Canyon Odor	Industrial	H_2S, Wind Speed, Wind Direction, Ambient Temperature
5	Lompoc – H Street	SLAMS	O_3, NO_2, SO_2, CO, PM_{10}, $PM_{2.5}$, Wind Speed, Wind Direction, Ambient Temperature
6	Lompoc HS&P (North)	Industrial	O_3, NO_2, SO_2, Total Hydrocarbons, Wind Speed, Wind Direction, Ambient Temperature
7	Lompoc Odor	Industrial	H_2S, Total Reduced Sulfur, Wind Speed, Wind Direction, Ambient Temperature
8	Paradise Road	Industrial/ SLAMS[1]	O_3, NO_2, Wind Speed, Wind Direction, Ambient Temperature
9	Santa Barbara	SLAMS	O_3, PM_{10}, $PM_{2.5}$, Wind Speed, Wind Direction, Ambient Temperature
10	Santa Maria	SLAMS	O_3, NO_2, CO, PM_{10}, $PM_{2.5}$, Wind Speed, Wind Direction, Ambient Temperature
11	Santa Ynez Airport	SLAMS	O_3
12	West Campus (University of California, Santa Barbara)	Industrial	SO_2, THC, H_2S, TRS, Wind Direction, Wind Speed

Notes:
[1] Ozone monitors at these locations are SLAMS; other monitors are industrial.
Source: SBCAPCD 2024a.

Table 3.3-2 combines the National Ambient Air Quality Standards (NAAQS) and the California Ambient Air Quality Standards (CAAQS) for relevant air pollutants and provides a summary of ambient air quality measured within the county for the years 2018 to 2021. Since 2018, exceedances have occurred for the Federal and State O_3 standards, the State 24-hour PM_{10} standard, and the Federal 24-hour $PM_{2.5}$ standard. The Federal and State standards for CO, NO_2, and SO_2, and the Federal standard for PM_{10} were not exceeded from 2018 through 2021 (CARB 2023a; SBCAPCD 2021, 2020b, 2019, 2018).

Table 3.3-2. Ambient Air Quality Standards for Criteria Pollutants in the SCCAB

Pollutant/Standard	Number of Days Threshold Was Exceeded & Maximum Levels During Violations			
	2020	2021	2022	2023
Ozone				
State 1-Hour > 0.09 ppm	4 days	0 days	0 days	0 days
State 8-Hour > 0.07 ppm	6 days	1 days	0 days	0 days
Federal 8-Hour > 0.07 ppm	6 days	1 days	0 days	0 days
Max. 1-Hour Conc. (ppm)	0.105	0.082	0.077	0.071
Max. 8-Hour Conc. (ppm)	0.086	0.071	0.069	0.068
Carbon Monoxide (CO)				
State 8-Hour > 9.0 ppm	0 days	0 days	0 days	0 days
Federal 8-Hour > 9.0 ppm	0 days	0 days	0 days	0 days
Max. 1-Hour Conc. (ppm)	2.5	1.7	0.9	1.7
Inhalable Particulates (PM_{10})				
State 24-Hour > 50 µg/m^3	33 days	13 days	7 days	13 days
Federal 24-Hour > 150 µg/m^3	0 days	0 days	0 days	0 days
Max. 24-Hour Conc. (µg/m^3)	113.3	73.1	76.0	115.0
Annual Average (µg/m^3)	25.9	22.8	21.7	20.0
Fine Inhalable Particulates ($PM_{2.5}$)				
Federal 24-Hour > 35 µg/m^3	10 days	0 days	0 days	0 days
Max. 24-Hour Conc. (µg/m^3)	85.6	20.2	21.0	41.0
Annual Average (µg/m^3)	9.2	6.6	8.0	7.9
Nitrogen Dioxide (NO_2)				
State 1-Hour > 0.18 ppm	0 days	0 days	0 days	0 days
Federal 1-Hour > 0.10 ppm	0 days	0 days	0 days	0 days
Max. 1-Hour Conc. (ppm)	0.036	0.062	0.024	0.034
Sulfur Dioxide (SO_2)				
State 1-Hour > 0.25 ppm	0 days	0 days	0 days	0 days
State 24-Hour > 0.14 ppm	0 days	0 days	0 days	0 days
State 24-Hour > 0.04 ppm	0 days	0 days	0 days	0 days
Max 1-Hour Conc. (ppm)	0.026	0.011	0.005	0.002

Source: SBCAPCD 2021a; 2022a; 2023a; 2024b.

3.3.2.6 Odors

Odors are not regulated under the Federal CAA or the CCAA (Section 3.3.3, *Regulatory Setting*); however, they are considered nuisances under the California Environmental Quality Act (CEQA). Odors can potentially affect human health in several ways. Odorant compounds can irritate the eye, nose, and throat, which can reduce respiratory volume. Additionally, VOCs can cause odors

that irritate (e.g., by compromising the immune system). Common sources of odors and nuisance emissions include wastewater treatment plants, landfills, composting facilities, petroleum refineries, and chemical manufacturing facilities.

3.3.3 REGULATORY SETTING

Federal, state, and local regulations have been enacted to address air quality in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future housing development under the Project and its associated impacts.

3.3.3.1 Federal and State: Ambient Air Quality Standards

Both the federal and state governments have established ambient air quality standards (AAQS) for several different pollutants, a summary of which is provided in Table 3.3-3. For some pollutants, separate standards have been set for different periods. Most standards have been set to protect public health. However, for other pollutants, standards have been based on some other value (e.g., protection of crops, protection of materials, or avoidance of nuisance conditions).

Santa Barbara County is designated nonattainment-transitional status for the State 1-hour and 8-hour O_3 standard, and is designated nonattainment for the State annual arithmetic mean and 24-hour PM_{10} standard. The county is designated as having attainment or attainment/unclassified status for federal and state standards for all other pollutants. Table 3.3-3 identifies the attainment and nonattainment pollutant designations for the county.

3.3.3.2 Federal

Federal Clean Air Act

The Federal CAA was passed in 1963 and amended in 1990, and was the first comprehensive federal law to regulate air emissions from stationary and mobile sources. Among other things, the law authorizes the USEPA to establish NAAQS for pollutants considered harmful to public health and the environment, including the six criteria pollutants: CO, Pb, NO_2, O_3, $PM_{2.5,}$ PM_{10}, and SO_2. The NAAQS help to ensure basic health and environmental protection from air pollution. The NAAQS currently in effect for each pollutant, as well as the attainment status of the SCCAB, are shown in Table 3.3-3 above. The Federal CAA also gives the USEPA the authority to limit emissions of air pollutants coming from sources like chemical plants, utilities, and steel mills.

Table 3.3-3. Santa Barbara County Attainment/Nonattainment Classification Summary

Pollutant	Averaging Time	California		Federal	
		Standard	Attainment Status	Primary Standard	Attainment Status
Ozone (O_3)	1-hour	0.09 ppm	N-T	Revoked	--
	8-hour[1]	0.07 ppm	N-T	0.07 ppm	A/U [1]
Nitrogen Dioxide (NO_2)	1-hour	0.18 ppm	A	0.1 ppm	A/U
	Annual Arithmetic Mean	0.03 ppm	A	0.053 ppm	A/U
Sulfur Dioxide (SO_2)	1-hour	0.25 ppm	A	0.075 ppm	A/U
	24-hour	0.04 ppm	A	Revoked	--
Carbon Monoxide (CO)	1-hour	20 ppm	A	35 ppm	A/U
	8-hour	9.0 ppm	A	9.0 ppm	A/U
Fine Particulate Matter ($PM_{2.5}$)	24-hour	--	--	35 µg/m^3 [2]	A/U
	Annual Arithmetic Mean	12 µg/m^3 [2]	A	9.0 µg/m^3 [3]	A/U
Particulate Matter (PM_{10})	24-hour[2]	50 µg/m^3	N	150 µg/m^3	U
	Annual Arithmetic Mean	20 µg/m^3	N	Revoked	--
Lead	30-day	1.5 µg/m^3	A	--	--
	Rolling 3-month	--	--	0.15 µg/m^3	A/U
Sulfates	24-hour	25 µg/m^3	A	--	--
Hydrogen Sulfide	1-hour	0.03 ppm	A	--	--
Vinyl Chloride (chloroethene)	24-hour	0.01 ppm	--	--	--
Visibility Reducing Particles[4]	8-hour	N/A	U	--	--

Notes:
A=Attainment; N=Nonattainment; N-T = Nonattainment Transitional; U=Unclassified; A/U= Attainment/Unclassifiable; -- = No Standard
mg/m^3=milligrams per cubic meter
ppm=parts per million
µg/m^3=micrograms per cubic meter

[1] U.S. Environmental Protection Agency (USEPA) strengthened the 8-hour O_3 standard from the 1997 level of 0.08 ppm to 0.075 ppm on May 27, 2008, but delayed implementation of the standard. Designations for the 2008 standard were finalized on April 30, 2012. Later, on October 1, 2015, the national 8-hour O_3 primary and secondary standards were lowered from 0.075 to 0.070 ppm.

[2] USEPA strengthened the 24-hour fine particle standard from the 1997 level of 65 µg/m^3 to 35 µg/m^3 on September 21, 2006. The annual standard was strengthened from 15 to 12.0 µg/m^3 on January 15, 2013.

[3] Effective May 6, 2024, the National Ambient Air Quality Standard (NAAQS) for PM2.5 was lowered from 12.0 to 9.0 µg/m3. EPA expects to finalize the attainment designations for the lower standard by February 2026. Based on prior monitoring data, Santa Barbara County is expected to be in attainment. More information on the revised PM2.5 standard can be found here: www.epa.gov/particle-pollution-designations

[4] Statewide Visibility Reducing Particles Standard (except Lake Tahoe Air Basin): Particles in sufficient amounts to produce an extinction coefficient of 0.23 per kilometer when the relative humidity is less than 70 percent. This standard is intended to limit the frequency and severity of visibility impairment due to regional haze and is equivalent to a 10-mile nominal visual range.

Source: SBCAPCD 2025a.

In 1990, the U.S. Congress adopted the Federal Clean Air Act Amendments (CAAA), which updated the nation's air pollution control program. The Federal CAAA established several requirements, including new deadlines for achieving federal clean air standards.

The USEPA is the federal agency charged with administering the Federal CAAA and other air quality-related legislation. As a regulatory agency, USEPA's principal functions include setting NAAQS; establishing minimum national emission limits for major sources of pollution; and promulgating regulations.

The Federal CAAA requires USEPA to approve state implementation plans (SIPs) to meet and/or maintain the NAAQS. California's SIP is comprised of plans developed at the regional or local level.

3.3.3.3 State

California Clean Air Act

The CCAA was enacted in 1988 (California Health & Safety Code Section 39000 et seq.). California also has ambient air quality standards (i.e., CAAQS), which predate USEPA's formation in 1970 and the original NAAQS for pollutants considered harmful to public health and the environment, including the six criteria pollutants, as well as sulfates, hydrogen sulfide, vinyl chloride (chloroethene), and visibility reducing particles. The CAAQS currently in effect for each pollutant, as well as the attainment status of the SCCAB, are shown in Table 3.3-3 above. In 1959, California enacted legislation requiring the California Department of Public Health (CDPH) to establish air quality standards and necessary controls for motor vehicle emissions. The CCAA requires all areas of the State to achieve and maintain the CAAQS by the earliest practicable date. California law continues to mandate CAAQS, although attainment of the NAAQS has precedence over attainment of the CAAQS. The CAAQS includes more stringent standards than the NAAQS. CARB ensures the implementation of the CCAA and responds to the Federal CAA. CARB is responsible for the control of vehicle emission sources, while the local air district is responsible for enforcing standards and regulating stationary sources.

California Air Resources Board

CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California. In this capacity, CARB conducts research, sets the CAAQS, compiles emission inventories, develops suggested control measures, provides oversight of local programs, and prepares the SIP. CARB is responsible for the control of vehicle emission sources, while the local air district is responsible for enforcing standards and regulating stationary sources.

California Air Toxics "Hot Spots" Information and Assessment Act

The Air Toxic "Hot Spots" Information and Assessment Act identifies TAC hot spots where emissions from specific stationary source facilities may expose individuals to an elevated risk of adverse health effects. It requires that a business or other establishment identified as a significant source of toxic emissions provide the affected population with information about the health risks posed by the emissions. Health Risk Assessments (HRAs) would identify the hazard or hazardous material, assess the amount, duration, and pattern of exposure to the hazard or hazardous material, assess the amount it would take to cause negative health effects, and characterize the risk to the general population and sensitive receptors from the hazard or hazardous material. The California Office of Environmental Health Hazard Assessment provides A Guide to Health Risk Assessment and The Air Toxics Hot Spots Program Guidance Manual for Preparation of Health Risk Assessments (2015) to aid California projects' compliance with the Air Toxic "Hot Spots" Information and Assessment Act. In Santa Barbara County, SBCAPCD implements and enforces the Air Toxic "Hot Spots" Information and Assessment Act. Over time, SBCAPCD has worked to reduce the number of significant risk facilities, and there are two remaining significant risk facilities in the county: Greka Oil & Gas, Inc. – Greka South Cat Canyon Facility, and Greka Oil & Gas, Inc. – Greka Refining Company (SBCAPCD 2025b).

California Building Code

California Code of Regulations, Title 24, is known as the CBC, which establishes the regulations for building construction and system design and installation to achieve energy efficiency and preserve outdoor and indoor environmental quality. The CBC includes the following subparts, which are most applicable to development under the proposed Project.

California Code of Regulations, Title 24, Part 6 comprises the California Energy Code, which was first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to increase the baseline energy efficiency requirements. The Title 24 standards were updated in 2021 and became effective on January 1, 2023. The updated standards apply to all buildings for which an applicable building permit is submitted on or after January 1, 2023, and establish new standards for electric-ready requirements, expanded solar PV and battery storage, and strengthened ventilation standards for improved air quality. The Title 24 standards also include efficiency improvements to the residential standards for attics, walls, water heating, and lighting; and efficiency improvements to the non-residential standards are in alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1-2013 National Standards. Although it was not originally intended to reduce criteria pollutants or TAC emissions, electricity production by fossil fuels results in ozone precursor emissions, and energy-efficient buildings require less electricity. Therefore, increased energy efficiency results in decreased criteria pollutants and TAC emissions from residential and non-residential buildings.

California Code of Regulations, Title 24, Part 11 comprises CALGreen, which establishes mandatory green building code requirements as well as voluntary measures (Tier 1 and Tier 2) for new buildings in California. The mandatory provisions in CALGreen will reduce the use of VOC-emitting materials, strengthen water efficiency conservation, increase construction waste recycling, and increase energy efficiency. Tier 1 and Tier 2 are intended to further encourage building practices that minimize the building's impact on the environment and promote a more sustainable design.

3.3.3.4 Local

Santa Barbara County Air Pollution Control District

SBCAPCD monitors air quality and regulates stationary emission sources in the county. As a responsible agency under CEQA, SBCAPCD reviews and approves environmental documents prepared by other lead agencies or jurisdictions to reduce or avoid impacts on air quality and to ensure that the lead agency's environmental document is adequate to fulfill CEQA requirements. As a concerned agency, the SBCAPCD comments on environmental documents and suggests mitigation measures to reduce air quality impacts. SBCAPCD has also established rules applicable to certain activities within the county, addressing specific topics. Rules that may apply to the proposed Project include:

- Rule 303 – Nuisance. A person shall not discharge from any source whatsoever such quantities of air contaminants or other material in violation of Section 41700 of the Health and Safety Code which cause injury, detriment, nuisance, or annoyance to any considerable number of persons or the public or which endanger the comfort, repose, health or safety or any such persons or the public or which cause or have a natural tendency to cause injury or damage to business or property.
- Rule 345 – Control of Fugitive Dust from Construction and Demolition Activities. This rule applies to any activity associated with the construction or demolition of a structure. Activities subject to this regulation are also subject to Rule 302 (Visible Emissions) and Rule 303 (Nuisance). This rule includes specific requirements and standards applicable to construction or demolition activities to reduce and prevent visible emissions.

The Federal CAAA of 1990 and the CCAA of 1988 mandate the preparation of plans for the attainment of air quality standards that provide an overview of air quality and sources of air pollution and identify pollution-control measures needed to meet federal and state air quality standards. The SBCAPCD and the Santa Barbara County Association of Governments (SBCAG) are responsible for formulating and implementing air quality attainment plans for Santa Barbara County.

To comply with these regulations, the County prepared an Air Quality Attainment Plan (AQAP) in 1979. The 1979 AQAP demonstrated that the area could not attain the Federal O_3 standard

by the required attainment date of 1982, despite the implementation of all reasonably available control techniques on stationary sources. The Federal CAAA requires that air quality plans include "...such other measures as may be necessary to ensure attainment and maintenance of such primary or secondary standards (for which the area is in a nonattainment status), including, but not limited to transportation controls..." To achieve this directive, land use control measures were and have been included in the AQAP to aid in future air quality planning efforts. Subsequent AQAPs have been issued in 1989 and 1991.

In 1994, the SBCAPCD began preparing a Clean Air Plan (CAP) to triennially update the AQAP. The CAP provides an overview of the regional air quality and sources of air pollution and identifies the pollution-control measures needed to meet clean-air standards. The schedule for plan development is outlined by federal and state requirements and is influenced by regional air quality. CAPs affect the development of SBCAPCD rules and regulations and other programs. They also influence a range of activities outside the district, including transportation planning, allocation of monies designated for air quality projects, and more. Starting in 2016, SBCAPCD began preparing an Ozone Plan to replace the CAP as the triennial update to the AQAP (SBCAPCD 2022a).

The SBCAPCD 2022 Ozone Plan is the most recent triennial update to the AQAP required by the state to show how SBCAPCD plans to meet the state 8-hour O_3 standard. Note that past ozone plan updates addressed both the federal and state O_3 standards, but this plan addresses the state standards only because the SCCAB is designated "attainment" for the federal 8-hour O_3 standards. The 2022 Ozone Plan builds upon and updates the 2019 Ozone Plan and includes an inventory of O_3 precursor emissions in the county, the most prevalent of which are ROCs and NO_x. The 2022 Ozone Plan focuses on reducing O_3 precursor emissions by predicting vehicle activity trends and applying both stationary source emission control measures and transportation control measures, which reduce mobile-source emissions, the primary source of ROC and NO_x emissions in the county (SBCAPCD 2022a).

Santa Barbara County Comprehensive Plan, Land Use Element, Air Quality Supplement

Due to the exceedance of the federal ambient air quality standard for O_3, the Federal CAAA requires that air quality plans include "...such other measures as may be necessary to insure [sic] attainment and maintenance of such primary or secondary standards (for which the area is in a nonattainment status), including, but not limited to transportation controls..." Since the success of certain aspects of transportation planning is an integral part of land use planning, and since emission growth from population-related sources contributes to the overall emission growth in the county, land use control measures have been included in the Air Quality Supplement to the Land Use Element in the County's Comprehensive Plan. These land use measures aid in future air quality planning efforts and present a coordinated approach to integrating air quality planning techniques into the County's land use planning program. Such

measures include the promotion of alternative transportation, directing new development within established urbanized areas, and restricting the development of auto-dependent facilities (County of Santa Barbara 2009).

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

The Regional Transportation Plan (RTP)/Sustainable Communities Strategy (SCS) is a report published every decade. The most recent version is the Connected 2050 RTP/SCS. The Connected 2050 RTP/SCS provides a collective vision for the region's future that balances transportation and housing needs with social, economic, and environmental goals. The plan helps guide future planning efforts and policy decisions that affect transportation, including its relationship with housing and land use, which will reduce GHG emissions in our region. The Connected 2050 RTP/SCS provides recommendations to help cities and the County make important decisions about transportation, housing, and land use. Connected 2050 RTP/SCS provides forward-looking recommendations for 2050 because many of our local government decisions will influence the region's long-term growth and development over the next 30 years. Fundamentally, this plan explores the region’s land use and travel patterns, accounts for the demographic growth that will force new demands on both, and presents a vision for how they can work together to satisfy the goals important to the region while also meeting the State’s GHG reduction targets.

Santa Barbara County Association of Governments (SBCAG) 2050 Regional Growth Forecast

The purpose of the Regional Growth Forecast is to provide consistent long-range population, job, and household forecasts for use in long-range regional planning to the year 2050 for the County, its major economic and demographic regions, and its eight incorporated cities. The Regional Growth Forecast is a requirement of the SBCAG RTP/SCS. The forecast is adopted by the SBCAG board and used in a variety of applications such as local General Plans, public service district forecasts, business development, transportation forecasts, and air quality planning. This forecast is based on the land use capacity of local general plans and takes input from all jurisdictions, the public, and the SBCAG board. The forecast is updated periodically as new demographic data, land use policies, and changes in growth assumptions warrant.

Santa Barbara County Grading Ordinance

Chapter 14 of the County Code is the Santa Barbara County Grading Code (Ord. No. 4766, 11-9-2010). The regulations, conditions, and provisions of this chapter constitute minimum standards and procedures necessary to protect and preserve life, limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, location, and maintenance of grading, drainage, erosion, sediment, and dust control when required by these regulations within the County. Under Chapter 14, all graded surfaces and materials, whether filled, excavated, transported, or stockpiled, shall be wetted, protected, or contained in such a manner as to prevent the generation of dust. Construction equipment and

materials on the site shall be used in such a manner as to avoid creating a public nuisance. Roadways and graded areas on the site shall be surfaced or wetted sufficiently to prevent the generation of excessive dust at all times. However, such wetting shall not cause offsite runoff of sediment or pollutants.

3.3.4 ENVIRONMENTAL IMPACT ANALYSIS

This section discusses the potential air quality impacts associated with the proposed Project. Where there are potentially significant impacts, mitigation measures are proposed, and the residual impact after mitigation is determined.

3.3.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For purposes of this Program Environmental Impact Report (EIR), implementation of the proposed Project may have a significant adverse impact on air quality if it would:

a. Conflict with or obstruct implementation of the applicable air quality plan.

b. Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is in nonattainment under an applicable federal or state ambient air quality standard.

c. Expose sensitive receptors to substantial pollutant concentrations.

d. Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people.

County of Santa Barbara Environmental Thresholds and Guidelines

Based on Appendix G of the CEQA Guidelines, the County has developed two criteria for determining if a project will have a potentially significant adverse air quality impact. If the project meets either of the two following criteria, the impacts must be discussed and analyzed in detail, and appropriate mitigation measures must be identified. Specifically, the County has determined that a significant adverse impact may occur when a project, individually or cumulatively, triggers any one of the following:

- Interferes with progress towards the attainment of the ozone standard by releasing emissions which equal or exceed the established long-term quantitative thresholds for NOx and ROC;
- Equals or exceeds the state or federal ambient air quality standards for any criteria pollutant (as determined by modeling);

The County also requires that cumulative air quality impacts and consistency with the policies and measures in the Air Quality Supplement of the Comprehensive Plan Land Use Element, other general plans, and the AQAP should be determined for all projects (i.e., whether the project exceeds the AQAP emission projections or growth assumptions). The County requires a discussion of the following issues as applicable to the project:

- Emissions which may affect sensitive receptors (e.g., children, elderly, or acutely ill);
- Toxic or hazardous air pollutants in amounts which may increase cancer risk for the affected population; or
- Odor or another air quality nuisance problem impacting a considerable number of people.

CEQA requires that the significance of a project's direct and indirect emissions be determined for both direct and indirect short-term (construction) and long-term (operational) impacts. To meet these CEQA requirements, the County's *Environmental Thresholds and Guidelines Manual* (2024) provides the following applicable thresholds/methodology for determining project impacts:

1. **Short-term/Construction Emissions:** Short-term air quality impacts generally occur during project construction (e.g., emissions from operation of equipment with internal combustion engines, fugitive dust from grading activities, application of paints). CEQA requires a discussion of the short-term impacts of a project in the environmental document. The reasoning for considering short-term impacts insignificant is provided below.

   No quantitative threshold has been established for short-term, construction-related PM_{10} (which is 50 percent of total dust). However, this impact should be discussed in all environmental documents for projects involving ground disturbance. Dust control measures are required under the County of Santa Barbara's Grading Ordinance for most projects. Some projects have the potential for construction-related dust to cause a nuisance. Also, Santa Barbara County violates the state standard for PM_{10}. Therefore, dust mitigation measures are required for all discretionary construction activities. The standard dust mitigation measures are based on policies in the 1979 AQAP and are listed in a separate implementation document, Air Quality Analysis for EIRs, available from the County Planning and Development Department (P&D).

   The short-term thresholds for NO_x and ROC emissions from construction equipment were not established. Emissions of NO_x from construction equipment in the County are estimated at 1,000 tons per year of NO_x. When compared to the total NO_x emissions inventory for the county of approximately 17,000 tons per year, construction emissions comprise approximately 6 percent of the 1990 county-wide emission inventory for NO_x (Santa Barbara County 1993 Rate-of Progress Plan). In general, this amount is considered insignificant.

2. **Long-term/Operational Emissions:** Long-term air quality impacts occur during project operation and include emissions from any equipment or process used in the project (e.g.,

residential water heaters, engines, boilers, operations using paints or solvents) and motor vehicle emissions associated with the project. These emissions must be summed to determine the significance of the project's long-term impact on air quality.

a. **Ozone Precursors (NO_x and ROCs).** A proposed project will not have a significant air quality effect on the environment if the operation of the project will:

   - Emit (from all project sources, mobile and stationary), less than the daily trigger for offsets set in the SBCAPCD New Source Review Rule for any pollutant (55 lbs/day for NO_x and ROC, and 80 lbs/day for PM_{10}); and
   - Emit less than 25 lbs/day for NO_x or ROC from motor vehicle trips only; and
   - Not cause or contribute to a violation of any CAAQS or NAAQS (except ozone); and
   - Not exceed the SBCAPCD health risk public notification thresholds adopted by the SBCAPCD Board; and
   - Be consistent with the adopted federal and state Air Quality Plans.

b. **Carbon Monoxide (CO).** A project will have a significant air quality impact if it causes, by adding to the existing background CO levels, a carbon monoxide "hot spot" where the California one-hour standard of 20 ppm CO is exceeded. This typically occurs at severely congested intersections.

   To determine whether a project would result in CO impacts, the County has established the following project screening criteria:

   - If a project contributes fewer than 800 peak-hour trips, then CO modeling is not required.
   - Projects contributing more than 800 peak hour trips to an existing congested intersection at a level of service (LOS) D or below, or will cause an intersection to reach LOS D or below, may be required to model for CO impacts. However, projects that will incorporate intersection modifications to ease traffic congestion, are not required to perform modeling to determine potential CO impacts.

3. **Cumulative Impacts.** Due to the county's non-attainment status for ozone and the regional nature of the pollutant, if a project's total emissions of the ozone precursors, NO_x or ROCs, exceed the long-term threshold, then the project's cumulative impacts will be considered significant. For projects that do not have significant ozone precursor emissions or localized pollutant impacts, emissions have been taken into account in the AQAP growth projections and therefore, cumulative impacts may be considered to be insignificant.

4. **Consistency with the AQAP and Other Planning Documents.** Consistency with local and regional plans, such as the AQAP, the Congestion Management Plan, and the RTP/SCS

is required under CEQA. Consistency with the AQAP means that stationary and vehicle emissions associated with the project are accounted for in the AQAP's emissions growth assumptions. The AQAP generally relies on the land use and population projections provided in SBCAG's Regional Growth Forecast. Further, consistency with the Air Quality Supplement of the County's Land Use Element must also be analyzed.

In addition to the County's thresholds described above in this section, the SBCAPCD has prepared the *Environmental Review Guidelines for the Santa Barbara County Air Pollution Control District* (2015), which also lists screening criteria for determining the significance of long-term operational emissions. A proposed project would not have a significant air quality effect on the environment if the operation of the project would:

- Emit (from all project sources, mobile and stationary) less than the daily trigger for offsets or Air Quality Impact Analysis set in the SBCAPCD New Source Review Rule, for any pollutant (240 pounds/day for ROCs and NO_x; and 80 pounds/day for PM_{10}. There is no daily operational threshold for CO; it is an attainment pollutant); and
- Emit less than 25 pounds per day of NO_x or ROCs (reactive organic gases [ROGs] or VOCs) from motor vehicle trips only; and
- Not cause or contribute to a violation of any CAAQS or NAAQS (except O_3); and
- Not exceed the SBCAPCD health risk public notification threshold adopted by the SBCAPCD Board; and
- Be consistent with the adopted federal and state Air Quality Plans.

Similar to the County's above-described thresholds for short-term/construction emissions, the SBCAPCD does not currently have quantitative thresholds of significance in place for short-term or construction emissions; however, the SBCAPCD uses 25 tons per year for ROCs (ROGs or VOCs) or NO_x as a guideline for determining the significance of construction impacts. Further, to assist Lead Agencies with determining whether the thresholds for vehicle-related emissions from project operations might be exceeded, SBCAPCD has prepared a screening table that lists only the most common types of land uses and estimates the size of a specific project type that is expected to be less than the threshold of significance for NO_x and ROC emissions from vehicles. This screening table is presented in Attachment A of SBCAPCD's *Scope and Content for Air Quality Sections in Environmental Documents* (2022b). However, the table does not list any land use categories related to recreation, as the County or SBCAPCD have not adopted screening criteria to characterize typical emissions from recreational development projects.

Methodology

As described in Chapter 2, *Project Description*, the Project plans for parks, trails, and recreational facilities in unincorporated areas within the county. The project also changes County policies and regulations to support the development of public parks, recreation, and trails through public-private partnerships. Project-level siting and design details are not known,

so the impact analysis does not evaluate air emissions at a project- or site-specific level. The programmatic analysis provided by this Program EIR addresses the potential for future parks, recreation, trails, and related development under the Project to significantly impact air quality within the county. Wherever possible, illustrative, quantitative examples are provided to describe the type and range of air pollutant emissions that could result from the implementation of the Project. As detailed below, this assessment estimates a large-scale recreational development project proposed by the Project to provide context for whether the future development would result in significant construction emissions. This assessment also considers operational emissions related to land use and development enabled by the Project. This analysis also considers whether the proposed Project would conflict with all applicable federal, state, and local air quality regulations and policies.

As described in section 3.0.4, *Impact Assessment Methodology*, to determine whether a potentially significant impact could occur as a result of the Project, the analysis considers the potential construction and operations of the Project components using reasonable worst-case assumptions, including:

1. The public park, recreation, and trail projects planned by County Parks, as described in Section.2.5.1, *Planned County Parks, Recreation, and Trails Projects*. The analysis assumes a maximum disturbance area of up to 50 acres as the most impactful planned park and recreation facilities.
2. The proposed amendments to the Comprehensive Plan and zoning ordinances that could enable the development of planned parks, trails, and recreational facilities. The analysis assumes that the amendments, including the updated Public and Private Parks/Recreation Facility Overlay and the Recreation Benefit Project (RBP) Program, could enable the following concepts as the most impactful potential development scenarios under the proposed Project's development standards:
    a. A maximum 160-site campground/RV park on a minimum 20-acre site
    b. A maximum 120-room country inn on a minimum 5-acre site
    c. A maximum 2,000-seat outdoor amphitheater

The information and analysis in this section are based on information from previous studies and EIRs prepared by the County or other local or regional agencies. These include the Agricultural Enterprise Ordinance EIR, the 2030 Draft Climate Action Plan and Program EIR, the 2021 Connected 2050 RTP/SCS EIR, as well as the County's CAP, Comprehensive Plan Land Use Element – Air Quality Supplement, and information from other recent environmental documents prepared for the County. The discussion of air quality in the Project area is broadly derived from the above sources, as well as the SBCAPCD Ambient Air Monitoring Network Plan and Annual Air Quality Reports, the 2022 Ozone Plan, and SBCAPCD's environmental review guidelines. The

quantitative analysis of air pollutant emissions is based upon estimates of emissions developed using the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.29. A detailed discussion of the approach to analysis is presented below.

Conflicts with Applicable Air Quality Plan

Federal and state ambient air quality standards are designed to prevent the harmful effects of air pollutant emissions. These standards are continually updated based on evolving research, including research that relates air quality impacts to health effects. At the regional level, the 2022 Ozone Plan works to ensure that the SCCAB reaches and maintains attainment with State standards for ozone. Locally, EIRs evaluate a plan or project's consistency with applicable policies identified in the Ozone Plan, intended to protect human health. As described above under the County's thresholds of significance for consistency with the AQAP and other planning documents, consistency with the regional air quality planning documents, including Air Quality Supplement of the Land Use Element means that stationary, area-wide, and mobile source emissions associated with the proposed Project are accounted for in the Ozone Plan's emissions growth assumptions, applicable control measures, and air emissions reduction policies which are directed at reducing O_3 precursor emissions and achieving attainment with State standards for ozone. These strategies are developed, in part, based on SBCAG's Regional Growth Forecast. Thus, projects that are consistent with the assumed growth projections and control strategies assumed in the development of the Ozone Plan would not conflict with or obstruct the implementation of the Ozone Plan, even if they exceed the SBCAPCD's numeric thresholds for criteria pollutants.

Cumulative Considerable Net Increase in Criteria Pollutants

CEQA Guidelines Section 15130 requires that an EIR discuss the cumulative impacts of a project when the project's incremental effects are cumulatively considerable. A "cumulative impact" is an impact that is created as a result of the combination of the proposed project with other projects, causing related impacts. "Cumulatively considerable" means that the incremental effects of the individual project are significant when viewed in connection with the effects of past projects, current projects, and probable future projects, which in this case includes growth within the county.

This analysis focuses on the air quality impacts that could occur from air pollutant emissions associated with the Project. Consistent with County and SBCAPCD guidance, this analysis evaluates the contribution of the Project to cumulative air quality impacts by comparing estimated emissions against the SBCAPCD's thresholds of significance defined above, as described further below. As described in Chapter 2, *Project Description,* the Project consists of planned conceptual park, recreation, and trails projects and amendments to County policies

and regulations in support of public parks, recreation, and trails. As such, the Project does not involve any proposals to implement site-specific improvements.

As discussed further below, emissions that would be generated from a conceptual larger-scale community park development that could be enabled by the Project were estimated using CalEEMod Version 2022.1.1.29 to provide an illustrative example of potential impacts that could result from the Project. However, given that the Project does not propose any site-specific details for the construction or operation of future development, default values were assumed based on the proposed land use type and property size. Calculation details are provided in the CalEEMod worksheet results in Appendix B.

Construction Air Quality Impacts

As described in Chapter 2, *Project Description*, the Project would include the future development of County parks, trails, and recreational facilities to serve residents within five recreation planning areas. The Project would also enable the development of public recreation facilities and related development through zoning ordinance amendments to allow public parks and trails and create the RBP Program. Depending on the timing of entitlements and permit processing, construction activities for individual uses and related development could begin shortly after adoption of the Project. The specific construction details (e.g., amount, location, scheduling/phasing, equipment, size, and grading) for future sites are unknown at this time and would greatly vary depending on the type and scale of proposed improvements. Therefore, it is impossible to quantify the total construction-related emissions that may potentially occur. As such, the analysis of construction-related air quality impacts is primarily qualitative, discussing the potential range of construction-related impacts that could occur from the development of parks, trails, and recreational facilities enabled by the Project.

However, to provide a reasonable, worst-case analysis of potential construction-related impacts of the Project, an estimate of hypothetical construction-related emissions that could result from the development of a conceptual community park was developed (Appendix B). Specifically, potential construction emissions were calculated using CalEEMod for development similar in type and scale to the proposed South Coast Aquatic Center and Goleta Community Sports Park, which represents a larger recreational development project envisioned under the Project. The scenario assumed that the project site in Goleta would include 10 acres for development of a "City Park," consisting of a 15,000-square-foot aquatics center with an Olympic sized pool, a 2-acre professional soccer field with stadium seating and support facilities (e.g., locker rooms, equipment storage), 3 acres of surface parking, and various youth sports fields.

As described above, default values were utilized for all construction-related information due to the absence of site-specific construction details. It should also be noted that the CalEEMod construction emissions estimates do not account for construction procedures mandated by

state law and local regulations, such as the California Code of Regulations Title 13, Division 3, Chapter 9, Article 4, Section 2423(b)(1), CARB construction equipment/vehicle idling restrictions, or adopted SBCAPCD rules. Further, the construction emissions estimates do not include any potential emission-reduction measures (e.g., watering of exposed soils to reduce dust and limits on vehicle idling). As such, the construction emissions modeling is highly conservative in its assumptions and overestimates the potential construction emissions of an actual community park development project. In the absence of adopted quantified significance thresholds for short-term construction projects, the annual construction emissions estimated for the conceptual park project are compared against the SBCAPCD's general guidance for determining the significance of construction impacts (25 tons per year for ROCs [ROGs or VOCs] or NO_x). Because it is unlikely that construction of multiple public parks would occur concurrently and within the same area, it is reasonable that construction emissions from one substantial community park project are representative of a reasonable worst-case scenario for Project impact analysis.

Operational Air Quality Impacts

Similar to construction, given the absence of project-level siting and design details, CalEEMod default values were utilized to provide an estimate of hypothetical operations-related emissions that could result from the development of a conceptual community park. Operational emissions associated with the Project are estimated using CalEEMod for area, energy, and mobile source emissions. Area source emissions would be generated by landscape maintenance equipment (such as those used for park, field, and landscaping maintenance). Energy source emissions are generated by emissions resulting from electricity and natural gas consumption for space and water heating; heating, ventilation, and air conditioning (HVAC); and the operation of swimming pools. Mobile emissions are those that would result from the operation of cars and vehicles by employees and guests of the park.

To determine whether the operation air quality impacts would be significant, the maximum daily emissions were summed and compared against SBCAPCD's numerical thresholds. It should be noted that, similar to the construction emissions modeling scenarios, the CalEEMod default assumptions for calculating area source, energy source, and mobile-source emissions estimates do not reflect any additional sustainability features or development standards mandated by recent state and local regulations (e.g., water efficiency, sustainable building standards). Similarly, the energy source emissions rates for electrical and natural gas supplies do not account for County enrollment in the Central Coast Community Energy program, which delivers clean and renewably sourced electricity to existing and future customers throughout the county. Furthermore, it is unlikely that the operation of large community parks would overlap within the same area (i.e., the Project envisions new parks distributed between five recreation planning areas to meet local needs). Therefore, the operational emissions estimates represent a highly conservative, worst-case emissions estimate.

Health Risks from Criteria Air Pollutants

In December 2018, the California Supreme Court held that the EIR for the Friant Ranch Project – a 942-acre master-planned, mixed use development with over 2,500 senior dwelling units, 250,000 sf of commercial space, and extensive open space/recreational amenities on former agricultural land in north central Fresno County – was deficient in its informational discussion of air quality impacts as they relate to adverse human health effects.

As noted in the *Brief of Amicus Curiae* prepared by the SCAQMD in the Friant Ranch case (April 6, 2015), SCAQMD concluded that currently available regional modeling tools are not well suited to analyze relatively small changes in criteria pollutant concentrations associated with individual projects. Regional modeling tools developed by air districts throughout the state, including SBCAPCD, are generally designed to be used at the federal, state, regional, and/or local levels and are not well-equipped to analyze whether and to what extent the criteria pollutant emissions of an individual project directly impact human health in a particular area. Even where an HRA can be prepared, however, the resulting maximum health risk value is only a calculation of risk – it does not necessarily mean anyone will contract cancer or non-cancer health risks as a result of the project. Though the *Brief of Amicus Curiae* was prepared by the SCAQMD, the SCAQMD maintains some of the most sophisticated air quality modeling and health impact evaluation capability of any of the air districts in the state.

For local plans or projects that exceed any identified numerical threshold adopted by local agencies or air districts, EIRs typically identify and disclose generalized health effects of certain air pollutants, but are currently unable to establish a reliable connection between any local plan or an individual project and a particular health effect. In addition, no relevant agency has approved a quantitative method to reliably and meaningfully do so. Several factors contribute to this uncertainty, including the regional scope of air quality monitoring and planning, technological limitations for modeling at a local plan or project level, and the intrinsically complex nature of the relationship between air pollutants and health effects in conjunction with local environmental variables. As such, this Program EIR does not provide a detailed analysis linking the Project's significant air quality impacts with a specific health effect, and impacts are considered insignificant.

In addition, parks, recreation, and trail projects do not involve the types of uses that generate health risks (i.e., diesel particulate matter from trucking, commercial freight vehicles, and stationary sources). Thus, potential health risks from criteria air pollutants from recreational projects and related development under the Project would be negligible. Furthermore, public parks, recreation, and trails provide opportunities for play, leisure, exercise, and access to fresh air in the outdoors to benefit community health and social wellbeing, which reduces health risks associated with air pollution.

Toxic Air Contaminants

SBCAPCD states that some classifications of projects are more likely than others to emit toxic pollutants. These may include commercial or industrial activities such as oil and gas processing, gasoline dispensing, dry cleaning, electronic and parts manufacturing, medical equipment sterilization, freeways, and rail yards that may increase the exposure to air pollution and associated cumulative risk should be considered (SBCAPCD 2022c). For projects that involve the generation of TACs, health risk assessment modeling may be required to determine the significance of impacts on nearby sensitive receptors. The significance threshold for long-term public health risk is set at 10 excess cancer cases in a million for cancer risk. For non-cancer risk, the significance level is set at a Hazard Index of more than one (1.0).

The greatest potential for TAC impacts associated with the Project would be related to diesel-fueled trucks and other vehicles along high-volume freeways located near parks and recreational facilities. CARB recommended in 2005 to avoid siting new sensitive land uses, including playgrounds and play areas associated with parks or community centers, within 500 feet of a freeway, urban roads with 100,000 vehicles per day, or rural roads with 50,000 vehicles per day. Recommendations also include avoiding siting new sensitive land uses within 1,000 feet of a major service and maintenance rail yards and immediately downwind of ports (CARB 2005).

Given the programmatic nature of the Project, it is not feasible to prepare a detailed assessment of the potential health risks associated with the potential siting of development of recreational facilities and parks within 500 feet of high-volume roadways or rail lines. In addition, concerning health risks associated with locating sensitive land uses in proximity to freeways and other high-traffic roadways, SBCAPCD concludes that health risk analysis modeling may not thoroughly characterize all the health risks associated with nearby exposure to traffic-generated pollutants. Therefore, SBCAPCD does not recommend using health risk assessment modeling as a tool for assessing health risk impacts for these types of projects. Instead, SBCAPCD recommends that sensitive land uses such as playgrounds should not be sited within 500 feet of U.S. Highway 101, and recommends policies that require redesigning projects so that sensitive receptors are moved at least 500 feet away from U.S. Highway 101 to reduce potential health impacts (SBCAPCD 2017). As such, potential impacts of the Project as they relate to TACs and public health risks associated with development near U.S. Highway 101 are instead based on whether the Project may enable future park and recreational facility development within 500 feet of U.S. Highway 101 and whether additional policies or measures requiring siting of development may be required to reduce potential health risks.

Mobile-source CO Modeling

While the County and SBCAPCD have adopted thresholds for determining impacts from the generation of a CO “hot spot”, SBCAPCD has concluded that, due to the relatively low

background ambient CO levels in Santa Barbara County, localized CO impacts associated with congested intersections are not expected to exceed the CO health-related air quality standards. Therefore, CO "hot spot" analyses are no longer required (SBCAPCD 2022c). As such, this Program EIR does not provide a detailed analysis of impacts associated with CO "hot spots", and impacts are considered insignificant.

3.3.4.2 Project Impacts

Table 3.3-4 provides a summary of the Project's impacts related to air quality. A detailed discussion of each impact follows.

Table 3.3-4. Summary of Air Quality Impacts

Air Quality Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact AQ-1. The Project would be consistent with applicable air quality plans, including the Ozone Plan and County Land Use Element Air Quality Supplement.	Insignificant	No mitigation measures required.	Insignificant impacts
Impact AQ-2. The Project could result in a cumulatively considerable net increase of criteria air pollutants for which the region is in nonattainment under an applicable Federal or State ambient air quality standard.	Potentially significant	MM AQ-1 (PM_{10} and Dust Control) MM AQ-2 (Exhaust Emissions)	Significant but mitigable impacts
Impact AQ-3. The Project could expose sensitive receptors to substantial pollutant concentrations or toxic or hazardous air pollutants.	Potentially significant	MM AQ-1 (PM_{10} and Dust Control) MM AQ-2 (Exhaust Emissions)	Significant but mitigable impacts
Impact AQ-4. The Project would not generate odors or nuisance problems impacting a considerable number of people.	Insignificant	No mitigation measures required.	Insignificant impacts
Cumulative Impacts	Potentially significant	MM AQ-1 (PM_{10} and Dust Control) MM AQ-2 (Exhaust Emissions)	Significant but mitigable impacts

Impact AQ-1. The Project would be consistent with applicable air quality plans, including the Ozone Plan and County Land Use Element Air Quality Supplement.

A project is deemed inconsistent with the air quality plan if it results in population and/or employment growth that exceeds growth estimates in the applicable air quality plan or would contribute to population growth in excess of that forecasted in the RTP/SCS. In Santa Barbara

County, the applicable air quality plan is SBCAPCD's 2022 Ozone Plan. The 2022 Ozone Plan includes stationary-source control measures to be implemented through the SBCAPCD regulations; mobile-source control measures to be implemented through incentive programs and other activities; and transportation control measures to be implemented through transportation programs in cooperation with SBCAG, local governments, transit agencies, and others. The 2022 Ozone Plan and associated control measures rely upon growth projections that are based in part on SBCAG's Regional Growth Forecast 2050, as well as transportation activity data from SBCAG's Connected 2050 RTP/SCS. SBCAG compiles growth estimates received from individual jurisdictions and generates projections for the region. When the SBCAG projections are released, regulatory documents such as a general plan or specific plan are considered to comply with SBCAG projections, as the information contained in such documents has at that point been incorporated into the SBCAG projections. SBCAG updates the regional forecasts and projections approximately every five years.

The Project does not involve the development of new housing and would not directly generate long-term residential population increases (see also, Chapter 5, *Other CEQA Considerations*). Rather, as an expansion of the existing parks and recreational facilities throughout the county, the Project is intended to serve the existing population and the anticipated future population. The Project would generate short-term employment opportunities during construction and some long-term employment opportunities during operation. A few people may be employed at new recreational facilities proposed by the Project, such as at a new community center or campground, or by County Parks as rangers and maintenance staff responsible for the operation of new County Parks facilities. However, these positions would likely be filled from existing populations rather than drawing new residents to the county, and, given the low potential for substantial job growth, increases in the population would be negligible. There would be no substantial increase permanent residential population that could result in substantial population growth. Accordingly, since little to no population growth is anticipated to result from the Project, no conflicts with the SBCAG's Connected 2050 RTP/SCS and Regional Growth Forecast would occur, and the Project would not conflict with the 2022 Ozone Plan. Therefore, the impact would be *insignificant*.

Impact AQ-2. The Project could result in a cumulatively considerable net increase of criteria air pollutants for which the region is in nonattainment under an applicable Federal or State ambient air quality standard.

Construction

The Project would foster recreation development projects that would result in the generation of air pollutants through the use of some heavy equipment during construction and mobile and area source emissions from operation. Based on the range of uses enabled under the Project, associated construction activities, if necessary at all, are anticipated to involve only minor

amounts of construction equipment, short-duration construction schedules, and limited constructed phases.

Construction activities would depend on the timing of individual projects and would vary day by day, monthly, and annually. Construction activities would generally involve four stages: 1) site preparation; 2) grading and excavation; 3) construction; and 4) final coating, along with landscaping improvements and paving activities. However, only a few projects proposed under the Project would involve typical construction activities, as many park and trail projects would be very small-scale and require only minor amounts of site disturbance, grading, installation of pre-fabricated structures (e.g., playground sets), and landscaping. These types of projects would require very short durations of construction activities, involve little to no earthwork, would not involve the construction of new structural development or paving of impervious surfaces, and would not involve the extensive use of construction equipment. For instance, the construction of new natural surface trails within the unincorporated area is typically conducted using small trail construction crews and hand tools to clear vegetation and grade a trail surface, and the minimal use of one or two pieces of small, off-road construction equipment. Similarly, small pocket parks and neighborhood parks typically involve the installation of children's playground sets and turf or landscaped areas using hand tools and small power tools, which would not entail extensive construction. Individual construction of these smaller-scale parks, trails, and recreational facilities would not generate substantial criteria pollutant emissions.

For some larger recreational projects, such as the South Coast Aquatic Center and Goleta Community Sports Park, and Guadalupe Community Park and Campground, grading would be necessary to prepare the site for development for the installation of level playing surfaces, the installation of new utility lines (e.g., landscape irrigation, electrical lines for lighting), structural development, and paving of new parking areas or walking paths. In a few cases, where sites are being redeveloped, such as the Jalama Beach County Park Expansion project, construction activities could also involve demolition activities. Short-term increases in criteria pollutant emissions would result from all phases of these types of construction activities, particularly due to the disturbance of soil and operation of heavy equipment such as trucks, graders, scrapers, compressors, and generators. Emissions from construction activities would include PM_{10} and exhaust emissions (ROCs, NO_x, CO, SO_2, $PM_{2.5}$).

A significant impact may occur if construction of parks, trails, and recreation facilities and related development exceeds SBCAPCD's recommended numerical thresholds for determining the significance of short-term, construction-related impacts. Because the SCCAB is currently in nonattainment for O_3 (for which ROCs and NO_x are precursors) and PM_{10} under federal and state standards, recreational development could generate emissions exceeding SBCAPD's recommended thresholds and contribute to further air quality violations for nonattainment criteria pollutants.

As described in the *Methodology* discussion under Section 3.3.4.1, *Thresholds of Significance,* modeling of construction emissions was performed using CalEEMod to provide an illustrative example of the type and extent of emissions that could occur from a larger community park development project. Specifically, a CalEEMod scenario was prepared to estimate emissions from one of the largest potential development projects that could occur as a result of the Project, the South Coast Aquatic Center and Goleta Community Sports Park. The estimated maximum annual construction emissions are presented in Table 3.3-5 and compared against SBCAPCD's recommended thresholds for characterizing impacts from short-term construction-related air pollutant emissions (Appendix B).

Table 3.3-5. Estimated Annual Construction Emissions (tons per year) for Conceptual Community Park Development Project Scenario

	ROGs (VOCs)	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Emissions (2027)	0.2	1.7	2.2	<0.1	0.5	0.2
Emissions (2028)	0.4	0.7	1.0	<0.1	<0.1	<0.1
Maximum	**0.4**	**1.7**	**2.2**	**<0.1**	**0.5**	**0.2**
SBCAPCD Recommended Threshold	**25**	**25**	**--**	**--**	**--**	**--**
Exceed Threshold?	**No**	**No**	**--**	**--**	**--**	**--**

Source: Appendix B.

Construction activities generating NO_x emissions would primarily be attributed to the operation of vehicles and large equipment that would occur throughout the construction process, but would generally be highest during the grading and building construction phases. Construction activities generating ROG (VOC) emissions would largely be attributed to the application of architectural coatings and paints during the final finishing phase of construction. As summarized in Table 3.3-5, the maximum emissions anticipated from construction of a large-scale community park under the Project, representing a highly conservative worst-case scenario, would be far below SBCAPCD's recommended thresholds for short-term construction impacts. Given the long-range schedule for the Project and the distribution of planned community parks, it is unlikely that construction emissions would compound from multiple projects enabled by the Project. Thus, the development of individual parks, trails, and recreational facilities projects involving new development that would be enabled by the Project is not considered to result in significant construction-related impacts.

However, despite anticipated construction-related emissions falling well below SBCAPCD's recommended thresholds, due to the county's designated nonattainment status for PM_{10}, SBCAPCD considers any discretionary project involving earth-moving activities as having the potential to generate PM_{10} emissions that could generate or contribute to a violation of federal

and state air quality standards, and "dust mitigation measures are required for all discretionary construction activities regardless of the significance of the fugitive dust impacts based on the policies in the 1979 Air Quality Attainment Plan." (SBCAPCD 2022c) In addition, the generation of fugitive dust during construction could have the potential to generate a public nuisance (SBCAPCD Rule 303) and/or result in noncompliance with SBCAPCD's requirements and standards for visible dust (SBCAPCD Rule 345). As such, the Project and the construction of improvements associated with discretionary actions are considered to result in a *potentially significant* impact from short-term PM_{10} emissions from construction.

Consistent with SBCAPCD's guidance and the County Grading Code, **MM AQ-1 (PM_{10} and Dust Control)** would require that construction activities associated with future development enabled under the Project implement measures to control PM_{10} and fugitive dust emissions generated during all stages of site construction. In addition, **MM AQ-2 (Exhaust Emissions)** would require future projects to implement measures to reduce construction-related exhaust emissions (PM_{10}) to the maximum extent feasible. Implementation of **MM AQ-1** and **MM AQ-2** would ensure that future construction projects enabled under the Project would not generate PM_{10} emissions that would generate or contribute to a violation of federal and state air quality standards, or violate existing SBCAPCD rules. Further, the vast majority of recreation development enabled by the Project, such as the development of pocket parks, neighborhood parks, and new trails, would not result in significant construction-related emissions, as most project work would occur by hand and using equipment with negligible emissions. With the implementation of the mitigation measures, construction impacts associated with the proposed Project would be *significant but mitigable*.

Operational

Recreational development under the Project would generate some long-term operational emissions. Because the county is in nonattainment for O_3 and PM_{10}, the Project could contribute to the existing nonattainment status for these pollutants. Operational emissions of the Project include those generated by the addition of new vehicle trips (mobile emissions) to and from recreational facilities, the use of landscaping maintenance equipment and consumer products (area source emissions), and the use of natural gas (energy emissions) and the use of appliances (e.g., microwaves, food preparation appliances) for the concession/bathroom buildings.

As described in the *Methodology* discussion of Section 3.3.4.1 *Thresholds of Significance*, modeling of operational emissions was performed using CalEEMod. A CalEEMod scenario was prepared to estimate emissions from a large community park and one of the largest potential development projects that could occur as a result of the Project. The estimated maximum daily emissions for this modeled scenario are presented in Table 3.3-6 and are compared against

applicable thresholds for determining the significance of impacts associated with operational emissions (Appendix B).

Table 3.3-6. Estimated Maximum Daily Operational Emissions (lbs/day) for Large-Scale Recreational Development Scenario

Category	ROG (VOC)	NO_X	CO	SO_2	PM_{10} Total	$PM_{2.5}$ Total
Mobile	2.2	1.4	11.6	<0.1	2.2	0.6
Area	0.7	<0.1	1.1	<0.1	<0.1	<0.1
Energy	<0.1	0.2	0.2	<0.1	<0.1	<0.1
Total	**2.9**	**1.6**	**12.9**	**<0.1**	**2.2**	**0.6**
SBCAPCD Threshold (all sources)	240	240	--	--	80	--
Exceed Threshold?	**No**	**No**	--	--	**No**	--
SBCAPCD Threshold (mobile sources)	25	25	--	--	--	--
Exceed Threshold?	**No**	**No**	--	--	--	--

Source: Appendix B.

Based on the highly conservative air emissions modeling results, operational emissions for NO_x, ROC, and PM_{10} resulting from the operation of individual recreational projects enabled by the Project would be far below adopted operational significance thresholds. Because operational emissions would not exceed SBCAPCD thresholds for the pollutants for which the county is in nonattainment, new recreational development directly proposed by the Project would not result in substantial contributions of these pollutants during operation on an individual project basis.

While it cannot be directly quantified, when considered together, the implementation of the uses and related development directly associated with the proposed Project (e.g., development and operation of the County's planned parks and trail projects) considered to have the potential to generate new mobile source emissions which would exceed adopted County and SBCAPCD thresholds for both NO_x and ROC. As previously discussed, the operation of other large recreational facilities, such as the Guadalupe Community Park & Campground and large-scale RBPs, may result in similar operational emissions to those presented above, given their similar size/scale. In contrast, minor, small-scale parks and recreation facilities would not generate stationary-source emissions and would generate only negligible mobile source emissions given their nature as non-intensive trip-generating uses. It must also be noted that the CalEEMod model run performed for this analysis does not account for the implementation of existing federal, state, or local regulations, sustainability features, or development standards aimed at reducing air emissions. Further, the modeled emissions do not account for the fact that individual recreational projects enabled by the proposed Project are not entirely new trip-

generating uses. The modeled emissions very conservatively assume mobile emissions from a new recreational facility are generated by new mobile trips. As previously described, parks, trails, and recreational facilities enabled by the Project would serve to meet the identified needs of existing communities throughout the county. By developing recreational facilities closer to existing communities in need of such services, in many cases, the Project is likely to reduce existing trip lengths and vehicle miles traveled (VMT), thereby generating fewer emissions than are assumed in this analysis. Please refer to Section 3.15, *Transportation,* for a detailed discussion of the Project's impacts on countywide VMT. Furthermore, it should be noted that the County's and SBCAPCD's significance thresholds for criteria pollutants do not distinguish between land use plans/programs and individual development projects. Therefore, the application of the SBCAPCD thresholds to a program-level EIR is highly conservative.

Despite the highly conservative analysis, given the small-scale nature of many of the recreational development projects and the insignificant criteria pollutant emissions generated by larger-scale recreational development projects, the operation of all recreational facilities directly proposed under the Project are not considered to generate substantial new criteria pollutant emissions which would exceed adopted County and SBCAPCD thresholds. Direct operational impacts of the Project are therefore considered *insignificant*.

In addition to operational emissions from County Parks projects enabled by the Project, the Project has the potential to result in new operational criteria pollutant emissions associated with the future recreational development enabled as a result of amendments to the County's Comprehensive Plan and associated zoning ordinance amendments, such as the proposed RBP Program. As described above, the proposed RBP program could enable development of larger projects, such as a new 160-site campground/RV park or a 2,000-seat outdoor amphitheater. Such use would be comparable in scale and operational characteristics to the larger County-proposed recreational development projects, and could individually generate a similar degree of operational criteria pollutant emissions. Given the modeled emissions for such uses do not exceed adopted County and SBCAPCD thresholds, impacts associated with the operational emissions of new privately-proposed recreational development projects and RBPs are considered *insignificant*.

Impact AQ-3. The Project could expose sensitive receptors to substantial pollutant concentrations or toxic or hazardous air pollutants.

As discussed in Section 3.3.2, *Environmental Setting*, sensitive receptors include individuals with pre-existing health problems, those who are close to an emissions source, or those who are exposed to air pollutants for long periods, and the establishments that host these individuals. Examples of sensitive receptors include schools, hospitals, and convalescent homes because the very young, the old, and the infirm are more susceptible to respiratory infections and other air quality-related health problems than the general public. Sensitive receptors affected by the

proposed Project would be residences, parks, hospitals, long-term care facilities, daycare centers (including public and private childcare centers, and worksites with onsite childcare facilities), and schools adjacent to project sites. The sensitive receptors described in Section 3.3.2, *Environmental Setting*, could experience adverse health effects from emissions generated from the construction and operation of recreational projects.

Typical Construction Emissions

Emissions generated by construction activities that are most likely to cause adverse effects on nearby sensitive receptors typically include fugitive dust (PM), diesel particulate matter (DPM) emissions, CO, NO_x, and ROGs (O_3 precursors). Sources of these pollutant emissions include exhaust of diesel-powered engines, emissions from combustion engines, and the generation of fugitive dust from earthmoving activities and soil disturbance. Operation of heavy equipment and vehicles would temporarily generate diesel exhaust, CO, and fugitive dust emissions on- and offsite, which could affect sensitive receptors located proximate to a project construction site or construction traffic route. Such emissions and impacts associated with individual construction projects would occur incrementally throughout site construction, which would be limited to a short period on an individual project basis. Further, as described in Impact AQ-2 above, the estimated annual construction emissions associated with the Project are not anticipated to generate emissions exceeding SBCAPCD's recommended thresholds. However, the County and SBCAPCD consider all construction activities within the county that involve earthwork activities to cause potential impacts from short-term PM_{10} and fugitive dust emissions. Given the proximity of several potential project sites to existing sensitive receptors, the construction of individual development projects may generate PM_{10} and/or fugitive dust emissions that adversely affect nearby sensitive receptors. As such, impacts from construction activities on nearby sensitive receptors are considered *potentially significant*.

Consistent with SBCAPCD's guidance and the County Grading Ordinance (County Code Chapter 14), **MM AQ-1** and **MM AQ-2** would require that construction activities associated with all future development projects permitted or enabled under the Project implement measures to control PM_{10}, fugitive dust, and equipment exhaust emissions generated during all stages of site construction. Implementation of **MM AQ-1** and **MM AQ-2** would ensure that future construction projects enabled under the proposed Project would not generate PM_{10} emissions that would contribute to substantial PM_{10} or fugitive dust emissions adversely affecting nearby sensitive receptors, or violate existing SBCAPCD rules, including SBCAPCD nuisance rules. With the implementation of these measures, impacts from typical construction activities would be reduced to a *significant but mitigable* level.

Asbestos Containing Materials and Lead-Based Paints

Typical construction has the potential to expose nearby sensitive receptors to the release of other hazardous air emissions associated with demolition activities. Older structures,

particularly those constructed before 1970, may be developed with materials such as asbestos-containing materials (ACMs) and lead-based paints (LBPs), which are known to be hazardous. Demolition of any structures containing ACMs and/or LBPs can have the potential to generate fugitive dust containing hazardous materials that could adversely affect nearby sensitive receptors. However, only one project currently proposes demolition activities: the Jalama Beach County Park Expansion and Coastal Access Improvements. Existing facilities at the park would be demolished to allow for the construction of new amenities and to rearrange the site. Jalama Beach County Park is 8.6 miles south of the City of Lompoc, the closest population center. There are no nearby sensitive receptors other than the campers themselves. During project development, the campground is likely to be closed, minimizing the potential sensitive receptors in the area. Therefore, demolition activities at Jalama Beach County Park would not expose nearby sensitive receptors to the release of hazardous air emissions. Overall, the Project has little potential to release ACMs and LBPs, and the impacts would be *insignificant*.

Toxic Air Contaminants and Adverse Health Risks

Operation of new recreational development would only result in minimal emissions of air toxics from maintenance or other ongoing activities, such as the use of chemicals (e.g., pesticides, fertilizers) for landscaping or application of cleaning solutions. Recreational developments enabled under the Project would not include the installation of industrial-sized paint booths or involve the extensive use of commercial or household cleaning products that could contribute significant TACs. Construction of new facilities as part of the Project would involve minimal truck trips and would therefore have limited emissions. Project development activities anticipated as part of the Project are not anticipated to consist of uses involving hazardous activities or the generation of hazardous materials and pollutants that are generally considered incompatible with residential development. As such, the potential development is not anticipated to generate TACs. Project impacts would be *insignificant*.

Localized CO Concentrations

As previously discussed in Section 3.3.4.1, *Thresholds of Significance,* while the County and SBCAPCD have adopted thresholds for determining impacts from the generation of a CO "hot spot," SBCAPCD has concluded that due to the relatively low background ambient CO levels in Santa Barbara County, localized CO impacts associated with congested intersections are not expected to exceed the CO health-related air quality standards. Therefore, CO "hot spot" analyses are no longer required (SBCAPCD 2022c), and due to the low background ambient CO levels in the county, impacts associated with CO "hot spots" are considered *insignificant*.

Impact AQ-4. The Project could generate odors or other nuisance problems impacting a considerable number of people.

According to CARB's CEQA Air Quality and Land Use Handbook (1993), objectionable odors are typically associated with industrial uses, some such as agricultural activities (e.g., farms and

dairies), refineries, wastewater treatment facilities, and landfills. The proposed Project would include the construction and operation of recreational facilities, which do not typically generate nuisance odors perceptible to the general public. Construction that would occur as a result of the proposed Project would be both temporally and geographically intermittent. Any odors that may be generated as a result of the development of individual project sites would be localized and temporary, and would not affect a substantial number of people or result in a nuisance as defined by SBCAPCD Rule 303.

Operationally, odors that would be expected from recreational development would typically be associated with smoke from campgrounds and barbeques, odors from trash receptacles at parks and RV dumping stations, and odors from dogs and equestrians. However, these odors would be consistent with those generated by existing recreational uses throughout the county and would be confined to the immediate vicinity of new recreational development. Additionally, it is expected that any individual project-generated refuse would be stored in covered containers and removed regularly, consistent with the County's solid waste and recycling pick-up requirements (e.g., LUDC Section 35.30.170). As such, the proposed Project would not generate odors substantially perceptible by sensitive receptors, and impacts associated with generation of objectionable odors would be *insignificant*.

3.3.4.3 Cumulative Impacts

Cumulative impacts related to air quality are related to air emissions that would be generated by recreational development throughout the county. This would include the construction and operational air quality impacts associated with the potential cumulative pending plans and projects throughout the SCCAB identified in Chapter 3, *Environmental Impact Analysis*.

Cumulative impacts on air quality could result from growth that would be inconsistent with the Ozone Plan and could therefore interfere with the attainment of federal or state ambient air quality standards within the county. As noted in Impact AQ-1 above, the Project would not substantially increase the permanent residential population, which could result in substantial population growth that would be inconsistent with the growth assumptions of SBCAG's Connected 2050 RTP/SCS and Regional Growth Forecast. Further, implementation of the Project, which focuses development of new recreational facilities, would be consistent with applicable policies, goals, and measures of the Land Use Element Air Quality Supplement. Therefore, the proposed Project would not result in regional housing and population growth that is not accounted for in the Connected 2050 RTP/SCS or Ozone Plan, and the implementation of the Project would not represent a substantial contribution to a cumulatively considerable impact resulting from consistency with the Connected 2050 RTP/SCS, Ozone Plan, or Land Use Element-Air Quality Supplement, and cumulative impacts would be *insignificant*.

As discussed above, the county is in nonattainment for O_3 and PM_{10}. Per the Ozone Plan, the latest emissions inventory and air quality modeling analysis indicate that significant reductions above and beyond those already achieved are still needed to meet these standards. Construction of recreation projects is not likely to exceed SBCAPCD recommended thresholds, and most construction projects are considered to result in insignificant contributions to regional O_3 precursor emissions. However, new construction and grading activities in the county are considered to result in potential impacts from PM_{10} emissions, including exhaust and dust, and the combined, cumulative effect of all construction in the county is considered to result in a cumulatively significant impact. The proposed Project would be required to implement **MM AQ-1** and **MM AQ-2**, which would mitigate significant impacts of the proposed Project to the maximum extent feasible, and the contribution of the proposed Project would be cumulatively *significant but mitigable*.

Concerning the contribution of operational emissions of the Project, the County concludes that the cumulative contribution of project emissions would be cumulatively considerable if it resulted in long-term emissions of O_3 precursors over long-term thresholds. Analysis in Impact AQ-2, operational emissions associated with Project activities would not exceed adopted thresholds. As such, the contribution of future emissions from the implementation (i.e., operation of parks) of the Project would not represent a substantial contribution to a cumulatively considerable impact. The proposed Project's contribution would represent a cumulatively *insignificant* cumulative impact.

3.3.4.4 Proposed Mitigation

MM AQ-1: PM_{10} and Dust Control. Development of County parks, permitted uses in Recreation zones, permitted parks and trails, and RBPs involving permitted construction activities ~~The County~~ shall require the following standards ~~for permitted uses in Recreation zones, permitted parks and trails, and RBPs~~:

- During construction, use water trucks, sprinkler systems, or dust suppressants in all areas of vehicle movement to prevent dust from leaving the site and from exceeding SBCAPCD's limit of 20 percent opacity for greater than 3 minutes in any 60-minute period. When using water, this includes wetting down areas as needed but at least once in the late morning and after work is completed for the day. Increased watering frequency should be required when sustained wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.
- Onsite vehicle speeds shall be no greater than 15 mph when traveling on unpaved surfaces.
- Install and operate a track-out prevention device where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can include any device or

combination of devices that are effective at preventing track out of dirt such as gravel pads, pipe-grid track-out control devices, rumble strips, or wheel-washing systems.

- If importation, exportation, and stockpiling of fill material are involved, soil stockpiled for more than one day shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.
- Minimize the amount of disturbed area. After clearing, grading, earthmoving, or excavation is completed, treat the disturbed area by watering, OR using roll-compaction, OR revegetating, OR by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur. All roadways, driveways, sidewalks, etc., to be paved should be completed as soon as possible.
- Schedule clearing, grading, earthmoving, and excavation activities during periods of low wind speed to the extent feasible. During periods of high winds (>25 mph) clearing, grading, earthmoving, and excavation operations shall be minimized to prevent fugitive dust created by onsite operations from becoming a nuisance or hazard.
- The contractor or builder shall designate a person or persons to monitor and document the dust control program requirements to ensure any fugitive dust emissions do not result in a nuisance and to enhance the implementation of the mitigation measures as necessary to prevent the transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to SBCAPCD before grading/building permit issuance and/or map clearance.

  Plan Requirements and Timing: This measure shall apply to applicable projects immediately following the certification of this EIR. These control measures shall be noted on all grading and building plans. The contractor or builder shall provide the County and SBCAPCD with the name and contact information for an assigned onsite dust control monitor(s) who has the responsibility to:

  - Assure all dust control requirements are complied with, including those covering weekends and holidays.
  - Order increased water as necessary to prevent the transport of dust offsite.
  - Attend the pre-construction meeting.

  The dust monitor shall be designated before the issuance of grading. The dust control components apply to the beginning of any grading or construction throughout all development activities until final inspection and until landscaping is successfully installed.

  Monitoring: County Parks ~~and~~ or County P&D processing planner(s) shall ensure measures are on the project plan. County grading and building inspectors shall spot-

check. Grading and Building shall ensure compliance onsite. SBCAPCD inspectors shall respond to nuisance complaints.

MM AQ-2: Equipment Exhaust. Development of County parks, permitted uses in Recreation zones, permitted parks and trails, and RBPs involving permitted construction activities ~~The County~~ shall require the following standards ~~for permitted uses in Recreation zones, permitted parks and trails, and RBPs~~:

- Diesel equipment meeting the CARB Tier 3 or higher emission standards for off-road heavy-duty diesel engines should be used to the maximum extent feasible.
- On-road heavy-duty equipment with model year 2010 engines or newer should be used to the maximum extent feasible.
- Diesel-powered equipment should be replaced by electric equipment whenever feasible. Electric auxiliary power units should be used to the maximum extent feasible.
- Equipment/vehicles using alternative fuels, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel, should be used onsite where feasible.
- Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
- All construction equipment shall be maintained per the manufacturer's specifications.
- The engine size of construction equipment shall be the minimum practical size. The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- Construction worker trips should be minimized by requiring carpooling and by providing lunch onsite.
- Construction truck trips should be scheduled during non-peak hours to reduce peak-hour emissions whenever feasible.
- Proposed truck routes should minimize, to the extent feasible, impacts on residential communities and sensitive receptors.
- Construction staging areas should be located away from sensitive receptors such that exhaust and other construction emissions do not enter the fresh air intakes of buildings, air conditioners, and windows.

Plan Requirements and Timing: This measure shall apply to applicable projects immediately following the certification of this EIR. These control measures shall be noted on all grading and building plans.

Monitoring: County Parks ~~and~~ or County P&D processing planner(s) shall ensure measures are on the project plan. County grading and building inspectors shall spot-check. Grading and Building shall ensure compliance onsite. SBCAPCD inspectors shall respond to nuisance complaints.

3.3.4.5 Secondary Impacts

Implementation of required mitigation measures would not result in any secondary impacts.

3.3.4.6 Residual Impacts

Impact AQ-1. The Project does not contribute to population growth and would be consistent with regional growth projections, the Connected 2050 RTP/SCS, Ozone Plan, and Land Use Element-Air Quality, and impacts would be *insignificant*.

Impact AQ-2. Implementation of **MM AQ-1** would require that construction activities implement measures to control PM_{10} and fugitive dust emissions generated during all stages of site construction. Implementation of **MM AQ-1** and **MM AQ-2** would ensure that future construction projects would not generate PM_{10} emissions that would generate or contribute to a violation of federal and state air quality standards, or violate existing SBCAPCD rules. With the implementation of **MM AQ-1** and **MM AQ-2**, construction impacts associated with the proposed Project would be reduced to *significant but mitigable.*

Impact AQ-3. Implementation of **MM HAZ-1** would eliminate or reduce potential adverse effects associated with the release of fugitive dust containing ACMs or LBPs. Therefore, with the implementation of **MM HAZ-1**, impacts would be *significant but mitigable*.

Impact AQ-4. Development enabled under the proposed Project would not generate odors substantially perceptible by sensitive receptors, and impacts associated with the generation of objectionable odors would be *insignificant*.

3.4 BIOLOGICAL RESOURCES

3.4.1 INTRODUCTION

This section describes potential impacts on biological resources that could occur from the implementation of the Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances Project (Project). This section describes existing special-status species, sensitive habitats, wetlands, and wildlife movement corridors in the Project area and discusses consistency with biological resources policies and regulations adopted by the County related to Environmentally Sensitive Habitat (ESH), Riparian Corridors (RC), oak (*Quercus* spp.) trees, and other local resources. The analysis addresses the temporary construction-related impacts and long-term impacts (e.g., human disturbance) that could result from future parks, trails, and related development as a result of the Project.

3.4.2 ENVIRONMENTAL SETTING

This section discusses existing conditions related to biological resources in Santa Barbara County. Given the programmatic nature of this Environmental Impact Report (EIR), no site-specific biological surveys have been conducted. Rather, the description of the environmental setting is based on information provided in previous long-range planning documents, recent EIRs prepared by the County, and associated technical studies. This discussion also references the results of countywide queries of the U.S. Fish and Wildlife Service (USFWS) Information, Planning, and Consultation (IPaC) database and California Department of Fish and Wildlife (CDFW) California Natural Diversity Database (CNDDB), as well as literature describing habitat requirements and distributions of special-status plant and wildlife species in the county (Appendix C). Additionally, the USFWS National Wetland Inventory (NWI) was used to identify potential wetland habitats throughout the county.

While these sources indicate the presence of sensitive biological resources throughout the county, they have not been recently analyzed. As such, available biological resources data is presented countywide and regionally, rather than relative to potential individual projects planned by the Project. The accuracy of the desktop research and available countywide data is limited by the various collection methods (ranging from site-specific surveys to aerial imagery and remote sensing) and age (in some cases, data was collected back nearly 40 years). Unlike other natural resources (e.g., cultural resources, geological formations, soils), which can remain in place indefinitely if undisturbed, sensitive biological resources, including special-status species and their habitats, are dynamic and can expand or contract in range due to a variety of natural and anthropogenic factors. Therefore, the regional data sources referenced in this analysis are not reliable on a site-specific basis

3.4.2.1 Existing Biological Resources

As described in Section 2.2.2, *Recreation Planning Regions*, this Program EIR recognizes five recreation planning areas geographically delineated for regions in Santa Maria Valley, Lompoc Valley, Santa Ynez Valley, Cuyama Valley, and the South Coast. Again, due to the large size and biological diversity of the unincorporated county, the discussion of biological resources is addressed regionally with a focus on both rural areas, where these resources can be most intact, and in more urban communities, which can also support potential intact habitat areas and sensitive species.

Santa Maria Valley

The Santa Maria Valley is formed by the Santa Maria River to the north and the Casmalia and Solomon Hills to the south, creating a wide valley that opens towards the Pacific Ocean. It includes the unincorporated communities of Orcutt, Casmalia, Garey, and Sisquoc, as well as the Cities of Guadalupe and Santa Maria.



The Solomon Hills in southern Orcutt support a range of sensitive habitats within existing undeveloped areas and designated open space.
Source: Santa Maria Times

While much of the Santa Maria Valley has been developed with agriculture and/or urban development, dune scrub, coastal sage scrub, wetlands, vernal pools, oak woodlands, and grasslands remain in undeveloped areas, particularly within the Solomon Hills, southwestern Orcutt, and Point Sal. Extensive eucalyptus (*Eucalyptus* spp.) woodlands also occur within the Solomon Hills and the central portion of Orcutt.

The southern portion of Orcutt includes riparian communities along the creeks and drainages, central dune scrub and grassland at lower elevations, oak woodland on north-facing slopes and in canyons, coastal sage scrub and sandhill chaparral on the higher and drier slopes, and bishop pine forest, which includes the rare Lompoc yerba santa (*Eriodictyon capitatum*) on and near Graciosa Ridge interspersed among sandhill chaparral (County of Santa Barbara 1995). The mosaic of oak woodland, scrub, grassland, and riparian communities in southern Orcutt provides continuity with the pine forest, chaparral, and grassland ecosystem to the southeast in the Solomon Hills, and the riparian, oak woodland, scrub, grassland, and wetland communities through and beyond the urban area to the northwest. The diversity of this assemblage of contiguous plant communities is important because it provides habitat for a high diversity of plant and wildlife species, allows movement between communities, and

enables these species to be capable of surviving extreme changes in the environment such as fire, flooding, and disease (County of Santa Barbara 1995).

The central, more developed portion of Orcutt contains central dune scrub, eucalyptus woodland, mixed woodland, grassland, and riparian communities along Orcutt Creek and the drainages originating in Pine Canyon and Graciosa Canyon. Although these areas are generally small, they provide a continuous stretch of habitat that is vital for plants and wildlife, linking the open lands of the Solomon and Casmalia Hills with the extensive grasslands and wetlands beyond the limits of Orcutt and the City of Santa Maria (County of Santa Barbara 1995).

The western portion of Orcutt is relatively flat and dominated by grassland. Riparian communities occur along several unnamed drainages and Orcutt Creek, and together provide another continuous stretch of habitat with connections to the more rugged and open lands of the Solomon Hills. An extensive vernal wetland/dune complex is located south and west of the Santa Maria Airport. This vernal wetland/dune complex can be considered the best example of vernal wetlands in Santa Barbara County. It supports a diverse array of water-dependent birds, rare amphibians, and plants. The grasslands in western Orcutt provide ideal hunting opportunities for many species of raptors, including golden eagles (*Aquila chrysaetos*), loggerhead shrikes (*Lanius ludovicianus*), and white-tailed kites (*Elanus leucurus*), providing connectivity with the Casmalia Hills to the south. The Casmalia Hills are vegetated by grassland, oak woodland, and central coastal scrub (dominated by black sage [*Salvia mellifera*] and Lompoc monkeyflower [*Diplacus lompocensis*]). Small wetlands occur near the ridge of these hills.

At the very western end of the Santa Maria Valley, north of Vandenberg Space Force Base, lies the County's Point Sal Reserve and Point Sal State Beach. The Point Sal area is characterized by steep slopes and ridgelines and tall dunes, which back two wide sandy beaches. Point Sal Ridge, a steep east-west oriented ridgeline, divides inland valleys and coastal ranches from ½-mile-long Point Sal Beach and the more remote 1.5-mile-long Paradise Beach to the north. Public land ownership encompasses Point Sal, Point Sal Ridge, which bisects the area, a major coastal dune complex to the northwest, rolling hills and inland valleys, and the wide sandy beaches at Point Sal State Beach and Paradise Beach.

Studies conducted for the area identified 14 plant communities in the Point Sal Reserve area, including active coastal dunes; foredunes; coastal bluff scrub; central dune scrub; central coastal sage scrub; chamise chaparral; central maritime chaparral; needlegrass grassland; ehrharta grassland; non-native (annual) grassland; freshwater seeps; central coast arroyo willow riparian forest; dune slack pond; and freshwater marsh. Of these, central dune scrub, central maritime chaparral, needlegrass grasslands, and wetlands are sensitive plant communities. Maritime chaparral plant communities contain several regionally endemic plants, including species of manzanita (*Arctostaphylos* spp.), ceanothus (*Ceanothus* ssp.), bush

monkey flower (*Diplacus aurantiacus*), dune larkspur (*Delphinium parryi* ssp. *Blochmaniae*), monardella (*Monardella* spp.), and Blochman's leafy daisy (*Erigeron blochmaniae*) (Storrer and Semonsen Environmental Services 1990a). Perennial native grasslands are found along the crest of Point Sal Ridge, on the north slope of the ridge, and around scrub habitats throughout the area. Livestock grazing and non-native grasses have displaced much of the native grasslands at Point Sal. Wetland communities at Point Sal occur at tributary streams to Happy Valley, the ephemeral pond at the lower end of the southern tributary, and along the coastal bluff between Point Sal and Mussel Point. These wetlands contain emergent aquatic vegetation such as cattails and rushes and are extremely susceptible to livestock damage, erosion, sedimentation, and invasive plants (Storrer and Semonsen Environmental Services 1990a).

Point Sal's unique climate and isolation, combined with coastal upwelling and thermoclines, make it a perfect habitat for a wide range of species. A total of 11 habitat types have been identified in the area, including nearshore waters, intertidal, sandy beach, rocky shoreline (including both Point Sal and Mussel Point), foredune, stabilized dune scrub, coastal sage scrub, chaparral scrub, willow riparian, wetland, and non-native woodland. Marine mammals at Point Sal include steller sea lion (*Eumetopias jubatus*), northern fur seal (*Callorhinus ursinus*), Guadalupe fur seal (*Arctocephalus townsendii*), northern elephant seals (*Mirounga angustirostris*), and harbor seals (*Phoca vitulina*), which all have been known to use the haulouts at Point Sal and Lion Rock. There are also numerous species of birds at Point Sal, including land birds such as Southern California rufous-crowned sparrow (*Aimohpila ruficeps canescens*), sage sparrow, and grasshopper sparrow (*Ammodramus savannarum*), as well as coastal birds such as white-crowned sparrow (*Zonotrichia leucophrys*). Many raptors have been known to roost at Point Sal, including golden eagle (*Aquila chrysaetos*), red-tailed hawk (*Buteo lineatus*), northern harrier (*Circus cyaneus*), American kestrels (*Falco sparverius*), barn owls (*Tyto alba*), great-horned owls (*Bubo virginianus*), and turkey vultures (*Cathartes aura*) (Storrer and Semonsen Environmental Services 1990b).

Several special-status species inhabit the Santa Maria Valley with more limited distribution in Orcutt, including plants, such as California jewelflower (*Caulanthus californicus*), Gambel's watercress (*Nasturtium gambelii*), and wildlife such as California tiger salamander (*Ambystoma californiense*), arroyo toad (*Anaxyrus californicus*), Southwestern pond turtle (*Actinemys pallida*), western snowy plover (*Charadrius nivosus nivosus*), least Bell's vireo (*Vireo bellii pusillus*), and vernal pool fairy shrimp (*Branchinecta lynchi*) (Appendix C). In addition, federally designated critical habitat for California red-legged frog (*Rana draytonii)*, California tiger salamander, La Graciosa Thistle (*Cirsium loncholepis*), Lompoc yerba santa, tidewater goby (*Eucyclogobius newberryi*), and western snowy plover is present within the Santa Maria Valley (USFWS 2025a).

Lompoc Valley



Several areas in Vandenberg Village and Mission Hills such as the vacant infill areas on Apollo Way (pictured above) support or border sensitive Burton Mesa chaparral habitat.
Source: Compass.com

Unincorporated areas within the Lompoc Valley contain extensive undeveloped open space and habitat areas associated with the Santa Ynez River corridor north of the City of Lompoc and the Burton Mesa Ecological Reserve near Purisima Hills surrounding the communities of Vandenberg Village, Mission Hills, and Mesa Oaks. The Santa Ynez River in this region is characterized by freshwater forested and shrub wetland habitats, with freshwater emergent wetland and riverine habitats, which support federally designated critical habitat for the federally endangered southwestern willow flycatcher (*Empidonax traillii extimus*) (USFWS 2025a). Extensive stands of Burton Mesa chaparral habitat surround and occur on many remaining undeveloped lands within the unincorporated communities of Vandenberg Village, Mission Hills, and Mesa Oaks. Burton Mesa chaparral is a rare type of declining maritime chaparral habitat that supports many sensitive plant species, such as rare manzanitas and ceanothus species. The proposed Gaviota Marine Terminal to Point Conception Coastal Trail Project lies within a grassy coastal habitat with a known presence of the California red-legged frog along the Gaviota coast.

Jalama Beach County Park is approximately 45 acres and serves as an essential coastal access point — one of only four in northern Santa Barbara County, and the only one classified as a Low-Cost Coastal Accommodation. The park provides visitors with a wide variety of activities, including camping, free access to the beach, a children's playground, and proximity to one of the County's most popular surf breaks. However, the rising popularity of the campground over the past decade has constrained public access to this important beach by day visitors, and aging facilities struggle to accommodate increases in demand. Jalama Creek, located immediately north of the park, is a perennial stream that is known to support numerous sensitive wildlife species(e.g., southwestern pond turtle, tidewater goby). The USFWS and National Marine Fisheries Services have designated portions of Jalama Creek and its associated uplands as critical habitat for California red-legged frog and southern California steelhead (*Oncorhynchus mykiss irideus*) (USFWS 2025b). It is designated ESH by the County and is regulated by federal and state resource agencies (i.e., USFWS, U.S. Army Corps of Engineers [USACE], CDFW, Regional Water Quality Control Board [RWQCB]). There are also several ephemeral drainages in the vicinity of the park that direct stormwater runoff toward the coastal bluffs and Pacific Ocean. The ephemeral drainages are culverted under Jalama Road and the

UPRR. Except for the beaches/dunes and the developed campground, the upland habitat surrounding the park is within USFWS-designated critical habitat for state- and federally listed Gaviota tarplant (*Deinandra increscens* ssp. *villosa*) (Appendix C).

Sensitive or special-status species expected to inhabit rural areas within the Lompoc Valley include species such as the California least tern (*Sternula antillarum borwni*), the Hawaiian petrel (*Pterodroma sandwichensis*), foothill yellow-legged frog (*Rana boylii*), vernal pool fairy shrimp, and the southwestern pond turtle (Appendix C). In addition, federally designed critical habitat for California red-legged frog, California tiger salamander, Gaviota tarplant, La Graciosa thistle, Lompoc yerba santa, monarch butterfly (*Danaus plexippus*), southwestern willow flycatcher, tidewater goby, and Vandenberg monkeyflower (*Diplacus vandenbergenis*) exist within the Lompoc Valley (USFWS 2025; Table 3.4-1).

Santa Ynez Valley

The Santa Ynez Valley is located in the central region of Santa Barbara County at the base of several converging mountain ranges, including the Santa Ynez Mountains and the San Rafael Mountains, as well as the Purisma Hills and the Santa Rita Hills. The Santa Ynez Valley includes pockets of urban development, including the unincorporated communities of Santa Ynez, Ballard, Los Olivos, and Los Alamos, as well as the cities of Buellton and Solvang. Agricultural land uses, including ranches and grazing lands, irrigated row crops, and vineyards occur throughout the rural areas of the valley. Undeveloped land supporting natural habitats is present surrounding the urban development and agricultural lands and in larger, less fragmented concentrations further away from existing development.

The Santa Ynez River originates on the north slope of the Santa Ynez Mountains and the south slope of the San Rafael Mountains flowing from east to west through the Santa Ynez Valley and emptying into the Pacific Ocean at Surf Beach near the City of Lompoc. The riverbed contains alternate channels that are vegetated by coastal and valley freshwater marshes. Vegetation within the floodplain consists of coast live oak riparian forest, central coast cottonwood-sycamore riparian forest, Central Coast arroyo willow riparian forest, and Central Coast riparian scrub (County of Santa Barbara 2009).



Biological resources in the Santa Ynez Valley are mainly associated with the Santa Ynez River and undeveloped rural lands. Areas within the urban boundaries of Santa Ynez, Los Olivos, Ballard, and Los Alamos are generally characterized by disturbed undeveloped land bordered by roadways, utilities, and fences.
Source: Google Earth

Plant communities within the Santa Ynez Valley include valley needlegrass grassland, non-native grassland, oak savanna and woodland, riparian forest and scrub, wetlands, buck brush chaparral, eucalyptus woodland, and coastal scrub (County of Santa Barbara 2009). The unincorporated community of Los Alamos, located on the western end of the Santa Ynez Valley, includes a reach of San Antonio Creek and its associated Riparian Corridor. Most of San Antonio Creek is located within a narrow strip of semi-rural land between the northern edge of the urbanized area and U.S. Highway 101 (County of Santa Barbara 2011). The entire reach of San Antonio Creek within and adjacent to the unincorporated community of Los Alamos has been channelized for flood control purposes and most reaches are periodically cleared of vegetation. Native grasslands, wildflower fields, coastal scrub, oak woodland, oak savannah, and riparian woodlands have been increasingly fragmented or eliminated by agricultural conversion in this area. Most of the remaining grasslands and woodlands in the Los Alamos Valley, Purisima Hills, and Solomon Hills are used as rangeland, but extensive portions of rangeland have been converted to vineyard production (County of Santa Barbara 2011).

The habitats within the Santa Ynez Valley support a variety of special-status plants and wildlife, which include species such as Gambel's watercress, Salt marsh bird's-beak (*Cordylanthus maritimus ssp. maritimus*), Least bell's vireo, arroyo toad, foothill yellow-legged frog, California red-legged frog, southwestern willow flycatcher, and Tidewater goby (Appendix C). In addition, federally designated critical habitat for California red-legged frog, California tiger salamander, southwestern willow flycatcher, Arroyo toad, California condor, and vernal pool fairy shrimp exist within the planning area (USFWS 2025a); (Table 3.4-1).

Cuyama Valley



A small tributary of the Cuyama River bisects New Cuyama. However, the surrounding agricultural and rural residential land uses limit the extent of riparian vegetation.
Source: Google Earth

The Cuyama Valley is located between the Caliente Mountain Range to the north and the Sierra Madre Mountains to the south and is bisected by the Cuyama River. This area is sparsely populated with the small unincorporated communities of Cuyama, New Cuyama, and Ventucopa, which are located along the Cuyama River in the northernmost portion of the Cuyama Valley and on the eastern edge of the county. Together these three small unincorporated communities provide several hundred homes and associated commercial development and public infrastructure in each community. Each of these communities is surrounded by rural agricultural lands (e.g., ranches, grazing lands, row crops) that occur on either side of the Cuyama River. Small tributaries to the Cuyama River also traverse these areas. Given the surrounding agricultural and rural residential uses, native vegetation along these tributaries is generally limited to a small number of trees and vegetation growing along the banks.

More extensive, unfragmented habitat is located to the southwest of these communities and associated with agricultural land uses. Natural ecological communities in the Cuyama Valley include oak woodland, sage communities, chaparral communities, native and non-native grassland, riparian woodland, freshwater habitats, and perennial and ephemeral streams (County of Santa Barbara 2014).

There are several federally listed and state-listed plant and wildlife species in the Cuyama Valley, several of which are only found in this area (Appendix C). The Cuyama Valley also contains federally designated critical habitat for Arroyo toad, California Condor, California red-legged frog, Least bell's vireo, Southwestern willow flycatcher, and Vernal pool fairy shrimp (USFWS 2025a). The Cuyama Valley has also been recognized by the National Audubon Society as an Important Bird Area (National Audubon Society 2025).

South Coast Region

Unincorporated areas of the South Coast region include the unincorporated communities of the Eastern Goleta Valley, Montecito, Summerland, Isla Vista, Toro Canyon, and Mission Canyon. These areas contain a range of habitats, including riparian woodlands along multiple creeks, coastal sage scrub, chaparral, oak and eucalyptus woodlands, and various types of wetlands. The foothill regions above Goleta, Santa Barbara, and Carpinteria are traversed by multiple drainages flowing from the Santa Ynez Mountains. These drainages support vegetated riparian

corridors in foothill areas and commonly extend into urban areas. For example, Maria Ygnacio Creek and Atascadero Creek traverse the Eastern Goleta Valley to converge directly south of the South Patterson Agricultural Area at the Goleta Slough and empty to the Pacific Ocean at Goleta Beach County Park. Foothills slopes are characterized by coastal sage scrub in lower elevation areas and chaparral in mid to higher elevations, with oak woodland sand grasslands interspersed within these areas.



In Eastern Goleta Valley, sensitive oak or riparian woodlands follow creek corridors such as Atascadero Creek and Maria Ygnacio Creek, which converge near the South Patterson Agricultural Area.
Source: EdHat

Within more urbanized areas, tracts of open grassland occur on level areas, with coastal sage scrub and oaks woodland habitats occupying sloping areas. Undeveloped hillsides commonly support mature oak woodland mixed with grassland and coastal sage scrub. Creek corridors, such as Atascadero Creek, provide riparian vegetation from the foothills through the urban areas. The Eastern Goleta Valley supports coast live oak and riparian woodlands along Atascadero Creek and Maria Ygnacio Creek within the South Patterson Agricultural Block. The Glen Annie Golf Course located north of the City of Goleta is traversed by one unnamed creek and is bordered by several areas of coastal sage scrub habitat and a perennial segment of Glen Annie/Tecolotito Creek and has a well-developed riparian corridor to the east (County of Santa Barbara 2015).

The Eastern Goleta Valley Community Plan identifies ESH under a mapped overlay, including habitats such as riparian woodlands, monarch butterfly roosts, coastal sage scrub, chaparral where it supports rare or vulnerable native vegetation alliances or sensitive native plant or wildlife species, oak woodlands, vernal pools, native grasslands, wetlands, dunes, white-tailed kite foraging habitat, raptor and turkey vulture roosts, critical wildlife habitat and wildlife corridors (County of Santa Barbara 2015a).

There are several federally listed and state-listed plant and wildlife species on the South Coast (Appendix C). In addition, federally designated critical habitats for Arroyo toad, California red-legged frog, the federally listed and state-listed Gaviota tarplant, Least bell's vireo, monarch butterfly, the federally endangered tidewater goby, the federally endangered Ventura marsh milk-vetch (*Astragalus pycnostachyus* var. *lanosissimus*), and the federally threatened western snowy plover exist within the region (USFWS 2025a; Table 3.4-1).

Table 3.4-1. Federally Designated Critical Habitat for Threatened and Endangered Species in Santa Barbara County

Common Name	Scientific name	Federal Status	Present in the Planning Area?
AMPHIBIANS			
California tiger salamander	*Ambystoma californiense*	Endangered	Santa Maria Valley Lompoc Valley Santa Ynez Valley
Arroyo toad	*Anaxyrus californicus*	Endangered	Santa Maria Valley Santa Ynez Valley Cuyama Valley South Coast
California red-legged frog	*Rana draytonii*	Threatened	Santa Maria Valley Lompoc Valley Santa Ynez Valley Cuyama Valley South Coast
BIRDS			
California condor	*Gymnogyps californianus*	Endangered	Cuyama Valley Santa Ynez Valley
Western snowy plover	*Charadrius lexandrines nivosus*	Threatened	Santa Maria Valley South Coast
Southwestern willow flycatcher	*Empidonax traillii extimus*	Endangered	Lompoc Valley Santa Ynez Valley Cuyama Valley
Least Bell's vireo	*Vireo bellii pusillus*	Endangered	Cuyama Valley South Coast Santa Ynez Valley
FISH			
Tidewater goby	*Eucyclogobius newberryi*	Endangered	Santa Maria Valley Lompoc Valley South Coast
INVERTEBRATES			
Vernal pool fairy shrimp	*Branchinecta lynchi*	Threatened	Santa Ynez Valley Cuyama Valley
INSECTS			
Monarch butterfly	*Danaus plexippus*	Proposed Threatened	Lompoc Valley South Coast
PLANTS			
Gaviota tarplant	*Deinandra increscens* ssp. *Villosa*	Endangered	Lompoc Valley South Coast
La Graciosa thistle	*Cirsium scariosum* var. *loncholepis*	Endangered	Santa Maria Valley Lompoc Valley
Lompoc yerba santa	*Eriodictyon capitatum*	Endangered	Santa Maria Valley Lompoc Valley

Table 3.4-1. Federally Designated Critical Habitat for Threatened and Endangered Species in Santa Barbara County (Continued)

Common Name	Scientific name	Federal Status	Present in the Planning Area?
PLANTS (Continued)			
Vandenberg monkeyflower	*Diplacus vandenbergensis*	Endangered	Lompoc Valley
Ventura Marsh Milk-vetch	*Astragalus pycnostachyus* var. *lanosissimus*	Endangered	South Coast

Source: USFWS 2025a.

3.4.2.2 Special-Status Species

As discussed in Section 3.4.2.1, *Existing Biological Resources*, Section 3.4.2.3, *Sensitive Habitats*, and Appendix C, habitats in the county support a diversity of special-status plant and wildlife species.

Special-status plant species include those that are:

- Listed or proposed for listing as threatened or endangered under the Federal Endangered Species Act (ESA) (50 Code of Federal Regulations [CFR] §17.12, and various notices in the Federal Register [FR] [proposed species]).
- Candidates for possible future listing as threatened or endangered under the Federal ESA.
- Listed or proposed for listing by the State of California as threatened or endangered under the California Endangered Species Act (CESA).
- Candidates for possible future listing as threatened or endangered under CESA.
- Consistent with the definitions of rare or endangered under the California Environmental Quality Act (CEQA) (CEQA Guidelines Section 15380).
- Listed as rare under the California Native Plant Protection Act (California Fish and Game Code Section 1900 et seq.).
- Listed by the California Native Plant Society (CNPS) as California Rare Plant Ranks (CRPR) 1A, 1B, 2A, 2B, 3, or 4 (CNPS 2025).

Special-status wildlife species include those that are:

- Listed or proposed for listing as threatened or endangered under the Federal ESA (50 CFR §17.11, and various notices in the FR (proposed species).
- Candidates for possible future listing as threatened or endangered under the Federal ESA.
- Listed or proposed for listing by the State of California as threatened or endangered under CESA.
- Candidates for possible future listing as threatened or endangered under CESA.
- Species of special concern to CDFW.

- Species fully protected in California (California Fish and Game Code, Section 3511 [birds], Section 4700 [mammals], Section 5050 [amphibians and reptiles], and Section 5515 [fish]).
- Species that meet the definitions of rare or endangered under CEQA (CEQA Guidelines Section 15380).

According to the CNDDB, Santa Barbara County (including the Channel Islands) is known to contain 55 federally listed and 51 state-listed rare, threatened, or endangered wildlife species (CDFW 2025). See Appendix C for a full list of special-status plant and wildlife species and their habitat requirements, organized by region, as well as the list of special-status species with potential to existing in the vicinity of Jalam Beach County Park.

Special-status wildlife species tend to occur within more extensive, unfragmented open spaces. Special-status birds (e.g., Swainson's hawk [*Buteo swainsoni*] and tricolored blackbird [*Agelaius tricolor*]) generally occur within relatively narrow bands of riparian habitats; however, they may also occur as transients in urbanized areas as well. Additionally, some special-status birds (e.g., burrowing owl [*Athene cunicularia*]) can also occur within agricultural lands. Many of the special-status amphibians and fish species that occur within the county use aquatic habitats immediately adjacent to existing urban development or agricultural land uses. Special-status plant species occur throughout the county, including within and adjacent to urban areas, but generally tend to be located within unfragmented areas with larger expanses of undisturbed native habitats.

3.4.2.3 Sensitive Habitats

The county contains several sensitive habitats designated by the federal government, the state, and/or the County.

Federally designated critical habitat is defined in Section 3(5)(A) of the Federal ESA as:

(i) The specific areas within the geographical area occupied by the species, at the time it is listed in accordance with the ESA, on which are found those physical or biological features essential to the conservation of the species and which may require special management considerations or protection; and
(ii) Specific areas outside the geographical area occupied by the species at the time it is listed, upon a determination that such areas are essential for the conservation of the species.

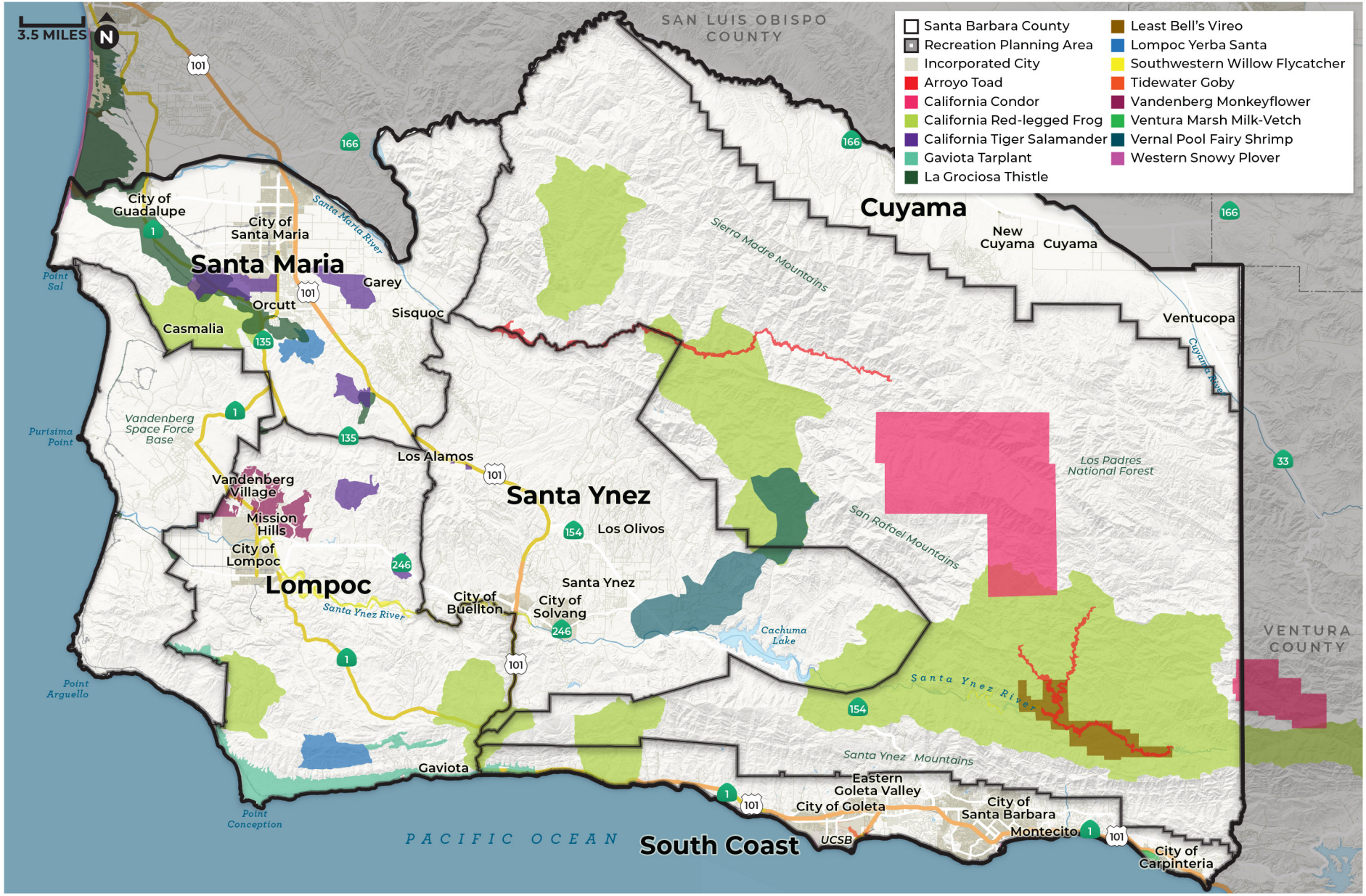
As described in Section 3.4.2.1, *Existing Biological Resources*, federally designated critical habitat has been designated within each of the five recreation planning areas in the county. However, the majority of these areas are located away from the developed areas within larger, unfragmented areas. Within the South Coast, federally designated critical habitat within the developed areas is generally limited to aquatic habitat for the endangered tidewater goby (e.g., within Atascadero Creek). Federally designated critical habitat for Vandenberg monkeyflower

occurs within or near Vandenberg Village and Mission Hills in Lompoc Valley. Additionally, federally designated critical habitat for the La Graciosa thistle and California tiger salamander occurs within or near Orcutt in the Santa Maria Valley, and federally designated critical habitat for the vernal pool fairy shrimp occurs within or near unincorporated communities such as Santa Ynez in Santa Ynez Valley (USFWS 2025a).

The California Coastal Act places a high priority on the protection of biological and natural resources. Strict limits are placed on development in the Environmental Sensitive Habitat Area (ESHA)[1] within the Coastal Zone. Section 30107.5 of the California Coastal Act defines ESHA as "any area in which plant or animal life or their habitats are either rare or especially valuable because of their special nature or role in an ecosystem and which could be easily disturbed or degraded by human activities and developments." Very limited types of development are allowed in ESHA and then only where there is no feasible less environmentally damaging alternative and feasible mitigation measures have been adopted. In general, only land uses that are dependent on the habitat resources are allowable within ESHA.

The County's Comprehensive Plan, including the Conservation Element, Open Space Element, Environmental Resource Management Element, Land Use Element, and Coastal Land Use Plan (CLUP), contains policies identifying the protection, preservation, and enhancement of biological and natural resources (Section 3.4.3, *Regulatory Setting*). These plans and policies promote the protection of important biological and natural resources and ensure that new development is compatible with these resources and the surrounding environment(County of Santa Barbara 2010). Additionally, some County community plans include local definitions and development standards for ESH. ESH includes areas such as wetlands, intertidal areas, monarch butterfly habitats, streams, riparian corridors, native grasslands, and other native plant communities. Community plans establish goals and policies to avoid disturbance to sensitive resources within mapped ESH. These standards apply where ESH exists and may be affected during development projects. The County built upon these policies by identifying and mapping the approximate extent of ESH overlays in some communities, including on the South Coast in the Eastern Goleta Valley, Mission Canyon, Summerland, and Toro Canyon. Given the nature of the mapping, the ESH overlays serve as an indicator of potential ESH but may not reflect actual site-specific extents of biological resources.

[1] Note that environmentally sensitive areas are defined by the California Coastal Commission (CCC) as "environmentally sensitive habitat areas" or "ESHA" in the Coastal Zone and by the County as "environmentally sensitive habitat" or "ESH" in inland areas.



wsp

Federally Designated Critical Habitats in Santa Barbara County

FIGURE 3.4-1



wsp

Environmentally Sensitive Habitats in the South Coast of Santa Barbara County

FIGURE 3.4-2

3.4.2.4 Wetlands and Other Waters of the United States

As further described in Section 3.10, *Hydrology and Water Quality*, the county supports several major water bodies (e.g., the Santa Ynez River, Santa Maria River, Sisquoc River, Cuyama River, San Antonio Creek), as well as smaller streams and tributaries throughout the region (e.g., Jalama Creek, Atascadero Creek, San Jose Creek). These water bodies support riverine and riparian habitats that support sensitive plants and wildlife in the county.

Riparian habitat occurs in and along the county's many creeks and streams, and arroyos, barrancas, and other types of drainages throughout the county. Riparian habitats protect stream banks from erosion, provide shade, and preserve water quality by filtering sediment and some pollutants from runoff before entering streams. As described in the County's Conservation Element, pursuant to Government Code §65302(d)(3), the County is required to provide a map that details rivers, creeks, riparian corridors, and other land areas which "may accommodate floodwater for purposes of groundwater recharge and stormwater management." Riparian Corridors are mapped on the South Coast in Eastern Goleta Valley, Mission Canyon, Montecito, Summerland, and Toro Canyon (County of Santa Barbara 2010).

All naturally occurring wetlands are considered to be significant biological resources because they provide a high number of functions in a generally dry, arid region, and because of their rarity within the region. Wetlands provide food, cover for protection against predators, and breeding habitat for organisms such as invertebrate larvae and amphibians. Mammals also use these habitats as a drinking water source, and some species may forage in wetlands. Wetland types found throughout the County include freshwater emergent wetland, freshwater forested/shrub wetland, freshwater pond, lake, slough, estuary, and riverine. Wetland habitats are regulated by the USACE pursuant to Section 404 of the Clean Water Act (CWA)[2], the Central Coast RWQCB pursuant to Section 401 of the CWA, and CDFW pursuant to Section 1600 of the California Fish and Game Code. Additionally, development within and adjacent to wetland habitats within the county is subject to the County policies, as well as the California Coastal Commission (CCC) for development within the Coastal Zone.

In addition to wetland habitats, Santa Barbara County also has seasonal pools that contain standing water on an ephemeral basis. In some cases, seasonal pools contain emergent wetland vegetation. However, seasonal pools with shorter hydroperiods may contain few emergent wetland plant species and may be classified as vernal pools. Vegetation in these pools may be sparse and consist mainly of upland plant species or specialized vernal pool

[2] As described in Section 3.10, *Hydrology and Water Quality*, on May 25, 2023, the U.S. Supreme Court issued a ruling on *Sackett et ux. v. Environmental Protection Agency et al.* (598 U.S. ___ [2023]) that limits the jurisdiction of the CWA. Under this ruling, the U.S. Supreme Court held that the CWA's use of "waters" under Section 1362(7) refers only to "geographic[al] features that are described commonly as "streams, oceans, rivers, and lakes" and to adjacent wetlands that are "indistinguishable" from those bodies of water due to continuous surface connection.

species. Puddles that form in road ruts or other anthropogenic areas can be considered seasonal pools. These areas can be important biologically because they can contain threatened and endangered species, such as vernal pool fairy shrimp, and provide habitat for a variety of aquatic invertebrates.

3.4.2.5 Wildlife Movement Corridors

Habitat linkages and wildlife corridors are suitable wildlife habitat areas in a region otherwise fragmented by rugged terrain, changes in vegetation, or human disturbance. Wildlife movement corridors or habitat linkages are critical to maintaining populations of plant and wildlife species. Wildlife corridors are typically bounded by urban areas or other areas unsuitable for wildlife. The fragmentation of large habitat areas into small, isolated segments reduces biological diversity, eliminates disturbance-sensitive species, restricts gene flow between populations, and may eventually lead to local extinctions of entire floral or faunal assemblages. Many land use planning guidelines now recognize the importance of protecting wildlife movement corridors and seek to retain major linkages wherever possible. However, defining precise corridor alignments and specific spatial and resource requirements can be problematic. The county and resource and conservation agencies consider wildlife movement corridors to be sensitive.

Depending on the species, wildlife movement corridors can vary from relatively narrow paths for movement between breeding and foraging areas to areas at the scale of mountain ranges or valleys for dispersal and migration. Natural features such as canyon drainages, ridgelines, or areas with vegetation cover provide corridors for wildlife travel. Many of the major wildlife movement corridors are represented by the ESH and Riparian Corridor overlays, which have been mapped along substantial portions of the main waterways. For example, in Eastern Goleta Valley, Atascadero Creek serves as an important wildlife corridor because it connects Goleta Slough, More Mesa, Lower Maria Ygnacio Creek, and the San Marcos Foothills. Wylie Canyon, San Pedro Creek, Encina Creek, Fremont Creek, San Jose Creek, Maria Ygnacio Creek, San Antonio Creek, and San Roque Creek also support wildlife movement from the mountains to the ocean within undeveloped passageways.

Agricultural land uses occur throughout much of the county and many wildlife species may move through agricultural fields that connect areas of native vegetation. For example, California red-legged frogs and California tiger salamanders are known to use fields that are currently in agricultural production during dispersal and migration. These species move between aquatic habitats traversing through upland areas; they may remain in suitable terrestrial habitats for periods of several months to years. Juveniles disperse away from aquatic breeding sites, apparently without regard to habitat corridors such as riparian areas when in undeveloped landscapes. Therefore, aquatic and terrestrial breeding and migration areas are required for species conservation.

3.4.3 REGULATORY SETTING

Federal, state, and local regulations have been enacted to protect biological resources in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future recreation development under the Project and its associated impacts.

3.4.3.1 Federal

Federal Endangered Species Act

Under the Federal ESA, it is unlawful to "take" any species listed as threatened or endangered. Take is defined as actions intended to "harass, harm, pursue, hunt, shoot, wound, kill, trap, capture, collect, or attempt to engage in any such conduct." An activity is defined as a take even if it is unintentional or accidental. Take provisions under the Federal ESA apply only to listed fish and wildlife species under the jurisdiction of USFWS and/or the National Oceanic and Atmospheric Administration, or National Marine Fisheries Service (NMFS). Consultation with USFWS or NMFS is required if a project "may affect" or result in the take of a listed species.

When a species is listed, USFWS and/or NMFS, in most cases, must officially designate specific areas as critical habitats for the species. Consultation with USFWS and/or NMFS is required for projects that include federal action or federal funding if the project would modify designated critical habitat.

Clean Water Act Section 404

Under Section 404 of the CWA, USACE regulates the discharge of dredged or fill material into U.S. waters. U.S. waters are those waters that have a connection to interstate commerce, either directly via a tributary system or indirectly through a nexus identified in USACE regulations. In nontidal waters, the lateral limit of jurisdiction under Section 404 extends to the ordinary high-water mark (OHWM) of a water body or, where adjacent wetlands are present, beyond the OHWM to the limit of the wetlands. The OHWM is defined as "that line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear natural line impressed on the bank, shelving, changes in the character of the soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding area" (33 CFR §328.3). In tidal waters, the lateral limit of jurisdiction extends to the high tidal line or, where adjacent wetlands are present, beyond the high tidal line to the limit of the wetlands.

On May 25, 2023, the U.S. Supreme Court issued a ruling on *Sackett et ux. v. Environmental Protection Agency et al.* (598 U.S. ___ [2023]) that limits the jurisdiction of the CWA. Under this ruling, the U.S. Supreme Court held that the CWA's use of "waters" under Section 1362(7) refers only to "geographic[al] features that are described commonly as "streams, oceans, rivers, and lakes" and to adjacent wetlands that are "indistinguishable" from those bodies of water due

to continuous surface connection. Specifically, under this ruling, to assert jurisdiction, a party must establish "first, that the adjacent 'body of water constitutes'…'water[s]' of the United States (i.e., a relatively permanent body of water connected to traditional interstate navigable waters); and second, that the wetland has a continuous surface connection with that water, making it difficult to determine where the 'water' ends and the 'wetland' begins."

Clean Water Act Section 401

Under Section 401 of the CWA, the State Water Resources Control Board (SWRCB) must certify all activities requiring a Section 404 permit. The Central Coast RWQCB regulates these activities and issues water quality certifications for those activities requiring a Section 404 permit by requiring a Section 401 Water Quality Certification. In addition, the Central Coast RWQCB has the authority to regulate the discharge of "waste" into Waters of the State pursuant to the Porter-Cologne Water Quality Control Act (Porter-Cologne).

Migratory Bird Treaty Act

The Migratory Bird Treaty Act (MBTA) prohibits actions that would result in a "take" of migratory birds, their eggs, feathers, or nests. Take is defined in the MBTA to include any attempt at hunting, pursuing, wounding, killing, possessing, or transporting by any means or in any manner any migratory bird, nest, egg, or part thereof. More than 800 species of birds are protected under the MBTA. Migratory birds are also protected, as defined in the MBTA, under Section 3513 of the California Fish and Game Code.

Bald and Golden Eagle Protection Act

The Bald and Golden Eagle Protection Act (BGEPA) makes it illegal to import, export, take (which includes molest or disturb), sell, purchase, or barter any bald eagle or golden eagle or parts thereof. USFWS oversees the enforcement of this Act. The 1978 amendment authorizes the U.S. Secretary of the Interior to permit the taking of golden eagle nests that interfere with resource development or recovery operations.

On September 11, 2009, USFWS announced a final rule on two new permit regulations that allow for the take of eagles and eagle nests under this Act. The permits authorize limited non-purposeful take of bald eagles and golden eagles, authorizing individuals, companies, government agencies (including tribal governments), and other organizations to disturb or otherwise take eagles in the course of conducting lawful activities, such as operating utilities and airports. Most permits issued under the new regulations would authorize disturbance. In limited cases, a permit may authorize the physical take of eagles but only if every precaution is taken to avoid physical take. Removal of eagle nests would usually be allowed only when it is necessary to protect human safety or the eagles.

Population information for both eagle species will guide USFWS in determining how many permits, including other types of permits USFWS already issued, or may be issued in any

locality. Priority will be given to Native American requests for permits to take eagles (under existing regulations) where the take is necessary for traditional ceremonies. Because of the limited size of the bald eagle populations in the southwestern U.S., permits may not be available in all locations. Disturbance or take of golden eagles is likely to be limited everywhere in the U.S. because of potential population declines.

Marine Mammal Protection Act (MMPA)

The U.S. Marine Mammal Protection Act (MMPA) of 1972, amended 1994, protects all marine mammals, including cetaceans (whales, dolphins, and porpoises), pinnipeds (seals and sea lions), sirenians (manatees and dugongs), sea otters, and polar bears within the waters of the U.S. Specifically, the MMPA prohibits the intentional killing or harassment of these marine mammals; however, incidental harassment, with authorization from the appropriate federal agency, may be permitted. The NMFS is responsible for enforcing the MMPA.

3.4.3.2 State

California Endangered Species Act

Under CESA, it is unlawful to "take" any species listed as rare, threatened, or endangered. Take under CESA means to "hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture, or kill." CESA take provisions apply to fish, wildlife, and plant species. Take may result whenever activities occur in areas that support a listed species. Consultation with CDFW is required if a project would result in "take" of a listed species.

California Code of Regulations, Sections 250 and 251

Section 250 of the California Fish and Game Code states that "[e]xcept as otherwise authorized in these regulations or in the Fish and Game Code, resident game birds, game mammals, and fur-bearing mammals may not be taken at any time." Section 251.1 of the California Fish and Game Code states that "[e]xcept as otherwise authorized in these regulations or in the Fish and Game Code, no person shall harass, herd or drive any game or nongame bird or mammal or fur-bearing mammal. For the purposes of this section, harass is defined as an intentional act that disrupts an animal's normal behavior patterns, which includes, but is not limited to, breeding, feeding, or sheltering. This section does not apply to a landowner or tenant who drives or herds birds or mammals for the purpose of preventing damage to private or public property, including aquaculture and agriculture crops." Activities that result in the take or harassment of a nongame mammal may also be considered in violation of this code.

California Code of Regulations, Sections 1600–1616

CDFW, through provisions of Sections 1600-1616 of the California Code of Regulations, is empowered to issue agreements for any alteration of a river, stream, or lake where fish or wildlife resources may be substantially adversely affected. Streams (and rivers) are defined by

the presence of a channel bed and banks and the conveyance of at least ephemeral flows. CDFW regulates wetland areas only to the extent that those wetlands are part of a river, stream, or lake as defined by CDFW. Section 1602 of the California Fish and Game Code requires any entity (e.g., person, state or local government agency, or public utility) that proposes a project that will substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake to notify CDFW of the project. In the course of this notification process, CDFW will review the project as it affects streambed habitats within the project area. CDFW may then place conditions in the Section 1602 Lake and Streambed Alteration Agreement (LSAA) to avoid, minimize, and mitigate any potentially significant adverse impacts within CDFW jurisdictional limits.

CDFW also has jurisdiction over any riparian habitat area associated with a river, stream, or lake. Riparian habitat includes willows, cottonwoods, and other vegetation typically associated with the banks of a stream or lake shoreline. In most situations, wetlands associated with a stream or lake would fall within the limits of riparian habitat. Thus, defining the limits of CDFW jurisdiction based on riparian habitat would automatically include any wetland areas. CDFW has not defined wetlands for jurisdictional purposes. Wetlands not associated with a lake, stream, or other regulated areas are generally not subject to CDFW jurisdiction.

California Fish and Game Code Sections 3503, 3503.5, and 3513 – Protection of Birds, Nests, and Raptors

Section 3503 of the California Fish and Game Code states that it is unlawful to take, possess, or needlessly destroy the nest or eggs of any bird. Section 3503.5 specifically states that it is unlawful to take, possess, or destroy any raptors (i.e., species in the orders *Falconiformes* and *Strigiformes*), including their nests or eggs. Typical violations of these codes include the destruction of active nests resulting from the removal of vegetation in which the nests are located. Violation of Section 3503.5 could also include failure of active raptor nests resulting from disturbance of nesting pairs by nearby project construction. This statute does not provide for the issuance of any type of incidental take permit. Section 3513 states that it is unlawful to take or possess any migratory nongame bird, as designated in the MBTA, or any part of such migratory nongame bird.

California Fish and Game Code – Additional Sections

Other applicable sections of the California Fish and Game Code include Section 2050 (CESA), Section 4150 (Nongame Animals), Section 5650 (prohibits water pollution), Section 5652 (prohibits refuse disposal in or near streams), Section 5901 (prohibits any device that impedes fish passage), and Section 5937 (requires sufficient water bypass and fish passage, relating to dams).

California Native Plant Protection Act

The California Native Plant Protection Act (CNPPA) preserves, protects, and enhances endangered and rare plants in California. Specifically, it prohibits the import, take, possession, or sale of any native plant designated by the CDFW Commission as rare or endangered, except under certain circumstances designated by the CNPPA.

California Native Plant Society Inventory

CNPS is a private plant conservation organization dedicated to the monitoring and protection of sensitive species in California. The CNPS has compiled an inventory comprised of information focusing on geographic distribution and qualitative characterization of rare, threatened, and endangered vascular plant species of California. The list has served as a potential candidate list for listing as Threatened and Endangered by CDFW. The CNPS has developed five categories of rarity:

- CRPR 1A: Presumed extirpated in California and either rare or extinct elsewhere.
- CRPR 1B: Rare, threatened, or endangered in California and elsewhere.
- CRPR 2A: Presumed extirpated in California, but more common elsewhere.
- CRPR 2B: Rare, threatened, or endangered in California, but more common elsewhere.
- CRPR 3 : Plants about which we need more information – a review list.
- CRPR 4 : Plants of limited distribution – a watch list.

The CNPS appends CRPR categorizations with "threat ranks" that parallel the ranks used by the CNDDB and are added as a decimal code after the CRPR (e.g., CRPR 1B.1). The threat codes are as follows:

1 – Seriously endangered in California (over 80% of occurrences threatened/high degree and immediacy of threat)
2 – Fairly endangered in California (20%–80% occurrences threatened)
3 – Not very endangered in California (less than 20% of occurrences threatened or no current threats known)

Porter-Cologne Water Quality Control Act (California Water Code Division 7)

Porter-Cologne seeks to preserve, enhance, and restore the quality of California's water resources. Porter-Cologne established the SWRCB and nine RWQCBs as the principal state agencies with the responsibility for controlling water quality in the state. The State of California regulates discharges of dredged and fill material to Waters of the State through its Water Quality Certification Program under the authorities of Porter-Cologne and CWA Section 401, a program that allows the state to ensure that activities requiring a federal permit or license comply with state water quality standards. The Water Quality Certification Program is the state's de facto wetland protection program. It protects all waters within the state's regulatory jurisdiction but has special responsibilities for wetlands, riparian areas, and headwater streams

because these water bodies are not systematically protected by other state and regional board programs.

California Coastal Act

The Coastal Commission was established in 1972 to regulate coastal development and its impact on public access and coastal resources. The Coastal Commission was made permanent by the State Legislature through adoption of the California Coastal Act of 1976 (California Public Resource Code Sections 30000 *et seq.*). The California Coastal Act outlines standards for development within the Coastal Zone, which extends along 1,100 miles of the California coastline and encompasses 1.5 million acres of land. The California Coastal Act encourages local governments to create Local Coastal Programs (LCPs) that govern decisions regarding short-term and long-term conservation and use of coastal resources. Development within the Coastal Zone requires a Coastal Development Permit (CDP) issued by the Coastal Commission or by a local government with a Coastal Commission-certified LCP.

3.4.3.3 Local

County of Santa Barbara Comprehensive Plan

The County's Comprehensive Plan addresses the conservation, development, and use of natural resources. Consistence with these policies is discussed further in Section 3.11, *Land Use and Planning*.

Land Use Element

The Land Use Element of the County's Comprehensive Plan contains policies to protect sensitive biological resources. The land uses allowed within the Land Use Element, and depicted on land use maps, are to be used to guide the public and the decision-makers as to what uses are appropriate if and when development occurs. New development must generally be consistent with the Comprehensive Plan's biological resource policies. The Hillside and Watershed Protection Policies address development on slopes to minimize grading, disruption of natural vegetation, and erosion.

Hillside and Watershed Protection Policies

1. Plans for development shall minimize cut and fill operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.
2. All developments shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of

the site which are not suited to development because of known soil, geological, flood, erosion, or other hazards shall remain in open space.

3. For necessary grading operations on hillsides, the smallest practical area of land shall be exposed at any one-time during development and the length of exposure shall be kept to the shortest practicable amount of time. The clearing of land should be avoided during the winter rainy season and all measures for removing sediments and stabilizing slopes should be in place before the beginning of the rainy season.
4. Sediment basins (including debris basins, desilting basins, or silt traps) shall be installed on the project site in conjunction with the initial grading operations and maintained through the development process to remove sediment from runoff waters. All sediment shall be retained on site unless removed to an appropriate dumping location.
5. Provisions shall be made to conduct surface water to storm drains or suitable water courses to prevent erosion. Drainage devices shall be designed to accommodate increased runoff resulting from modified soil and surface conditions as a result of development. Water runoff shall be retained onsite whenever possible to facilitate groundwater recharge.
6. Degradation of the water quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants, such as chemicals, fuels, lubricants, raw sewage, and other harmful waste, shall not be discharged into or alongside coastal streams or wetlands either during or after construction.

Streams and Creeks Policies

1. All permitted construction and grading within stream corridors shall be carried out in such a manner as to minimize impacts from increased runoff, sedimentation, biochemical degradation, or thermal pollution.

Conservation Element

The County's Conservation Element describes the ecological communities within the county and provides recommendations regarding future land uses (County of Santa Barbara 2010). The Conservation Element uses U.S. Forest Service (USFS) plant community distribution maps and topographical data for the purpose of indicating the presence of broad ecological zones. Within the mapped areas the County identifies: 1) the particular category of natural community; 2) the ecological value of that community; 3) the use which it can tolerate; and 4) the intensity of that use which it can tolerate. In general, the boundaries of an unusual or delicate habitat on County maps were drawn to include a buffer zone. Sometimes the surrounding zone was designated as tolerating low intensity uses. Streams selected for preservation either had buffer zones drawn roughly 100 feet on each side, or the adjacent vegetation received a low classification for tolerance and intensity of use (County of Santa Barbara 2010).

Open Space Element

The Open Space Element identifies areas within Santa Barbara County where natural resources such as wetlands, rare and endangered plant and wildlife communities, and shorelines and dunes occur.

Environmental Resources Management Element

The Environmental Resources Management Element (ERME) presents the County's policies for air quality, biology, surface and groundwater resources, noise, and visual resources protection. The ERME summarizes the various environmental factors analyzed in the Conservation and Open Space Elements and identifies policies that define whether development is appropriate given the severity of constraints.

Community Plans

Santa Barbara County has 10 community or area plans. Each community or area plan contains goals, objectives, policies, action/programs, and development standards guiding the development of the community it serves and supplements the policies and goals of the Comprehensive Plan. A policy is a specific statement that guides decision-making. Development standards are measures that will be applied to development projects consistent with relevant policies of the community plan. Development standards typically specify how and where development is designed and constructed.

As described above in Section 3.4.2.3, *Sensitive Habitats*, several community plans include policies and development standards for ESH. For instance, relevant ESH policies from the Eastern Goleta Valley Community Plan are described below. Similarly, policies from Montecito, Summerland, Mission Canyon, and Toro Canyon Plan community plans also address ESH. Potential recreation projects proposed within these areas would be required to comply with the ESH policies and all relevant development standards.

Eastern Goleta Valley Community Plan

Policy ECO-EGV-5.1. ESH areas and Riparian Corridors (RC) within Eastern Goleta Valley shall be protected and, where feasible and appropriate, enhanced.

Policy ECO-EGV-5.5. (INLAND) Minimum Buffer Areas for ESH. The minimum buffer strip and setbacks from streams and creeks for development and activities within the ESH overlay that are regulated by the County Zoning Ordinances shall be as follows, except on parcels designated for agriculture in rural areas where Policy ECO-EGV5.6 shall apply:

- ESH areas within the Urban Area and Existing Developed Rural Neighborhood (EDRN): a minimum setback of 50 feet from either side of top-of-bank of creeks or existing edge of riparian vegetation, whichever is further, shall be indicated on all site plans. Plans shall minimize ground disturbance and vegetation removal.

- ESH areas within the Mountainous-GOL zone district: a minimum buffer of 200 feet from the edge of existing riparian vegetation. Grading and vegetation removal within these buffers shall be restricted while not precluding reasonable use of a parcel.

Policy ECO-EGV-5.5. (COASTAL) Minimum Buffer Areas for Streams and Creeks. The minimum buffer strip and setbacks from streams and creeks for development and activities within the ESH overlay that are regulated by the County Coastal Zoning Ordinance shall be as follows:

- ESH areas within the Urban Area: a minimum setback of 50 feet from either top-of-bank of streams and creeks or the existing edge of riparian vegetation, whichever is the furthest distance from the stream or creek. The setback shall be indicated on all site plans.

Policy ECO-EGV-5.7. (COASTAL) Minimum Buffer Areas for ESH. A minimum setback of 50 feet from the outer edge of all ESH habitats shall be required unless otherwise specified in the Local Coastal Program.

Policy ECO-EGV-5.8. (COASTAL) Resource dependent uses may be allowed in ESH where sited and designed to avoid significant disruption of habitat values. A resource dependent use is a use that is dependent on the ESH resource to function (e.g., nature study, habitat restoration, and public trails). Non-resource dependent development, including fuel modification, shall be sited and designed to avoid ESH and ESH buffer areas. If avoidance is infeasible and would preclude reasonable use of a parcel, then the alternative that would result in the fewest or least significant impacts shall be selected.

Orcutt Community Plan

Policy BIO-O-1. Important natural resources in Orcutt, including sandhill chaparral, central dune scrub, wetlands, oak trees and woodland, Bishop pine forest, specimen trees, and central sage scrub shall be protected, consistent with the Open Space Plan and the standards below, unless this would prevent reasonable development of a property.

- Landscaping for development on the edge of designated natural undeveloped open space areas shall include native trees and shrubs, with habitat restoration efforts focused on buffers. Planting of highly invasive weedy plants (e.g., iceplant, pampas grass, veldt grass, Monterey pine, eucalyptus, spiny clotbur, and Australian fireweed) shall be prohibited within 500 feet of natural undeveloped open space areas.
- Where new development eliminates important onsite habitat (e.g. coastal sage scrub, grasslands, riparian habitat and wetlands), County shall require development to restore or enhance like-kind habitat either onsite or offsite. If restoration sites are limited or unavailable, County shall require payment of adequate fees into a mitigation bank program acceptable to County to permanently protect a comparable or greater amount of created or restored habitat elsewhere within the Orcutt Planning Area.

Policy BIO-O-5. New facilities in Orcutt, including roads, bike paths/trails, sewer lines and retention basins, shall to the maximum extent feasible be sited and designed to avoid disruption of significant natural resources within designated natural undeveloped open space areas, minimize removal of significant native vegetation and trees and provide for reasonable levels of habitat restoration for significant habitats disrupted by construction.

- Multi-use trail construction should avoid removal of riparian vegetation to the maximum extent feasible. The Orcutt Creek multi-use trail shall be set back a minimum of 50 feet from the outside edge of riparian vegetation or the top-of-bank (whichever is further), unless this would make the multi-use trail link infeasible. Trail construction shall include riparian restoration between the edge of existing native vegetation and the bicycle path. Trail lighting should be directed away from the creek.
- Trails should follow existing dirt road and trail alignments and utilize existing bridges where feasible. Where this is not possible, prior to final trail alignment proposed trail routes should be surveyed and rerouted where necessary to avoid sensitive species, subject to final approval by Planning and Development (P&D) and the Park Department. All trails shall be sited and designed to avoid or minimize impacts to sensitive resources, areas of steep slopes and/or highly erosive/sandy soils, where feasible. Developers shall fund sign installation along certain trails (as identified in the Multi Use Trail Guidelines) providing educational and interpretive information and advising dog owners to keep their dogs out of sensitive habitats.
- Excavated fill for retention basin construction shall not be placed within important natural resource areas. Areas adjacent to or within habitats which are disturbed during construction shall be revegetated with appropriate native species. All sensitive habitat areas adjacent to proposed retention basins shall be fenced before grading begins to prevent disturbance and stockpiling in these areas.

Los Alamos Community Plan

Policy BIO-LA-1. Maintain the quality of streams, sloughs, drainage channels, and areas adjacent to such waters. Protect, maintain, and restore significant habitat and/or vegetation within the town's Urban Boundaries.

- Certain development (including dredging, filling, and grading) within the San Antonio Creek corridor shall be allowed within the 50-foot riparian vegetation buffer established in Dev Std BIO-LA1.1.1 subject to review and approval by Planning and Development Department. Allowed development shall be limited to the following:
  - Public trails or other passive public recreational uses;
  - Flood control projects, where the project is for improvement or maintenance of stream channel flow capacity and/or is necessary for public safety or to protect existing development;

  - Development where the primary function is the improvement of fish and wildlife habitat; and
  - Culverts, fences, pipelines, and bridges (when support structures are located outside critical habitat) may be permitted, when no alternative route/location is feasible.
- County Parks is encouraged to coordinate with Planning and Development regarding development within Los Alamos County Park. If necessary, Planning and Development staff shall conduct a biological site visit and/or a biological report shall be prepared by a County-approved consultant. The report should specify measures to be taken to protect affected trees and/or wildlife resources. If necessary, an appropriate replacement/ replanting program may be developed.

Policy BIO-LA-1.8. Annual and native grasslands in Sub-Area 1 that could serve as an upland habitat for special-status wildlife species shall be preserved to the extent feasible.

Gaviota Coast Plan

Policy NS-2. Environmentally Sensitive Habitat Protection. (*COASTAL*). ESH areas shall be protected against any significant disruption of habitat values and only uses dependent on those resources shall be allowed within those areas. A resource dependent use is a use that is dependent on the ESH resource to function (e.g., nature study, habitat restoration, public trails, and low-impact campgrounds). Resource-dependent uses shall be sited and designed to avoid significant disruption of habitat values to ESH through measures including but not limited to: utilizing established disturbed areas where feasible, limiting grading by following natural contours, and minimizing removal of native vegetation to the maximum extent feasible. Non-resource dependent development, including fuel modification and agricultural uses, shall be sited and designed to avoid ESH and ESH buffer areas. If avoidance is infeasible and would preclude reasonable use of a parcel or is a public works project necessary to repair and maintain an existing public road or existing public utility, then the alternative that would result in the fewest or least significant impacts shall be selected and impacts shall be mitigated. Development in areas adjacent to ESH areas and parks and recreation areas shall be sited and designed to prevent impacts which would significantly degrade those areas and shall be compatible with the continuance of those habitat and recreation areas.

Policy NS-4. ESH Criteria and Habitat Types. (*COASTAL*). ESH means any area in which plant or animal life, or their habitats are either (A) rare or (B) especially valuable because of their special nature or role in an ecosystem. The presence and extent of ESH shall be identified on a case-by-case basis based upon site-specific evidence provided by a biological report prepared by a qualified biologist. Although a site-specific analysis will form the basis for ESH determinations, the following types of habitats are considered rare or especially valuable, and therefore ESH, unless a particular habitat area is so small and isolated or degraded that it is no longer sustainable.

Santa Ynez Community Plan

Policy BIO-SYV-3. Significant biological communities shall not be fragmented by development into small, non-viable areas.

- Public trails shall be sited and designed to avoid or minimize impacts on native habitat, areas of steep slopes, and/or highly erosive and sandy soils. Trails should follow existing dirt road and trail alignments and use existing bridges. Where this is not possible, prior to final trail alignment, proposed trail routes should be surveyed and re-routed where necessary to avoid sensitive species, subject to final approval by Planning and Development and the Parks Department.

Policy BIO-SYV-13. The use of native landscaping shall be encouraged, especially in parks, buffers adjacent to native habitats, and designated open space.

Montecito Community Plan

Policy BIO-M-1.7. No structures shall be located within a riparian corridor except: public trails that would not adversely affect existing habitat; dams necessary for water supply projects; flood control projects where no other method for protecting existing structures in the floodplain is feasible and where such protection is necessary for public safety, other development where the primary function is for the improvement of fish and wildlife habitat and where this policy would preclude reasonable development of a parcel. Culverts, fences, pipelines, and bridges (when support structures are located outside the critical habitat) may be permitted when no alternative route/location is feasible. All developments shall incorporate the best mitigation measures feasible to minimize the impact to the greatest extent.

Policy BIO-M-1.22. The use of native landscaping shall be encouraged, especially in parks and designated open spaces.

Toro Canyon Community Plan

Policy BIO-TC-1. ESH areas shall be protected and, where appropriate, enhanced.

- New public accessways and trails located within or adjacent to ESH shall be sited to minimize impacts to ESH to the maximum extent feasible. Measures, including but not limited to, signage, placement of boardwalks, and limited fencing shall be implemented as necessary to protect ESH. Where feasible, trails shall be sited to the outside of riparian areas with limited exceptions for crossings. Where no other feasible alternative exists, public accessways and trails may be a permitted use in Environmentally Sensitive Habitat Areas. When trail plans are developed and the most desirable location would result in trail segments adjacent to sensitive species habitats that may require seasonal closures, alternative trail connections shall be identified. Where seasonal closures occur, these alternative trail segments shall be used.

Policy BIO-TC-12.2. Public trails shall be sited and designed to avoid or minimize impacts to native habitat, areas of steep slopes, and/or highly erosive/sandy soils. Trails should follow existing dirt road and trail alignments and use existing bridges. Where this is not possible, prior to final trail alignment, proposed trail routes should be surveyed and re-routed where necessary to avoid sensitive species, subject to final approval by Planning and Development and the Parks Department.

Mission Canyon Community Plan

Policy BIO-MC-3.10. Public trails shall be sited and designed to avoid or minimize impacts on ESH, areas of steep slopes, and/or highly erosive soils. Proposed trail routes should be surveyed and re-routed where necessary to avoid sensitive species, subject to final approval by Planning and Development and the Parks Division.

Lompoc Area Interpretive Guidelines

Goal A-9. In order to provide community cohesiveness, new neighborhoods should be designed to provide public multi-purpose trails and transit-linkages to existing neighborhoods, schools, parks, and commercial areas.

Goal B-1. To the maximum extent feasible, development projects should dedicate land and construct, public or privately developed parks, athletic fields, and trails for public use. Examples include playing fields, basketball courts, playground equipment, etc. Developers and the County shall work together to provide regional park facilities in accordance with the findings of the Regional Needs Assessment for Parks as adopted by the Board of Supervisors.

Coastal Land Use Plan

The CLUP lays out the general patterns of development throughout the coastal areas of the county. Its purpose is to protect coastal resources while accommodating land use development within the Coastal Zone.

> **Environmentally Sensitive Habitat Area Overlay Designation Policy 9-1:** Prior to the issuance of a development permit, all projects on parcels shown on the land use plan and/or resource maps with a Habitat Area overlay designation or within 250 feet of such designation or projects affecting an ESHA shall be found to be in conformity with the applicable habitat protection policies of the land use plan. All development plans, grading plans, etc., shall show the precise location of the habitat(s) potentially affected by the proposed project. Projects which could adversely impact an ESHA may be subject to a site inspection by a qualified biologist to be selected jointly by the County and the applicant.
>
> **Native Plant Communities Policy 9-35:** Oak trees, because they are particularly sensitive to environmental conditions, shall be protected. All land use activities,

including cultivated agriculture and grazing, should be carried out in such a manner as to avoid damage to native oak trees. Regeneration of oak trees on grazing lands should be encouraged.

Native Plant Communities Policy 9-36: When sites are graded or developed, areas with significant amounts of native vegetation shall be preserved. All developments shall be sited, designed, and constructed to minimize impacts of grading, paving, construction of roads or structures, runoff, and erosion of native vegetation. In particular, grading and paving shall not adversely affect root zone aeration and stability of native trees.

Santa Barbara County Land Use and Development Code

The County's Land Use and Development Code (LUDC), Chapter 35, Zoning, of the County Code, includes development standards protecting biological resources.

Chapter 14 Appendix A – Grading Ordinance Guidelines for Native Oak Tree Removal

The purpose of this regulation is to protect native oak trees and govern deciduous and live oak removals. It proposes a tiered system based on lot size and the number of trees removed to determine the applicable permits required. Tier 1 covers exempt tree removals, Tier 2 requires replanting, Tier 3 requires a management plan, and Tier 4 requires discretionary permit review from the County. The County Grading Ordinance applies to all private land outside of the Coastal Zone and urban boundaries.

Section 35.28.100 Environmentally Sensitive Habitat Overlay

Section 35.28.100 of the LUDC provides restrictions on development in areas with unique natural resources including sensitive plant and wildlife species and/or their habitats. The overlay is intended to:

1. Protect and preserve specified areas in which plant or wildlife species or their habitats are either rare or especially valuable because of their role in the ecosystem, and that could be easily disturbed or degraded by human activities and development; and
2. Ensure that each project permitted in the overlay zone is designed and carried out in a manner that will provide the maximum feasible protection to sensitive habitat areas

Sections 35.28.100(B) and (C) describe the applicability of the overlay (e.g., description of how a determination of the ESH boundary is made during permit application review) and permit and processing requirements, respectively.

Section 35.28.170 Riparian Corridor – Goleta (RC-GOL) Overlay Zone

Section 35.28.170 of the LUDC identifies the Goleta (RC-GOL) overlay zone is applied within rural areas designated agriculture on the Comprehensive Plan maps for the Eastern Goleta Valley Community Plan area and Goleta Community Plan area to protect and preserve mapped

Riparian Corridors that could be easily disturbed or degraded by development and other human activities. The overlay is also intended to maintain a continuous canopy of trees along each Riparian Corridor and protect the overall ecological integrity of the mapped stream system.

Sections 35.28.170(B) and (C) describe the applicability of the overlay and permit and processing requirements, respectively.

Chapter 35 – Zoning, Article IX – Deciduous Oak Tree Protection and Regeneration

The County Deciduous Oak Tree Protection and Regeneration Ordinance implements the goals and policies of the Santa Barbara County Comprehensive Plan that promotes the protection of deciduous oak trees. Article IX identifies requirements for oak tree replacement if an oak tree removal permit is permitted, including requiring preparation of an Oak Tree Management Plan, replacing oak trees removed at a compensation ratio of 15 to 1, replacing trees with native nursery stock, planting saplings in suitable locations, and maintaining and protecting planted saplings. These regulations address deciduous oak tree removal in the inland rural areas of the county if such removal is not associated with development that requires a permit under Articles III or IV of Chapter 35 of the County Code. For the urban and coastal areas, community plans and the CLUP determine tree protection policies.

3.4.4 ENVIRONMENTAL IMPACT ANALYSIS

This section discusses the potential biological resource impacts associated with the proposed Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed and the residual impact after mitigation is determined.

3.4.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purposes of this Program EIR, implementation of the proposed Project may have a significant adverse impact relating to biological resources if it would:

a. Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by CDFW or USFWS.

b. Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, and regulations or by the CDFW or USFWS.

c. Have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means.

d. Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

e. Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance.

f. Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan.

CEQA Guidelines Section 15206 states that a project is of statewide, regional, or area-wide significance if it has the potential to affect sensitive wildlife habitats substantially, including riparian lands, wetlands, bays, estuaries, marshes, and habitats for rare and threatened species, as defined by CEQA Guidelines Section 15380. CEQA Guidelines Section 15380(d) further provides that plant or wildlife species may be treated as rare or endangered even if they are not on one of the official lists (i.e., if they are likely to become endangered in the foreseeable future).

Non-applicable thresholds:

- There are no adopted Habitat Conservation Plans or Natural Community Protection Plans applicable to recreational development within the unincorporated areas of the county. Therefore, CEQA Threshold (f) is not discussed further within this impact analysis. CEQA Thresholds (b) and (c) are discussed jointly in Impact BIO-2.

County of Santa Barbara Environmental Thresholds and Guidelines

The County's *Environmental Thresholds and Guidelines Manual* (2024) indicates that the determination of impact is done on a case-by-case basis. Because of the complexity of biological resource issues, substantial variation can occur between cases. An assessment of impacts must account for both short-term and long-term impacts. Thus, the assessment must account for items, such as immediate tree removal and longer-term, more subtle impacts, such as interruption of the natural fire regime or interference with plant or animal propagation. Disturbances to habitats or species may be significant, as determined by substantial evidence in the record (not public controversy or speculation) if they affect significant resources in the following ways:

1. Substantially reduce or eliminate species diversity or abundance.
2. Substantially reduce or eliminate the quantity or quality of nesting areas.
3. Substantially limit reproductive capacity through losses of individuals or habitat.
4. Substantially fragment, eliminate, or otherwise disrupt foraging areas and/or access to food sources.

5. Substantially limit or fragment range and movement (geographic distribution or animals and/or seed dispersal routes).
6. Substantially interfere with natural processes, such as fire or flooding, upon which the habitat depends.

There are many areas in the county where little or no importance is given to habitat, and it is presumed that disruption would not create a significant impact. Examples of areas where impacts on habitat are presumed to be insignificant include the following:

1. Small areas of non-native grassland if wildlife values are low.
2. Individuals or stands of non-native trees if not used by important animal species such as raptors or monarch butterflies.
3. Areas of historical disturbance such as intensive agriculture.
4. Small pockets of habitats are already significantly fragmented or isolated, and degraded or disturbed.
5. Areas of primarily ruderal species resulting from pre-existing man-made disturbance.

In addition to the criteria listed above, the following questions and factors are used in assessing the significance of project impacts on biological resources:

1. Size.
    - How much of the resource in question both on and off the project site would be impacted (percentage of the whole area and square footage and/or acreage)?
    - How does the area or species that would be impacted relate to the remaining populations off the project site (percentage of the total area or species population, either quantitatively or qualitatively)?
2. Type of Impact.
    - Would it adversely indirectly affect wildlife (e.g., light, noise, barriers to movement)?
    - Would it remove the resource or cause an animal to abandon the area or a critical activity (e.g., nesting) in that area?
    - Would it fragment the area's resources?
3. Timing.
    - Would the impact occur at a critical time in the life cycle of an important plant or animal (e.g., breeding, nesting, flowering periods)?
    - Is the impact temporary or permanent? If it is temporary, how long would the resource take to recover?
    - Would the impact be periodic, of short duration, but recur again and again?

Section D of the County's *Environmental Thresholds and Guidelines Manual* (2021) includes habitat-specific impact assessment guidelines, which provides additional impact assessment guidelines specific to several biological communities. The following summarizes the thresholds applied to different habitat types throughout the county.

1. **Wetlands.** The following types of project-created impacts may be considered significant:
    - Projects which result in a net loss of important wetland areas or wetland habitat value, either through direct or indirect impacts to wetland vegetation, degradation of water quality, or would threaten the continuity of wetland-dependent animal or plant species.
    - Projects which substantially interrupt wildlife access, use, and dispersal in wetland areas.
    - Impacts to the hydrologic conditions of wetlands systems, such as the quantity and quality of run-off, etc.
    - Substantial alteration of tidal circulation or decrease of tidal prism in coastal salt marsh habitats.
    - Adverse hydrologic changes (e.g., altered freshwater input), substantial increase of sedimentation, introduction of toxic elements, or alteration of ambient water temperature in coastal salt marshes.
    - Indirect impacts from construction activities near coastal marshes such as noise and turbidity on sensitive animal species, especially during critical periods such as breeding and nesting.
    - Disruption of wildlife dispersal corridors in coastal salt marshes.
    - Disturbance or removal of substantial amounts of coastal salt marsh habitats. Because of the high value and extremely limited extent of salt marsh habitat in the county, small areas of such habitat may be considered significant.
    - Direct removal of a vernal pool or vernal pools complex.
    - Direct or indirect adverse hydrologic changes to vernal pool habitats such as altered freshwater input, changes in the watershed area or run-off quantity and/ or quality, substantial increase in sedimentation, introduction of toxic elements or alteration of ambient water temperature.
    - Disruption of larger plant community (e.g. grassland) within which a vernal pool occurs, isolation or interruption of contiguous habitat which would disrupt animal movement patterns, alter seed dispersal routes, or increase vulnerability of species to weed invasion or local extirpation.
2. **Riparian Habitats.** The following types of project-created impacts may be considered significant:

- Direct removal of riparian vegetation.
- Disruption of riparian wildlife habitat, particularly animal dispersal corridors and/or understory vegetation.
- Intrusion within the upland edge of the riparian canopy (generally within 50 feet in urban areas, within 100 feet in rural areas, and within 200 feet of major rivers), leading to potential disruption of animal migration, breeding, etc. through increased noise, light and glare, and human or domestic animal intrusion.
- Disruption of a substantial amount of adjacent upland vegetation where such vegetation plays a critical role in supporting riparian-dependent wildlife species (e.g., amphibians), or where such vegetation aids in stabilizing steep slopes adjacent to the riparian corridor, which reduces erosion and sedimentation potential.
- Construction activity which disrupts critical time periods (nesting or breeding) for fish and other wildlife species.

3. **Native Grasslands.** Project-created impacts may be considered significant if they result in the removal or severe disturbance to a patch or patches of native grasses greater than 0.25 acre, and that are clearly part of a significant native grassland or an integral component of a larger ecosystem.
4. **Oak Woodlands and Forests.** The following changes in habitat value and species composition may be considered significant:

   - Habitat fragmentation.
   - Removal of understory.
   - Alteration to drainage patterns.
   - Disruption of the canopy.
   - Removal of a significant number of trees that would cause a break in the canopy or disruption in animal movement in and through the woodland.

5. **Individual Native Trees.** Impacts to individual native trees may be considered significant if a project results in the loss of 10 percent or more of the trees of biological value on a project site.

Methodology

As described in Chapter 2, *Project Description*, the Project plans for parks, trails, and recreational facilities in unincorporated areas within the county. The Project also changes County policies and regulations to support the development of public parks, recreation, and trails through public-private partnerships. Project-level siting and design details are not known, so the impact analysis provided below does not evaluate impacts on biological resources at a project- or site-specific level. The programmatic analysis provided by this Program EIR addresses the potential for parks, recreation, trails, and related development under the Project

to affect known biological resources mapped by the County, state, or federal resource agencies as having known potential to support sensitive habitats or special-status species. The analysis also addresses both onsite and offsite impacts, which may occur due to the disruption of wildlife migration corridors, habitat fragmentation, and secondary impacts associated with changes in drainage patterns (e.g., creek alterations), or other actions, such as onsite or offsite vegetation clearance for wildfire hazard reduction (Section 3.17, *Wildfire*). Wherever possible, illustrative examples of potential sites are provided to describe particular types of habitats or special-status species that could be impacted where the implementation of the Project could impact such resources. As described in section 3.0.4, *Impact Assessment Methodology*, to determine whether a potentially significant impact could occur as a result of the Project, the analysis considers the potential construction and operations of the Project components using reasonable worst-case assumptions, including:

1. The public park, recreation, and trail projects planned by County Parks, as described in Section.2.5.1, *Planned County Parks, Recreation, and Trails Projects*. The analysis assumes a maximum disturbance area of up to 50 acres as the most impactful planned park and recreation facilities.
2. The proposed amendments to the Comprehensive Plan and zoning ordinances that could enable the development of planned parks, trails, and recreational facilities. The analysis assumes that the amendments, including the updated Public and Private Parks/Recreation Facility Overlay and the Recreation Benefit Project Program, could enable the following concepts as the most impactful potential development scenarios under the proposed Project's development standards:
    a. A maximum 160-site campground/RV park on a minimum 20-acre site
    b. A maximum 120-room country inn on a minimum 5-acre site
    c. A maximum 2,000-seat outdoor amphitheater

The biological resources impact assessment generally compares the potential locations of the planned County Parks projects and the typical types of parks, recreation, and trails projects that could be permitted under the Project to the location of known biological resources or areas with a high potential for biological resources. With regards to the Jalama Beach County Park Expansion and Coastal Access Improvements Project, a Biological Resources Assessment was conducted for the proposed improvements which conducted biological field investigations including pedestrian surveys to facilitate mapping of primary vegetation types, document dominant plant species and wildlife, and identify, special-status plant species and sensitive habitats for avoidance (Appendix C). While a more site-specific analysis of this project area was conducted, a complete analysis of all potential site-specific impacts, such as the precise quantification of potential impacts (e.g., native vegetation or tree removal), is not possible as site-specific development or site plans are not available for all proposed or future parks,

recreation, and trails projects. Further, mapping of community-wide or regional resources are often necessarily high-level and, in many cases, outdated.

This Program EIR also analyzes any potential impacts associated with the future implementation of the Recreation Master Plan's programs and policies. For example, the Project would amend the County's zoning ordinance to support permitting public parks and trials by private entities. The changes would alter the regulatory environment for privately proposed recreation and trails projects, such as those proposed by the RBP Program. The planned parks and trails projects would be subject to the County's policies such as the Conservation Element, Open Space Element, or the Santa Barbara County Coastal Zoning Ordinance that provide detailed policies protecting biological resources.

To evaluate the potential for secondary impacts associated with flooding and associated potential flood control improvements impacts on biological resources, this section cross-references information regarding the hydrologic setting and impacts as described in Section 3.10, *Hydrology and Water Quality*. To evaluate secondary impacts associated with wildfire and associated potential vegetation clearing for fire protection and potential impacts to biological resources, this section cross-references information regarding the wildfire setting and impacts as described in Section 3.17, *Wildfire*.

The analysis presented in this section is based on available long-range planning documents and agency resource mapping, available EIRs and other CEQA documents, related technical studies, and other site-specific studies conducted for several of the improvements proposed at County Parks facilities (e.g., Jalama Beach County Park). This programmatic analysis is also supported by the review of the CNDDB information from the USFWS, existing adopted plans, public databases, and recent studies, that identify such resources including the County's Comprehensive Plan as well as the 1993 Goleta Community Plan, 2015 Eastern Goleta Valley Community Plan, 1997 Orcutt Community Plan, and 2009 Santa Ynez Community Plan

3.4.4.2 Project Impacts

Table 3.4-2 below provides a summary of the Project's impacts related to biological resources. A detailed discussion of each impact follows.

Table 3.4-2. Summary of Biological Resources Impacts

Biological Resources Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact BIO-1. The Project could impact ESH, Riparian Corridors, wetlands, oak woodlands, native grasslands, and other sensitive habitats and natural communities.	Potentially significant	MM BIO-1 (Tree Protection Plan) MM BIO-2 (Habitat Protection Plan) MM BIO-3 (Species-Specific and Sensitive Habitat Avoidance and Minimization Measures) MM BIO-4 (General Construction Avoidance and Minimization Measures)	Significant but Mitigable
Impact BIO-2. The proposed Project could have a substantial adverse effect, either directly or indirectly through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the CDFW or USFWS.	Potentially significant	MM BIO-1 (Tree Protection Plan) MM BIO-2 (Habitat Protection Plan) MM BIO-3 (Species-Specific and Sensitive Habitat Avoidance and Minimization Measures) MM BIO-4 (General Construction Avoidance and Minimization Measures) MM NOI-1 (Recreation Noise Standards)	Significant but Mitigable
Impact BIO-3. The proposed Project could interfere substantially with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.	Potentially significant	MM BIO-2 (Habitat Protection Plan) MM BIO-5 (Wildlife Movement Plan)	Significant but Mitigable
Impact BIO-4. The proposed Project could conflict with adopted local plans, policies, or ordinances oriented towards the protection and conservation of biological resources.	Insignificant	No mitigation measures required.	Insignificant impacts

Table 3.4-2. Summary of Biological Resources Impacts (Continued)

Biological Resources Impacts	Impact Classification	Mitigation Measures	Residual Significance
Cumulative impacts	Potentially significant	MM BIO-1 (Tree Protection Plan) MM BIO-2 (Habitat Protection Plan) MM BIO-3 (Species-Specific and Sensitive Habitat Avoidance and Minimization Measures) MM BIO-4 (General Construction Avoidance and Minimization Measures) MM BIO-5 (Wildlife Movement Plan) MM NOI-1 (Recreation Noise Standards)	Significant but Mitigable

Impact BIO-1. The Project could impact ESH, Riparian Corridors, wetlands, oak woodlands, native grasslands, and other sensitive habitats and natural communities.

As described in Section 3.4.2, *Environmental Setting*, biological habitats and natural communities occur throughout the unincorporated county. The Project proposes planned park, recreation, and trail projects that could entail the physical development of new facilities or the expansion of existing facilities throughout the county. In addition, the RBP Program and a package of amendments to the County Comprehensive Plan and zoning ordinances, including the County LUDC, Montecito Land Use Development Code (MLUDC), and Article II, Coastal Zone Ordinance (CZO), would support the implementation of the Project over 10 to 20 years.

For 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, some urban areas, particularly in the South Coast and Santa Maria Valley in the community of Orcutt, are proximate to creek corridors and or consist of open, undeveloped sites that do support sensitive habitats and natural communities, including designated ESH. More rural areas in the county such as Cuyama Valley and Santa Ynez Valley

can be home to more extensive natural ecological communities supporting a greater diversity of sensitive habitats and natural communities.

Thus, while it cannot be fully quantified, future parks, recreational facilities, trail development, and RBPs have the potential to occur on sites supporting such resources, resulting in direct impacts to sensitive habitats and natural communities from construction of recreation projects. However, future parks, recreation, and trail development, as well as RBPs enabled by the Project, would be subject to the wide range of existing federal, state, and county policies, and development standards proposed under the Project that would avoid or minimize impacts that could result from development in sensitive habitats. For instance, within the Orcutt Community Plan area, future recreational development would be guided by policies such as Policy BIO-O-1 and Policy BIO-O-5 from the Orcutt Community Plan that require projects to avoid disruption of significant natural resources and provide reasonable levels of habitat restoration in order to be approved, or Policy ECO-EGV-5.1 and Policy ECO-EGV-5.5, which requires the protection of ESH areas and riparian corridors, as well as the establishment of mandatory minimum development setbacks from sensitive habitats. Direct impacts would further be avoided through the implementation of and compliance with the additional development standards proposed as part of the Project zoning ordinance amendments, which establish objective development standards to ensure high-quality, safe, and accessible facilities to enhance community sustainability and protect natural resources, including significant biological habitats or sensitive natural communities. Future development directly and indirectly enabled under the Project would be required to adhere to these policies and regulations. Adherence to these policies and regulations would reduce any adverse effects on biological resources for the vast majority of recreational development proposed or enabled under the Project.

Nevertheless, new private recreational development and RBPs enabled under the Project would continue to have the potential to result in development of lands supporting ESH, Riparian Corridors, wetlands, oak woodlands, native grasslands, and other sensitive habitats and natural communities, particularly when new development cannot be located entirely within previously disturbed areas. For instance, the RBP Program could allow for development of a new 160-site campground/RV park, with supporting development (e.g., roads, parking areas), on AG-1 and AG-II lands. For such projects, it is unlikely that new development could be located within existing disturbed areas, resulting in development or disturbance of potentially sensitive habitat areas. As such, private recreational development and RBPs enabled by the Project could result in *potentially significant* impacts. Implementation of **MM BIO-1 (Tree Protection Plan)** and **MM BIO-2 (Habitat Protection Plan)** would require applicants for recreational development projects and RBPs to prepare a Tree Protection Plan (TPP) and Habitat Protection Plan (HPP) that document existing resources at the site, identify potential impacts associated with the individual development project, and describe necessary avoidance, minimization, and compensatory mitigation strategies to be implemented for each project. Compliance with

existing and proposed development standards for new development proposed or enabled by the Project, as well as implementation of required mitigation measures, would reduce potential direct impacts to sensitive habitats and natural communities to a *significant but mitigable* level.

With regards to the planned Jalama Beach Campground Expansion & Upgrade Project and Jalama Bluff Trail included in the Project, proposed improvements would result in direct impacts to native habitat as a result of vegetation removal, grading, and construction of campground facilities, the proposed blufftop trail, and the coastal access stairway. Specifically, proposed improvements would affect an estimated 3.4 acres of sensitive habitat and natural communities – 1.4 acres of ESH and 2.0 acres of California Sagebrush Scrub - affecting 8 of the 11 plant communities identified in the survey area, as well as beach, coastal bluff, and developed areas (see Table 3.4-3; Appendix C). The proposed campground improvements would not result in any direct impacts to Jalama Creek or the associated riparian corridor; however, the proposed blufftop trail improvements (e.g., rock reinforcement, new culverts) could result in minimal impacts to three ephemeral drainage features along the coastal bluff. In addition, construction of the proposed engineered staircase would occur within the top of bank (i.e., top of the canyon walls) of the "The Crack". Therefore, implementation of the Jalama Beach Campground Expansion & Upgrade Project and Jalama Bluff Trail is anticipated to result in a *potentially significant* impact on sensitive habitats and natural communities.

In addition to mandatory compliance with existing and proposed policies and development standards, implementation of mitigation measures would be required to reduce and compensate for impacts resulting from the implementation of the Jalama Beach Campground Expansion & Upgrade Project and Jalama Bluff Trail projects. **MM BIO-3 (Species-Specific and Sensitive Habitat Avoidance and Minimization Measures)** would require the implementation of various pre-construction species surveys, construction monitoring, construction worker orientation, and habitat restoration planning efforts to ensure impacts to sensitive habitats are avoided to the maximum extent feasible, and/or that appropriate restoration activities are conducted to offset and mitigate the effects of project disturbance at appropriate mitigation ratios and at suitable mitigation sites. In addition, **MM BIO-4 (General Construction Avoidance and Minimization Measures)** would require that construction best management practices are implemented to minimize impacts to sensitive habitats to the maximum extent feasible. These mitigation measures would reduce potential direct impacts to sensitive habitats and natural communities to a *significant but mitigable* level.

Table 3.4-3. Summary of Impacts to Sensitive Habitat and Natural Communities for the Jalama Beach County Park Expansion and Coastal Access Improvements Project

Resource Affected	Area of Impact (Upper Mesa Campground Expansion) (acres)	Area of Impact (Campground) (acres)	Area of Impact (Coastal Access Improvements) (acres)	Total Area of Impact (acres)
Environmentally Sensitive Habitat				
California Brittlebrush Scrub	0.00	0.09	0.00	0.09
California Sagebrush – Purple Needlegrass Scrub	0.95	0.00	0.00	0.95
Dune Mat	0.00	0.01	0.00	0.01
Giant Coreopsis Scrub	0.00	0.16	0.03	0.19
Native Vegetation Community				
California Sagebrush Scrub	1.33	0.0	0.65	1.98
Non-Native Vegetation Community				
Wild Oats/Annual Brome Grassland	0.36	0.02	0.01	0.39
Ornamental Trees/Landscaping	0.00	2.97	0.02	2.99
Ruderal/Disturbed	0.00	1.10	0.07	1.17
Other Land Use Types				
Beach	0.00	0.00	0.00	0.00
Coastal Bluff	0.00	0.00	0.01	0.01
Developed	0.00	8.12	0.04	8.16

Source: Appendix C.

Long-term direct and indirect impacts on sensitive habitats may also occur as a result of the development of new parks, trails, and recreational facilities on sites supporting or located proximate to sensitive habitats and natural communities. The operation of new parks and trails would increase human presence and activities within the area which could encroach up these habitats and cause adverse impacts. For instance, landscaping and maintenance of new parks and trails could result involve infrequent vegetation clearance, potential of sensitive habitats and natural communities directly adjacent to the facilities. Development and landscaping could also introduce non-native invasive plants that could threaten the integrity of native plant communities. For recreational facilities built on in the urban-rural boundary, this could also entail clearance and maintenance of wildfire fuel buffer areas. New multi-use recreational trails constructed adjacent to creeks and waterways could also generate runoff and pollution (e.g., trash, dog and equestrian waste). Further, increased human presence can result in increased potential for human encroachment into and trampling of habitat.

However, recreation is generally considered compatible with biological resources as increased human presence and indirect impacts from use and operation of recreational facilities typically result in only negligible impacts. In fact, recreational uses, particularly trails, are often located within or construction alongside the designation of natural open space or habitat conservation areas. Most users of parks and trails tend to confine themselves to the developed area or along the trail corridor. Furthermore, County Parks is required to design and implement public park and trail improvements consistent with the Comprehensive Plan and all applicable policies and standards, as well as federal and state regulations, to protect biological resources and surface and groundwater quality. Such policies include setbacks from sensitive habitats, mandatory requirements for the use of native plants in landscaping, or development standards to ensure the control of pollution and erosion. For non-County projects countywide, including RBPs, and County Parks projects in the Coastal Zone, projects would be subject to existing County policies and regulations, as well as the Project's proposed standards for development of parks/playgrounds and trails, development in the Recreation zone, and requirements for RBPs, which would reduce potential for long-term direct and indirect impacts. Further, future development enabled under the Project's zoning ordinance amendments would also be required to comply with additional development standards and conditions of approval which would be imposed on a universal and/or case-by-case basis and include conditions such as the establishment of special setbacks and buffers, regulation of outdoor lighting, and regulation of noise and vibration. With the implementation existing policies and regulations and proposed development standards for new recreational development, long-term direct and indirect impacts to sensitive habitats and natural communities as a result of future parks, recreation, and trail development, as well as RBPs, enabled by the Project would be *insignificant*.

Impact BIO-2. The Project could have a substantial adverse effect, either directly or indirectly through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the CDFW or USFWS.

As described in Impact BIO-1, many future parks, trails, and recreational development projects proposed or enabled under the Project would occur in urban areas and would not significantly impact habitats supporting candidate, sensitive, or special-status species. For instance, the development of new pocket or neighborhood parks in highly urbanized areas of the county would largely occur on previously disturbed sites that do not provide suitable habitat for such species. Future parks, recreation, and trail development, as well as RBPs enabled by the Project, would be also be subject to the wide range of existing federal, state, and county policies, community plan policies, and development standards proposed under the Project that would avoid or minimize impacts that could result from development of sites that provide suitable habitat for special-status species. These include policies mandating the protection of ESH areas which support numerous special-status species from any significant disturbance of habitat, as

well as policies or ordinances such as CLUP Policy 9-35 and the County's Deciduous Oak Tree Protection and Regeneration Ordinance which mandate the protection and avoidance of locally important species. For many projects, direct impacts would further be avoided through the implementation of and compliance with the additional development standards proposed as part of the Project zoning ordinance amendments, which establish objective development standards to ensure high-quality, safe, and accessible facilities to enhance community sustainability and protect natural resources, including important or special-status species.

However, it is possible that future development of parks, trails, and recreational facilities proposed or enabled by the Project, particularly future RBP projects, could occur on previously undisturbed sites or sites that do support special-status species, particularly in the rural areas or in urban environments along creek corridors. Further, depending on the individual site and proximity to habitat supporting sensitive wildlife species (e.g., riparian and creek corridors, trees supporting roosting or nesting birds), construction activities could generate noise that would significantly disturb sensitive species. For instance, loud construction activities occurring in proximity to nesting sites could cause birds to temporarily vacate an area or even result in nest abandonment. As such, impacts are considered *potentially significant*.

Implementation of **MM BIO-1 (Tree Protection Plan)** and **MM BIO-2 (Habitat Protection Plan)** would require applicants for recreational development projects and RBPs to prepare a TPP and HPP that document existing resources at the site, identify potential impacts associated with the individual development project, and describe necessary avoidance, minimization, and compensatory mitigation strategies to be implemented for each project. Compliance with existing and proposed development standards for new development proposed or enabled by the Project, as well as implementation of required mitigation measures, would reduce potential direct impacts to protected species to a *significant but mitigable* level.

With regards to the Jalama Beach Campground Expansion & Upgrade Project and Jalama Bluff Trail projects, proposed improvements would result in direct impacts to special-status species as a result of habitat disturbance, vegetation removal, grading, and construction of campground facilities, the proposed blufftop trail, and the coastal access stairway. As presented in the Biological Resources Assessment for the Blufftop Trail & Campground Improvements Projects at Jalama Beach County Park (Appendix C), numerous sensitive wildlife species occur or have the potential to occur in the open water, riparian, dune, coastal scrub, and grassland habitats that surround the Jalama Beach County Park. These include, but are not limited to, Gaviota tarplant, cliff aster (*Malacothrix saxatilis* var. *saxatilis*), red sand verbena (*Abronia maritima*), tidewater goby, California red-legged frog, southwestern pond turtle, and two-striped garter snakes (*Thamnophis hammondii*). The Biological Resources Assessment concludes that implementation of the proposed improvements would not substantially reduce or eliminate habitat for special-status wildlife species, as there is an abundance of wildlife habitat in the vicinity. However, ground disturbance associated with campground expansion in

the Upper Mesa area would have the potential to directly disturb a 0.53-acre population of Gaviota tarplant. In addition, redevelopment and site improvements at the main campground could directly disturb California red-legged frog, which could occur in campground construction areas. Further, if construction activities were to occur during the nesting bird season (February 1, through August 31), construction work could result in direct impacts (e.g., vegetation removal) and indirect impacts (e.g., noise, dust) to nesting birds and result in nest abandonment. Given the potential for direct impacts to Gaviota tarplant, a federally- and state-listed species, California red-legged frog, a federally threatened species and state Species of Special Concern, and nesting birds, impacts to special-status species associated with implementation of the Jalama Beach Campground Expansion & Upgrade Project and Jalama Bluff Trail projects are considered *potentially significant*.

In addition to mandatory compliance with existing and proposed policies and development standards, implementation of mitigation measures would be required to reduce and compensate for impacts resulting from the implementation of the Jalama Beach Campground Expansion & Upgrade Project and Jalama Bluff Trail. **MM BIO-3 (Species-Specific and Sensitive Habitat Avoidance and Minimization Measures)** would require the implementation of pre-construction Gaviota tarplant surveys, preparation of a Gaviota Tarplant Mitigation Plan in consultation with USWFS and CDFW, and mandatory consultation with USFWS and CDFW regarding the need for Incidental Take Permits for impacts to Gaviota tarplant and California red-legged frog. **MM BIO-3** would also require various pre-construction species surveys, construction monitoring, construction worker orientation, and habitat restoration planning to ensure impacts to special-status species are avoided to the maximum extent feasible, and/or that appropriate activities are conducted to offset and mitigate the effects of project disturbance. Further, **MM BIO-4 (General Construction Avoidance and Minimization Measures)** would require that construction best management practices be implemented to minimize impacts to special-status species to the maximum extent feasible. These mitigation measures would reduce potential direct impacts to special-status species to a *significant but mitigable* level.

In addition to the direct impacts described above, the Project would result in potential long-term indirect impacts to special-status species following construction activities. As previously described, the development of new parks, trails, and recreational facilities could occur on sites supporting or located proximate to suitable habitats supporting various special-status species. By locating recreational development and facilitating recreation in these areas, the proposed Project has the potential to increase human presence in such habitats. For instance, the types of recreational activities located in these areas could include multi-game sports tournaments taking place at larger community parks, which could generate excessive noise levels or nighttime lighting that could cause disturbance to wildlife, causing them to temporarily vacate an area or disrupt nesting, breeding, and foraging activities. The development of trails,

particularly when along riparian corridors, could increase the potential for similar noise disturbance or increased potential for human encroachment into or trampling of special-status plant species and wildlife habitats, or increased occurrences of wildlife mortality.

Similar to direct impacts resulting from future recreational development, the potential for indirect impacts to special-status species would be reduced through implementation of existing federal, state, and county policies, and development standards, particularly those policies and development standards which mandate setbacks from sensitive habitats, such as Gaviota Coast Plan Development Standard NS-2 which requires the provision of buffers between ESH and new development to provide distance and physical barriers to human intrusion. Future development enabled under the Project's zoning ordinance amendments would also be required to comply with additional development standards and conditions of approval which would be imposed on a universal and/or case-by-case basis and include conditions such as the establishment of special setbacks and buffers, regulation of outdoor lighting, and regulation of noise and vibration. With application of existing and proposed policies and development standards, indirect impacts to special-status species resulting from the operation of recreational facilities and increased human presence would be *insignificant.* Further, while not required to reduce indirect impacts, any potential adverse effects on special-status wildlife from increased human presence would be further reduced as a result in implementation of **MM NOI-1 (Recreation Noise Standards)** which would establish further limits on outdoor amplified sound and other uses generating noise.

Impact BIO-3. The Project could interfere substantially with the movement of native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors or impede the use of native wildlife nursery sites.

Santa Barbara County is home to many wildlife corridors such as creeks and riparian corridors, wetlands, open native habitats, and water bodies. The development of new parks, trails, and recreational facilities on sites that are currently undeveloped or are adjacent to natural communities could interfere with native fish and wildlife movement due to habitat fragmentation and the creation of barriers to wildlife movement (e.g., fences or walls). For example, the development of outdoor recreation within the County-owned Baron Ranch as part of the Baron Ranch Trails Project or development of the Orcutt Creek Trail Project could occur in close proximity to existing riparian corridors, which could disrupt or constrain important wildlife corridors. Potential disruption of wildlife corridors, particularly those that connect mountainous and coastal areas, or undeveloped foothill lands to pockets of open spaces, could interfere with wildlife passage for fish, amphibians, reptiles, and a range of mammals, potentially including endangered steelhead trout, southwestern pond turtle, deer, coyotes, and even occasional bears and mountain lions. Development of the large-scale facilities such as

sports fields or campgrounds could also potentially impact wildlife passage as a result of fencing or increased lighting and noise.

As previously stated, recreational facilities, particularly trails and parks with open spaces, are often considered to be compatible with natural resources and communities. Many parks are developed with landscaped areas that are complimentary to adjacent natural communities and can help support wildlife movement. In addition, according to The Next Summit, "social" or "user-created" trails often form when people take shortcuts or explore off-path. Unlike official trials. Which are engineered to minimize erosion and avoid sensitive habitats, these informal paths can create erosion, cause drainage problems, and trample fragile vegetation (The Next Summit 2024). Keeping people on designated trails can minimize human impact on natural spaces, prevent erosion, and keep waterways clean. Trails can prevent disturbing animals and their access to food and water, and preserve natural landscapes utilized by biological resources. Renovating existing trail systems so that they are safer for the public and can withstand an increased capacity of recreationalists would promote safer and more predictable recreation use for people and wildlife.

While there is potential for future parks, trails, and recreational projects to directly or indirectly interfere with the movement of native resident or migratory species, any future recreation projects permitted under the Project would be subject to the wide range of existing County policies, along with development standards proposed under the Project, that would ensure appropriate siting and design of development so as not to substantially adversely affect wildlife movement and corridors (refer to discussion under Impact BIO-1 and Impact BIO-2 above).

Indirect impacts to biological resources could also occur as a result of adoption and implementation of the proposed LUDC and zoning ordinance amendments. As previously discussed, implementation of these amendments has the potential to encourage future development beyond what is anticipated or projected under the current land use framework. The zoning ordinance amendments proposed under the Project which establish objective development standards to ensure high-quality, safe, and accessible facilities to enhance community sustainability and protect natural resources, including significant biological habitats or sensitive natural communities would also apply to future projects enabled under the LUDC and zoning ordinance amendments. However, it is impossible to predict how, when, and where projects enabled under the proposed amendments, including eligible RBP Program projects, would take place. Likewise, it is difficult to predict the scope, scale, and extent of development proposed by these projects. Depending on the specific location of future uses and related development, projects enabled under the proposed amendments could result in a disruption of habitat. For instance, 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. Adherence to existing and proposed policies and regulations would help avoid or reduce any

adverse effects on to wildlife movement; however, it is possible that existing and proposed regulations alone might not fully avoid adverse effects. Therefore, impacts are considered *potentially significant*.

Implementation of **MM BIO-5 (Wildlife Movement Plan)** would require applicants for recreational development projects and RBPs to prepare a Wildlife Movement Plan. The Wildlife Movement Plan would first determine if potential wildlife linkages traverse the project site, and then develop a wildlife fencing plan that would avoid disruption of wildlife movement. Future privately-proposed recreational development projects and RBPs would also be required to implement **MM BIO-2 (Habitat Protection Plan)** requiring the evaluation of project-specific impacts to sensitive habitats and natural communities, including corridors for wildlife movement, and the avoidance, minimization, and mitigation of impacts to such resources. With implementation of these mitigation measure, impacts to wildlife movement would be *significant but mitigable.*

Impact BIO-4 The proposed Project could conflict with adopted local plans, policies, or ordinances oriented toward the protection and conservation of biological resources.

As discussed above, implementation of the proposed Project and the development of future parks, trails, recreational facilities, and RBPs could result in substantial adverse impacts to biological resources. While the development of individual site improvements and facilities could occur on or in close proximity to sensitive biological resources, any future recreation projects permitted under the Project would be subject to the wide range of existing County policies, along with development standards proposed under the Project, that would ensure appropriate siting and design of development so as not to substantially adversely affect such resources, to the maximum extent feasible. Further, the Project proposes implementation of the zoning ordinance amendments to encourage future development beyond what is anticipated or projected under the current land use framework. The zoning ordinance amendments proposed under the Project which establish objective development standards to ensure high-quality, safe, and accessible facilities to enhance community sustainability and protect natural resources, including significant biological resources, would also apply to future projects enabled under the LUDC and zoning ordinance amendments.

The proposed zoning ordinance amendments would also allow additional recreation in certain zones to support compatible recreational activities in the rural areas of the county. For example, the Baron Ranch Trails project would create 14 miles of new recreational trails designated for multi-use hikers, mountain bikers, and equestrians with some trails designated for hikes and equestrian use only. Many of these proposed trail alignments would utilize existing agricultural access roads that could vary in terrain, including the trail connection under Highway 101 and the UPRR corridor to improve an existing creek culvert to allow pedestrian access. While this

project would involve some vegetation clearance and grading for new trails, the project would be required to adhere to the proposed development standards Section 14 and Section 21 which would prohibit use within agricultural buffers and require buffers around environmentally sensitive habitats and riparian corridors. Additionally, the RBP Program would foster public-private partnerships to help fulfill the recreation needs identified by the Recreation Master Plan. To do so, the RBP Program would create voluntary opportunities in unincorporated areas for private developers to contribute directly to the County's public recreation system.

The nature of the Recreation Master Plan is to provide additional guidance and regulations to require future parks and trails projects to adhere to existing and adopted local plans, policies, and ordinances oriented toward the protection and conservation of biological resources. Adherence to these policies and regulations would reduce any adverse effects on biological resources, and indirect impacts on biological resources associated with implementation of the Project would be *insignificant*.

3.4.4.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis,* the cumulative setting for the Project involves a variety of long-range plans, policies, and initiatives as well as development of county projects in the unincorporated county and surrounding incorporated cities. Impacts associated with the Project along with potential impacts from past, pending, and current planning or development projects inform the cumulative impacts analysis. Such cumulative projects would range from programmatic projects such as the Agricultural Enterprise Ordinance (AEO), and development and annexations proposed under the general plans and the County's 2023-2031 Housing Element, as well as individual development projects.

The Project would result in cumulatively considerable impacts if it, in combination with proposed development under other County plans and projects, would adversely affect, either directly or through habitat modifications, any species, riparian habitat, or natural community identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations or by the USFWS or CDFW; adversely affect federally or state protected wetlands regulated under Section 404 or Section 401 or California Fish and Game Code Section 1600-1616 (including marsh, vernal pool, and coastal areas) through direct removal, filling, hydrological interruption, or other means; interfere substantially with movement of any native resident or migratory fish or wildlife species or with established migratory corridors or native wildlife nursery sites; or conflict with any local policies or ordinances protecting biological resources, including tree preservation policies, habitat conservation plans, natural community conservation plans, or other approved conservation plans.

As previously described, the objectives and policies in the County Comprehensive Plan, community plans, LUDC, and CLUP require avoidance of impacts to sensitive biological

resources. The Project also proposes new standards for development of parks, recreational facilities, trails, and RBPs that would require avoidance of impacts to the maximum extent feasible. Additionally, **MM BIO-1** through **MM BIO-5** would be required to reduce or avoid potential impacts associated with the development of future recreational projects and RBPs that cannot fully avoid disturbance to sensitive habitats or protected species. Through compliance with existing and proposed policies and development standards, as well as implementation of mitigation measures, Project-specific impacts would be reduced to a significant but mitigable level, and the Project would not result in cumulatively considerable impacts in the county.

Therefore, the parks and trails projects planned for under the Project would not substantially contribute to cumulatively considerable impacts in combination with other future and pending developments. These cumulative impacts would be considered *significant but mitigable*.

3.4.4.4 Proposed Mitigation

MM NOI-1 (Recreation Noise Standards) would apply.

MM BIO-1: Tree Protection Plan. Development of County parks, ~~The County shall require the applications for~~ permitted uses in Recreation zones, permitted parks and trails, and RBPs shall be sited to prevent the removal or damage to mature trees to the extent feasible. Where development cannot be sited to avoid removal or damage to mature trees, the County shall require the preparation of ~~to include for County P&D approval~~ a TPP. The TPP shall be prepared by an arborist/biologist approved by County P&D ~~and shall determine whether mature native trees are located on the project site~~. If the biologist finds that there are no mature native trees ~~at the project site~~ that would be adversely affected by the project, they shall submit a memorandum describing these findings to the County ~~P&D for review~~. If mature native trees ~~are present~~ would be adversely affected by the project, the TPP shall determine ~~whether~~ appropriate avoidance, minimization, or compensatory measures to be implemented to sufficiently mitigate adverse impacts to mature trees ~~are necessary~~.

The TPP shall include the following components:

Site Plan Component:

- All mature native trees shall be identified in the site plan.
- All ground disturbance and development shall be sited to avoid mature native trees to the maximum extent practicable as determined by the arborist/biologist.
- The location of all tree wells or retaining walls shall be located at least 6 feet from the dripline of all protected trees.
- The location of all paths (i.e., driveways, sidewalks, etc.) shall be located at least 25 feet from dripline areas. Only pervious paving materials (e.g., gravel, brick without mortar, turf block) shall be located within 6 feet of dripline areas.

Construction Component:

- Fencing of all trees to be protected shall be located at least 6 feet outside the dripline with chain-link (or other material satisfactory to the County) fencing at least 3 feet high, staked to prevent any collapse, and with signs identifying the protection area placed in 15-foot intervals on the fencing.
- Fencing/staking/signage shall be maintained throughout all grading and construction activities.
- Equipment storage (including construction materials, equipment, fill soil, or rocks), and construction staging and parking areas shall be located outside of the protection area.
- All trees located within 25 feet of buildings shall be protected from stucco and/or paint during construction.
- No irrigation shall occur within 6 feet of the dripline of any protected tree.
- The TPP shall require that the following activities shall be done only by hand: any excavation or trenching required within the dripline or sensitive root zone of any specimen within the habitat; cleanly cutting any roots of 1 inch in diameter or greater within the habitat; and tree removal and trimming within the habitat.
    - If large rocks or challenging conditions are present onsite, rubber-tired construction equipment weighing 5 tons or less or a small, tracked excavator (i.e., 215 or smaller track hoe) may be used.
- Grading shall be designed to avoid ponding and ensure proper drainage within the driplines of oak trees.

Tree Replacement Component:

- The replacement trees shall be a native species, planted at a 10:1 ratio for oak trees (15:1 for blue oaks or valley oaks), and a 2:1 ratio for other trees. The replanting location shall be shown on site plans.
- Species shall be from locally obtained plans and seed stock.
- The trees shall be gopher-fenced.
- The trees shall be irrigated with drip irrigation on a timer until established.
- The trees shall be weaned off of irrigation over a period of 2 to 3 years.
- No permanent irrigation shall occur within the dripline of any tree.
- If replacement trees cannot all be accommodated onsite, the applicant shall submit a plan for approval by the Planning and Development Department for replacement trees to be planted offsite on lands owned by the property owner/applicant, on land with which the property owner/applicant has a real interest, or on other approved restoration site(s).

- All new and replanted trees shall be protected from predation by wild and domestic animals and from human interference by the use of staked, chain link fencing, and gopher fencing during the maintenance period.

Plan Requirements and Timing: The TPP shall be prepared by the applicant and submitted as part of project application materials. For County Parks projects, the TPP shall be prepared prior to preparation of the final site plan. The County ~~P&D~~ shall review and confirm that all recommendations for the protection of mature native trees are reflected in project plans and permit requirements. All site plan components related to earth movement, construction, and temporarily and/or permanently installed protection measures shall be graphically depicted ~~by the applicant~~ on project plans and submitted to the County ~~P&D~~ for review and approval before the issuance of final approvals or permits by the County. All standards and requirements for the protection of mature native trees shall be printed on all building and grading plans.

Monitoring: County Parks or County P&D processing planner(s) ~~County P&D~~ shall ensure that the TPP is included as part of the project plans ~~application and that all standards and requirements for protection are reflected in project plans~~. ~~The~~ County Parks and/or the applicant shall demonstrate to County ~~P&D~~ compliance monitoring staff that protection or other required measures are in place before ground disturbance and that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed as required by the approved TPP.

MM BIO-2: Habitat Protection Plan. Development of County parks, ~~The County shall require the applications for~~ permitted uses in Recreation zones, permitted parks and trails, and RBPs shall be sited to avoid adverse effects to sensitive biological resources to the extent feasible. Where development cannot be sited to avoid adverse affects to sensitive biological resources, the County shall require the preparation of ~~to include for County P&D approval~~ an HPP. The HPP shall be prepared by a biologist approved by County P&D. The 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. If the biologist finds that there are no potential sensitive biological resources at the project site that would be adversely affected by the project, they shall submit a memorandum describing these findings to the County ~~P&D~~ for review. If resources are present and would be adversely affected by the project, the HPP shall determine ~~whether~~ appropriate avoidance, minimization, or compensatory measures to be implemented to sufficiently mitigate adverse impacts to sensitive biological resources ~~are necessary~~.

The HPP shall include at a minimum the following components:

- A description of the location and extent of driplines and sensitive root zones for all vegetation to be preserved, locations of sensitive habitats with a detailed description of allowed disturbance, and depictions of original and new locations for replanted species.
- Depiction of approved development envelopes, equipment storage, construction staging, and parking areas.
- If sensitive habitats, watercourses, or riparian habitats occur within the project site, to the maximum extent feasible as determined by the biologist, the HPP shall identify a 100-foot buffer for ground disturbance and vegetation removal. The area shall be fenced with a fencing type and in a location acceptable to County P&D. Depiction of the type and location of protective fencing or other barriers to be in place to protect the habitat areas. Protective fencing/staking/barriers shall be maintained throughout all grading and construction activities. To the extent feasible, grading activities adjacent to sensitive habitats, watercourses, or riparian habitats shall be timed to avoid wet weather conditions.
- If a project site is located adjacent to sensitive habitats, watercourses, or riparian habitats, the project shall be landscaped with only native, non-invasive, or compatible species to the adjacent habitat.
- No alteration to stream channels or banks shall be permitted until the applicant demonstrates receipt of all authorizations from USACE, Central Coast RWQCB, and/or CDFW for any planned alteration to stream channels or banks.
- 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.
- The HPP shall require that the following activities be done only by hand: any excavation or trenching required within the dripline or sensitive root zone of any specimen within the habitat; cleanly cutting any roots of 1 inch in diameter or greater within the habitat; and tree removal and trimming within the habitat.

  - If large rocks or challenging conditions are present onsite, rubber-tired construction equipment weighing 5 tons or less or a small, tracked excavator (i.e., 215 or smaller track hoe) may be used.

- If it becomes necessary to disturb or remove any plants within the habitat area, or in the event of unexpected damage, specimens shall be boxed and replanted. If it is not feasible to replant, plants shall be replaced at a minimum using the standards from the applicable Community Plan. If no replacement standards are provided in a Community Plan, the project biologist shall determine the appropriate replacement ratio based on existing habitat quality. If replacement plants cannot all be accommodated onsite, a plan must be approved by County P&D for replacement plants to be planted off-site on lands owned by the property owner/applicant, on land with which the property owner/applicant has a real interest, or on other approved restoration site(s).
- Grading shall be designed to ensure that habitat areas have proper drainage during and after construction, per biologist recommendations.
- Focused surveys for special-status species, and any capture, temporary possession, and relocation of wildlife shall be conducted only by a County-approved biologist(s) with appropriate collection and handling permits from CDFW and USFWS.
- Any planting stock brought onto a project site for landscaping or habitat restoration shall be inspected to ensure it is free of pest species that could invade natural areas, including but not limited to Argentine ants. Any planting stock found to be infested with such pests shall be quarantined, treated, or disposed of according to best management practices by qualified personnel, in a manner that precludes invasion into natural habitats.

  Plan Requirements and Timing: The HPP shall be prepared by the applicant and submitted as part of project application materials. For County Parks projects, the HPP shall be prepared prior to preparation of the final site plan. The County ~~P&D~~ shall review and confirm that all recommendations for the protection of sensitive biological resources are reflected in project plans and permit requirements. All site plan components related to earth movement, construction, and temporarily and/or permanently installed protection measures shall be graphically depicted ~~by the applicant~~ on project plans and submitted to the County ~~P&D~~ for review and approval before the issuance of final approvals or permits by the County. All standards and requirements for the protection of sensitive biological resources shall be printed on all building and grading plans.

  Monitoring: County Parks or County P&D processing planner(s) ~~County P&D~~ shall ensure that the HPP is included as part of the project plans ~~application and that all standards and requirements for protection are reflected in project plans~~. ~~The~~ County Parks and/or the applicant shall demonstrate to County ~~P&D~~ compliance monitoring staff that protection or other required measures are in place before ground disturbance and that

any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed as required by the approved HPP.

MM BIO-3: Species-Specific and Sensitive Habitat Avoidance and Minimization Measures. To mitigate impacts to special-status species and sensitive habitats resulting from implementation of the Jalama Beach County Park Expansion and Coastal Access Improvements Project, the County shall implement the following:

1. As recommended by CDFW and USFWS, additional Gaviota tarplant surveys should be conducted by a qualified biologist prior to issuance of any construction permits to continue documentation of the distribution and abundance of Gaviota tarplant populations in the Upper Mesa expansion area. ~~Following CDFW and USFWS guidelines, voucher specimens for Gaviota tarplant populations should be collected by a permitted biologist for genetic analysis.~~ This measure applies only to proposed campground improvements in the Upper Mesa expansion area.
2. Continue consultation with the regulatory agencies concerning the need for an Incidental Take Permit from the USFWS and Consistency Determination from CDFW for impacts to California red-legged frog upland habitat and Gaviota tarplant in the Campground Area and Upper Mesa expansion area. Agency consultation should also include involvement of the USACE for construction of the beach access staircase and drainage crossings for the blufftop trail. This measure applies only to proposed campground improvements in the Upper Mesa expansion area, proposed campground improvements in the existing campground, and proposed Crack stairway improvements.
3. A Gaviota Tarplant Mitigation Plan should be developed for the Project in consultation with CDFW and USFWS that includes a suitable offsite mitigation location that can be preserved in perpetuity. In addition, a Gaviota Tarplant Protection Plan & Weed Management Plan should be prepared for Gaviota tarplant habitat that will remain protected in place. This measure applies only to proposed campground improvements in the Upper Mesa expansion area.
4. A Dune & Riparian Habitat Restoration Plan should be prepared that provides the details of proposed onsite restoration to mitigate impacts to dune mat vegetation and encroachment on the prescribed ESH buffers. The Dune & Riparian Habitat Restoration Plan should identify where along the northern and western perimeters of the campground restoration is to take place and provide details of how restoration would be implemented (e.g., site preparation, planting specifications, planting palette, irrigation, maintenance, monitoring, success criteria, and reporting requirements). The Dune & Riparian Habitat Restoration Plan should also provide details of how restored and existing dune habitat will be protected from pedestrians accessing the beach. This measure applies only to proposed campground improvements in the existing campground.
5. An Offsite Habitat Restoration Plan should be prepared to mitigate impacts to purple needlegrass, California brittlebush scrub, and giant coreopsis scrub. If suitable habitat is

available, the Offsite Habitat Restoration Plan could also incorporate the offsite Gaviota tarplant mitigation referenced above. The Offsite Habitat Restoration Plan should identify suitable mitigation locations to allow for a minimum 3:1 mitigation of ESH impacted by the Project. Mitigation areas must be in locations that can be preserved in perpetuity. The Offsite Habitat Restoration Plan should provide details of all restoration locations and how restoration would be implemented (e.g., site preparation, planting specifications, planting palette, irrigation, maintenance, monitoring, success criteria, and reporting requirements). This measure applies only to proposed campground improvements in the Upper Mesa expansion area, proposed campground improvements in the existing campground, and proposed blufftop trail improvements.

6. A qualified biologist shall conduct pre-construction surveys of the campground, the Upper Mesa campground expansion area, equipment access routes, proposed trail alignments, parking areas, and surrounding habitats, including the adjacent portions of Jalama Creek, for sensitive plant and wildlife species that may occur in the Survey Area. During pre-construction surveys all sensitive plant populations (i.e., Gaviota tarplant, red sand verbena, and cliff aster) should be flagged/fenced for avoidance during construction. Pre-construction surveys for sensitive wildlife (i.e., California red-legged frog, southwestern pond turtle, two-striped garter snake) should be conducted within 7 days of the commencement of work on each trail alignment. This may require multiple pre-work wildlife surveys, depending on the construction timeline, to ensure that potential impacts to sensitive wildlife are avoided. If any federally- or state-listed wildlife species are observed or considered potentially present the USFWS and/or CDFW will be consulted regarding any necessary avoidance measures. This measure applies to all proposed improvements.

7. If the Project is implemented during the bird nesting season (~~February 1 to August 31~~ January – mid-September), a qualified biologist shall conduct a pre-construction survey of the Survey Area and adjacent habitats within 7 days of vegetation removal or construction commencement (i.e., mobilization, staging equipment) to avoid impacts to nesting raptors and other birds. If breeding birds with active nests are found prior to (or during) campground/trail construction, a qualified biologist shall oversee the establishment of a buffer (prescriptively 300 feet ~~for passerines~~ and 500 feet for raptors and special-status passerines). No activities will be allowed within the buffer(s) until the young have fledged from the nest or the nest fails. The prescribed buffers may be adjusted by a qualified biologist to reflect existing conditions, including but not limited to ambient noise, topography, and level of disturbance. Consultation with CDFW may be necessary to implement reduced nest buffers. This measure applies to all proposed improvements.

8. Prior to the start of work, a County-approved biologist shall oversee a worker orientation for all trail crew personnel (including supervisors, equipment operators, laborers, and volunteers) which emphasizes the presence of special-status plant and wildlife species within or adjacent to the Survey Area, identification of those species, their habitat requirements, applicable regulatory policies and provisions regarding their protection, measures being implemented to avoid and/or minimize impacts, and penalties for

noncompliance will be conducted. No staging of equipment or construction supplies shall occur prior to the worker orientation. This measure applies to all proposed improvements.

9. Prior to the start of campground construction, protective fencing and/or BMPs (e.g., silt fencing, fiber rolls) should be installed along the perimeters of disturbance areas to protect adjacent dune, riparian, purple needlegrass, and Gaviota tarplant habitat. Protective fencing and BMPs should also be installed along trails and around proposed parking lots following initial vegetation removal to protect surrounding native scrub habitat. This measure applies only to proposed campground improvements in the Upper Mesa expansion area, proposed campground improvements in the existing campground, and proposed blufftop trail improvements.
10. All vegetation removal and construction activities should be monitored full-time by a qualified biologist to ensure that impacts to sensitive habitat and plants are minimized to the greatest extent feasible and impacts to wildlife are avoided. This measure applies to all proposed improvements.
11. Pesticide/insecticide use should be avoided to prevent impacts to sensitive invertebrates that have the potential to occur. This measure applies to all proposed improvements.

    Plan Requirements and Timing. This measure shall apply to implementation of the improvements proposed as part of the Jalama Beach County Park Expansion and Coastal Access Improvements Project. These conditions shall be noted on all grading and construction plans. Species and habitat surveys, agency consultation, mitigation and restoration plan, worker orientation, and construction fencing requirements shall be implemented prior to commencement of grading throughout the year. Construction monitoring activities shall occur throughout the duration of construction.

    Monitoring. County Parks staff shall ensure all conditions are reflected on all grading and construction plans, and shall ensure compliance on site during construction through periodic site visits.

MM BIO-4: General Construction Avoidance and Minimization Measures. To mitigate impacts to special-status species and sensitive habitats resulting from the implementation of the Jalama Beach County Park Expansion and Coastal Access Improvements Project, the County shall implement the following:

- All construction equipment shall be limited to the designated work areas, access routes, and trail alignments. Trails should be constructed with hand tools whenever possible to avoid impacts to sensitive biological resources.
- All motorized equipment used shall be maintained in proper working condition and shall be free of drips and leaks of coolant, hydraulic, and petroleum products. No equipment shall be used for the Project unless such equipment is free of leaks and drips. A spill prevention and clean-up kit (including socks, absorbent pads, kitty litter, broom, dustpan, shovel, and container for dirty absorbent material) shall be available on-site for immediate use in case

of an accidental spill. No equipment maintenance or fueling shall occur within 100 feet from any drainages.

- Dust generated by the construction activities shall be kept to a minimum with a goal of reducing impacts to adjacent habitat. A water truck or sprinkler system should be used to prevent excessive dust.
- Trash and food items will be kept in closed containers and removed daily.

> **Plan Requirements and Timing.** This measure shall apply to implementation of the improvements proposed as part of the Jalama Beach County Park Expansion and Coastal Access Improvements Project. These conditions shall be noted on all grading and construction plans.
>
> **Monitoring.** County Parks staff shall ensure all conditions are reflected on all grading and construction plans, and shall ensure compliance on site during construction through periodic site visits.

MM BIO-5: Wildlife Movement Plan. Development of County parks, ~~The County shall require the applications for~~ permitted uses in Recreation zones, permitted parks and trails, and RBPs shall be sited to avoid adverse affects to wildlife corridors or linkages to the extent feasible. Where development cannot be sited to avoid adverse affects to wildlife corridors or linkages, the County shall require the preparation of ~~to include for County P&D approval~~ a Wildlife Movement Plan. The Wildlife Movement Plan shall be prepared by a biologist approved by County P&D. ~~The Wildlife Movement Plan shall first determine whether the project site has the potential to support wildlife linkages.~~ If the biologist finds that there are no potential wildlife corridors traversing the project site that would be adversely affected by the project, they shall submit a memorandum describing these findings to the County ~~P&D for review~~. If wildlife corridors ~~are identified~~ would be adversely affected by the project, the Wildlife Movement Plan shall analyze proposed fencing in relation to the surrounding opportunities for wildlife movement/migration, identify the type, material, length, and design of proposed fencing, and shall propose non-disruptive, wildlife-friendly fencing, such as post and rail fencing, wire fencing, and/or high-tensile electric fencing, to allow passage by smaller animals and prevent movement in and out of the project sites by larger mammals, such as deer. The evaluation and Wildlife Movement Plan shall also identify project design features that would reduce potential impacts and maintain habitat and wildlife movement.

> **Plan Requirements and Timing:** The Wildlife Movement Plan shall be prepared by the applicant and submitted as part of project application materials. For County Parks projects, the Wildlife Movement Plan shall be prepared prior to preparation of the final site plan. The County ~~P&D~~ shall review and confirm that all recommendations for the protection of wildlife corridors are reflected in project plans and permit requirements. All project design features and protection measures shall be graphically depicted ~~by the applicant~~ on project plans and submitted to the County ~~P&D~~ for review and approval

before the issuance of final approvals or permits by the County. All standards and requirements for the protection of wildlife movement corridors shall be printed on all building and grading plans.

Monitoring: County Parks or County P&D processing planner(s) ~~County P&D~~ shall ensure that the Wildlife Movement Plan is included as part of the project plans ~~application and that all standards and requirements for protection are reflected in project plans~~. The applicant shall demonstrate to County ~~P&D~~ compliance monitoring staff that protection or other required measures are in place before ground disturbance and that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed as required by the approved Wildlife Movement Plan.

3.4.4.5 Secondary Impacts

Implementation of **MM NOI-1** and **MM BIO-1** through **MM BIO-5** would not result in adverse secondary impacts.

3.4.4.6 Residual Impacts

Impacts BIO-1. Future development enabled by the Project would be subject to compliance with existing regulations addressing impacts on sensitive habitats and natural communities, including the Santa Barbara County Comprehensive Plan Land Use Element Hillside and Watershed Protection Policies, Conservation Element, Open Space Element, Coastal Land Use Plan, LUDC, and various other local and state regulations addressing the protection of biological resources. Implementation of **MM BIO-1 (Tree Protection Plan)**, **MM BIO-2 (Habitat Protection Plan)**, **MM BIO-3 (Species-Specific and Sensitive Habitat Avoidance and Minimization Measures),** and **MM BIO-4 (General Construction Avoidance and Minimization Measures)** would ensure that site-specific impacts associated with implementation of private recreation development projects, future RBPs, and the Jalama Beach County Park Expansion and Coastal Access Improvements Project would be reduced. Therefore, residual impacts associated with Impact BIO-1 would be *significant but mitigable.*

Impact BIO-2. Future development enabled by the Project would be subject to compliance with existing regulations addressing impacts on special-status species, including the Santa Barbara County Comprehensive Plan Land Use Element Conservation Element, Coastal Land Use Plan, LUDC, the County's Deciduous Oak Tree Protection and Regeneration Ordinance, and various other local and state regulations addressing the protection of biological resources. Implementation of **MM BIO-1 (Tree Protection Plan)**, **MM BIO-2 (Habitat Protection Plan)**, **MM BIO-3 (Species-Specific and Sensitive Habitat Avoidance and Minimization Measures),** and **MM BIO-4 (General Construction Avoidance and Minimization Measures)** would ensure that

site-specific impacts associated with implementation of the recreation development projects, future RBPs, and the Jalama Beach County Park Expansion and Coastal Access Improvements Project would be reduced. **MM NOI-1 (Recreation Noise Standards)** would establish further limits on outdoor amplified sound and other uses generating noise, which would reduce and avoid disturbance of biological resources. Therefore, residual impacts associated with Impact BIO-2 would be *significant but mitigable.*

Impact BIO-3. While future projects permitted under the Project would be required to adhere to existing County policies and development standards requiring appropriate siting and design to reduce impacts to biological resources to the maximum extent possible, it is possible that some future recreation development projects and RBPs could significantly adversely affect the movement of any wildlife. Implementation of **MM BIO-2 (Habitat Protection Plan)** and **MM BIO-5 (Wildlife Movement Plan)** would ensure that site-specific impacts associated with implementation of private recreation development projects and future RBPs would be reduced. Therefore, residual impacts associated with Impact BIO-3 would be *significant but mitigable.*

Impact BIO-4. With mandatory compliance with existing county policies and regulations and development standards proposed under the Project, impacts associated with compliance with adopted local plans, policies, or ordinances oriented towards the protection and conservation of biological resources would be *insignificant*.

This page was intentionally left blank.

3.5 CULTURAL AND TRIBAL CULTURAL RESOURCES

3.5.1 INTRODUCTION

This section describes potential impacts on cultural and tribal cultural resources that could occur from the implementation of the Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (Project). Cultural resources are the tangible or intangible remains or traces left by prehistoric or historic peoples and typically include prehistoric and historic archaeological sites and the historic built environment, such as buildings or structures, or traditional cultural places or landscapes. Cultural and tribal cultural resources discussed in this section include three categories: 1) historic resources; 2) archaeological resources; and 3) tribal cultural resources, as follows.

1. **Historic resources** include buildings, structures, and objects of historic or aesthetic importance that amplify the local population's sense of community, enhance perceptions and enjoyment of the community, and provide an important measure of the physical quality of life. When a significant concentration of such resources occurs within a defined geographic space, a historic district may be defined.
2. **Archaeological resources** represent and document activities, accomplishments, and traditions of previous occupation, and link current and former inhabitants of an area. Archaeological resources may date from the historic or prehistoric period and include physical remains of the past, such as artifacts, manufacturing debris, dietary refuse, and the soils in which they are contained, or areas where prehistoric or historic activity measurably altered the earth.
3. **Tribal cultural resources** include sites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe that are either: 1) included or determined to be eligible for inclusion in the California Register of Historical Resources (CRHR); or 2) included in a local register of historical resources as defined in Public Resources Code (PRC) Section 21074. Tribal cultural resources may also include resources determined by the Lead Agency, at its discretion and supported by substantial evidence, to be significant. A cultural landscape that meets these criteria is considered a tribal cultural resource to the extent that the cultural landscape is geographically defined in terms of size and scope.

3.5.2 ENVIRONMENTAL SETTING

Santa Barbara County has a rich history of habitation dating back 11,000 to 12,000 years ago, including the region's first known habitants, the Chumash, a Native American tribe that continues to reside in the county today. Native habitation extended through European exploration periods, which began in 1542 with Juan Cabrillo's explorations and establishment

of missions in the 1760s. Settlers claimed land in the county through the 1800s as part of the state's Gold Rush, expansion of ranching, and American industrialization, including commercial agriculture and tourism. Agriculture also expanded rapidly in the county, which increased the growth of agricultural economies supported by landowners and immigrant populations. The prehistory and history of the county are summarized below.

3.5.2.1 Precontact Setting

Within the Santa Barbara Channel region, the Barbareño Chumash developed a highly complex social system during late prehistory. While it is clear that there are many differences between the Chumash groups living north and south of Point Conception and between the coast and interior areas of the county, there are some broad patterns of cultural change applicable to all regions.

Early Holocene/Paleocoastal Period (Prior to 6500 Before Present [B.P.])

Human inhabitation of the Santa Barbara County region is believed to have begun more than 12,000 years ago. Although early archaeological evidence is sparse, several discoveries have led to an understanding of the prehistory of the area. A fluted Clovis point fragment found near the coast on Hollister Ranch is estimated to be approximately 11,000 to 12,000 years old (Erlandson et al. 1987). Human presence became more widespread around approximately 9000 B.P. when these ancient residents inhabited the coast and exploited marine resources before the Milling Stone Period (6500 – 3500 B.P.). Very few of these "Paleocoastal" sites have been identified. This shortage could be due to relatively small populations and/or loss through erosion and other natural forces, including the increase in global sea levels. The Paleocoastal Period exhibited low population density and simple technology. Early populations appear to have subsisted largely on plants, shellfish, and vertebrate species, with artifact assemblages emphasizing flaked stone tools.

Milling Stone Period (6500 – 3500 B.P.)

The Milling Stone Period is defined by the prevalence of handstones and milling slabs, indicating a reliance on seeds and other plant foods. Milling stones called mutates and manos dated as old as 9000 B.P. have been found in abundance. These milling stones have been interpreted as evidence of a dietary shift to a focus on plant materials such as seeds and nuts, and may also be a sign of food storage capabilities (Glassow 1996). As such, it is believed that subsistence during the Milling Stone Period consisted of a mixture of plant foods, shellfish, and a limited array of vertebrate species. However, researchers working in other locations have reported differently on food preferences during the Milling Stone Period, which may reflect mobility between coastal and inland locations.

Assemblages from this era also contain hammerstones for making flaked tools and for resharpening milling surfaces, small anvils, bone fish gorges, stone sinkers, and other fishing

technology. The number, size, and complexity of habitation sites increase dramatically at this time, and sites show substantial variability across the region. Well-developed middens have been associated with this period, suggesting more regular and continuous use of habitation sites; however, small ephemeral campsites marked by just a few handstones or other milling tools are also found during this time.

Archaeological sites within the period from 6,500 to 5,000 years ago are very limited, likely due to environmental changes (Glassow 1996; Lebow et al. 2001).

Early Period (3500 – 600 B.P.)

Cultural changes during the Early Period are thought to have occurred as a result of environmental shifts, rising sea levels, and an increase in the population base. Population densities appear to have surged around 5,000 years ago. The response to these changes by people of this period is evidenced by sites that appear more settled, but not permanent, with an increase in specialized sites for resource procurement activities such as hunting, fishing, and plant material processing. As a result of the increased population, trade between regions expanded, as evidenced by the presence of exotic shell beads and obsidian materials. Like the Milling Stone Period, ground stone artifacts identified with the Early Period consist of handstones and milling slabs. Toward the end of the period mortars and pestles were added, probably indicating systematic exploitation of acorns. Notched projectile points and the atlatl (throwing stick) appear shortly thereafter as well.

Middle Period (600 B.P. – 1000 Anno Domini [A.D.])

The early Middle Period is defined by the continued specialization in resource exploitation, trade, and increased technological complexity. Fishing, sea mammal hunting, and acorn harvesting increased steadily during this time. Use of the single-piece shell fishhook appeared during this period, and by 800 years ago the bone-barbed harpoon, large contracting stem chert projectiles, and sewn plank canoe had all come into use (Erlandson 1993; Glassow, Wilcoxon, and Erlandson 1988; Glassow 1996; King 1990; Strudwick 1985). Scholarly opinions regarding the development of a definitively centralized and stratified society differ; however, most agree this cultural change took place late in the Middle Period. Microlithic blades also began to be found late in this period and are believed to have been used primarily to perforate shells. Smaller projectile points begin to be found from this period, indicating the use of bows and arrows in the region. Both fish and acorns continued to be primary sources of subsistence. The development of mass hunting techniques suggests population pressure on resource collection late in the period.

Middle-Late Transitional Period (1000–1250 A.D.)

The absence of imported obsidian after 1000 A.D. may reflect a change in trade relationships that is likely associated with a shift in settlement patterns. Middle-Late Transitional Period

sites contain a mixture of earlier artifact types. However, the appearance of small leaf-shaped projectile points marks the arrival of the bow and arrow to the region. Although different evaluation methods have produced a different time frame for the development of chiefly status positions, craft specialization, and complex socioeconomic and political systems, profound changes in Chumash society, economy, and political organization began sometime during the Middle-Late Transitional and Late Periods.

Late Period (A.D. 1300–1769)

By the Late Period, Chumash culture was most likely very similar to that observed by the Spanish when they arrived. The southern Chumash had developed a complex religious, social, and economic system. Social and political structures continued to increase in complexity. Archaeological investigations indicate an increase in marine and terrestrial species in midden deposits less than 600 years old. The use of temporary camps for resource procurement also increased. Objects of material culture included a wide array of utilitarian and ornamental objects such as arrow points, small bead drills (microlithic blades), various mortar types for milling different foods, *Olivella* shell beads and disk beads, and various other artifacts.

3.5.2.2 Ethnography

Chumash is a name derived from the traditional Chumash language that is used by anthropologists to refer to several closely related groups of Native Americans that spoke seven similar languages. The Chumash people lived between Malibu in Los Angeles County and the Monterey County line, on the northern Channel Islands, and east as far as the edge of Kern County. Chumash territory has been divided into sections representing the various linguistic subgroups. There is limited information about the geographical limit of the dialects and the purported boundaries are based more on topography. However, the territorial divisions may correspond more to catchment areas of the missions for which the groups were named rather than the groups' actual native territories (Kroeber et al. 1911).

The Interior and Inezeño Chumash are known to have villages that numbered approximately 100 to 200 individuals, a significantly smaller population, in contrast to the 500 to 1,000 individuals that inhabited settlements along the Santa Barbara Channel (Glassow 1990). In addition to consisting of lower population densities, the inland groups also appeared to have greater seasonal mobility; subsistence focused on acorns and stored food during the winter, and tubers, grass seeds, and bulbs during the spring. Fish provided a high-quality food source in the late summer and early fall, while hunting was best in spring, summer, and fall (Landberg 1965).

Despite being a largely non-agricultural group, the Chumash exhibited a complex society that tied separate villages together by regionally influencing economic, religious, and political

systems. Personal rankings were dependent on wealth and social status, occupations were specialized, leadership was hereditary, and the chiefdom could span several villages.

The Chumash had a rich material culture consisting of utilitarian items such as fishnets, fishhooks, baskets, stone bowls, canoes (*tomols*) among coastal groups, and projectile points. In addition, some utilitarian objects and religious objects such as charmstones were decorated with shell beads. The decimation of Native American populations and subsequent deterioration of cultural practices as a result of missionization is a profound event in the history of the coastal region. Much information was lost, and the mission records do not provide much insight into the lifeways of the Chumash or other groups of the coastal region before contact with Europeans.

3.5.2.3 History

Santa Barbara County

European contact with the Chumash occurred in 1542 A.D. during Juan Cabrillo's explorations. He aimed to reassert Spanish claims in the area. Spanish missionaries began their exploration of California and the development of the missions in the 1760s. The Spanish Colonial Period (1769–1822) is marked by the establishment of permanent Spanish settlements. The Santa Barbara Presidio (or military fort) that was founded in 1782 and five Franciscan missions in Chumash territory generated significant disruptions in the existing way of life. The establishment of the Santa Barbara, Santa Ines, and La Purisima Missions led to the incorporation of the Chumash into mission settlements and the gradual depopulation of Chumash villages and settlements. During the Mission Period (1760–1820), some lands held by the missions were granted to Spanish military veterans. These land grants foreshadowed the subsequent Rancho Period (1820–1845) in California.

Following Mexican independence from Spain in 1822, the Mexican government gained control over California. About 500 land grants were given to local rancheros during the Rancho Period. Ranchos are located within the Project area (County of Santa Barbara Surveyor 2008). Life on the ranchos in many ways resembled life in the Spanish missions. The typical rancho employed between 20 and several hundred Native American workers, many of whom had formerly lived at local missions. The Mexican-American War occurred between 1846 and 1848 and ended with the Treaty of Guadalupe Hidalgo, which made California a U.S. territory. In 1848, the land once occupied by the Chumash was taken possession of by the U.S., which led to California's statehood in 1850. The state's Gold Rush brought many settlers to the county. During a heavy drought in the 1860s, cattle prices declined, which led to the sale of various rancho lands throughout California.

Oil was first discovered in California during the 1860s, but did not become a major economic force until the 1890s. George S. Gilbert was among the first men to drill for oil in California when

he built a small refinery on the Ojai Ranch in Ventura County in 1861. Experiments with the substance determined that oil provided a cleaner, cheaper, and more effective fuel source than coal. Oil also provided an alternative to the kerosene shortage that resulted when the outbreak of the Civil War interfered with the shipping of supplies from the East.

Santa Maria Valley

Settlers initially came to the Santa Maria Valley in the late 19th century to take advantage of the area's prime soils and establish the region as an agricultural-intensive area. The ranchos in the area included the Tinaquaic Rancho in Santa Maria. The City of Guadalupe was established in the 1840s as part of a Mexican land grant and incorporated in 1946. The City's name honors Our Lady of Guadalupe (a title given to the Virgin Mary). The City of Santa Maria was also established after several agriculturalists banded together to donate land at the intersection of their properties in 1875. Although it was first called Grangerville, the name of the city changed to Central City, and then finally to Santa Maria in 1885. By the 1900s, the Santa Maria Valley had become one of the most productive agricultural regions in the state. Oil exploration in the Santa Maria Valley began in 1888, and in 1901 William Orcutt introduced Union Oil in the area. Oil development increased and intensified throughout the 1900s and became an additional economic and organizing force in the region.

Lompoc Valley

European settlement of the Santa Rita Hills and the Lompoc Valley began in 1787 after the establishment of the La Purisima Mission. The ranchos in the region included Lompoc and San Julian Rancho in Lompoc, the Punta de la Concepcion Rancho in Point Conception, and the Ex-Mission la Purisima Rancho in Los Berros. In 1874, the Lompoc Land Company established a temperance colony located along the Coast Line stagecoach route between San Luis Obispo and Santa Barbara, which dispersed with the incorporation of the City of Lompoc in 1888. The introduction of the coastal railroad between San Francisco and Los Angeles, and the subsequent Lompoc extension in 1901, facilitated growth in the valley and the clearing of lands for agricultural production. In the early twentieth century, the mining of diatomaceous earth began, and the mining industry came to be a major employer. Agriculture and mining continue to be major industries in the Lompoc Valley; in particular, flower cultivation dominates the agricultural industry (Lompoc Valley Historical Society 2017).

Santa Ynez Valley

The ranchos in this region included the Santa Rosa Rancho in Buellton, the Cañada de los Pinos and Nojoqui ranchos in Solvang, and La Laguna Rancho in Santa Ynez. The extension of transportation systems into the Santa Ynez Valley was a precursor to future settlement; the Coast Line stagecoach arrived in 1861, and the Santa Ynez Turnpike was completed in 1869—in 1881, the town of Ballard was founded (Rife 1977). The town of Santa Ynez was established one year after Ballard in 1882. In 1887, Los Olivos became the third town to be established in

the region. The town was named after the olive grove that grew on the mesa east of town (Rife 1977).

The railroad was eventually extended to San Luis Obispo from Santa Barbara. The town of Buellton originated from a post office at the Buell ranch in 1883. A schoolhouse developed in 1889 marked the turning point for a community centered on agriculture and ranching, and by 1918 its charter was official. Danish settlers purchased what is now known as Solvang, or Sunny Field, as translated in Dutch.

The Franciscan missionaries developed an outpost for livestock operations in Los Alamos. The rancho in Los Alamos was called the Los Alamos Rancho. With the development of the stagecoach route in 1873, Los Alamos became a layover stop. Between 1875 and 1878, portions of the Los Alamos and La Laguna ranchos were purchased to establish the town of Los Alamos. Subsequently, Los Alamos became a commercial center for the Los Alamos Valley. The arrival of the Pacific Coast Railroad in 1882 allowed for the transport of agricultural goods from the valley and boosted the valley's economic value. The introduction of the automobile and the discovery of oil in the Los Alamos Valley between 1915 and 1945 impacted the region and led to the development of a main thoroughfare (later U.S. Highway 101) and road infrastructure (County of Santa Barbara, Planning and Development [P&D] 2010).

Cuyama Valley

Two ranchos – Rancho Cuyama M.A. de la G.Y. Lata and Rancho Cuyama Cesario Lataillade – were granted along the Cuyama River in the Cuyama Valley, and agriculture was (and continues to be) a defining characteristic of this region (County of Santa Barbara Surveyor 2008). The Cuyama Valley developed slowly due to its remoteness and lack of transportation infrastructure. The alignment for State Route (SR) 166 was adopted into the state highway system in 1919 but the roadway was not constructed until the early 1930s. Following, the town of Cuyama developed in the 1930s. The Atlantic Richfield Company developed the town of New Cuyama in the early 1950s as a base for its workforce in the Cuyama Valley.

South Coast

Ranchos in the South Coast region included Nuestra Señora del Refugio in present-day Refugio State Beach, Cañada del Corral in Gaviota, La Goleta and Dos Pueblos in Goleta and Las Positas y La Calera in Hope Ranch. Gaviota was known for farming and cattle ranching. Goleta Valley was largely agricultural and was known for lemon growing. Many of the ranchos were sold in the 1860s due to the drought. The City of Santa Barbara was established in 1850 following the Mexican-American War. Wood buildings replaced the Spanish and Mexican adobe, and the city adopted a gridded street pattern. Natural gas and crude oil were first extracted from the Santa Barbara Channel along the coast at Summerland in 1866. In 1902, oil drilling at Summerland's beaches hit its peak. Oil and gas extraction in Goleta primarily occurred along Ellwood Mesa. Tourism and settlement steadily rose after the Southern Pacific Railroad completed its track

link from Santa Barbara to Los Angeles and San Francisco in 1901. In the 1860s, Italians settled in Montecito and began farming (City of Santa Barbara 2022).

3.5.2.4 Known Cultural Resources in Santa Barbara County

Historic Resources

The National Register of Historic Places (NRHP) is the official list of historic districts, sites, buildings, structures, and objects deemed worthy of preservation by the Secretary of the Interior. National Historic Landmarks (NHL) are designated nationally significant historic places because they possess exceptional value or quality in illustrating or interpreting the heritage of the U.S. There are 44 historic properties and districts in Santa Barbara County listed on the NRHP, including eight NHLs (Table 3.5-1; U.S. National Park Service 2025a; 2025b).



Rocky Nook Park, located in the City of Santa Barbara, was designated as a County Historic Landmark in 2023. The park covers almost 20 acres and offers shaded picnic areas, short trails, and large sandstone boulders popular for climbing. Photo: Yelp.

The CRHR program encourages public recognition and protection of resources and consideration under the California Environmental Quality Act (CEQA). California Historical Landmarks (CHL) are buildings, structures, sites, and places that have been determined to have statewide historical significance. CHLs are automatically listed in the CRHR. The California Office of Historic Preservation (OHP) lists 16 designated CHLs in Santa Barbara County (Table 3.5-1; OHP 2025a).

County Historic Landmarks and Places of Historic Merit are designated by the County's Historic Landmarks Advisory Commission (HLAC). Places of Historic Merit are recognized as having historic, aesthetic, or cultural value; however, they are not protected by restrictions related to demolition, removal, alteration, or use like Historic Landmarks are, which are recognized at a higher level of historic, aesthetic, or cultural significance. Places, sites, buildings, and structures can be designated as historic if they meet one or more of the County HLAC's specific criteria. There are 63 designated County Historic Landmarks (including 6 historic trails) and 20 designated County Places of Historic Merit located in the county (County of Santa Barbara 2024a; 2025).

Table 3.5-1. Known Historic Sites within Unincorporated Area of Santa Barbara County

Community	Region	Resource Name	National Register	National Landmark	State Landmark	County Landmark[1]
New Cuyama	Cuyama Valley	Eastern Sierra Madre Ridge Archaeological District	X			
Lompoc	Lompoc Valley	La Purisima Mission	X	X	X	
Lompoc	Lompoc Valley	SS YANKEE BLADE	X			
Conception	Lompoc Valley	USCG McCullough McCulloch Shipwreck	X			
Lompoc	Lompoc Valley	Well, Hill 4			X	
Lompoc	Lompoc Valley	Cota Adobe on Rancho Santa Rosa				X
Lompoc	Lompoc Valley	Santa Rosa School				X
Sisquoc	Santa Maria Valley	Chapel of San Ramon			X	
Point Sal Highlands	Santa Maria Valley	Point Sal Ataje	X			
Sisquoc	Santa Maria Valley	Benjamin Foxen Adobe Site				X
Casmalia	Santa Maria Valley	Hitching Post				X
Orcutt	Santa Maria Valley	Pine Grove Cemetery				X
Sisquoc	Santa Maria Valley	Sisquoc Church and San Ramon Chapel Cemetery				X
Sisquoc	Santa Maria Valley	Sisquoc Store				X
Los Olivos	Santa Ynez Valley	Ballard Adobes				X
Los Alamos	Santa Ynez Valley	Los Alamos Ranch House	X	X		
Ballard	Santa Ynez Valley	Ballard Little Red Schoolhouse				X
Ballard	Santa Ynez Valley	Ballard Presbyterian Church				X
Los Olivos	Santa Ynez Valley	Berean Baptist Church				X

Table 3.5-1. Known Historic Sites within Unincorporated Area of Santa Barbara County (Continued)

Community	Region	Resource Name	National Register	National Landmark	State Landmark	County Landmark[1]
Cold Spring Canyon	Santa Ynez Valley	Cold Spring Canyon Bridge				X
Manzana Creek	Santa Ynez Valley	Dabney Cabin				X
Ballard	Santa Ynez Valley	Davison House				X
Los Olivos	Santa Ynez Valley	Hartley House				X
Manzana Creek	Santa Ynez Valley	Manzana School House				X
Los Olivos	Santa Ynez Valley	Mattei's Tavern				X
Solvang	Santa Ynez Valley	Rancho El Alamo, Pintado Adobe				X
Santa Ynez	Santa Ynez Valley	Santa Ynez Public Branch Library				X
Los Alamos	Santa Ynez Valley	Union Hotel and California Garage				X
Solvang	Santa Ynez Valley	Wulff's Windmill				X
Gaviota	South Coast	Gaviota Pass			X	
Santa Barbara	South Coast	Masini Adobe				
Santa Barbara	South Coast	Painted Cave	X			
Santa Barbara	South Coast	Point Conception Light Station	X			
Montecito	South Coast	Steedman Estate	X	X		
Montecito	South Coast	All Saints by the Sea Episcopal Church				X
Santa Barbara	South Coast	Arroyo Burro Trail				X
Gaviota	South Coast	Arroyo Hondo Bridge				X
Santa Barbara	South Coast	Bryce Beach Cabana and Funicular				X
Montecito	South Coast	Canby House				X
Carpinteria	South Coast	Casa Blanca Poolhouse				X
Montecito	South Coast	Coral Casino				X
Montecito	South Coast	Deane School Buildings				X
Santa Barbara	South Coast	Fremont Trail				X
Goleta	South Coast	Goleta Depot	X			X

Table 3.5-1. Known Historic Sites within Unincorporated Area of Santa Barbara County (Continued)

Community	Region	Resource Name	National Register	National Landmark	State Landmark	County Landmark[1]
Isla Vista	South Coast	Helena T. Devereux Hall				X
Goleta	South Coast	Hope House	X			X
Montecito	South Coast	Hot Springs Trail				X
Santa Barbara	South Coast	Irene and Francis Rich Beach Cabana				X
Santa Barbara	South Coast	Irvine-Richard Property				X
Montecito	South Coast	Juarez-Hosmer Adobe				X
Gaviota	South Coast	Las Cruces Adobe				X
Montecito	South Coast	Leaping Greyhound Bridge				X
Santa Barbara	South Coast	Main-Begg Farmhouse				X
Montecito	South Coast	Moody Sisters Cottage				X
Goleta	South Coast	Orella Adobes				X
Montecito	South Coast	Rancho Las Fuentes Lemon Packing House				X
Santa Barbara	South Coast	Rattlesnake Trail				X
Carpinteria	South Coast	Rincon Trail				X
Santa Barbara	South Coast	Rocky Nook Park				X
Carpinteria	South Coast	Romero Canyon Trail				X
Goleta	South Coast	San Jose Winery				X
Santa Barbara	South Coast	San Marcos Barn and Spring House				X
Montecito	South Coast	San Ysidro RanchAdobe				X
Santa Barbara	South Coast	Santa Barbara Botanic Garden, Mission Dam and Aqueduct				X
Montecito	South Coast	Sheldon House				X
Carpinteria	South Coast	Sunday School Oak				X
Santa Barbara	South Coast	Val Verde	X			X
Summerland	South Coast	World War I Monument				X

Source: U.S. National Park Service 2025a; 2025b; OHP 2025a; County of Santa Barbara 2025.

Table 3.5-2. County Places of Historic Merit

Community	Region	Resource Name
Buellton	Santa Ynez Valley	Rancho La Purisma / Pleasant Valley School House
Buellton	Santa Ynez Valley	Walter and Evelyn's Central Avenue House
Los Olivos	Santa Ynez Valley	Lansing's Bridge
Los Olivos	Santa Ynez Valley	D.D. Davis Store
Los Olivos	Santa Ynez Valley	Tunnell-Brown House
Los Olivos	Santa Ynez Valley	Berean Baptist Church Sunday School Building
Los Olivos	Santa Ynez Valley	William and Lydia Davis House
Solvang	Santa Ynez Valley	Foley Estates Vineyard and Winery
Goleta	South Coast	Daniel Hill Adobe
EGV	South Coast	Lane Family Main Farm House and Cottage
Gaviota	South Coast	Vista del Mar School
Gaviota	South Coast	El Rancho Tajiguas (Main House)
Montecito	South Coast	Casa Del Greco
Montecito	South Coast	Clavelitos
Montecito	South Coast	Cowles Road
Montecito	South Coast	Hermosillo Road
Montecito	South Coast	Riven Rock Stone Water Tower and Reservoir
Montecito	South Coast	Stone Bridges of Riven Rock
Montecito	South Coast	Glen Oaks Stable/Carriage House

Source: County of Santa Barbara 2024a.

Historic Trails

As shown in Table 3.5-1 above, the County designates six historic trails within the county: Arroyo Burro Trail, Rattlesnake Trail, Hot Springs Trail, Romero Canyon Trail, Rincon Trail, and Fremont Trail. All these trails are on the South Coast and have been designated as historic for their character and evidence of use during various notable periods of the County's history, most commonly by Native Americans.

In addition to these trails, the Juan Bautista de Anza trail (also known as the Anza Trail) is a designated National Historic Trail established under the authorities of the National Trails System Act of 1968. The trail comprises the overland route traveled by Captain Juan Bautista de Anza of Spain during the years 1775 and 1776 from Sonora, Mexico to the vicinity of San Francisco, California. The corridor generally follows the County's coastline and passes through several incorporated cities and unincorporated communities.

Santa Maria Valley

Within the Santa Maria Valley, there are seven County- or state-designated historic properties and/or landmarks and one nationally designated resource in the unincorporated area. Examples of these include the Pine Grove Cemetery in the community of Orcutt and several pioneer-era buildings in and around the unincorporated community of Sisquoc (County of Santa Barbara 2025; OHP 2025a; U.S. National Park Service 2025b). Additional historic resources are known to exist within and around the community of Orcutt, particularly within the Old Town area, and consist largely of historic structures from the early 1900s, such as the James L. Forbes house and Orcutt Hotel (County of Santa Barbara 1997). There are no designated County Places of Historic Merit within the unincorporated areas of the Santa Maria Valley (County of Santa Barbara 2024a).

Lompoc Valley

Within the Lompoc Valley, there are four County- or state-designated historic properties and/or landmarks and three nationally designated resources in the unincorporated area. These resources include the La Purisima Mission and the wreck of the SS Yankee Blade (County of Santa Barbara 2025; OHP 2025a; U.S. National Park Service 2025a; 2025b). There are no designated County Places of Historic Merit within the Lompoc Valley Region (County of Santa Barbara 2024a).

Santa Ynez Valley

Within the Santa Ynez Valley, there are 14 County- or state-designated historic properties and/or landmarks and one nationally designated resource in the unincorporated area. Examples of these resources include the Little Red Schoolhouse and Presbyterian Church in the community of Ballard, the Los Alamos Ranch House (an NHL) and Union Hotel in Los Alamos, and the Hartley House and Mattei's Tavern in Los Olivos (County of Santa Barbara 2025; U.S. National Park Service 2025a; 2025b). There are eight designated County Places of Historic Merit within the unincorporated areas of the Santa Ynez Valley, five of which are located around the community of Los Olivos (County of Santa Barbara 2024a).

Cuyama Valley

Within the Cuyama Valley, there are no County- or state-designated historic properties and/or landmarks, but there is one nationally designated historic resource in the unincorporated area. The Eastern Sierra Madre Ridge Archaeological District is listed on the NRHP (U.S. National Park Service 2025b). There are no designated County Places of Historic Merit within the Cuyama Valley (County of Santa Barbara 2024a).

South Coast

Within the South Coast, there are 35 County- or state-designated Historic Landmarks and six nationally designated resources in the unincorporated area (County of Santa Barbara 2025; OHP 2025a; U.S. National Park Service 2025a; 2025b). There are 11 designated County Places of Historic Merit within the South Coast (County of Santa Barbara 2024a).

Archaeological and Tribal Cultural Resources

Prehistoric and historic archaeological resources represent and document activities, accomplishments, and traditions of previous occupation, and link current and former inhabitants of an area. Some archaeological sites and the artifacts and remains in them are a sacred part of the heritage, religion, and culture of the Native American community, which indicates a tribal cultural resource, as defined by the state legislature in 2015 with the passing of Assembly Bill (AB) 52. Tribal cultural resources are defined as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is listed or eligible for listing in the CRHR or local register of historical resources, or determined by a lead agency to be significant according to criteria outlined in CEQA. Tribal cultural resources may include Native American archaeological sites. As archaeological and tribal cultural resource sites are among the most fragile, nonrenewable resources in California, various laws and regulations require the development of property to be accompanied by a rational and respectful concern for the protection of cultural resources. County policy requires the preservation and protection of these sites and resources. (See Section 3.5.3, *Regulatory Setting*, for a description of pertinent laws and regulations.)

Archaeological Potential of the County

The summary below is based on information obtained from the Central Coast Information Center (CCIC) at the Department of Anthropology at the University of California, Santa Barbara (UCSB) and included in the County Comprehensive Plan Conservation Element (County of Santa Barbara 2010). As part of the Conservation Element, the County created maps using CCIC data to estimate the density of known sites in planning areas and to evaluate applications for specific development projects on a project-by-project basis. There are two classes of archaeological site density: 1) High-Density, which is greater than one site per square mile; and 2) Low-Density, which is less than one site per square mile. Table 3.5-3 shows archaeological site density and a brief narrative for each region and includes the region's topographic classification. A topographic classification was included because the type of adaptation represented in archaeological sites, and the density of such sites, tends to vary according to the environment. The topographic classes include coastal strand, mountain ridge, and valley bottom. The entire coastline of the county could be linked into one large High-Density zone. While Table 3.5-3 indicates areas of the county that may be archeologically sensitive, this

information does not provide complete or adequate information for specific planning areas or sites since most of the county has not been surveyed for archaeological resources. When surveys occur, they are primarily associated with specific development applications. As such, Table 3.5-3 indicates the generally known locations of archeological potential but does not rule out the potential for archeological sensitivity in other regions of the county.

Archaeological Resources at Jalama Beach County

Jalama Beach County Park and surrounding areas have been surveyed for cultural resources to inform the planning of the Jalama Beach County Park Expansion and Coastal Access Improvements project (refer to Chapter 2, *Project Description*). For the Jalama Beach County Park Expansion and Coastal Access Improvements project, Applied Earthworks, Inc. (AE) conducted a plan review and Native American outreach and provided preliminary recommendations to address cultural resources. This work identified multiple known prehistoric archaeological sites near the project sites, including the upper mesa location for the proposed campground expansion and the blufftop corridor for a proposed coastal trail. Two archaeological sites would have the potential to be affected by this recreation project. One of the two sites identified had previously been determined to be eligible under the CRHR, and the other is considered potentially eligible for the CRHR and is discussed below (Gerber 2022). Further, research has demonstrated that even in areas previously disturbed by park construction, sufficiently intact deposits may remain which contain data potential, and human remains may be present in all areas of the site.

For the proposed Jalama Bluff Trail, WSP archaeologists conducted a Phase 1 archaeological survey in 2018. Background research, as well as a 2018 site survey, identified one significant resource in the project area (the same one that was identified as being potentially eligible for CRHR listing in the AE report described above). This resource has not been formally assessed for CRHR eligibility but is considered a potentially significant cultural resource as defined by *Santa Barbara County Cultural Resources Guidelines* and California Environmental Quality Act (CEQA) Guidelines Section 15046.5(3) (Victorino and Stone 2018).

Native American Heritage Commission Sacred Lands File and Previous Tribal Consultation

The California Native American Heritage Commission (NAHC) is a nine-member body whose members are appointed by the Governor. The NAHC identifies, catalogs, and protects Native American cultural resources – ancient places of special religious or social significance to Native Americans and known ancient graves and cemeteries of Native Americans on private and public lands in California. The Sacred Lands File (SLF) is the NAHC's private inventory of spiritually and culturally significant sites in California. Generally speaking, an SLF search assists in determining if any known properties of traditional cultural value are located within or adjacent to a given area, though negative results do not preclude the existence of such sites.

Table 3.5-3. Archaeological Site Density Areas in Santa Barbara County

Region	Topographic Class	Density Class	Description
South Coast	Coastal	High Density	Chumash at the time of Spanish contact; Santa Barbara-Goleta foothills is especially high-density
San Marcos Pass	Mountain	High Density	San Marcos Pass Native American trade route between the coast and Santa Ynez Valley; sites in the area are predominately rock shelters and pictographs are reported
Upper Santa Ynez River	Valley	High Density	A large number of sites in Lake Cachuma and surrounding valleys and canyons
Solvang	Valley	High Density	Historic sites associated with the Mission, a probable protohistoric village site, and possibly some related smaller sites
Happy Canyon	Mountain	High Density	The entire canyon is high-density; Cachuma Camp is known to be high-density
Pendola and Juncal Ridge	Mountain	High Density	The entire length of the Santa Ynez can be considered high-density; connects to the Upper Santa Ynez high-density region
Zaca Lake	Mountain	High Density	Sites represent a special adaptation to unusual environmental conditions; historic occupation is known
Hurricane Deck	Mountain	High Density	Subject to looters
Sierra Madre Ridge	Mountain	High Density	Includes many pictograph sites; wilderness area contains high-density sites as well
Santa Barbara Potrero and Santa Barbara Canyon	Mountain	High Density	Delimited by the grassy vegetation of the potrero
Davey Brown Canyon	Mountain	High Density	Historical interior village and related smaller sites
Potrero Seco	Mountain	High Density	The mountainous region adjacent to the Ventura County line
Vandenberg	Coastal	High Density	High density on Vandenberg Space Force Base (VSFB) and adjacent areas
Birabent Canyon	Mountain	Low Density	Little is known
Santa Cruz Creek	Mountain	Low Density	Little is known
Nojoqui Summit	Valley	Low Density	Known Chumash trade routes and regions include pictograph sites
Rancho San Julian	Mountain	Low Density	Little is known
Lompoc	Valley	Low Density	Little is known, but probable that more sites exist here given the Upper Santa Ynez River and Pendola high-density sites

Table 3.5-3. Archaeological Site Density Areas in Santa Barbara County (Continued)

Region	Topographic Class	Density Class	Description
Point Conception	Coastal	Low Density	A few sites are known, but probable that more sites exist; after adequate surveying of the region, the entire coastline of the county can probably be linked into one large High-Density zone

[1] These density classes are estimates based on known site locations only, as most of the county has not been surveyed for archaeological resources.

Source: County of Santa Barbara 2010.

The County requested an SLF search from the NAHC on January 22, 2025, for all unincorporated areas within the county. The response, received on January 24, 2025, indicated the presence of Native American cultural resources within the search area; however, the NAHC did not provide the location or nature of these resource(s) and recommended that the County contact Native American individuals and organizations to elicit information and/or concerns regarding any cultural resource issues related to the Project.

Previously, in conjunction with the cultural resource studies conducted for the Jalama Beach County Park Expansion and Coastal Access Improvements project, both Victorino and Stone (2018) and Gerber (2022) initiated tribal consultation. On June 14, 2022, AE contacted the NAHC to request an SLF Search and current contact information for NAHC-listed groups and individuals interested in receiving information about projects in Santa Barbara County. On July 17, AE received a response that indicated negative results for the SLF search and included a list of Native American tribes who might have knowledge of cultural resources in the project area. On August 15, AE sent each listed party a letter and map describing the project and inviting respondents to share information or concerns. In response, Annette Ayala of the Barbareño/Ventureno Band of Mission Indians called AE to request a copy of their report and the CCIC record search results. In addition, Michael Khus-Zarate emailed AE to request an "updated inventory of cultural resources in and around the vicinity of the project area," and "a consultation session to understand the scope and nature of the project as it may impact cultural materials and sites, at a date to be determined." AE deferred providing additional information pending direction from the County (Gerber 2022).

In addition, Victorino and Stone requested a search of the NAHC's SLF on May 21, 2018, to determine the presence of any Native American heritage resources within the project site. Frank Lienert, NAHC Associate Governmental Program Analyst, responded to this request in a letter dated June 4, 2018. The SLF search came back negative for the site (Victorino and Stone 2018).

Tribal Cultural Resources Consultation

As part of the tribal consultation process required by AB 52 and SB 18, the County sent a request for tribal consultation to the list of tribes provided by the NAHC. The letters, which were sent

on February 20, 2025, described the Project and requested input on the Project from these individuals and organizations. The County sent a total of 21 letters. To date, the County has not received requests to participate in government-to-government consultation associated with the Project, pursuant to PRC Section 21080.3.1 and in accordance with the provisions of SB 18 and AB 52.

3.5.3 REGULATORY SETTING

Federal, state, and local regulations have been enacted to protect cultural and tribal cultural resources in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to the Project and its associated impacts.

3.5.3.1 Federal

National Register of Historic Places (NRHP)

The NRHP was established by the National Historic Preservation Act of 1966 to help identify and protect properties that are significant cultural resources at the national, state, and/or local levels. Listing of private property on the NRHP does not prohibit the property owner from taking actions that may result in the alteration or demolition of the historic resource. Certain provisions of the Tax Reform Act of 1976 that encourage the preservation of depreciable historic structures by allowing favorable tax treatments for rehabilitation, and discourage destruction of historic buildings, may apply. Four criteria have been established to determine if a resource is significant to American history, architecture, archaeology, engineering, or culture and should be listed in the NRHP.[1] These criteria include:

A. It is associated with events that have made a significant contribution to the broad patterns of our history;

B. It is associated with the lives of persons significant in our past;

C. It embodies the distinctive characteristics of a type, period, or method of construction that represents the work of a master, or that possess high artistic values, or that represent a significant and distinguishable entity whose components may lack individual distinction;

D. It yields, or may be likely to yield, information important in prehistory or history.

[1] "Guidelines for Completing National Register of Historic Places Forms: Part A – How to Complete the National Register Registration Forms," National Register Bulletin 16A, U.S. Department of Interior, National Park Service, 1997. This bulletin contains technical information on comprehensive planning, survey of cultural resources and registration in the National Register of Historic Places.

Districts, sites, buildings, structures, and objects of potential significance that are at least 50 years of age must meet one or more of the above criteria to be eligible for listing in the NRHP. However, the NRHP does not prohibit the consideration of properties less than 50 years of age whose exceptional contribution to the development of American history, architecture archeology, engineering, and culture can be demonstrated under NRHP Criteria Consideration G (Properties that have Achieved Significance within the Past 50 Years).

In addition to the above criteria, a property must have integrity, which is defined as: "...the ability of a property to convey its significance." The seven aspects of integrity include location, design, setting, materials, workmanship, feeling, and association.

U.S. Forest Service Plans for Trail and Trail Bridge Structures

The USDA Forest Service Standard Trail Plans and Specifications are for the design, construction, and maintenance of National Forest System trails and trail bridges. The Standard Trail Plans and Specifications were developed to assist with trail design, construction, maintenance, inventory, condition assessment, and the assembly of trail construction plan packages. The standard plans address a range of trail features including trail sections, turnouts, trail bases and foundations, culverts, signage, bollards, boardwalks, and bridges. These plans and specifications also are available for other Federal, State, and local agencies, communities, trail partners, volunteers, and entities. County Parks applies these standards and plan specifications to all trail projects in the unincorporated area of the county.

3.5.3.2 State

California Register of Historical Resources

The State of California Historical Resources Commission has designed the CRHP for use by state and local agencies, private groups, and citizens to identify, evaluate, register, and protect California's historical resources. The CRHP is the authoritative guide to the state's significant historical and archaeological resources. The State OHP administers federally- and state-mandated historic preservation programs to further the identification, evaluation, registration, and protection of California's irreplaceable historic resources.

Cultural resources are protected by California PRC Section 5024.1, which established the CRHR. Section 5024 requires state agencies to provide notice to, and to confer with the State Historic Preservation Office (SHPO) before altering, transferring, relocating, or demolishing state-owned resources.

The CRHR program encourages public recognition and protection of resources of architectural, historical, archaeological, and cultural significance; identifies historical resources for state and local planning purposes; determines eligibility for state historic preservation grant funding; and

affords certain protections under CEQA. The following criteria are utilized when determining if a resource has architectural, historical, archaeological, or cultural significance.

- **Criterion 1:** Is the resource associated with events that have made a significant contribution to the broad patterns of local or regional history or the cultural heritage of California or the U.S.?
- **Criterion 2:** Is the resource associated with the lives of persons important to local, California, or national history?
- **Criterion 3:** Does the resource embody the distinctive characteristics of a type, period, region, or method of construction, or represent the work of a master or possesses high artistic values?
- **Criterion 4:** Has the resource yielded, or has the potential to yield, information important to the prehistory or history of the local area, California, or the nation?

These factors are broadly mirrored in criteria for historic significance within CEQA, CRHR, and the County Code.

California Environmental Quality Act (CEQA) Section 15064.5

CEQA Guidelines Section 15064.5 states that a resource shall be considered "historically significant" if it meets any of the criteria for listing in the CRHR (PRC Section 5024.1, Title 14 California Code of Regulations, Section 4852). The criteria used for assessing eligibility for the CRHR are listed above. Cultural resources meeting one or more of these criteria are defined as "historical resources" under CEQA. Included in the definition of historical resources are prehistoric archaeological sites, historic archaeological sites, historic buildings and structures, traditional cultural properties important to a tribe or other ethnic group, cultural districts and landscapes, and a variety of other property types.

Resources included in a local register of historical resources (pursuant to PRC Section 5020.1[k]) or identified as significant in a historical resources survey (meeting the criteria in PRC Section 5024.1[g]) also are considered "historical resources" for the purposes of CEQA.

The fact that a resource is not listed in or determined to be eligible for listing in the CRHR, not included in a local register of historical resources, or not identified in a historical resources survey, does not preclude a lead agency from determining that the resource may be a historical resource as defined in PRC Sections 5020.1(j) or 5024.1I.

California Coastal Act

The California Coastal Commission is tasked with the protection of coastal resources, including those having prehistoric, paleontological, historic, and cultural importance within the Coastal Zone. Section 30244 of the Act seeks to minimize the adverse impacts to archaeological resources within the Coastal Zone by requiring mitigation of adverse impacts to these resources by any development. It states that where development would adversely impact archaeological

or paleontological resources as identified by the SHPO, reasonable mitigation measures shall be required.

Assembly Bill (AB) 52

AB 52 was approved by former Governor Edmund Gerry "Jerry" Brown, Jr. on September 25, 2014. The bill amended Public Resources Code (PRC) Section 5097.94, and added PRC Sections 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2, and 21084.3. The primary intent of AB 52 is to include California Native American tribes early in the environmental review process and to establish a new category of resources related to Native American tribes that require consideration under CEQA, known as tribal cultural resources (as defined in PRC Section 21074[a]). On July 30, 2016, the California Natural Resources Agency adopted the final text to update Appendix G of the CEQA Guidelines for tribal cultural resources, which was approved by the Office of Administrative Law on September 27, 2016.

PRC Section 21074.1 defines tribal cultural resources as "[s]ites, features, places, cultural landscapes, sacred places, and objects with cultural value to a California Native American tribe..." A tribal cultural resource must be on, or eligible for, the CRHR as described above for historical resources, or must be included in a local register of historical resources. Additionally, as discussed above for historical resources, the lead agency can determine that a tribal cultural resource is significant even if it has not been evaluated as eligible for the CRHR or is not on a local register.

PRC Section 21080.3.1 requires that within 14 days of a Lead Agency determining that an application for a project is complete, or a decision by a public agency to undertake a project, the Lead Agency shall provide formal notification to the designated contact, or a tribal representative, of California Native American tribes that are traditionally and culturally affiliated with the geographic area of the project (as defined in PRC Section 21073) and who have requested in writing to be informed by the Lead Agency (PRC Section 21080.3.1[b]). Tribes interested in consultation must respond in writing within 30 days from receipt of the Lead Agency's formal notification, and the Lead Agency must begin consultation within 30 days of receiving the tribe's request for consultation (PRC Sections 21080.3.1[d] and 21080.3.1[e]).

PRC Section 21080.3.2(a) identifies the following as potential consultation discussion topics: the type of environmental review necessary; the significance of tribal cultural resources; the significance of the project's impacts on the tribal cultural resources; project alternatives or appropriate measures for preservation; and mitigation measures. Consultation is considered concluded when either (1) the parties agree to measures that would mitigate or avoid a significant effect, if a significant effect exists on a tribal cultural resource; or (2) a party, acting in good faith and after reasonable effort, concludes that mutual agreement cannot be reached (PRC Section 21080.3.2[b]).

If a California Native American tribe has requested consultation pursuant to PRC Section 21080.3.1 and has failed to provide comments to the Lead Agency, or otherwise failed to engage in the consultation process, or if the Lead Agency has complied with PRC Section 21080.3.1(d) and the California Native American tribe has failed to request consultation within 30 days, the Lead Agency may certify an EIR or adopt a Negative Declaration (ND) or Mitigated Negative Declaration (MND) (PRC Section 21082.3[d][2] and [3]).

PRC Section 21082.3(c)(1) states that any information, including, but not limited to, the location, description, and use of the tribal cultural resources, that is submitted by a California Native American tribe during the environmental review process shall not be included in the environmental document or otherwise disclosed by the Lead Agency or any other public agency to the public without the prior consent of the tribe that provided the information. If the Lead Agency publishes any information submitted by a California Native American tribe during the consultation or environmental review process, that information shall be published in a confidential appendix to the environmental document unless the tribe that provided the information consents, in writing, to the disclosure of some or all of the information to the public.

However, confidentiality does not apply to data or information that are, or become publicly available, are already in lawful possession of a project applicant before the provision of the information by the California Native American tribe, are independently developed by the project applicant or the project applicant's agents, or are lawfully obtained by the project applicant from a third party that is not the Lead Agency, a California Native American tribe, or another public agency (PRC Section 21082.3[c][2][B]).

AB 52 establishes that "[a] project with an effect that may cause a substantial adverse change in the significance of a tribal cultural resource is a project that may have a significant effect on the environment" (PRC Section 21084.2). It further states that the lead agency shall establish measures to avoid impacts that would alter the significant characteristics of a tribal cultural resource, when feasible (PRC Section 21084.3).

Senate Bill (SB) 18

Passed in 2004, SB 18 requires cities and counties to consult with Native American tribes to help protect traditional tribal cultural places through the land use planning process. SB 18 applies to general plan adoption or amendments and specific plan adoption or amendments. Unlike AB 52, SB 18 is not an amendment to, or otherwise associated with, CEQA. Instead, SB 18 requires cities and counties to consult with Native American tribes early during broad land use planning efforts on both public and private lands, before site- and project-specific land use decisions (Governor's Office of Planning and Research 2005). The County P&D has developed protocols for Native American consultation under SB 18 and has incorporated the requirement into its Permit Process Procedures Manual.

A Native American tribe is defined as a federally recognized California Native American tribe or a non-federally recognized California Native American tribe that is on the contact list maintained by the NAHC (Governor's Office of Planning and Research 2005). Traditional tribal cultural places are defined in PRC Section 5097.9 and Section 5097.993 to include sanctified cemeteries, places of worship, religious or ceremonial sites, sacred shrines, or any historic, cultural, or sacred site that is listed on or eligible for the CRHR including any historic or prehistoric ruins, burial grounds, or archaeological site (Governor's Office of Planning and Research 2005).

Under SB 18, cities and counties must notify the appropriate Native American tribe(s) of intended adoption or amendments to general plans or specific plans and offer the opportunity for the tribe(s) to consult regarding traditional tribal cultural places within the proposed plan area. Consultation is intended to encourage the preservation and protection of traditional tribal cultural places by developing treatment and management plans that might include incorporating the cultural places into designated open spaces (Governor's Office of Planning and Research 2005). The following list briefly identifies the contact and notification responsibilities of local governments, in sequential order of their occurrence.

- Prior to the adoption or any amendment of a general plan or specific plan, a local government must notify the appropriate tribes (on the contact list maintained by the NAHC) of the opportunity to conduct consultations for the purpose of preserving, or mitigating impacts to, cultural places located on land within the local government's jurisdiction that is affected by the proposed plan adoption or amendment. Tribes have 90 days from the date on which they receive notification to request consultation, unless a shorter timeframe has been agreed to by the tribe (California Government Code Section 65352.3).
- Prior to the adoption or substantial amendment of a general plan or specific plan, a local government must refer the proposed project to those tribes that are on the NAHC contact list and have traditional lands located within the city or county's jurisdiction. The referral must allow a 45-day comment period (California Government Code Section 65352). Notice must be sent regardless of whether prior consultation has taken place. Such notice does not initiate a new consultation process.
- Local governments must send notice of a public hearing, at least 10 days prior to the hearing, to tribes who have filed a written request for such notice (California Government Code Section 65092).

Native American Historic Resource Protection Act

PRC Sections 5097.993-5097.994 establish as a misdemeanor, punishable by both fine and imprisonment, the unlawful and malicious excavation, removal or destruction of Native American archeological or historic sites on public lands or on private lands. Certain legal acts by landowners are exempt (NAHC 2025).

Archaeological, Paleontological, and Historical Sites, Native American Historical, Cultural, and Sacred Sites (Public Resources Code Section 5097)

PRC Section 5097.9 states that no public agency or private party on public property shall *"interfere with the free expression or exercise of Native American Religion."* The PRC further states:

> *"No such agency or party [shall] cause severe or irreparable damage to any Native American sanctified cemetery, place of worship, religious or ceremonial site, or sacred shrine...except on a clear and convincing showing that the public interest and necessity so require."*

Codes Governing Human Remains

California law protects Native American burials, skeletal remains, and associated grave goods, of their antiquity, and provides for the sensitive treatment and disposition of those remains.

- CEQA Guidelines Section 15064.5 assigns special importance to human remains and specifies procedures to be used when Native American remains are discovered.
- PRC Section 5097 specifies the procedures to be followed in the event of the unexpected discovery of Native American human remains on non-federal public lands.

In addition, California Health and Safety Code Section 7050.5 requires that if human remains are discovered in any place other than a dedicated cemetery, no further disturbance or excavation of the site or nearby area reasonably suspected to contain human remains shall occur until the county coroner is notified and has examined the remains. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to Section 5097.98, will immediately notify those persons it believes to be most likely descended from the deceased Native Americans so they can inspect the burial site and make recommendations for treatment or disposal.

California Native American Graves Protection and Repatriation Act

The California Native American Graves Protection and Repatriation Act (California Repatriation Act), enacted in 2001, establishes a state repatriation policy intent that is consistent with and facilitates implementation of the federal Native American Graves Protection and Repatriation Act. It requires all State agencies and museums that receive State funding and that have possession or control over collections of human remains or cultural items, as defined, to complete an inventory and summary of these remains and items on or before January 1, 2003, with certain exceptions. The California Repatriation Act also provides a process for the identification and repatriation of these items to the appropriate tribes. It strives to ensure that all California Indian human remains and cultural items are treated with dignity and respect; encourages voluntary disclosure and return of remains and cultural items by publicly funded agencies and museums in California; and states an intent for the state to provide mechanisms

for aiding California Indian tribes, including non-federally recognized tribes, in filing repatriation claims and getting responses to those claims (NAHC 2025).

California Government Code Sections 6254 and 6254.10

California Government Code Section 6254(r) explicitly authorizes public agencies to withhold information from the public relating to *"Native American graves, cemeteries, and sacred places maintained by the Native American Heritage Commission."* California Government Code Section 6254.10 specifically exempts from disclosure requests for

> *"records that relate to archaeological site information and reports, maintained by, or in the possession of the Department of Parks and Recreation, the State Historical Resources Commission, the California State Lands Commission, the Native American Heritage Commission, another State agency, or a local agency, including the records that the agency obtains through a consultation process between a Native American tribe and a State or local agency."*

3.5.3.3 Local

Santa Barbara County Comprehensive Plan

Land Use Element

The Comprehensive Plan Land Use Element (adopted 1980, amended and republished 2016) lays out the general patterns of development throughout the unincorporated areas of the county. The County requires the protection of significant archaeological and historic resources to the greatest extent possible. The Land Use Element contains the following Historical and Archaeological Sites Policies:

1. All available measures (e.g., purchase, tax relief, purchase of development rights) shall be explored to avoid development on significant historic, prehistoric, archaeological, and other classes of cultural sites.
2. When developments are proposed for parcels where archaeological or other cultural sites are located, project design shall be required which avoids impacts to such cultural sites if possible.
3. When sufficient planning flexibility does not permit avoiding construction on archaeological or other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed in accordance with the guidelines of the State OHP and the State NAHC.
4. Off-road vehicle use, unauthorized collection of artifacts, and other activities other than development which could destroy or damage archaeological or cultural sites shall be prohibited.

5. Native Americans shall be consulted when development proposals are submitted that impact significant archaeological or cultural sites.

Conservation Element

The Comprehensive Plan Conservation Element (adopted 1979, amended and republished 2010) describes the historic and archaeological setting of the county and lists resources that are known to be present or potentially present in the county. While the Conservation Element does not contain any specific policies addressing historic and archaeological resources, it does include the following recommendations in reference both to general urban expansion and to development projects:

- Once the most likely direction of urban growth has been determined from the Comprehensive Plan, those archaeological site areas most likely to be subjected to development should be systematically surveyed. Such surveys would provide information on the nature and location of sites that would be useful to planners and developers before modification begins.

For specific development projects, the Conservation Element recommends the following:

- A systematic ground survey of the project area and alternative areas should be carried out by the archaeologist selected. Preliminary testing of sites within the designated construction area may be included.
- A report should be submitted by the archaeologist to the planners and developers concerned with the project and to responsible government agencies. This report should include details on surface and sub-surface finds, an evaluation of the area and the sites it may contain, and suggestions for further actions concerning archaeological resources.

The Conservation Element also contains the following recommendations in which archaeological studies may be incorporated into projects.

- Archaeological sites may be incorporated into parks or landscaped areas in such a way that no damage will be done to the archaeological materials
- Areas with archaeological sites may also be designated as limited use areas where they can be protected from vandalism. For either of these first two alternatives, a preliminary survey and surface collection by a competent archaeologist must be carried out prior to any action. Buffer zones adjacent to these sites may be necessary, but the extent of such a zone must be determined for each site
- Outdoor museums are a feasible alternative to destruction when the nature of the archaeological remains is such that their careful excavation and preservation by professionals would prove attractive to the public. This alternative would be of value to the public relations of many private firms and would serve to increase the awareness of the county's prehistory among both residents and tourists. A museum of this sort might consist

of a simple tin roof and fence protecting ongoing or completed excavations and appropriate displays of artifacts. Painted Cave is an example of how this approach has been implemented in the county.

- One method of preserving sites for future archaeological investigation is through the use of extensive land fill. If sites scheduled for possibly damaging use could be covered with sufficient clean fill to avoid damage, such sites would be preserved.
- Salvage excavation is a last resort in the preservation of archaeological information. Such short-notice excavations destroy relevant information which might be more effectively excavated with future improved archaeological methods and techniques. In salvage archaeology, it frequently is impossible to generate an adequate research design before excavation is commenced. Considering these factors, the loss of valuable information is inevitable. In addition, salvage operations are expensive undertakings. Consequently, every effort should be made to preserve, rather than excavate endangered archaeological sites.

Community Plans

Community-specific goals and policies for historic and archaeological resources are provided in several adopted community plans as part of the Comprehensive Plan. A policy is a specific statement that guides decision-making. Development standards are measures that will be applied to development projects consistent with relevant policies of the community plan. Development standards typically specify how and where development is designed and constructed. Any future development within the community plan areas would be subject to the cultural, tribal cultural, and historic resource protection and preservation goals and policies of that plan. Examples of key goals, policies, and development standards from community plans that may be applicable to development enabled by the Project are presented below.

Eastern Goleta Valley Community Plan

- **Objective HA-EGV-1:** Protect and preserve significant archaeological, historic built environment, and tribal cultural resources in the Eastern Goleta Valley.
    - **Policy HA-EGV-1.1:** Known and discovered significant historic, archeological, and tribal cultural resources shall be protected from immitigable disturbance or destruction.
    - **Policy HA-EGV-1.2:** Development resulting in increased building size or demolition of buildings/structures included in the list of historic, or buildings/structures over 50 years of age and evaluated as important at the local, state or national level, shall be reviewed for consistency with historic resource preservation policies by P&D.
    - **Policy HA-EGV-1.3:** Development resulting in increased building size or demolition of buildings/structures included in the list of historic, or buildings/structures over 50 years of age and evaluated as important at the local, state or national level, shall be reviewed for consistency with historic resource preservation policies by P&D.

- **Objective HA-EGV-2:** Protect and preserve significant tribal cultural resources in the Plan area.
    - **Policy HA-EGV-2.1:** Significant tribal cultural resources of concern to the Chumash Indians should be protected and preserved to the maximum extent feasible.

Los Alamos Community Plan

- **Goal HA-LA-1:** Preserve and protect those cultural and historic resources deemed of special significance to the maximum extent feasible.
    - **Policy HA-LA-1.1:** Promote historic tourism by identifying and preserving local historic resources.
    - **Policy HA-LA-1.2:** Significant cultural, archeological, and historic resources in the Los Alamos Planning Area shall be protected and preserved. Efforts to preserve and enhance historic structures shall be encouraged.
        - **DevStd HA-LA-1.2.1:** New development shall preserve and or restore the character defining features of significant historic resources, in particular, the façade of significant historic structures visible from Bell Street, unless shown to be technically infeasible and precludes reasonable development.
          For structures that have been determined to be a significant historic resource, the project applicant shall retain a County-qualified architectural historian to collaborate in designing the proposed adaptive reuse of structures that are to be renovated to maximize the integration of new architectural elements with those historical character-defining features.

Orcutt Community Plan

- **Policy HA-O-1:** Archaeological and historic resources in the Orcutt Planning Area shall be protected and preserved to the maximum extent possible.
    - **DevStd HA-O-1.1:** Development on Key Sites that have not been surveyed by a County qualified archaeologist should be surveyed and mitigated in accordance with State and County archaeological and historic guidelines.
- **Policy HA-O-2:** Structures of historic significance in Old Town Orcutt, as shown on Figure 34, shall be preserved unless this would prevent reasonable development of a property. If any of these structures are not designated as a historic structure by the County Landmarks Commission, it should be considered for such a designation as part of the Old Town Implementation Study.

Santa Ynez Community Plan

- **GOAL HA-SYV:** Preserve and protect significant cultural, archaeological and historical resources in the Santa Ynez Valley Planning Area to the maximum extent feasible.
  - **Policy HA-SYV-1:** Archaeological resources shall be protected and preserved to the maximum extent feasible.
    - **DevStd HA-SYV-1.1:** A Phase 1 archaeological survey shall be performed when identified as necessary by a County archaeologist or contract archaeologist using the best available resources. The content, format, and length of the Phase 1 survey report shall be consistent with the size of the project and findings of the study.
    - **DevStd HA-SYV-1.2:** If archaeological remains are identified and cannot be avoided through project redesign, the proponent shall fund a Phase 2 study to determine the significance of the resource prior to issuance of any permit for development. All proposed mitigation recommendations resulting from the Phase 1 or Phase 2 study, including completion of additional archaeological analysis (Phase 3) and/or project redesign shall be incorporated into any permit issued for development.
  - **Policy HA-SYV-2:** Historic resources shall be protected and preserved to the maximum extent feasible.
    - **DevStd HA-SYV-2.3:** No permits shall be issued for any development or activity that would adversely affect the integrity of officially designated Historic Landmarks and Structures of Merit, historical resources eligible for the CRHR, or identified historical districts unless a professional evaluation of the proposal has been performed pursuant to the County's most current Regulations Governing Archaeological and Historical Projects. All such professional studies shall be reviewed and approved by County P&D and all feasible mitigation measures shall be incorporated into any permit issued for development.
  - **Policy HA-SYV-4:** Traditional cultural, historical, and spiritual properties of concern to the Santa Ynez Tribal Elders Council should be protected and preserved to the maximum extent feasible.

County Landmarks and Places of Historic Merit Lists

The County maintains two local registers that identify local historic resources: the Santa Barbara County Landmarks list, and the Places of Historic Merit list. Both are maintained by HLAC. Pursuant to CEQA statute 21074(a)(1)(B) and CEQA Guidelines Section 15064.5(a)(2), any resource listed in a local register of historical resources is presumed to be a significant historical resource. As provided in County Code Chapter Section 18A-3, a place, site, building, structure, or object may be eligible for designation as a place of historic merit or landmark if:

a. It exemplifies or reflects special elements of the county's cultural, social, economic, political, archaeological, aesthetic, engineering, architectural, or natural history; and/or

b. It is identified with persons or events significant in local, state, or national history; and/or

c. It embodies distinctive characteristics of a style, type, period, or method of construction or is a valuable example of the use of indigenous materials or craftsmanship; and/or

d. It is representative of the work of a notable builder, designer, or architect; and/or

e. It contributes to the significance of a historic area, being a geographically definable area possessing a concentration of historic, prehistoric, archaeological, or scenic properties, or thematically related grouping of properties, which contribute to each other and are unified aesthetically by plan or physical development; and/or

f. It has a location with unique physical characteristics or is a view or vista representing an established and familiar visual feature of a neighborhood, community, or the County of Santa Barbara; and/or

g. It embodies elements of architectural design, detail, materials, or craftsmanship that represent a significant structural or architectural achievement or innovation; and/or

h. It reflects significant geographical patterns, including those associated with different eras of settlement and growth, particularly transportation modes or distinctive examples of park or community planning; and/or

i. It is one of the few remaining examples in the county, region, state, or nation possessing distinguishing characteristics of an architectural or historical type or specimen.

The designation of a landmark or a historic place alone does not place the property under special requirements or conditions of use, nor does it require repair or renovation of the premises. However, the HLAC may require maintenance of the premises as a condition for continued recognition of the historic merit of the premises. Under Section 18A-5, the following provides a summary of special conditions that may be imposed on designated Landmarks:[2]

a. Demolition, removal, or destruction, partially or entirely, may be prohibited unless consent in writing is first obtained from the County HLAC.

b. Alterations, repairs, additions, or changes, other than normal maintenance and repair work shall not be made unless and until all plans have been reviewed and approved or modified by the County HLAC and reasonable conditions imposed as deemed necessary.

[2] Places of Historic Merit are recognized as having historic, aesthetic, or cultural value; however, they are not protected by restrictions as to demolition, removal, alteration, or use like Historic Landmarks are, which are recognized at a higher level of historic, aesthetic, or cultural significance.

All such work shall be done under the direction and control of the County HLAC. Decisions of the County HLAC may be appealed to the County Board of Supervisors.

c. That only certain specified uses may be made, or that certain specified uses shall be prohibited.

d. No buildings or structures exposed to public view within a specified distance may be placed, erected, moved in, altered, enlarged, or removed (other than normal maintenance and repair work) without approval, with reasonable conditions imposed, where deemed necessary, by the HLAC.

e. Other reasonable requirements, restrictions, or conditions to meet special or unique circumstances.

Santa Barbara County Land Use and Development Code

Section 35.60.040 of the County's Land Use and Development Code (LUDC) contains the following standards addressing archaeological resources:

A. Development proposed on a lot where archaeological or other cultural sites are located shall be designed to avoid impacts on the cultural sites if possible.

B. When sufficient planning flexibility does not permit avoiding construction on an archaeological or other cultural site, adequate mitigation shall be required. Mitigation shall be designed in compliance with the guidelines of the State OHP and the State NAHC.

C. Native Americans shall be consulted when development proposals are submitted that impact significant archaeological or cultural sites.

D. All available measures (e.g., purchase of the site, tax relief, purchase of development rights) shall be explored to avoid development on significant historic, prehistoric, archaeological, and other classes of cultural sites.

Planning permit requirements for demolition and replacement in-kind of an existing and conforming structure are exempt under Section 35.20.040 of the LUDC if the structure is less than 50 years old or if the Director or the HLAC has determined that a structure that is 50 years old is not historically significant. Additionally, a structure that has been declared to be a historical landmark in compliance with a resolution of the Board may be enlarged, extended, reconstructed, relocated, and/or structurally altered provided the County HLAC has reviewed and approved the proposed structural alterations and has determined that the proposed structural alterations will help to preserve and maintain the landmark in the long-term (LUDC Section 35.101.020).

County Coastal Land Use Plan

The County's Coastal Land Use Plan (CLUP) contains the following policies addressing cultural resources:

- **Policy 10-1**: All available measures (e.g., purchase, tax relief, purchase of development rights) shall be explored to avoid development on significant historic, prehistoric, archaeological, and other classes of cultural sites.
- **Policy 10-2**: When developments are proposed for parcels where archaeological or other cultural sites are located, project design shall be required which avoids impacts to such cultural sites if possible.
- **Policy 10-3**: When sufficient planning flexibility does not permit avoiding construction on archaeological or other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed in accordance with the guidelines of the State OHP and the State NAHC.
- **Policy 10-4**: Off-road vehicle use, unauthorized collecting of artifacts, and other activities other than development which could destroy or damage archaeological or cultural sites shall be prohibited.
- **Policy 10-5**: Native Americans shall be consulted when development proposals are submitted which impact significant archaeological or cultural sites.

The CLUP sets forth the following recommendations to ensure that important historical sites in the Coastal Zone are protected (pg. 150):

1. The County should undertake an inventory of historical sites in the unincorporated areas of the County.
2. Significant sites should be designated as landmarks by the County Advisory Landmark Committee and restrictions imposed as currently permitted by County Ordinance No. 1716.
3. Historic sites of national significance should be nominated for landmark status by the NHLs Project and the NRHP. Those of statewide significance should be nominated for inclusion on the register of CHLs.

Owners of historical sites meeting the criteria specified in Sections 50280-50289 of the Government Code should be encouraged to enter into historical properties contracts with the County (the contract gives the owner the benefit of assessment based on restricted use of the property) it insures permanent preservation of significant sites.

County Coastal Zoning Ordinance

Article II of Chapter 35 of the County Code consists of the Santa Barbara County Coastal Zoning Ordinance (CZO), published in January 2014 and most recently updated in July 2024. Section

35-65 of the CZO includes the following policies that protect archaeological resources, as well as Policies 10-1 through 10-5 from the CLUP:

1. When developments are proposed for lots where archaeological or other cultural sites are located, project design shall be required which avoids impacts to such cultural sites if possible.
2. When sufficient planning flexibility does not permit avoiding construction on archaeological or other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed in accord with the guidelines of the State OHP and the State NAHC.
3. Native Americans shall be consulted when development proposals are submitted which impact significant archaeological or cultural sites.

3.5.4 ENVIRONMENTAL IMPACT ANALYSIS

This section discusses the potential cultural resource impacts associated with the Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed and the residual impact after mitigation is determined.

3.5.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purposes of this Program Environmental Impact Report (EIR), the Project may have a significant adverse impact relating to cultural resources if it would:

a. Cause a substantial adverse change in the significance of a historical resource pursuant to Section 15064.5;

b. Cause a substantial adverse change in the significance of an archaeological resource pursuant to Section 15064.5; or

c. Disturb any human remains, including those interred outside of dedicated cemeteries.

Further, implementation of the Project may have a significant adverse impact relating to tribal cultural resources if it would:

a. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in PRC Section 21074 as either a site, feature, place, or cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is:

   i. Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in PRC Section 5020.1(k), or

ii. A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision(c) of PRC Section 5024.1. In applying the criteria set forth in subdivision (c) of PRC Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.

County of Santa Barbara Environmental Thresholds and Guidelines

The County's *Environmental Thresholds and Guidelines Manual* (2024b) provides guidance for assessing the significance or importance of archaeological, historical, and tribal cultural resources. For determining the significance of impacts under CEQA, the County's thresholds defer to the thresholds of CEQA. Specifically, the significance of impacts on cultural resources should be evaluated pursuant to CEQA Sections 21084.1 and Section 15064.5. The significance of impacts to tribal cultural resources should be evaluated pursuant to CEQA Section 21084.2.

Methodology

As described in Chapter 2, *Project Description*, the Project plans for parks, trails, and recreational facilities in unincorporated areas within the county. Project-level siting and design details are not known, so the analysis does not evaluate cultural or tribal cultural resource impacts at a project- or site-specific level. The programmatic analysis provided by this Program EIR addresses the potential for future parks, recreation, trails, and related development under the Project to significantly adversely affect historic, archaeological, or tribal cultural resources. Wherever possible, illustrative examples are provided to describe particular areas of the county (e.g., urban versus rural areas) where the implementation of the Project could have adverse impacts. As described in section 3.0.4, *Impact Assessment Methodology*, to determine whether a potentially significant impact could occur as a result of the Project, the analysis considers the potential construction and operations of the Project components using reasonable worst-case assumptions, including:

1. The public park, recreation, and trail projects planned by County Parks, as described in Section.2.5.1, *Planned County Parks, Recreation, and Trails Projects*. The analysis assumes a maximum disturbance area of up to 50 acres as the most impactful planned park and recreation facilities.
2. The proposed amendments to the Comprehensive Plan and zoning ordinances that could enable the development of planned parks, trails, and recreational facilities. The analysis assumes that the amendments, including the updated Public and Private Parks/Recreation Facility Overlay and the Recreation Benefit Project Program, could enable the following concepts as the most impactful potential development scenarios under the proposed Project's development standards:
    a. A maximum 160-site campground/RV park on a minimum 20-acre site

b. A maximum 120-room country inn on a minimum 5-acre site

c. A maximum 2,000-seat outdoor amphitheater

Key resources or data used in the preparation of this section include the County's Comprehensive Plan, the National Park Service's NRHP, the National Park Service's California NHLs, the State OHP's CHLs, and the County HLAC's resources for County Landmarks and Places of Historic Merit. The information and analysis presented in this section are based on available long-range planning documents, EIRs, and related studies that apply to the Project area. Additionally, this section integrates relevant information from the 2024 Housing Element Update Program EIR and the 2024 Agricultural Enterprise Ordinance Program EIR, and two site-specific studies completed for the Jalama Beach County Park Expansion and Coastal Access Improvements project.

3.5.4.2 Project Impacts

Table 3.5-4 provides a summary of the Project's impacts related to cultural and tribal cultural resources. A detailed discussion of each impact follows.

Table 3.5-4. Summary of Cultural and Tribal Cultural Resources Impacts

Cultural and Tribal Cultural Resources Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact CTCR-1. The Project could occur in or near previously unevaluated historic properties and could cause physical demolition, destruction, relocation, or alteration of historical resources.	Potentially significant	MM CTCR-1 (Objective Development Standards for Addressing Historic and Archaeological Resources)	Significant but mitigable
Impact CTCR-2. The Project could cause disruption, alteration, destruction, or adverse effects on significant archaeological resources.	Potentially significant	MM CTCR-1 (Objective Development Standards for Addressing Historic and Archaeological Resources) MM CTCR-2 (Avoidance of Disturbance to Native Soils) MM CTCR-3 (Location-Specific Phase 2 Testing) MM CTCR-4 (Extended Phase 1/Phase 2 Testing Program)	Significant but mitigable

Table 3.5-4. Summary of Cultural and Tribal Cultural Resources Impacts (Continued)

Cultural and Tribal Cultural Resources Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact CTCR-3. The Project could disrupt human remains, including those interred outside of formal cemeteries.	Insignificant	No mitigation measures required.	Insignificant
Impact CTCR-4. The Project could cause disruption, alteration, destruction, or adverse effects on significant tribal cultural resources.	Potentially significant	MM CTCR-1 (Objective Development Standards for Addressing Historic and Archaeological Resources) MM CTCR-5 (Post-Discovery Tribal Consultation)	Significant but mitigable
Cumulative Impacts	Potentially significant	MM CTCR-1 (Objective Development Standards for Addressing Historic and Archaeological Resources) MM CTCR-5 (Post-Discovery Tribal Consultation)	Significant but mitigable

Impact CTCR-1. The Project could occur in or near previously unevaluated historic resources and could cause physical demolition, destruction, relocation, or alteration of historic resources.

As described in Section 3.5.2.4, *Known Cultural Resources in Santa Barbara County*, the unincorporated county currently has 15 historic properties and districts listed on the NRHP, 4 state-designated CHLs, 55 County Historic Landmarks, and 19 County Places of Historic Merit, as well as an unknown number of potentially eligible but currently unidentified historic structures. The Project could directly result in, or indirectly enable future development that could cause, disruption or disturbance of known and unknown historic properties and resources that are culturally significant under CEQA.

To help meet recreation needs in Santa Barbara County, the Project includes planned public parks, recreation, and trail projects that would develop new facilities or expand existing facilities in unincorporated areas in the county. The potential for the Project to directly impact historic properties is extremely low because the proposed County parks projects (listed in Section 2.5.1) do not overlap or otherwise interact with NRHP- or CRHR-listed properties, County Historic Landmarks, or Places of Historic Merit. Further, planned projects are on sites that do not have existing structures that would be affected by the development of parks and

trails. Rather, projects involve either existing public parkland or trail corridors, or undeveloped properties. In addition, federal, state, and local regulations would help minimize potential direct impacts of planned public parks, recreation facilities, and trails. For example, NRHP- and CRHR-listed properties are subject to provisions that encourage the preservation of historic structures through fiscal incentives for property owners (36 CFR Part 60; OHP 2025b). Locally, County Historic Landmarks are subject to special conditions, identified in Chapter 18-A of the zoning code, intended to protect their status and integrity. Lastly, all County Parks projects must be designed and implemented consistent with the Comprehensive Plan, which includes policies to protect historic structures from destruction, damage, or loss of integrity.

As discussed in Section 3.5.2, *Environmental Setting*, the county has trails that are either officially designated as County Historic Landmarks or Places of Historic Merit or are not designated but have historical significance, such as the Anza Trail. The Project does not include specific changes or upgrades of the historic trails but generally supports the maintenance and expansion of historic trails through proposed policies in the Comprehensive Plan and changes to the zoning ordinances. Therefore, it is foreseeable that future public trail projects could involve improvements or changes to the historic trail amenities and conditions. However, the potential for direct, adverse impacts to historic trails is very low. Projects proposed on historic trails would likely be related to the trails themselves, including maintenance of the trails for recreational use, which would help preserve their integrity and defining characteristics as historic resources. In fact, the Project encourages coordination with volunteer trail groups to develop and maintain historic trails, such as in the case of the Juan Bautista de Anza National Historic Trail, which is consistent with Section 5, Subsection 17 of the National Trails System Act. In addition, trail design and construction projects in unincorporated areas of the county are required by County Parks to comply with County Parks' plan specification for trail development, consistent with the U.S. Forest Service's Plans for Trail and Trail Bridge Structures. These specifications would ensure any future maintenance or improvements to historic trails would retain their integrity, accessibility, and quality with no significant adverse impact. Additionally, as part of the Project, the County would adopt new development standards for all public trail projects within the unincorporated areas. These would require that trails avoid or minimize impacts to known historic sites and structures, including County landmarks inclusive of historic trails. Accordingly, new trail development proposed or enabled by the Project is considered unlikely to result in impacts on historic resources.

The Project also includes amendments to the Comprehensive Plan and zoning ordinances to enable the development of public parks, trails, and Recreation Benefit Projects (RBPs), which would include a public recreation component in addition to a private development component as allowed by the zoning ordinances. As a result, the Project would indirectly result in development that could adversely impact potentially eligible historic structures (generally those that are 50 years of age or greater) that are not currently identified or known ("unknown"

historic resources). The potential for impacts to unknown historic resources depends on project type and location, as well as existing land use/zoning in the project site. The indirect impact on historic resources would only occur when a public park, trail, or RBP is proposed to either adaptively reuse or damage/demolish a historic structure that meets historic resource criteria.

Most recreation project types and locations would have extremely limited potential to impact unknown historic resources due to the limitations of allowed uses and development standards for public parks, trails, and RBPs. For example, public parks are typically outdoor uses with limited structural development (e.g., playgrounds, picnic and seating areas, restrooms) that would involve relatively minor ground disturbance and would not create a major need for site clearing, excavation, demolition, or alteration of existing structures. In addition, projects proposed on undeveloped land would not contain known or unknown historic structures, so the potential for impacts would be extremely low. It is foreseeable that future RBPs could include adaptive reuse or modification of existing structures that meet historic resource criteria, such as onsite residences, barns, or agricultural buildings. However, any proposed RBP would be subject to the County's existing regulations protecting places, sites, buildings, structures, or objects that may be eligible for designation as a place of historic merit or landmark.

Even though the potential for indirect impacts is low, adverse impacts to historic resources are possible because it is impossible to predict how, when, and where projects enabled under the Project, including eligible RBP Program projects, would take place. Likewise, it is difficult to predict the scope, scale, and extent of development proposed by these projects. Therefore, additional parks, trails, recreation facilities, and related development could be proposed near known (e.g., NRHP, CRHR, County Historic Landmark) or unknown (e.g., potentially eligible structures over 50 years of age) historic sites. Therefore, the Project could result in indirect impacts to historic resources.

Future development indirectly enabled under the Project would be required to adhere to relevant policies and regulations, including those described above, on a case-by-case basis during County review of individual permit applications and/or as part of a discretionary process, depending on the scope and scale of the proposed project and necessary permit approvals. Further, to address this potential for loss or damage to unknown historic resources, the proposed zoning ordinance amendments under the Project include development standards for public parks and trails, as well as RBPs, that would require development to avoid or minimize impacts to known historic and archaeological sites and structures. Adherence to existing and proposed policies and regulations would help minimize adverse effects on known historic resources but would not eliminate the potential for impacts to currently unknown historic resources. Impacts are therefore considered *potentially significant* and would require mitigation measure **MM CTCR-1 (Objective Development Standards for Addressing Historic and Archaeological Resources)** to reduce impacts to a *significant but mitigable* level.

Impact CR-2. The Project could cause disruption, alteration, destruction, or adverse effects on significant archaeological resources.

As described in Section 3.5.2, *Environmental Setting*, prehistoric and historic archaeological resources have the potential to occur throughout the unincorporated county and primarily within undisturbed soils within areas of known past habitation and use. Therefore, the Project could directly result in, or enable future development that could cause, the physical development or alteration of lands (e.g., grading of a site or the construction of new structures) that could disrupt or disturb undiscovered archaeological resources that are culturally significant under CEQA.

The Project includes planned park, recreation facility, and trail projects that would entail the physical development of new facilities or the expansion of existing facilities. Construction of these projects, particularly new community parks, campgrounds, and trail corridors in rural areas and on undisturbed properties, could have a potential direct adverse effect on archaeological resources if development were to occur in an area where resources are either present or have a high potential to exist. Development on vacant undisturbed sites would have greater potential for disturbance of undiscovered archaeological resources than on previously disturbed sites. This would be particularly true in areas located near creek beds, bluffs, and estuaries, which have a greater likelihood of supporting early habitation and use by Native Americans.

The potential for new development to adversely affect archaeological resources depends largely on the type of project/improvements. Proposed parks, trails, and recreation facilities within urbanized areas or agricultural properties subject to past tilling or other soil disturbance are highly unlikely to have the potential to disturb archaeological resources. Past development and disturbance indicate a low potential for intact archeological resources, and these types of parks and trail projects would involve relatively minor ground disturbance due to the nature and scale of the development proposed. For instance, Oak Knoll Neighborhood Park is located within a suburban area of Orcutt surrounded by residential development and would involve the development of an existing flood control retention basin as a new neighborhood park. Development of the proposed improvements would likely involve some surficial grading that would not involve deep excavation or grading to depths that would extend below the depths of existing disturbed soils. Additionally, projects involving the expansion or improvement of existing park facilities or development of facilities on existing disturbed sites (e.g., existing parkland, former developed sites, active or former agricultural lands), such as the Lake Cachuma Campground and South Shore Facilities Improvements, the Guadalupe Community Park & Campground, Gaviota Marine Terminal Recreation Area, or the South Coast Aquatic Center and Goleta Community Sports Park would entail the replacement of existing facilities or site reconfigurations within areas that have already been highly disturbed. For these projects, the presence of archaeological resources in an area that could be disturbed by development is

considered very low. Even though larger recreation projects such as campgrounds, community parks, and associated facilities would involve larger sites, greater areas of disturbance, and typically involve new structural development or site improvements that require a greater degree of grading and excavation, their location in areas of past disturbance and development substantially eliminates the potential to adversely affect archaeological resources.

Trail development in rural and/or undisturbed areas has the potential to encounter intact archeological resources during trail construction and maintenance. For example, changes or expansion of the trail system with the addition of a rustic pack-in/pack-out campground on the North Shore of Lake Cachuma could encounter cultural resources due to known cultural resource values in the area, based on the 2011 Cachuma Resource Management Plan and Programmatic Environmental Impact Statement (EIS). Similarly, trail improvements in undeveloped areas and creek corridors, such as the San Marcos Foothills, Baron Ranch, Orcutt Foothills, and Drum Canyon, have the potential to encounter buried cultural resources during construction and maintenance. Therefore, while the potential is low, it is foreseeable that future public projects could adversely affect archaeological resources. Trail design and construction projects in unincorporated areas of the county are required by County Parks to comply with County Parks' plan specification for trail development, consistent with the U.S. Forest Service's Plans for Trail and Trail Bridge Structures. These specifications would ensure any future maintenance or improvements to trails would adhere to construction techniques that minimize soil disturbance and erosion. Additionally, as part of the Project, the County would adopt new development standards for all public trail projects within the unincorporated areas. These would require that trails avoid or minimize impacts to known archaeological resources and sites. As such, new trail developments proposed or enabled by the Project are considered unlikely to result in impacts to archaeological resources.

The Project also includes amendments to the Comprehensive Plan and zoning ordinances to enable the development of public parks, trails, and RBPs, which would include a public recreation component in addition to a private development component as allowed by the zoning ordinances. As a result, the Project would indirectly result in development that could adversely impact buried archaeological resources. The potential for impacts to unknown cultural resources depends on project type and location, as well as existing land use/zoning in the project site. The indirect impact on historic resources would only occur when a public park, trail, or RBP is proposed in undisturbed areas with past habitation or use that would retain intact cultural resources.

Most recreation project types and locations would have extremely limited potential to impact unknown archaeological resources due to the limitations of allowed uses and development standards for public parks, trails, and RBPs. For example, public parks are typically outdoor uses with limited structural development (e.g., playgrounds, picnic and seating areas, restrooms) that would involve relatively minor ground disturbance and would not create a

major need for site clearing, excavation, demolition, or alteration of existing structures. In addition, projects proposed on developed land or formerly disturbed land would not contain intact known or unknown historic structures, so the potential for impacts would be extremely low. It is foreseeable that future RBPs could include the development of recreation and non-recreation uses that could encounter cultural resources during construction if development occurs on undeveloped land. However, any proposed RBP would be subject to the County's existing regulations protecting archaeological resources.

Even though the potential for indirect impacts is low, adverse impacts to archaeological resources are possible because it is impossible to predict how, when, and where projects enabled under the Project, including eligible RBP Program projects, would take place. Likewise, it is difficult to predict the scope, scale, and extent of development proposed by these projects. Therefore, additional parks, trails, recreation facilities, and related development could result in indirect impacts on archaeological resources, particularly if development involves ground disturbance with heavy construction activities (e.g., excavation or grading), sites with known archaeological resources, or previously undisturbed sites with high potential for undiscovered, intact archaeological resources to exist.

Future development indirectly enabled under the Project would be required to adhere to relevant policies and regulations, including those described above, on a case-by-case basis during County review of individual permit applications, depending on the scope and scale of the proposed project and necessary permit approvals. As described above, federal, state, and County policies and regulations (e.g., Section 35.60.040 of the County LUDC) require the avoidance and protection of significant archaeological resources from development, along with the mitigation of impacts to such resources when avoidance or protection of the resource is not feasible (see Section 3.5.3, *Regulatory Setting*). Further, to address this potential for loss or damage to cultural resources, the proposed zoning ordinance amendments under the Project include development standards for public parks and trails, as well as RBPs, that would require development to avoid or minimize impacts to known historic and archaeological sites and structures. RBPs would also be subject to site-specific permitting and all applicable provisions of the zoning ordinances, which would address potential historic resource impacts on a case-by-case basis. Adherence to existing and proposed policies and regulations would help minimize adverse effects on archaeological resources but would not eliminate the potential for impacts. Impacts are therefore considered *potentially significant* and would require mitigation measure **MM CTCR-1 (Objective Development Standards for Addressing Historic and Archaeological Resources)** to reduce impacts to an *insignificant* level.

In addition, the Project includes the Jalama Beach County Park Expansion and Coastal Access Improvements project, which would result in unique site-specific impacts on archaeological resources. This project would involve extensive ground disturbance to support the renovation, improvement, and expansion of campground facilities at Jalama Beach County Park, as well as

the construction of new public parking lots, a coastal access stairway, and a blufftop coastal trail in a known archaeologically sensitive area. Construction activities have the potential to unearth, damage, or destroy known prehistoric archaeological resources within the site. The archaeological setting at Jalama Beach County Park has been well documented, and there are multiple prehistoric archaeological sites in the immediate vicinity. Based on the results of the *Revised Plan Review, Native American Outreach, and Preliminary Recommendations: Cultural Resources Services for Jalama Beach County Park Public Access CEQA Support* prepared by Applied EarthWorks, Inc. (2022) and the *Phase 1 Archaeological Survey Jalama Beach County Park Dedication Property* prepared by Wood Environment & Infrastructure Solutions, Inc. (2018) for the County, proposed improvements would directly affect two of these sites, CA-SBA-205 and CA-SBA-3504. Therefore, impacts to archaeological resources as a result of the Jalama Beach Campground Expansion & Upgrade Project are also considered *potentially significant* and would require mitigation measures **MM CTCR-2 (Avoidance of Disturbance to Native Soils), MM CTCR-3 (Location-Specific Phase 2 Testing),** and **MM CTCR-4 (Extended Phase 1/Phase 2 Testing Program)** to reduce these project-specific impacts to a *significant but mitigable* level.

Impact CTCR-3. The Project could disrupt human remains, including those interred outside of dedicated cemeteries.

As discussed in Impacts CTCR-1 and CTCR-2 above, the Project could directly result in, or enable future development that could cause, the physical development or alteration of lands (e.g., grading of a site or the construction of new structures) that could disrupt or disturb human remains. The potential for new development under the Project to directly or indirectly disturb human remains depends on a project's location and the extent of proposed improvements. For example, the construction of proposed pocket and neighborhood park projects involving only minor ground disturbance would have extremely low potential to extend into previously undisturbed soils or uncover buried human remains. In addition, projects located in developed urban areas or on historically cultivated agricultural lands, which have typically experienced extensive disturbance and development, would also have low potential to uncover and disturb human remains. The Mission Hills Neighborhood Park, for example, would expand existing park facilities in a developed residential community. The proposed Guadalupe Community Park & Campground is proposed on currently inactive agricultural land that has been subject to deep tilling and ripping for decades. The potential for construction associated with these projects and others in similar settings to extend into previously undisturbed soils or uncover buried human remains is therefore extremely limited. Similarly, projects involving the development of new trails are considered to have little to no potential to cause disturbance to human remains. Except in cases where trails are proposed in areas of steep terrain, the development of new trails would involve only surficial grading and ground disturbance. In addition, development standards proposed under the Project would require that trails be sited within previously

disturbed areas to the extent feasible, thus reducing the potential for disruption of previously undisturbed soils.

Some larger park, recreation, and trail projects, both those planned by the County and those enabled by the proposed zoning ordinance amendments (including RBPs), may involve more significant ground disturbance, site clearing, excavation, and structural development that could disturb buried human remains if present. Development on vacant, undisturbed sites would also have greater potential for disturbance of human remains. This is particularly true in areas located near creek beds, bluffs, and estuaries, which have a greater likelihood of having supported early habitation and use by Native Americans. For example, as discussed in Impact CTCR-2 above, implementation of the proposed Jalama Beach Campground Expansion & Upgrade Project would involve extensive ground disturbance at Jalama Beach Park, which has multiple recorded prehistoric archaeological sites in its immediate vicinity. Given the evidence that the area supported early habitation and use by Native Americans, the potential for buried human remains is high.

However, various laws and regulations govern the unanticipated discovery of human remains and outline processes and requirements that emphasize their protection and preservation. For any park, recreation, or trail project proposed by the County or another entity, in the unlikely event that previously unidentified human remains are discovered, State Health and Safety Code Section 7050.5 requires that further disturbances and construction activities shall stop in any area or nearby area suspected to overlie remains in accordance with. The Santa Barbara County Coroner would be contacted in accordance with Title 14, CCR Section 15064.5(e). Pursuant to PRC Section 5097.98, if the coroner determines that the human remains are of Native American origin, the NAHC will be notified. Arrangements for the human remains would be made, and further provisions of PRC Section 5097.98 are to be followed as applicable. Compliance with these regulations would ensure that even if buried human remains are discovered, actions would be taken to avoid or minimize their disturbance as much as possible. Therefore, impacts would be *insignificant*.

Impact CTCR-4. The Project could cause disruption, alteration, destruction, or adverse effects on significant tribal cultural resources.

As described in Section 3.5.2.4, *Known Cultural Resources in Santa Barbara County*, tribal cultural resources may include cultural landscapes, sacred places, and Native American archaeological sites. The County has not received requests from any Native American tribe for government-to-government consultation associated with the proposed Project, pursuant to PRC Section 21080.3.1, SB 18, and AB 52. Nevertheless, this analysis considers the potential for tribal cultural resources to be affected by the Project based on available resources and information.

The potential for direct impacts to known historic and archaeological resources would be extremely low because proposed County parks projects generally do not overlap with NRHP- or CRHR-listed properties, County Historic Landmarks, or Places of Historic Merit and because federal, state, and local regulations relating to these resources would help minimize potential impacts, as described in Impact CTCR-1. In addition, the proposed zoning ordinance amendments under the Project include the adoption of additional development standards that would require development to avoid or minimize impacts to known historic and archaeological sites and structures.

As discussed in Impacts CTCR-1 and CTCR-2 above, development occurring as a result of the Project (both through proposed County parks projects and other park and recreational projects) would have the potential to directly impact unknown historic and cultural resources, and to indirectly impact both known and unknown historic and cultural resources. The extent of these impacts would vary depending on the type and location of proposed projects (e.g., scale of proposed structural development, excavation required). In addition, park, recreation, or trail projects could directly (i.e., through County actions) or indirectly (e.g., through private projects or RBP Program projects) result in disruption, alteration, demolition, or other adverse impacts to currently unknown tribal cultural resources, as well as resource types that are not easily identified or delineated, such as sacred places. Therefore, impacts on tribal cultural resources would be *potentially significant.*

Implementation of **MM CTCR-1 (Objective Development Standards for Addressing Historic and Archaeological Resources)** would prevent future park, recreation, and trail projects from altering, relocating, or demolishing structures 50 years of age or greater and would implement a stop-work order upon the inadvertent discovery of archaeological resources. In addition, **MM CTCR-5 (Post-Discovery Tribal Consultation)** would require project applicants to consult with Native American tribes if archaeological or historic resources are discovered during project design, construction, or operation. These mitigation measures would reduce potential impacts on tribal cultural resources to a *significant but mitigable* level.

3.5.4.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis*, the cumulative setting for the Project involves a variety of policies and initiatives in the county, as well as development projects in the unincorporated county and surrounding incorporated cities. These projects include parks and trail projects within the cities, state parks, and federal properties; related projects such as master plans and the California Coastal Trail; other plans such as General Plan updates; and the County's current cumulative projects list. These cumulative projects could impact historic, archaeological, and tribal cultural resources within the Project area in combination with the planned parks projects under the Project, as well as future park and recreation projects enabled by the proposed zoning ordinance amendments. Cumulative new development may create

greater potential for ground disturbance and associated development on sites across the county that may contain known or unknown historic, archaeological, and tribal cultural resources, as well as buried human remains. Therefore, the Project's contribution to cumulatively considerable impacts is *potentially significant*.

All planned County parks projects, as well as future park and recreation projects enabled by the proposed zoning ordinance amendments, would comply with existing County policies and regulations (e.g., County Code Chapter 18A, the County Comprehensive Plan, applicable community plans, LUDC, MLUDC, CLUP, CZO, and Section 8 of the County's 2024 *Environmental Thresholds and Guidelines Manual*), as well as proposed zoning ordinance amendments and their development standards. In addition, the inclusion of mitigation measures **MM CTCR-1 (Objective Development Standards for Addressing Historic and Archaeological Resources)** and **MM CTCR-5 (Post-Discovery Tribal Consultation)** would prevent future park, recreation, and trail projects from altering, relocating, or demolishing structures 50 years of age or greater; would implement a stop-work order upon the inadvertent discovery of archaeological resources; and would require project applicants to consult with Native American tribes if archaeological or historic resources are discovered during project construction or operation. These mitigation measures would reduce the Project's contribution to cumulatively considerable impacts to cultural, historic, and tribal cultural resources to a *significant by mitigable* level.

3.5.4.4 Proposed Mitigation

MM CTCR-1: Objective Development Standards for Addressing Historic and Archaeological Resources. Development of County parks, permitted uses in Recreation zones, permitted parks and trails, and RBPs shall be sited to avoid the alteration, relocation, or demolition of structures 50 years of age or greater. ~~All County Parks projects shall be subject to the following standards. The County shall amend the Santa Barbara County zoning ordinances to add the following requirements for permitted uses in Recreation zones, permitted parks and trails, and RBPs: Development does not alter, relocate, or demolish structures 50 years of age or greater.~~ If the site of proposed development exhibits potentially historic and/or archaeological resources, the applicant shall retain a County P&D-qualified professional historian/archaeologist to document all potentially historic and/or archaeological resource features. If the historian/archaeologist finds that there are no qualifying historic or archaeological resources onsite with potential to be adversely affected by proposed development, they shall submit a memorandum describing these findings to the County ~~P&D for review~~. If historic, archaeological, or tribal cultural resources are encountered during grading, construction, landscaping, other construction-related activity, or any operation-related activity, the Owner/Applicant and/or their agents, representatives, or contractors shall stop or redirect work immediately and retain a County P&D approved archaeologist and Native American representative to evaluate the significance of the

find in compliance with the provisions of Phase 2 investigations of the County Archaeological Guidelines and funded by the Owner/Applicant.

> **Plan Requirements and Timing:** This measure shall apply to applicable projects immediately following the certification of this EIR.
>
> **Monitoring:** County ~~P&D~~ compliance monitoring staff shall ensure compliance through a review of project plans and/or applicant/contractor-provided documentation.

MM CTCR-2: Avoidance of Disturbance to Native Soils. To reduce impacts within the primary area of sensitive associated with improvements proposed as part of the Jalama Beach Campground Expansion & Upgrade Project site, all new development shall be located on existing concrete foundations or slabs and existing utilities or subsurface features (e.g., septic tanks and leach fields) shall be abandoned in place to the maximum extent feasible. Where such avoidance is deemed infeasible, construction shall occur on sterile fill placed on geofabric. Designers should work with an archaeologist to determine what construction methods should be used to avoid or minimize impacts. Existing paving and structural foundations should remain in place to avoid ground disturbance, and (optionally) be covered with fill. The depth of fill over geofabric would vary depending on the depth of significant archaeological deposits but should be deep enough to avoid incursion into such deposit, plus a buffer of at least 12 inches. Where no excavation is planned but project elements (such as new campsites) would be placed on the surface over significant deposits, fill of at least 12 inches would be required. Fill should be deep enough to support shallow- to medium-rooted vegetation. Deep-rooted vegetation may cause impacts on archaeological deposits. The location and required depth of fill should be delineated on grading plans.

Within the area of secondary sensitivity, the depth of required fill would vary depending on the depth of the significant archaeological deposit and the maximum depth of ground disturbance. Existing subsurface elements such as utility lines should be abandoned in place.

For areas outside of, but adjacent to, the primary and secondary sensitivity areas, placement of cabins and associated elements on sterile fill, abandoning any existing utilities in place, and avoiding ground disturbance here would avoid disturbing these materials. The risk of encountering intact materials in this area is considered relatively low, and monitoring would suffice as an appropriate condition for work in this area.

> **Plan Requirements and Timing:** Protection or other required measures shall be in place before ground disturbance.
>
> **Monitoring:** County Parks shall ensure that all archaeological resource protection standards are reflected in project plans. County Parks staff shall ensure that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed.

MM CTCR-3: Location-Specific Phase 2 Testing. At the Jalama Beach Campground Expansion & Upgrade Project site, within the area of primary sensitivity, where new development requires ground disturbance, location-specific Phase 2 testing shall be required in previously untested areas to evaluate data potentials and assess project impacts. New play structures, and potentially the ranger structure, may require footings. As identified below, excavation for footings or foundations would require targeted Phase 2 excavation in the exact area(s) planned for disturbance. The purpose of the Phase 2 study would be to identify if data potentials are present in this part of the site, and if so, assess project impacts. Optimally, the Phase 2 work would include the collection of sufficient material so that if data potentials are present, additional analysis of that material would serve as Phase 3 data recovery/mitigation to reduce impacts from ground disturbance to less than significant. If Phase 2 testing demonstrates that the deposit within the project footprint does not contain a density and diversity of artifacts sufficient to address relevant research questions, then this area should be delineated on grading plans and monitoring would suffice during development activities. If Phase 2 testing indicates that data potentials are present, the area should be avoided or capped. Phase 2 testing results would delineate the area to be capped (the area with data potentials). The depth of capping would depend on the depth of significant deposits and the required depth of grading and would be identified in the Phase 2 report.

In the area of primary sensitivity, if portions of the park are capped to protect the site, the Cultural Resource Guidelines for Santa Barbara County specify that an "index sample" should be collected and curated, since capping precludes future research within that area. Once these areas are identified, a review of previous excavations should occur to identify if they are sufficient to qualify as an index sample for the capped locations. Given the extent of prior work within the area of primary sensitivity, it is likely that sufficient data has been collected to qualify as an index sample. As with the primary sensitivity area, several locations within the area of secondary sensitivity have been previously tested. Comparison of the test results with proposed ground disturbance locations is necessary and could identify areas without data potentials, where ground disturbance would not cause a significant impact.

> **Plan Requirements and Timing:** Phase 2 Testing shall be completed and recommendations shall be integrated into project plans before approval and construction.
>
> **Monitoring:** County Parks shall ensure that all archaeological resource protection standards developed through Phase 2 Testing are reflected in project plans.

MM CTCR-4: Extended Phase 1/Phase 2 Testing Program. The Jalama Beach Campground Expansion & Upgrade Project proposes to relocate the existing administrative structures (e.g., ranger's residences, garages, etc.) from the existing park to the bluff immediately above the park. To characterize this area's deposit and identify where (and if) fill is required, a focused

extended Phase 1/Phase 2 testing program shall be carried out within the area proposed for development. If the Extended Phase 1/Phase 2 testing demonstrates that the deposit within the project footprint does not have data potentials (i.e., deposit does not contain a density and diversity of artifacts sufficient to address relevant research questions), then no fill would be required, and monitoring would suffice during development activities. If the Extended Phase 1/Phase 2 results indicate that data potentials are present, the testing would clarify and delineate the area to be capped and the recommended depth of fill. The extended Phase 1/Phase 2 effort should be designed to collect enough material so that technical analysis of lithics, shell, and bone, and radiocarbon dating, could be performed and no additional excavation would be needed. This material would also serve as an index sample required for the area(s) that are capped.

> **Plan Requirements and Timing:** Extended Phase 1/Phase 2 Testing shall be completed and recommendations shall be integrated into project plans before approval and construction.
>
> **Monitoring:** County Parks shall ensure that all archaeological resource protection standards developed through Extended Phase 1/Phase 2 Testing are reflected in project plans.

MM CTCR-5: Post-Discovery Tribal Consultation. For future park, recreation, and trail projects and RBPs enabled by the Project, if tribal cultural resources are identified or discovered during construction, landscaping, or other construction-related or operational activities, the owner/applicant and/or their agents, representatives, or contractors shall immediately contact P&D. P&D shall coordinate consultation with a Native American tribal representative. The appropriate Native American tribal representative shall be identified using the most recent contact list provided by the NAHC. If mitigation actions are required through consultation with the Native American tribal representative, appropriate mitigation shall be funded by the owner/applicant.

> **Plan Requirements and Timing:** If tribal cultural resources are discovered, construction activities shall stop immediately. The owner/applicant/owner shall immediately contact County P&D permit compliance staff, who would consult with a Native American tribal representative. This condition shall be printed on all building and grading plans.
>
> **Monitoring:** County P&D permit compliance staff shall ensure that no further disturbance shall occur via periodic site visits and other appropriate measures until consultation with a Native American tribal representative is complete and any site-specific mitigation has been identified and implemented.

3.5.4.5 Secondary Impacts

Implementation of **MM CTCR-1** through **MM CTCR-5** would not result in significant secondary impacts.

3.5.4.6 Residual Impacts

Impact CTCR-1. Implementation of **MM CTCR-1 (Objective Development Standards for Addressing Historic and Archaeological Resources)** would ensure that park, recreation, and trail projects (both those planned by the County and enabled under the Project) do not propose significant alteration, relocation, or demolition of any structure 50 years of age or greater. This would reduce the potential for direct and indirect impacts to both known and unknown historic resources. Therefore, residual impacts associated with Impact CTCR-1 would be *significant but mitigable*.

Impact CTCR-2. Implementation of **MM CTCR-1 (Objective Development Standards for Addressing Historic and Archaeological Resources)** would ensure that appropriate measures are taken in the event of inadvertent discovery of an archaeological resource such that park, recreation, and trail projects (both those planned by the County and enabled under the Project) do not significantly impact unknown archaeological resources. In addition, **MM CTCR-2 (Avoidance of Disturbance to Native Soils), MM CTCR-3 (Location-Specific Phase 2 Testing),** and **MM CTCR-4 (Extended Phase 1/Phase 2 Testing Program)** would ensure that significant impacts to known archaeological resources at the Jalama Beach Campground Expansion & Upgrade Project site are avoided. Therefore, residual impacts associated with Impact CTCR-2 would be *significant but mitigable*.

Impact CTCR-3. Compliance with various regulations governing human remains would ensure that even if buried human remains are discovered during the construction of park, recreation, and trail projects (both those planned by the County and enabled under the Project), actions would be taken to avoid or minimize their disturbance as much as possible. Therefore, residual impacts associated with Impact CTCR-3 would be *insignificant*.

Impact CTCR-4. Implementation of **MM CTCR-1 (Objective Development Standards for Addressing Historic and Archaeological Resources)** would prevent future park, recreation, and trail projects from altering, relocating, or demolishing structures 50 years of age or greater and would implement a stop-work order upon the inadvertent discovery of archaeological resources. In addition, **MM CTCR-5 (Post-Discovery Tribal Consultation)** would require project applicants to consult with Native American tribes if archaeological or historic resources are discovered during project construction or operation. These mitigation measures would ensure that park, recreation, and trail projects (both those planned by the County and enabled under the Project) do not significantly impact tribal cultural resources. Therefore, residual impacts associated with Impact CTCR-4 would be *significant but mitigable.*

This page was intentionally left blank.

3.6 ENERGY

3.6.1 INTRODUCTION

This section describes potential impacts related to energy usage and conservation, as well as potential inconsistencies with relevant energy reduction and sustainability plans and policies, from the implementation of the Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (Project). The discussion of energy resources includes electricity, natural gas, gasoline, and other transportation-related fuels (e.g., diesel fuel), and renewable energy resources.

3.6.2 ENVIRONMENTAL SETTING

Santa Barbara County residents receive energy from a range of renewable and non-renewable sources, consisting primarily of electric power, natural gas, and transportation-related fuels (e.g., gasoline and diesel). State and local governments and private entities provide a range of energy services to the residents of the county, as described herein.

3.6.2.1 Electricity

The production of electricity within the state requires the consumption or conversion of energy resources, including natural gas, coal, water, nuclear, and renewable resources, such as wind, solar, and geothermal. Over the past five years, non-residential electricity consumption has gradually declined in both the state and county, while residential electricity consumption has gradually increased. In 2022, Californians consumed 287,826.1 million kilowatt hours (kWh), or 2,878.3 gigawatt-hours (GWh), of electricity across the residential and non-residential sectors, an approximate 2.1 percent increase from the prior five years. In 2022, Santa Barbara County, inclusive of the incorporated cities and unincorporated areas, consumed 2,804.1 GWh of electricity across the residential and non-residential sectors, an approximate 0.6 percent reduction from the prior five years. Of the countywide 2022 electricity consumption, about 830 GWh were residential and about 1,974 GWh were non-residential (California Energy Commission [CEC] 2023c) (Table 3.6-1).[1]

[1] Electricity and natural gas consumption as reported by CEC for Santa Barbara County, which includes incorporated and unincorporated areas.

Table 3.6-1. Statewide and Countywide Electricity Demand 2018-2022 (Millions of kWh [GWh])

Year	Statewide		Countywide	
	Non-residential	Residential	Non-residential	Residential
2018	190,224.17	91,763.94	2,063.61	757.96
2019	188,614.06	92,727.36	1,983.99	787.96
2020	175,687.23	102,948.67	1,903.36	837.61
2021	179,640.31	100,539.57	1,931.89	812.87
2022	184,229.93	103,596.19	1,974.15	829.97

Sources: CEC 2023c.

In 2022, California's in-state electric power mix included 47.5 percent generated by natural gas-fired power plants, 0.1 percent generated by coal-fired power plants, 7.2 percent from large hydroelectric dams, 0.2 percent generated by oil and other petroleum or waste heat, and 8.7 percent from nuclear power plants. The remaining 36.3 percent of electricity production in California was supplied by renewable sources, including biomass, geothermal, small hydroelectric, solar, and wind power (CEC 2023b).

Santa Barbara County receives electricity services from two energy service providers: Pacific Gas & Electric Company (PG&E) in North County (Santa Maria, Cuyama, Lompoc, and Santa Ynez) and Southern California Edison (SCE) on the South Coast. Within the PG&E total service territory, electrical power is generated by renewable (30 percent), natural gas (25 percent), and nuclear (23 percent) sources (PG&E 2022). Within the SCE total service territory, electrical power is generated by natural gas (26 percent) and renewable sources (25 percent), with the majority of its supply sources associated with non-traceable electrical transactions (41 percent)[2] (SCE 2022). Large-scale solar facilities in the Cuyama Valley are the sole-source of electricity generation and provide energy to PG&E within the North County. On the South Coast, there exists the Ellwood backup natural gas power electrical plant in the City of Goleta, which is a "peaker plant" designed to provide electricity to the South Coast during disruption of SCE transmission from Ventura County. However, due to unknown reasons, the plant has not functioned as a reliable emergency power generator and the existing and future operation of the facility is currently under investigation (County of Santa Barbara 2019).

Within the county, the transmission grid is designed to carry electricity over large distances, connecting large utility-scale power plants to load centers, such as cities and suburban communities. The grid is owned and operated by SCE and PG&E within their respective service territories with maintenance and period upgrades provided, as needed. Because the county lies at the border between SCE and PG&E electric service territories in the state, residents and

[2] Non-traceable transactions relate to unspecified electricity supplies that have been purchased through open market transactions which cannot be traced to a specific generation source.

businesses are vulnerable to electric outages as the respective grids have more limited resilience and backup capability (County of Santa Barbara 2019). The county's location at the end of each utility's electrical distribution system additionally causes lower grid reliability because most of the utility generation is coming from only one direction for each utility, creating a "cul-de-sac" effect in both the North County and South Coast. The county's electricity transmission grid includes lines of three voltage levels: 220 kilovolts (kV), 115 kV, and 60/66kV. Higher voltage lines (i.e., 220kV and 115kV) can carry more electricity than the lower voltage lines (i.e., 60/66kV) and therefore are particularly important. The sole 220kV line in the county lies in the South Coast and the North County comprises the majority of 115kV lines (Figure 3.6-1). The electricity distribution grid connects to the transmission grid and carries electricity directly to buildings. Disruptions to the few key transmission lines in the county are more impactful than in other locations, increasing the likelihood of outages and increasing the downtime when outages do occur (County of Santa Barbara 2019).

As a result of constraints in the existing electrical grid and to reduce air pollutant and greenhouse gas (GHG) emissions, the County is actively taking steps to improve the resiliency and sustainability of the electric grid. In 2019, Santa Barbara County joined Central Coast Community Energy (3CE), a community choice energy agency established by public agencies to source clean and renewable electricity. As the owners of the transmission grid, PG&E and SCE continue to play their traditional role of delivering power and have partnered with 3CE to deliver 3CE clean energy supplies to enrolled customers within the county, maintain the electric infrastructure, and continue to handle customer billing. Under 3CE's program, customers may opt to enroll in either the 3CE Choice Program or the 3CE Prime Program. The 3CE Choice Program is the default service offering electricity sourced from 38.4 percent eligible renewable sources, 11.8 percent from large hydroelectric, and 49.8 percent from non-traceable electrical transactions. The 3CE Prime Program offers electricity sourced from 100 percent renewable solar (50 percent) and wind (50 percent) sources (3CE 2022). 3CE has committed to sourcing 100 percent clean and renewable energy by 2030. In its first two years of operations, 3CE has contracted for 453.3 megawatts (MW) of long-term eligible renewable resources and 192.7 MW of battery storage (3CE 2023).

In addition to joining the 3CE, the County has taken the following steps to improve resiliency and sustainability:

- Adopt the Zero Net Energy Ordinance requiring all new county facilities designed after 2025 to produce more energy than they consume, using a combination of renewable energy sources and increased energy efficiency.
- Delivering energy efficiency programs through the Tri-County Regional Energy Network (3C-REN), a partnership with San Luis Obispo and Ventura Counties.
- Supporting local commercial and municipal facilities in planning for increased energy resilience.

- Adopting the Strategic Energy Plan to address resiliency concerns and which identifies total resource potential for a variety of renewable energies, creates a list of priority sites for renewable energy development throughout the county, and develops a set of strategies for tackling barriers to renewable energy (County of Santa Barbara 2019).

Figure 3.6-1. Santa Barbara County Electrical Transmission Grid



Source: County of Santa Barbara 2019.

3.6.2.2 Natural Gas

Natural gas services within the county are provided entirely by the Southern California Gas Company (SoCalGas). Natural gas is a fossil fuel formed when layers of buried organic matter are exposed to intense heat and pressure over thousands of years. The energy is stored in the form of hydrocarbon and can be extracted in the form of natural gas, which can be combusted to generate electricity, enabling this stored energy to be transformed into usable power or to be used directly for heating, cooking, and other uses.

Over the past five years, non-residential natural gas consumption has gradually decreased in the state and has remained relatively consistent in the county. Residential natural gas consumption has gradually increased in both the state and county. In 2022, Californians consumed 11,710.64 million therms of gas across the non-residential and residential sectors, an approximate 5.2 percent reduction since 2018. In comparison, Santa Barbara County, inclusive of incorporated cities and unincorporated areas, consumed 129.15 million therms of

gas in 2022, an approximate 3.4 percent increase since 2018. Of the county's 2022 gas consumption, 58.4 million therms were consumed by the residential sector and 70.75 million therms were consumed by the non-residential sector (CEC 2023e) (Table 3.6-2).

Table 3.6-2. Statewide and Countywide Natural Gas Demand 2018-2022 (Millions of therms)

Year	Statewide		Countywide	
	Non-residential	Residential	Non-residential	Residential
2018	7,949.64	4,394.40	70.37	54.48
2019	7,985.16	4,793.79	77.58	59.73
2020	7,202.88	4,780.81	64.01	60.03
2021	7,327.42	4,595.56	71.37	59.41
2022	7,166.07	4,544.57	70.75	58.40

Sources: CEC 2023e.

SoCalGas provides natural gas to 21.8 million consumers through 5.9 million meters in more than 500 communities. The company's service territory includes communities throughout Central California and Southern California, from Visalia to the Mexican border (SoCalGas 2023). The county is located in SoCalGas' North Coastal and Coastal Systems. Natural gas is delivered by SoCalGas from in-state and out-of-state suppliers and delivered to the county through its integrated gas pipeline system. SoCalGas is responsible for maintenance and periodic upgrades to the natural gas distribution system, as needed.

3.6.2.3 Petroleum and Transportation Energy

Transportation energy demand in California is largely related to vehicular traffic (e.g., passenger vehicles, light duty trucks, semi-trucks, etc.) with the majority of transportation-related energy demand currently met by gasoline and diesel fuel. Gasoline and diesel fuel are supplied to county residents by a widely distributed series of service stations. The California Department of Motor Vehicles (DMV) reports that approximately 36 million automobiles were registered in the state in 2024 (DMV, 2025). Within the county, an estimated 3.1 billion vehicle miles traveled (VMT) were traveled in 2021, accounting for approximately 0.9 percent of the state's total VMT.

Over the past five years, gasoline fuel sales have gradually declined in both the state and county, while diesel fuel sales have increased statewide and slightly decreased in the county. In 2022, California purchased an estimated 13.6 billion gallons of gasoline and 2.3 billion gallons of diesel fuel. In the same year, gasoline and diesel fuel sales in Santa Barbara County are estimated at 170 million gallons and 22 million gallons, respectively, which equates to approximately 1.3 percent of statewide gasoline sales and 1.0 percent of statewide diesel fuel sales (CEC 2023a) (Table 3.6-3).

Table 3.6-3. State and County Transportation Fuel Demand 2018-2022 (millions of gallons)

Year	Statewide		Countywide	
	Gasoline	Diesel	Gasoline	Diesel
2018	15.47	1.78	191	24
2019	15.37	1.76	177	19
2020	12.57	1.74	146	17
2021	13.82	1.88	168	17
2022	13.64	2.29	170	22

Source: CEC 2023a.

3.6.2.4 Energy Conservation and Renewable Resources

Appendix F, *Energy Conservation* of the California Environmental Quality Act (CEQA) Guidelines expresses the goal of conserving energy in the State of California and guides the analysis of energy impacts. Under CEQA (Public Resources Code Section 21100[b][3]), Environmental Impact Reports (EIRs) must include a discussion of the potentially significant energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. Appendix F lists the following methods to achieve this goal: 1) decreasing overall per capita energy consumption; 2) decreasing reliance on natural gas and oil; and 3) increasing reliance on renewable energy sources. In addition to building code compliance, relevant considerations may include, among others, the project size, location, orientation, equipment use, and any renewable energy features that are incorporated into the project (CEQA Guidelines Section 15126.2[b]).

Energy conservation plays a key role in statewide, regional, and County efforts to reduce the reliance on non-renewable energy sources such as fossil fuels and to reduce the level of greenhouse gases (GHGs), as well as the adverse effects of climate change. Energy conservation measures include a range of approaches such as optimizing building design to reduce heating and cooling energy uses at residential, mixed-use, and commercial developments, reducing single occupancy vehicle use, encouraging a transition to hybrid and electric vehicles, etc. As described further in Section 3.6.3, *Regulation Setting*, energy conservation measures at the County level are guided and often required through both state legislation and County plans and ordinances. Key state legislation that requires energy conservation includes Senate Bill (SB) 350, which requires the state to double statewide energy efficiency savings in electricity and natural gas use by 2030, and the California Building Code (CBC) requires increased energy efficiency and conservation structures. SB 100 established that 100 percent of all electricity in California must be obtained from renewable and zero-carbon energy resources by the end of 2045. As described above, at the local level, the County has adopted the Strategic Energy Plan, the key objectives of which are to help identify measures to help the County meet aggressive state and local emissions reduction goals and improve the

resiliency of the local electrical grid. In addition, improvements in sustainability and energy conservation have been made by the County through participation in the 3CE program, adoption of the Zero Net Energy Ordinance, partnership in the 3C-REN program, and supporting local commercial and municipal facilities in planning for increased energy efficiency. The 2015 County Energy and Climate Action Plan (ECAP) also includes action items that would increase renewable energy within the county, including providing low-interest loans for alternative energy technology, encouraging the use of anaerobic digesters in agriculture, wastewater treatment, and solid waste management, attracting businesses that develop or market alternative energy technologies, and developing a solar photovoltaic ready construction ordinance (County of Santa Barbara 2015). The increase in private solar infrastructure use throughout the county has offset a limited amount of energy use associated with new development in the county.

Appendix F, *Energy Conservation* of the CEQA Guidelines expresses the goal of conserving energy in the State of California and guides the analysis of energy impacts. Under CEQA (Public Resources Code Section 21100[b][3]), EIRs must include a discussion of the potentially significant energy impacts of proposed projects, with particular emphasis on avoiding or reducing inefficient, wasteful, and unnecessary consumption of energy. Appendix F lists the following methods to achieve this goal: 1) decreasing overall per capita energy consumption; 2) decreasing reliance on natural gas and oil; and 3) increasing reliance on renewable energy sources. In addition to building code compliance, relevant considerations may include, among others, the project size, location, orientation, equipment use, and any renewable energy features that are incorporated into the project (CEQA Guidelines Section 15126.2[b]).

As identified in the Strategic Energy Plan, Santa Barbara County supports a large renewable energy potential for solar photovoltaic (PV), wind, hydrologic, and biomass. The Santa Barbara County region has a strong history of urban rooftop installations, and solar, by far, surpasses every other type of renewable energy potential with 1,700-2,925 GWh annual generation and potential to power 595,000-1,023,000 households. In urban areas, distributed renewable energy generally takes the form of solar energy systems installed on rooftops and carports. For the unincorporated county, commercial buildings account for 991 kW distributed solar capacity, and residential buildings account for 4,142 kW distributed solar capacity. The total county has a much higher percentage of commercial and industrial solar projects than the unincorporated county areas only, with roughly 40 percent of countywide potential being commercial and industrial for the entire county, compared to only 20 percent for the unincorporated county. This is to be expected due to incorporated cities having more commercial and industrial building spaces than unincorporated areas (County of Santa Barbara 2019).

3.6.3 REGULATORY SETTING

Federal, state, and local regulations have been enacted to address energy in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future development under the Project and its associated impacts.

3.6.3.1 Federal

At the federal level, the U.S. Environmental Protection Agency (USEPA), the U.S. Department of Energy, and the U.S. Department of Transportation are the three agencies with the most direct influence over national energy policies, especially transportation energy consumption. Generally, federal agencies establish and enforce fuel economy standards for automobiles and light trucks, fund energy-related research and development projects, and fund transportation infrastructure projects to manage transportation energy resource demand.

Vehicle Emissions Standards

In 2009, a national policy was adopted for fuel efficiency and emissions standards in the U.S. auto industry, which applies to passenger cars and light-duty trucks for model years 2012 to 2016 (referred to as the Pavley standards). The standards surpass the prior Corporate Average Fuel Economy standards and require an average fuel economy standard of 35.5 miles per gallon (mpg) and 250 grams of CO_2 per mile by model year 2016, based on USEPA calculation methods. In 2012, standards were adopted for model year 2017 to 2025 for passenger cars and light-duty trucks. By 2025, vehicles are required to achieve 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 163 grams of CO_2 per mile. According to the USEPA, a model year 2025 vehicle would emit approximately one-half of the GHG emissions from a model year 2010 vehicle. One April 12, 2023, the USEPA announced new, more ambitious proposed standards to further reduce harmful air pollutant emissions from light-duty and medium-duty vehicles starting with model year 2027 (USEPA 2023).

Energy Policy and Conservation Act

In 1975, Congress enacted the Federal Energy Policy and Conservation Act, which established the first fuel economy standards for on-road motor vehicles in the U.S. Under the Act, the National Highway Traffic Safety Administration (NHTSA) is responsible for establishing additional vehicle standards. In 2012, new fuel economy standards for passenger cars and light trucks were approved for model years 2017 through 2021 (77 FR 62624-63200). Fuel economy is determined based on each manufacturer's average fuel economy for the fleet of vehicles available for sale in the U.S.

Energy Policy Act of 1992

The Energy Policy Act of 1992 was passed to reduce U.S. dependence on foreign petroleum and improve air quality. The Energy Policy Act includes several provisions intended to build an

inventory of alternative fuel vehicles in large, centrally fueled fleets in metropolitan areas. The Energy Policy Act requires certain federal, state, and local government and private fleets to purchase a percentage of light-duty alternative fuel vehicles each year. Financial incentives were also included in the Energy Policy Act, such as federal tax deductions for businesses and individuals to cover the incremental cost of alternative fuel vehicles. States are also required by the Energy Policy Act to consider a variety of incentive programs to help promote the expansion of alternative fuel vehicle fleets.

Energy Star Program

In 1992, the USEPA introduced Energy Star as a voluntary labeling program to provide simple, credible, and unbiased information about energy efficiency to consumers. Under this program, appliances, commercial buildings, industrial plants, and/or homes that meet the program's energy management specifications are certified with the Energy Star label.

Energy Policy Act of 2005

The Energy Policy Act of 2005 includes provisions for renewed and expanded tax credits for electricity generated by qualified energy sources (i.e., landfill gas), provides bond financing, tax incentives, grants, and loan guarantees for clean renewable energy and rural community electrification, and establishes a federal purchase requirement for renewable energy called the Renewable Fuels Standard (RFS).

Energy Independence and Security Act of 2007

On December 19, 2007, the Energy Independence and Security Act of 2007 (EISA) was signed into law. This federal legislation requires ever-increasing levels of renewable fuels (the RFS) to replace petroleum. The USEPA is responsible for developing and implementing regulations to ensure that transportation fuel sold in the U.S. contains a minimum volume of renewable fuel. The RFS program regulations were developed in collaboration with refiners, renewable fuel producers, and many other stakeholders.

The RFS program was created under the Energy Policy Act of 2005 and established the first renewable fuel volume mandate in the U.S. As required under the Act, the original RFS program required 7.5 billion gallons of renewable fuel to be blended into gasoline by 2012. Under the EISA, the RFS program was expanded in several key ways that lay the foundation for achieving significant reductions in GHG emissions from the use of renewable fuels, reducing imported petroleum, and encouraging the development and expansion of the renewable fuels sector in the U.S.

The EISA includes several key provisions that will increase energy efficiency and the availability of renewable energy, which will reduce GHG emissions as a result. The EISA facilitates the reduction of GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting a mandatory RFS that requires fuel producers to use at least 36 billion gallons of biofuel in 2022;
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances;
- Achieving approximately 25 percent greater efficiency for light bulbs by phasing out old incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020; and,
- While superseded by the 2019 USEPA and NHTSA actions described above Section 3.3, Air Quality, the Act included: 1) establishing a minimum average fuel economy of 35 mpg for the combined fleet of cars and light trucks by 2020; and 2) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of green jobs.

3.6.3.2 State

California Energy Action Plan

In 2003, the California Public Utilities Commission (CPUC) and CEC adopted the Energy Action Plan (EAP), which represented the first time agencies described a single, unified approach to meeting California's energy needs. The EAP identifies emerging trends related to energy supply, demand, conservation, public health and safety, and the maintenance of a healthy economy. The overall goal of the plan is for the state's energy to be reliable, affordable, technologically advanced, and environmentally sound. In 2005, CPUC and CEC adopted the EAP II, which updated the energy policy vision and highlighted the importance of climate change. At the beginning of 2008, the CEC and CPUC determined that it was not necessary or productive to prepare a new energy action plan. This determination was based, in part, on a finding that the state's energy policies have been significantly influenced by the passage of Assembly Bill (AB) 32, the California Global Warming Solutions Act of 2006 (discussed below). Rather than produce a new energy action plan, the CEC and CPUC prepared an update that examines the state's ongoing actions in the context of global climate change.

Assembly Bill 2076 and Reducing California's Petroleum Dependence

Under Assembly Bill (AB) 2076 (Chapter 936, Statutes of 2000), the CEC and California Air Resources Board (CARB) in 2003 adopted a joint-agency report, Reducing California's Petroleum Dependence. This report recommended to the Governor and Legislature: 1) adopt a

statewide goal to reduce petroleum demand to 15 percent below 2003 on-road gasoline and diesel consumption levels by 2020; 2) work with the California delegation and other states to establish national fuel economy standards that double fuel efficiency; and 3) establish a goal to increase the use of alternative fuels to 20 percent of on-road transportation fuel use by 2020 and 30 percent by 2030.

Integrated Energy Policy Report

On April 29, 2015, Governor Edmund G. Brown Jr. signed Executive Order (EO) B-30-15, establishing a new statewide goal to reduce GHG emissions 40 percent below 1990 levels by 2030. SB 1389 (Bowen, Chapter 568, Statutes of 2002) requires CEC to prepare integrated energy policy reports that identify major energy trends and issues facing the state's electricity, natural gas, and transportation fuel sectors and provide policy recommendations to conserve resources; protect the environment; ensure reliable, secure, and diverse energy supplies; enhance the state's economy; and protect public health and safety. The 2022 Integrated Energy Policy Report Update, adopted by the CEC in 2023, provides the results of the CEC's assessments of a variety of energy issues facing California (CEC 2023d).

SB 1078 and SB 107

SB 1078 (2002) and SB 107 (2006) created the Renewable Energy Standard, which required electric utility companies to increase procurements from eligible renewable energy resources by at least 1 percent of their retail sales annually until reaching 20 percent by 2010. SB X1-2 (2011) requires a Renewable Portfolio Standard (RPS), functionally the same thing as the Renewable Energy Standard, of 33 percent by 2020. In 2013, the statewide average for the three largest electrical suppliers (PG&E, SCE, and San Diego Gas & Electric) was 22.7 percent. As noted below, SB 350 increased the renewable requirement to 50 percent for 2030.

AB 1493

AB 1493 (Chapter 200, Statutes of 2002), known as the Pavley Bill, amended Health and Safety Code Section 42823 and added Section 43018.5. AB 1493 recognized climate change as a public health concern and motor vehicles as a major source of the state's GHG emissions. AB 1493 requires CARB to adopt regulations that achieve the maximum feasible and cost-effective reduction of GHG emissions from passenger vehicles, light-duty trucks, and other vehicles used for noncommercial personal transportation in California.

AB 1007

AB 1007 (Chapter 371, Statutes of 2005) required the CEC to prepare a state plan to increase the use of alternative transportation fuels in California. The State Alternative Fuels (SAF) Plan was prepared in partnership with CARB and in consultation with other federal, state, and local agencies. The SAF Plan considers the following policy goals: petroleum reduction, air quality, GHG reduction, and in-state biofuel production and use.

Bioenergy Action Plan, EO S-06-06

EO S-06-06 (2006) establishes targets for the use and production of biofuels and biopower and directs state agencies to work together to advance biomass programs in California while providing environmental protection and mitigation. The EO establishes the following target to increase the production and use of bioenergy, including ethanol and biodiesel fuels made from renewable resources: produce a minimum of 20 percent of its biofuels in California by 2010, 40 percent by 2020, and 75 percent by 2050. EO S-06-06 also calls for the state to meet a target for the use of biomass electricity.

The 2011 Bioenergy Action Plan identifies barriers to bioenergy and recommends actions to meet clean energy, waste reduction, and climate protection goals. The 2012 Bioenergy Action Plan updates the 2011 Plan and provides a more detailed action plan to achieve the following goals:

- Increase environmentally and economically sustainable energy production from organic waste
- Encourage development of diverse bioenergy technologies that increase local electricity generation, combined heat and power facilities, renewable natural gas, and renewable liquid fuels for transportation and fuel cell applications
- Create jobs and stimulate economic development, especially in rural regions of the state
- Reduce fire danger, improve air and water quality, and reduce waste

SB 350

SB 350 increases California's renewable electricity procurement goal from 33 percent by 2020 under EO S-14-08 to 50 percent by 2030. This objective will increase the use of RPS-eligible resources, including solar, wind, biomass, geothermal, and others. SB 350 also requires the state to double statewide energy efficiency savings in electricity and natural gas end uses by 2030. To help meet these goals and reduce GHG emissions, large utilities will be required to develop and submit Integrated Resource Plans (IRPs). These plans detail how utilities will meet their customers' resource needs, reduce GHG emissions, and increase the use of clean energy resources. SB 350 also transforms the California Independent System Operator, a nonprofit public corporation, into a regional organization, contingent upon approval from the state legislature. The bill also authorizes utilities to undertake transportation electrification.

SB 100

In 2018, SB 100 established that 100 percent of all electricity in California must be obtained from renewable and zero-carbon energy resources by the end of 2045. SB 100 also creates new standards for the RPS, increasing required energy from renewable sources for both investor-owned utilities and publicly-owned utilities from 50 percent to 60 percent by the end of 2030. Incrementally, these energy providers must also have a renewable energy supply of 44 percent

by the end of 2024, and 52 percent by the end of 2027. The updated RPS goals are considered achievable since many California energy providers are already meeting or exceeding the RPS goals established by SB 350.

California Air Resources Board

In 2022, CARB released the Final 2022 Scoping Plan Update, the third update to the California 2008 Climate Change Scoping Plan. While previous Scoping Plans have focused on specific GHG reduction targets, the Final 2022 Scoping Plan Update expands on these plans and lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279. A key element for achieving the outcomes of the plan is to reduce demand for liquid petroleum by 94 percent and total fossil fuel demand by 86 percent in 2045 compared to 2022. To support this transformation, the plan also focuses on expanding clean energy production and distribution infrastructure, decarbonizing the electricity sector, and replacing fossil-fuel generation with renewable and zero-carbon resources, including solar, wind, energy storage, geothermal, biomass, and hydroelectric power.

California Building Code

California Code of Regulations, Title 24, is known as the CBC, which establishes the regulations for building construction and system design and installation to achieve energy efficiency and preserve outdoor and indoor environmental quality. The CBC includes the following subparts which are most applicable to development under the proposed Project.

California Code of Regulations, Title 24, Part 6 comprises the California Energy Code, which was first established in 1978 in response to a legislative mandate to reduce California's energy consumption. The standards are updated periodically to increase the baseline energy efficiency requirements. The Title 24 standards were updated in 2021 and became effective on January 1, 2023. The updated standards apply to all buildings for which an applicable building permit is submitted on or after January 1, 2023, and established new standards for electric-ready requirements, expanded solar PV and battery storage, and strengthened ventilation standards for improved air quality. The Title 24 standards also include efficiency improvements to the residential standards for attics, walls, water heating, and lighting; and efficiency improvements to the non-residential standards are in alignment with the American Society of Heating and Air-Conditioning Engineers (ASHRAE) 90.1-2013 National Standards. Although it was not originally intended to reduce GHG emissions, electricity production by fossil fuels results in GHG emissions and energy-efficient buildings require less electricity. Therefore, increased energy efficiency results in decreased GHG emissions.

California Code of Regulations, Title 24, Part 11 comprises CALGreen, which establishes mandatory green building code requirements as well as voluntary measures (Tier 1 and Tier 2) for new buildings in California. The mandatory provisions in CALGreen will reduce the use of

volatile organic compound (VOC) emitting materials, strengthen water efficiency conservation, increase construction waste recycling, and increase energy efficiency. Tier 1 and Tier 2 are intended to further encourage building practices that minimize the building's impact on the environment and promote a more sustainable design.

3.6.3.3 Local

Santa Barbara County Comprehensive Plan

The Santa Barbara County Comprehensive Plan establishes goals, policies, and objectives adopted by the County to ensure the adequate protection and provision of services and resources. The Energy Element of the Comprehensive Plan contains long-range planning guidelines and mechanisms to encourage energy efficiency and the use of alternative forms of energy in the county.

- **Energy Goal 5: Alternative Energy** – Encourage the use of alternative energy for environmental and economic benefits and encourage opportunities for businesses that develop or market alternative energy technologies.
- **Energy Policy 5.1: Environmental Analysis** – In the consideration of alternative energy, the County shall consider the full-life-cycle environmental effects and embedded energy requirements to provide such alternative energy. The County shall encourage the use of those alternatives determined to present sufficient environmental benefits.
- **Energy Policy 5.2: Alternative Energy Technologies** – The County shall encourage the use of alternative energy technology in appropriate new and existing development.
- **Energy Policy 5.13: Alternative Energy Technology Businesses** – Among broader Countywide efforts to attract businesses, the County shall initiate planning efforts to pursue desired businesses that develop or market alternative energy technologies.

County of Santa Barbara Climate Action Planning

The County's ECAP, adopted in 2015, is a GHG emission reduction plan. The County has been implementing the ECAP's emission reduction measures since 2016. The ECAP established a goal of reducing GHG emissions in the unincorporated parts of the county to 15 percent below 2007 levels by 2020 and identified 53 emissions reduction measures (ERMs) to achieve this goal. While the focus of the ECAP is on strategies and measures to reduce GHG emissions, several of the goals, strategies, and measures of the ECAP involve core strategies for reducing dependence on non-renewable energy resources and reducing emissions from certain sectors, which directly relate to the use and conservation of energy resources. For instance, the ECAP includes goals that directly or broadly apply to energy resources and conservation, including fostering increases in energy efficiency, decrease the overall use of combustion engine vehicles and the number of single-passenger vehicle trips, promote the use of alternative energy, and

maximize the efficient use of local land resources through the implementation of policies and programs that promote mixed-use and infill development.

As outlined in the ECAP Final Report, the County did not meet the 2020 GHG emissions reduction goal contained within the ECAP. The County began work updating the ECAP, GHG emissions forecasts, reduction targets, and GHG emissions reduction programs and policies as part of the SB County 2030 Climate Action Plan. The County published the Draft 2030 Climate Action Plan for public review and comment in March 2023, and expects to adopt the plan in late 2023. The 2030 Climate Action Plan includes updated GHG emissions forecasts, as well as goals and policies for reducing countywide GHG emissions below adopted targets by 2030, with the ultimate goal of achieving carbon neutrality by 2045. One of the measures considered as part of this draft plan includes Measure CE-1, which if adopted would establish a goal to electrify 100 percent of new residential and new commercial construction by 2023. Further, the 2030 Climate Action Plan is designed to be a quantified plan under CEQA, which will provide the County with the ability to streamline the environmental review process of future development projects.

County of Santa Barbara Collaborative Reach Code

The County of Santa Barbara and the cities of Goleta and Carpinteria are collaborating to develop and adopt local "reach" codes to reduce carbon emissions from new construction and development. "Reach" codes are local code amendments that extend beyond state energy-efficiency requirements. They are intended to support energy efficiency, electrification, and renewable energy which can reduce GHG emissions through the electrification, or requirement for new construction to be all-electric.

County of Santa Barbara Strategic Energy Plan

The County developed the Strategic Energy Plan to: 1) stimulate local renewable energy generation within the county; 2) help meet local climate change mitigation goals; and 3) improve the resiliency of the local electric grid. The Strategic Energy Plan identifies and summarizes the renewable energy potential in the county, as well as barriers to renewable energy development, and provides recommendations for actions to be taken by the County to overcome barriers and improve energy resiliency and sustainability. In addition, the Strategic Energy Plan identifies goals targeted toward meeting aggressive state and local emissions reduction goals (County of Santa Barbara 2019).

Zero Net Energy Ordinance

In March 2014, the County Board of Supervisors adopted the Zero Net Energy Ordinance, which requires that all new County-owned facilities and major renovations beginning design after 2025 be constructed as Zero Net Energy Facilities with an interim target for 50 percent of new facilities beginning design after 2020 to be Zero Net Energy. The Zero Net Energy Ordinance

also requires that County departments take measures toward achieving Zero Net Energy for 50 percent of the square footage of existing County-owned facilities by 2025, and the remaining 50 percent by 2035.

Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS)

The Santa Barbara County Association of Governments' (SBCAG's) Connected 2050 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS) integrates land use and transportation strategies to achieve required emission reductions per SB 375. The RTP describes how the region plans to invest in the transportation system in the next 20 years. This long-range planning document includes a SCS as required by SB 375 (SBCAG 2021).

3.6.4 ENVIRONMENTAL IMPACT ANALYSIS

This section discusses the potential impacts on energy supplies and energy conservation associated with the proposed Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed and the residual impact after mitigation is determined.

3.6.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For purposes of this Program EIR, implementation of the proposed Project may have a significant adverse impact on energy if it would:

a. Result in potentially significant environmental impact due to wasteful, inefficient, or unnecessary consumption of energy resources, during project construction or operation.

b. Conflict with or obstruct a state or local plan for renewable energy or energy efficiency.

County of Santa Barbara Environmental Thresholds and Guidelines

The County's *Environmental Thresholds and Guidelines Manual* (2024) does not identify applicable thresholds related to energy resources; therefore, for this analysis, the Program EIR relies upon the County's Initial Study Checklist. Under the Energy section of the County's Initial Study Checklist, the County considers a project's impact on energy resources and infrastructure potentially significant if it would result in:

- Substantial increase in demand, especially during peak periods, upon existing energy sources; and/or
- Requirement for the development or expansion of new sources of energy.

Methodology

As described in Chapter 2, *Project Description*, the Project includes the proposed Recreation Master Plan, a strategic long-range plan to fund and construct new public parks and trails to meet current and future recreation needs countywide. However, future project-level siting and design details, as well as the timing of future development, are not known. As a result, the impact analysis provided below does not specifically evaluate individual impacts at a project- or site-specific level. Rather, the Recreation Master Plan identifies recreation needs within five recreation planning regions and proposes capital improvements, programs, funding, and implementation strategies to guide the long-term development of a range of public parks and trail projects. The programmatic analysis provided by this Program EIR analyzes potential future energy demand and energy-conserving features associated with potential future parks, recreation, and trail development enabled under the Project. This assessment estimates two hypothetical construction development scenarios to provide context for whether the future development would result in substantial increases in energy demand, require the development or extension of energy infrastructure or result in unnecessary or wasteful energy consumption. This analysis also considers whether the Project would conflict with all applicable state and local energy conservation regulations and policies (e.g., compliance with California Code of Regulations, Title 24, Building Energy Efficiency Standards [Part 6] CALGreen [Part 11]).

The information and analysis in this section are based on information from previous studies and EIRs prepared by the County. These include the 2021 Connected 2050: RTP/SCS EIR, the Draft 2030 Climate Action Plan EIR, as well as the County's Strategic Energy Plan, the ECAP, and the Draft 2030 Climate Action Plan. This section also utilizes data from the CEC and the California Emissions Estimator Model (CalEEMod) Version 2022.1.1.29, consistent with the air quality analysis in Section 3.3, *Air Quality*.

Construction Energy Use

Construction of new development enabled under the Recreation Master Plan would result in energy demand as a result of the use of heavy-duty construction equipment, on-road trucks (e.g., haul trucks), and workers commuting to and from a specific construction site. Heavy-duty construction equipment would be primarily diesel-fueled. Energy demand (specifically transportation fuel consumption) from heavy-duty construction equipment is estimated based on the CalEEMod analysis and transportation fuel consumption data from the CARB OFFROAD2011 model (Appendix B). As described in Section 3.3, *Air Quality*, the quantitative analysis of potential construction emissions is illustrative and is based upon estimates of emissions developed using CalEEMod

It was assumed that diesel fuel would be used for all equipment, as this represents the most conservative scenario for reasonable maximum potential energy use during construction. The total construction fuel consumption is calculated as the sum of total estimated fuel

consumption for each piece of equipment used in each phase of construction. Section 5, *Activity Data* in the CalEEMod Detailed Report (see Appendix B), provides detailed construction phasing, construction equipment used in each phase, total number of days worked, equipment horsepower, equipment load factor, and equipment quantities based on typical construction equipment and default model assumptions. These assumptions were used to calculate total fuel consumption for specific equipment. Total fuel consumption was then based on a fuel consumption factor of 0.05 gallons per horsepower per hour (gal/hp/hr) for diesel engines as derived from the South Coast Air Quality Management District CEQA Handbook Table A9-3E.

Operational Energy Use

New development enabled under the Recreation Master Plan would require long-term energy consumption from landscape maintenance equipment (such as those used for park, field, and landscaping maintenance), heating, ventilation, and air conditioning (HVAC), and the operation of swimming pools. Electricity and natural gas demand for new potential development enabled under the proposed Project are derived from the results of the CalEEMod results. A detailed discussion of the methodology employed for modeling the operation of development enabled under the Project using CalEEMod is presented in the *Methodology* discussion of Section 3.3.4.1, *Thresholds of Significance* (Section 3.3, *Air Quality*). As described in the assumptions outlined therein, default assumptions were utilized for estimating emissions. These default assumptions do not reflect any site-specific details or plans, as such details for the construction or operation of future development, as such details are not available. The default assumptions similarly do not account for any additional sustainability features or development standards mandated by recent state and local regulations. Nor do the electrical and natural gas demands account for County enrollment in the 3CE program, or the County's Net Zero Energy Ordinance, which would require new County-owned facilities to be designed as 50 percent net zero after 2025 and 100 percent net zero after 2035. Therefore, the operational electricity and natural gas demands represent a highly conservative estimate and provide only an illustrative example of the type and extent of energy demands that could occur from a larger recreational development project.

Gasoline and diesel fuel consumption for increases in development-related vehicular traffic is estimated for a large-scale recreational development project to provide an illustrative example of potential impacts resulting from development of new community-scale park under the Project and to show the potential effects associated with individual park projects. In addition, fuel consumption has been calculated based on the number of trips and the estimated VMT for the Large-Scale Conceptual Community Park Scenario from CalEEMod. The estimated fuel demand for vehicles is based on fuel consumption factors from the CARB EMission FACtors (EMFAC) model and average fuel economy information provided by the Bureau of Transportation Statistics. EMFAC is incorporated into CalEEMod. Therefore, this energy assessment is consistent with the modeling approach used for the other quantitative

environmental analysis provided in this Program EIR and is consistent with standard practice for impact analysis according to CEQA.

3.6.4.2 Project Impacts

Table 3.6-4 provides a summary of the proposed Project's impacts related to energy-related impacts. A detailed discussion of each impact follows.

Table 3.6-4. Summary of Energy Impacts

Energy Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact EN-1. The Project would increase energy demand, but would not result in a substantial increase in demand, necessitate expansion or installation of new energy infrastructure, or result in wasteful, inefficient, and unnecessary consumption of energy resources during the construction or operation of individual parks, recreation, and trail developments.	Insignificant	No mitigation measures required.	Insignificant
Impact EN-2. The Project would conform to the applicable plans, policies, and regulations regarding energy conservation relative to parks, recreation, and trail development.	Insignificant	No mitigation measures required.	Insignificant
Cumulative Impacts	Insignificant	No mitigation measures required.	Insignificant

Impact EN-1. The Project would increase energy demand, but would not result in a substantial increase in demand, necessitate expansion or installation of new energy infrastructure, or result in wasteful, inefficient, and unnecessary consumption of energy resources during the construction or operation of individual parks, recreation, and trail developments.

Energy use during future parks, recreation, trail construction, and Recreation Benefit Projects (RBPs) would primarily occur in association with fuel use by vehicles and other equipment to conduct construction activities. The construction period and associated energy demands for each park or trail development project enabled under the Recreation Master Plan would vary depending on the type of project. Construction of new pocket or neighborhood parks and trails would involve only minor construction activities and equipment and would last only a few months, while larger recreational development projects such as new community parks and campgrounds could require much lengthier construction durations and more intensive construction activities. The operation of projects proposed or enabled by the Project would increase the demand for electricity, natural gas, and transportation fuels through building

heating and cooling, lighting at night, the use of maintenance vehicles and equipment, and vehicle emissions from visitors.

Electricity and Natural Gas

Many parks and recreation facilities would utilize existing infrastructure and would not result in substantial increases in energy uses. However, other development including campgrounds pool facilities, and visitor-serving commercial uses could require new development and/or would result in additional consumption of electricity and/or natural gas. Nevertheless, operational impacts would be negligible due to small scale of development. Both regional service providers, SCE and PG&E, have supplies and infrastructure available to meet existing and future utilities demands within their respective service areas. Further, as individual projects proposed as a result of the proposed Project would increase demand for electrical supplies over a span of many years, the projected demand would be factored into PG&E and SCE's 10-year load forecasts and associated supply planning. Therefore, it is not anticipated that the proposed Project would substantially affect the availability of electricity and natural gas supplies.

As described in the *Methodology* discussion of Section 3.3.4.1 *Thresholds of Significance*, modeling of energy demands was performed using CalEEMod. A CalEEMod scenario was prepared to estimate energy demands from a large community park, which is one of the largest potential development projects that could occur as a result of the Project. The estimated maximum kWH per year and therms per year for this modeled scenario are presented in Table 3.6-5 and are compared against countywide electricity and natural gas use (Appendix B). Based on the highly conservative energy modeling results, energy demands resulting from the operation of projects enabled by the Project would be nominal and within reasonable demands of the county.

Table 3.6-5. Estimated Electricity and Natural Gas Demand for Large-Scale Conceptual Community Park Scenario

	Non-Residential Electricity Demand (kWh per year)	Natural Gas Demand (therms per year)
Santa Barbara County (2022)	1,974,510,000	70,750,000
Estimated Energy Demand	300,454	8,530

Source: Appendix B.

All projects that require substantial additional development would undergo permit review by the County and would need to comply with relevant policies and programs – including the County Code, Comprehensive Plan, LUDC, CBC, 2022 California Green Building Standards (Chapter 10, Article XIV), and the 2022 California Building Energy Efficiency Standards – that address requirements for energy consumption and efficiency relating to new development. Individual recreation projects proposed by the County would also be subject to mandatory

compliance with applicable measures and actions of the County's 2030 Climate Action Plan, which include renewable energy expansion and building electrification of all new County-owned facilities in compliance with County implementation actions under Measure MO-1 (Increase sustainability and resilience of County-operated facilities).

Further, the Project includes amendments to County policy and regulations to support public parks and recreation as a key component of sustainable communities and the County's One Climate Initiative program. The amendments would encourage renewable energy use in parks to offset energy consumption. Given the required compliance with applicable regulations and the Project's amendments to County Policy, impacts relating to electricity and natural gas associated with the proposed Project are considered to be *insignificant*.

Transportation Fuels

Construction

The Project would result in the daily consumption of vehicle fuel during construction from the operation of heavy diesel-powered equipment and construction worker vehicle trips. As shown in Table 3.6-6, the total diesel fuel to be required during construction to power diesel construction equipment for the modeled project scenario is estimated to be 29,643 gallons, while gasoline fuel demand for construction vehicle trips is estimated at 1,125 gallons.[3,4] As presented in Table 3.6-6, the estimated diesel and fuel anticipated from construction of a large-scale recreational development project under the Project, representing a highly conservative worst-case scenario, would represent a very small fraction of the county's total annual diesel fuel consumption (an estimated 22 million gallons) – approximately 0.1 percent – and gasoline fuel consumption (an estimated 170 million gallons) in 2022 – far less than 0.1 percent. Thus, the development of individual parks, trails, and recreational facilities projects involving new development that would be enabled by the proposed Project are not considered to result in significant construction-related impacts.

Table 3.6-6. Estimated Construction Fuel Consumption for Large-Scale Recreational Development Scenario

Fuel Consumption from Construction Equipment (Gallons)	Fuel Consumption from Construction Vehicle Trips (Gallons)	Total (Gallons)
29,643.24	1,125.10	30,768.34

Source: Appendix B.

[3] Total fuel consumption for construction worker vehicle trips is based on average fuel consumptions for light-duty vehicles assuming that 100 percent of construction workers would arrive to the construction site using such vehicles.

[4] The average fuel consumption rate for construction vehicle trips is based on light-duty fuel efficiency estimates from 2000 to 2023, as provided by Bureau of Transportation Statistics (2025).

Table 3.6-7. Comparison of Construction and County Diesel Fuel Usage

	Diesel Fuel Consumption (Gallons)	Gasoline Fuel Consumption (Gallons)
Santa Barbara County (2022)	22,000,000	170,000,000
Estimated Construction Fuel Demand	29,643.24	1,125.10

Future construction recreational improvements and the additional allowable uses proposed or enabled by the Project would result in temporary, short-term increases in the use of and demand for transportation fuels and would be subject to compliance with the State and County policies, such as the California State law prohibiting heavy-duty diesel vehicles from idling for longer than 5 minutes that would likely result in less demands that has been estimated above. Further, as discussed in other sections of this EIR, implementation of the Project would serve to provide more diverse and accessible recreational amenities to meet identified recreational demands of county residents, consistent with goals and policies of the County's Comprehensive Plan and Community Plans. As such, construction of new parks, trails, and recreational facilities under the Project would not generate substantial increases in demand for transportation fuels that would be considered wasteful, inefficient, or unnecessary, and impacts would be *insignificant*.

Operation

Daily consumption of transportation fuel during operation would occur as employees and visitors would travel to and from parks and trails using personal or work vehicles, and from the use gas-powered equipment in the maintenance and operation of new facilities. The estimated operational transportation fuel demands for the modeled project are presented in Table 3.6-8. As shown in the table, while site-specific details and vehicle trip characteristics are not available, a single typical large-scale recreation development project is estimated to result in the consumption of approximately 97.5 gallons of fuel per day, or an estimated 35,597.5 gallons per year, representing a highly negligible increase in the county's annual gasoline fuel demands – far less than 0.1 percent.

Table 3.6-8. Estimated Operational Fuel Consumption for Large-Scale Recreational Development Scenario

Vehicle Type	Percent of Vehicle Trips	Daily VMT	Average Fuel Economy (Miles/Gallon)	Total Daily Fuel Consumption (Gallons)	Total Annual Fuel Consumption (Gallons)
Passenger Cars	44.0	1,102	30.3	36.4	13,271.9
Light/Medium Duty Vehicles	52.6	1,316	23.0	57.2	20,892.1
Heavy Duty Vehicles/Other	0.7	18	7.4	2.4	866.6
Motorcycles	2.7	67	43.4	1.6	566.9
Total	**100**	**2,503**	**--**	**97.5**	**35,597.5**

Source: Appendix B.

Although VMT has been estimated for a large-scale conceptual community park scenario above, as discussed in Section 3.15, *Transportation*, estimation of the total number of trips, VMT, and associated fuel demands for the proposed Project as a whole remains speculative due to its programmatic nature and lack of information regarding the location, extent, and details of operation of future proposed uses and development. While the proposed Project may result in an undeterminable amount of new fuel consumption, increases in the demand for fuels within the county would have a negligible effect on transportation fuel supplies, which are considered at a statewide level of demand and supply.

Individual recreation projects proposed by the County would also be subject to mandatory compliance with applicable measures and actions of the County's 2030 Climate Action Plan, which include actions such as TR-1.7, requiring the transition of County medium and heavy-duty fleet vehicles to zero emission vehicles (e.g., electric) by 2035. Therefore, impacts would be *insignificant*.

Impact EN-2. The Project would conform to the applicable plans, policies, and regulations regarding energy conservation relative to parks, recreation, and trail development.

The Recreation Master Plan would not be inconsistent with federal, state, or local energy conservation goals and policies. As previously described, the Project includes a strategic long-range plan to fund and construct new public parks and trails to meet current and future recreation needs countywide. All development enabled under the proposed Project would be subject to compliance with existing state and County regulations, such as building code requirements established in Title 24 of the California Code of Regulations. Part 6 of Title 24 and all applicable rules and regulations outlined in Section 3.6.3, *Regulatory Setting* would reduce energy demand and increase energy efficiency related to future development facilitated by the proposed Project. Most notably, the California Energy Code (Part 6) and CALGreen (Part 11) establish mandatory energy efficiency standards and green building code requirements for

residential and non-residential buildings to reduce energy demand and consumption and increase energy resiliency and efficiency.

Additionally, the proposed Project is generally consistent with the goals and policies outlined in the County's Energy Element, 2015 ECAP, and Strategic Energy Plan, as well as SBCAG's RTP/SCS, CARB's Scoping Report, and the County's Draft 2030 Climate Action Plan. Many of the goals and policies of these plans identify regional measures or strategies for reducing energy consumption and improving energy efficiency by encouraging County actions and adoption of plans that would improve energy resiliency and encouraging development within urban areas near existing services as a means to reducing vehicle trips, transportation fuel demand, and mobile-source GHG emissions.

Further, approval of the proposed Project, as a policy document update, would not change these existing regulations applicable to all future development enabled under the proposed Project and would not provide goals, policies, or programs that would conflict with or obstruct a state or local plan for renewable energy or energy efficiency. Therefore, impacts would be *insignificant*.

3.6.4.3 Cumulative Impacts

Electricity and Natural Gas

Potential future development within the county and the state would incrementally contribute to the need for regional energy production and distribution facilities. As previously discussed, these facilities are operated and maintained by private utility companies that plan for and accommodate anticipated growth. Electric and natural gas services are provided upon demand from consumers and expanded as needed to meet demand, consistent with applicable local, state, and federal regulations. Concerning electricity, all new development in the county must comply with adopted building standards, including the California Energy Code, which requires new development to be built more sustainably to reduce electricity demands. Cumulative development projects also include the County's Utility-Scale Solar Ordinance Project, which once adopted would increase the County's ability to produce locally sourced renewable energy supplies, and the 2030 Draft Climate Action Plan. The plan includes various implementation actions and measures aimed at improving energy efficiency throughout the county, including actions such as installing renewable energy infrastructure to supplement energy demands and improve compliance with California New Zero Net Energy policy and County Strategic Energy Plan. These cumulative development actions and measures are aimed at improving compliance with and exceeding the standards of adopted state and local plans for renewable energy and energy efficiency. As such, with mandatory compliance with existing regulations and energy efficiency standards, as well as through the adoption of additional actions and measures aimed at increasing energy conservation and resilience, cumulative development, in addition to the

proposed Project, would not result in the inefficient use or waste of electrical supplies or result in conflicts with existing plans. Therefore, associated cumulative impacts would be *insignificant*.

Concerning natural gas consumption, California's natural gas demand is expected to decrease at a rate of 1.0 percent per year from 2018 to 2035 as a result of stricter codes/standards, energy efficiency improvements, and the state's transition away from fossil fuel-generated electricity to increased renewable energy. While cumulative projects would result in the use of nonrenewable natural gas resources, which could limit future availability, the use of such resources would be on a relatively small scale and would be consistent with regional and local growth expectations for Santa Barbara County. As described for the proposed Project, new development throughout the would be subject to existing standards, including the California Energy Code, which mandates that new development be built electric-ready which would reduce the potential for increased consumption of natural gas. Further, cumulative development within Santa Barbara County would be subject to mandatory compliance with existing policies and regulations.

Given that all recent past, present, and reasonably foreseeable cumulative development would be required to meet at minimum state and local energy requirements, and given cumulative development occurring throughout the county includes plans, programs, and initiatives that would improve local energy efficiency and sustainability, the Recreation Master Plan would not result in a substantial contribution to cumulatively considerable impacts, and cumulative impacts would be *insignificant*.

Transportation Energy

Parks, recreation, and trail development enabled by the Recreation Master Plan along with future growth within the county would cumulatively increase the demand for transportation-related fuel in the state and region. However, over the last decade, the state has implemented several policies, rules, and regulations to improve vehicle fuel economy, increase the development and use of alternative fuels, reduce air pollutants and GHG emissions from the transportation sector, and reduce VMT which would reduce reliance on petroleum fuels. According to the CEC, gasoline consumption has declined by 6 percent since 2008, and the CEC predicts that the gasoline demand will continue to decline over the next 10 years and that there will be an increase in the use of alternative fuels, such as natural gas, biofuels, and electricity. In 2020, Governor Gavin Newsom also signed EO N-79-20, which calls for zero-emission vehicles (ZEVs) by 2035. Therefore, the Recreation Master Plan would not result in a substantial contribution to cumulatively considerable impacts associated with transportation energy supplies, and impacts would be *insignificant*.

3.6.4.4 Proposed Mitigation

No mitigation measures are required.

3.6.4.5 Secondary Impacts

No mitigation measures are required to reduce impacts associated with the proposed Project. Therefore, no direct secondary impacts would occur.

3.6.4.6 Residual Impacts

Impact EN-1. Implementation of the proposed Project would not result in substantial increases in energy demands, result in the need for the development or expansion of energy infrastructure, or result in the wasteful, inefficient, or unnecessary consumption of energy resources during construction and operation, nor would implementation of the proposed Project require the development or expansion of new energy sources. Residual impacts would be *insignificant.*

Impact EN-2. Implementation of the proposed Project would not conflict with applicable, plans, policies, and regulations regarding energy use and conservation. Future development enabled under the proposed Project would be subject to compliance with existing state and local regulations and mandates applicable to energy efficiency and conservation. Residual impacts would be *insignificant.*

3.7 GEOLOGY AND SOILS

3.7.1 INTRODUCTION

This section describes the environmental and regulatory setting and evaluates the effects of geologic and soils hazards from the implementation of the Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (Project). This section also identifies relevant regulatory compliance measures and feasible mitigation measures that would reduce physical environmental impacts associated with the proposed Project. Additionally, this section describes and evaluates potential impacts to paleontological resources that may be adversely affected by the implementation of the proposed Project. Geologic issues related to agricultural soils are discussed in Section 3.2, *Agricultural Resources,* and groundwater and groundwater basins are discussed in Section 3.10, *Hydrology and Water Quality*.

3.7.2 ENVIRONMENTAL SETTING

3.7.2.1 Existing Conditions

Regional Geologic Setting

The Project area supports diverse geologic features, topography, and soils. This includes coastal terraces and alluvial valleys, steep foothills and mountains, multiple potentially active earthquake faults and associated seismic hazards, and a wide range of soil types with varying constraints (e.g., limited capacity for septic wastewater disposal, soil expansion, and soil liquefaction).

As discussed in Section 3.7.2.4, *Seismic Hazards*, several active and potentially active faults in the San Andreas Fault system fall within the county. Faults in the northern part of the county are predominantly northwest-southeast, but generally trend east-west in the Coastal Zone. The varied topography of the Project area supports areas of steep or very steep slopes, some of which are known to be susceptible to landslide hazards or other types of slope failure (e.g., mudflows). Soils also vary widely throughout the Project area and can be subject to geotechnical hazards and restrictions for the disposal of wastewater via septic systems and leach fields (Section 3.7.2.3, *Soils*).

3.7.2.2 Topography

Topography within the Project area is highly variable, with low-lying agricultural lands along the rivers and streams within the Santa Maria, Lompoc, Santa Ynez, and Cuyama valleys (Section 3.10, *Hydrology and Water Quality*). These major drainages are bordered by higher

elevation areas such as the Sierra Madre Mountains in Cuyama, the Solomon Hills south of Santa Maria, the San Rafael Mountains north of Santa Ynez, and the Casmalia Hills north of Lompoc. The Sierra Madre Ridge south of the Cuyama Valley rises to 5,845 feet in elevation, San Rafael Mountains north of the Santa Ynez Valley up to 6,700 feet, and the Santa Ynez Mountains from 2,500 to 4,000 feet between the South Coast and Santa Ynez Valley regions, although much of these higher elevation lands are located within the Los Padres National Forest (LPNF). Interior systems of hills, such as the Casmalia Hills and Solomon Hills, are generally under 2,000 feet in elevation and separate the Los Alamos, Lompoc, and Santa Maria Valleys. The South Coast Region includes the coastal terrace and steep foothills drainages (e.g., Dos Pueblos Canyon) along much of the Gaviota Coast and more limited areas of the Goleta Valley, with several major drainages, such as Ellwood and San Jose Creeks, occurring within these foothill areas. More limited foothills areas north of Santa Barbara and Carpinteria exclude the coastal valleys and terraces and are restricted to the foothills of the Santa Ynez Mountains, which are characterized by steep ridges and deep creek valleys such as portions of the Mission Creek drainage north of Santa Barbara and Santa Monica Creek north of the Carpinteria Valley.

3.7.2.3 Soils

Soils within the Project area are diverse but are generally comprised of thick sandstone and shale with lesser amounts of conglomerate, alluvial fan deposits, dune sand, and diatomite (County of Santa Barbara 2023). Soil stability and related constraints and hazards depend on soil characteristics and slope.

The Santa Barbara formation occurs in patches within the Project area in the coastal hills and in the lower foothills from Carpinteria to Goleta. Because it is so soft and weakly cemented, the Santa Barbara Formation is rapidly gullied and washed away when vegetation is removed, creating erosion hazards on steep slopes. Old dunes in the northern part of the county extend into the eastern Santa Maria Valley and Santa Rita Valley and are subject to a similar degree of erosion as the Santa Barbara Formation.

The Santa Barbara County coastline is characterized by sea cliffs along the coastal terrace that are mainly subject to coastal erosion (County of Santa Barbara 2023). The majority of exposed rocks in the sea cliffs are part of the Monterey Formation and Sisquoc Formation, which are readily eroded by marine and non-marine processes. This rock is primarily comprised of hard, splintery, silicified shale, but it presents as a soft diatomaceous shale in many places. It also contains thin beds of volcanic ash that are tightly folded or crumpled and are shattered or fractured extensively in many places. Mussel Rock, located at the south end of the Guadalupe Dune Field, is part of the Franciscan Formation and is comprised of more resistant rock, including hard, crystalline volcanic rocks, hard cherts, and well-cemented sandstones. Bedrock is exposed from Purisima Point southward to the mouth of the Santa Ynez River and is part of the Monterey Formation.

The slopes of Figueroa Mountain are characterized by ranchlands and vineyards, which can support serpentine outcrops (i.e., a rock formation that is visible on the surface), making the ground unstable and prone to landslides (County of Santa Barbara 2023). Rincon mudstone is exposed on the south face and locally on the north flank of the Santa Ynez Mountains from near Point Conception eastward to the county line. Rock in this formation can break down into an unstable, heavy, clay soil that expands when wet and develops deep cracks when dry. The soils on the Monterey Formation, which occur along the county's coastline, are also subject to hazards related to expansive soils, but are not as severe as those for the Rincon Formation. The Fanglomerate or Older Alluvium occurs discontinuously in the lower foothills of the Santa Ynez Range and is characterized by large sandstone boulders, which can make development challenging.

3.7.2.4 Seismic Hazards

Regional Faulting and Ground Shaking

Seismically induced ground acceleration is the shaking motion that results from earthquakes. This phenomenon is generally the greatest cause of widespread damage in an earthquake. The intensity of ground shaking resulting from an earthquake depends on the magnitude of the earthquake, the distance from the focus (i.e., the place inside Earth's crust where an earthquake originates), and the type of bedrock, alluvium, and soil through which the seismic waves travel. Generally, seismic waves attenuate with distance from the focus of the earthquake.

The entire county is considered seismically active (County of Santa Barbara 2023). The San Andreas Fault is situated approximately 7 miles to the northeast of the county, in the southern Coast Range Province within Santa Barbara County. Active faults in the San Andreas Fault system that fall within the county include the Nacimiento, Ozena, Suey, and Little Pine faults. As discussed further in Table 3.7-1, there are a total of nine active faults within the county.

Fault rupture occurs when movement on a fault within the Earth breaks through to the surface. Rupture may occur suddenly during an earthquake or slowly in the form of fault creep, which is the slow rupture of the Earth's crust. Fault rupture potential is generally low throughout the county; however, the County maintains a policy to avoid constructing buildings on or immediately adjacent to active or historically active faults (County of Santa Barbara 2023).

Tsunami Risk

Tsunamis are long-wavelength, seismic sea waves (long compared to ocean depth) generated by the sudden movements of the ocean floor during submarine earthquakes, landslides, or volcanic activity. Seiches are waves generated in large, enclosed bodies of water. Areas prone to tsunami hazards in the County are limited to coastal areas and offshore areas. The Project area includes only limited agricultural lands within low-lying coastal regions of the county that could be susceptible to tsunami hazards, such as agricultural lands west of the City of

Guadalupe. The Project area includes some agricultural lands near or adjacent to other bodies of water within the County, such as Lake Cachuma and Twitchell Reservoir.

Liquefaction

Liquefaction occurs when ground shaking causes the mechanical properties of some fine-grained, saturated soils to liquefy and act as a fluid. It is the result of a sudden loss of soil strength due to a rapid increase in soil pore water pressures caused by ground shaking. For liquefaction to occur, three general geotechnical characteristics should be present: 1) groundwater should be present within the potentially liquefiable zone; 2) the potentially liquefiable zone should be granular and meet a specific range in grain-size distribution; and 3) the potentially liquefiable zone should be of low relative density. If those criteria are present and strong ground motion occurs, then those soils could liquefy, depending upon the intensity and duration of the strong ground motion.

Table 3.7-1. Active Faults within or near the Project Area

Fault	Description
Big Pine	The Big Pine fault extends eastward as far as the San Andreas fault, some 25 miles east of the Santa Barbara–Ventura County line.
Graveyard - Turkey Trap	Two 4-mile-long in-echelon faults underlie the Holocene alluvium of central Cuyama Valley. The total length of the fault zone is estimated to be 7 miles.
Mesa	The Mesa fault trends from its intersection with the More Ranch – Mission Ridge fault 4 miles southeast to the ocean. The Mesa fault may continue onshore to the east as the Carpinteria or Rincon Creek fault.
More Ranch	The More Ranch fault trends east-west for 9 miles near the coast and south of Goleta; the eastern end curves and may continue east as the Mission Ridge fault. The late Pliocene to Pleistocene sediments north of the fault have been dropped up to 2,000 feet at the east end; displacement decreases to the west and dies out near the ocean.
Nacimiento	The Nacimiento fault trends from its intersection with the Big Pine fault in Santa Barbara County 170 miles northwest to the Pacific Ocean near Point Sur. It is considered to be a strike-slip fault with a right lateral sense of movement.
Pacifico	The Pacifico fault trends east-west 13 miles at the western end of the Santa Ynez Mountains and meets the ocean near the mouth of Jalama Creek. The Pacifico fault is likely a member of the Santa Ynez fault zone because of its similar trend and location directly west of the intersection of the north and south branches of the Santa Ynez fault.
Santa Cruz Island	The Santa Cruz Island fault, which falls within Santa Barbara County but not within the Project area, trends west-northwest for 13 miles across the center of Santa Cruz Island. Erosion along this zone has formed the prominent Central Valley.
Santa Rosa Island	The Santa Rosa Island fault, which falls within Santa Barbara County but not within the Project area, trends east-west across central Santa Rosa Island.
Santa Ynez	The Santa Ynez fault trends east-west 75 miles from its intersection with the Agua Blanca thrust fault in eastern Ventura County to Gaviota Pass in western Santa Barbara County. At Gaviota Pass, the Santa Ynez fault splits into a south branch, which intersects the coast 7 miles to the southwest, and a north branch, which continues 7 miles further west.

Source: County of Santa Barbara 2023.

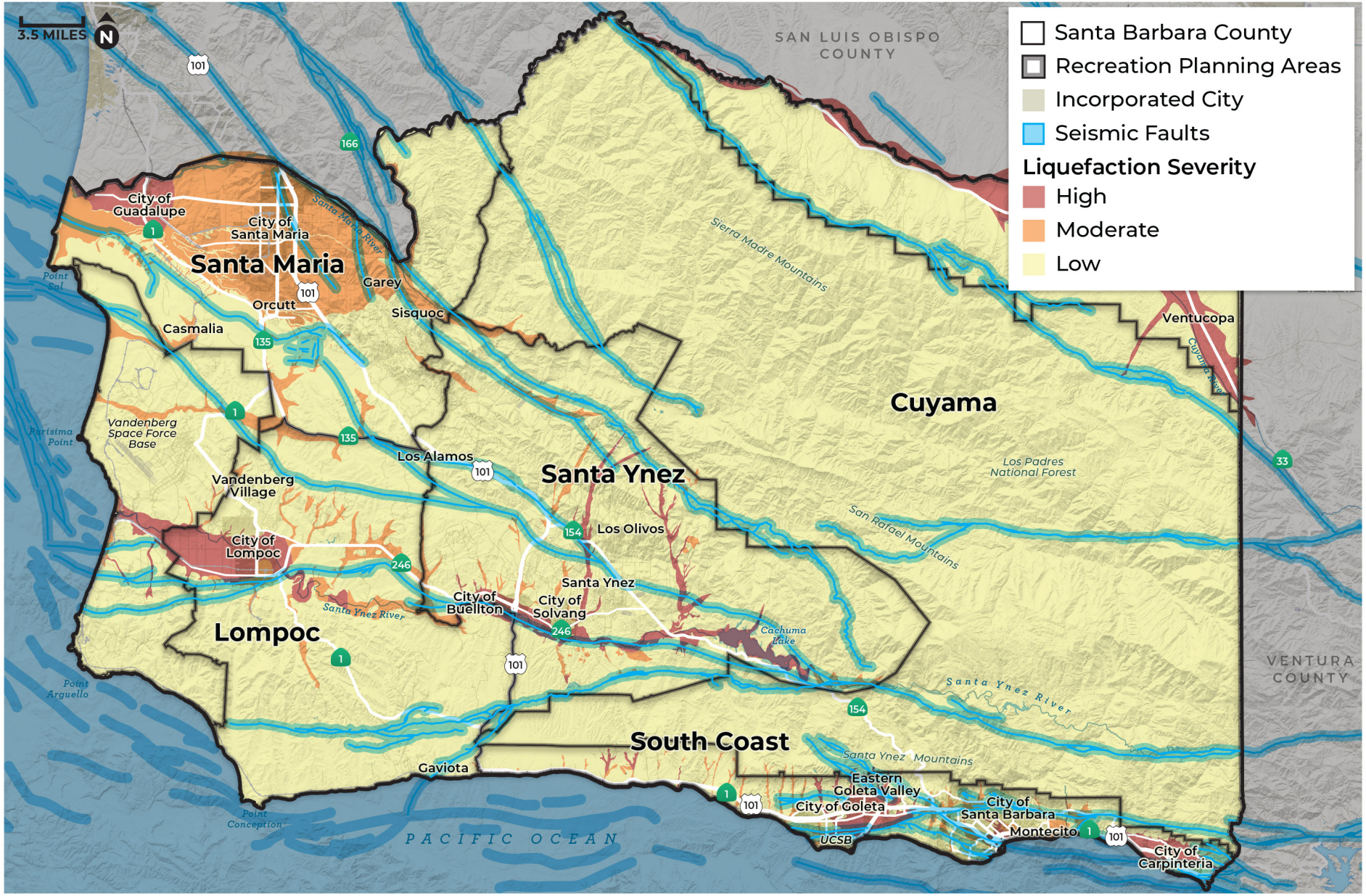
Liquefaction causes two types of ground failure: lateral spread and loss of bearing strength. Lateral spreads develop on gentle slopes and entail the sidelong movement of large masses of soil as an underlying layer liquefies. Loss of bearing strength occurs when the soil supporting structures liquefy, causing the structures to settle, resulting in damage and, in some cases, collapse. Areas in the county that generally have high groundwater levels and poorly consolidated sandy soils have been delineated as having a high liquefaction potential during a major earthquake. Most of the low coastal plain and valley bottoms are underlain by alluvium and are identified as having a moderate risk of liquefaction potential. Areas that have soils of mixed sand and clay, with historic high groundwater levels, have been outlined as having a conditional liquefaction potential.

Lands within the Project area that are the most susceptible to liquefaction (designated Severity Class 3) are agricultural lands surrounding Guadalupe, the alluvial valleys along the Santa Ynez River near Solvang, Buellton, Santa Ynez, and Lompoc, nearly the entirety of the Cuyama Valley, portions of the Eastern Goleta Valley near the Goleta Slough, the harbor and airport areas in Santa Barbara, and many of the lands surrounding Carpinteria. Areas designated as having moderate potential for severity of liquefaction (designated Severity Class 2) primarily include the vast majority of lands surrounding Santa Maria, including the communities of Garey and Sisquoc, nearly all of the lands of which are AG-II zoned lands (County of Santa Barbara 2023).

Landslides and Slope Stability

The stability of slopes is a complex function of the height and steepness of slopes, the inherent strength of the material underlying the slopes, and the presence and orientation of geologic planes of weakness such as bedding, joints, and faults. The surface and subsurface moisture conditions, weathering, and temporal effects are also important factors in determining slope stability.

Much of the county is mountainous or hilly with variable and complex geologic conditions. Landslides and landslide-prone sedimentary formations are present throughout the coastal plain of western Santa Barbara County. Generally, areas with soft soils are more prone to movement. Landslides also occur in the granitic mountains in the eastern portion of the county, although they are less prevalent. The formations most susceptible to landslides are the Rincon, Monterey, Point Sal, and serpentines associated with the Franciscan Formation (County of Santa Barbara 2023).



Geologic Hazard Areas in Santa Barbara County

FIGURE 3.7-1

The Seismic Safety and Safety Element of the County's Comprehensive Plan lists the areas in the county where there are geologic formations that can lead to fairly severe landslides (County of Santa Barbara 2023). The areas are as follows:

- Foothills in the Summerland area (Rincon Formation)
- Foothills of the South Coast – from Santa Barbara west to Gaviota Pass (Rincon and Monterey Formations)
- Hope Ranch area – west of Lavigia Hill to Goleta (Rincon and Monterey Formations)
- Sea cliffs along the coast from Santa Barbara to Gaviota, particularly those with out-of-slope dips (Rincon and Monterey Formations)
- Solvang area south of the Santa Ynez River in the vicinity and east of Alisal Ranch (Rincon, Sespe, Vaqueros, and Monterey Formations)
- Areas east and northeast of Los Olivos near the Los Padres National Forest boundary (Paso Robles, Foxen, and Franciscan Formations)
- Lompoc area south of the Santa Ynez River (Monterey and Sisquoc Formations)
- Mountains south of Guadalupe and east of Point Sal (Point Sal, Foxen, Monterey, Lospe, and Franciscan Formations)

3.7.2.5 Soil Hazards

Ground Failure

Compressible and collapsible soils can cause settlement and damage to structures unless adequate precautions are taken. Compressible soils are fine-grained cohesive soils of low strength, which consolidate and cause settlement when overburdened with fill or structure loads, particularly when saturated. Settlement of soil under load occurs slowly and may continue, although at a diminishing rate, for several years. Compressible soils usually result from deposition in swampy, marshy environments, in estuaries, and sloughs. Because compressible soils are frequently associated with organic matter, and even include organic matter such as peat, they are commonly dark in color. Highly compressible soils are not particularly common in the



Ground failure can occur when compressible or collapsible soils are overburdened with structures the soils are incapable of supporting. As such, permitted development and land uses on compressible soils found along the South Coast, such as the Goleta Slough (pictured above) is limited.

county. Highly compressible soils are only found along the South Coast in the Goleta, Carpinteria, and Santa Barbara sloughs; however, much of the rest of the county is considered to have a low to moderate rating for compressible soils (County of Santa Barbara 2023).

Collapsible soils are low-density, fine-grained, dominantly granular soils, usually with minute pores and voids. When these soils become saturated with water, they undergo a rearrangement of their grains, resulting in substantial and rapid settlement under relatively low loads. Therefore, such soils are extremely sensitive to an increase in moisture content caused either by a rise in the groundwater table or by increased surface water infiltration. Collapsible soils generally result from rapid deposition close to the source of the sediment, where the material has not been reworked or had contact with enough moisture to form a compact soil. The only notable case of a collapsing soil problem in the county is in the town of New Cuyama, where corrective measures have been required to halt the settlement of houses supported on collapsible alluvium (County of Santa Barbara 2023).

Erosion

Soil erosion is the removal of soil by water and wind. Soil erosion potential is related to texture, organic matter content, soil structure, and permeability. Other factors that influence erosion potential include the amount of rainfall and wind, the length and steepness of the slope, and the density and type of vegetative cover. Coastal erosion is influenced by wave action, tidal currents, wave currents, surface runoff, drainage, and high winds. Soil erosion has the potential to occur from natural and human-induced activities countywide.

Erosion can vary greatly in short distances and, thus, erosion has not been mapped or rated at the county level (County of Santa Barbara 2023). However, there are a few areas that are particularly susceptible, including sea cliffs, recent and old dunes, the Fanglomerate, Terrace and Older Alluvium deposits, and the Casitas, Santa Barbara, Pico, Paso Robles, Careaga, and Orcutt Formations.

The Santa Barbara County coastline is mainly subject to marine erosion. The western coastline is comprised of dunes and sea cliffs. The majority of exposed rocks in the sea cliffs are readily eroded by marine and non-marine processes (County of Santa Barbara 2023).

Expansive Soils

Expansive soils can cause problems because they contain clay minerals that swell when the moisture content increases and shrink when the moisture decreases. Such soils are usually described as “adobe” and form ground cracks when they are allowed to dry out. The volume changes resulting from variable moisture conditions can cause movement and cracking of structures built on expansive soils. Soils beneath concrete floor slabs tend to increase in moisture content, thus causing heave. Soils under raised floors tend to dry out and shrink, causing settlement of the structure. Expansive soils are present throughout the county (County

of Santa Barbara 2023). The most hazardous areas occur in a belt along the foothills of the South Coast from Gaviota to Carpinteria, where geological formations are either highly expansive themselves or generate highly expansive topsoil. Expansive and shrinkable soils are found in the Rincon and Monterey Formations, which generally occur along the coastal bluffs and terraces along the Gaviota Coast. In north Santa Barbara County, expansive soils occur primarily within the Botella, Diablo, Positas, San Andreas, and Tierra series, as well as the less dispersed Los Osos series, which occurs throughout the Santa Maria Valley, Santa Ynez Valley, and Lompoc Valleys.

Subsidence

Land subsidence is defined by the USGS as the lowering of the land-surface elevation from changes that take place underground. Common causes of land subsidence from human activity are pumping water, oil, and gas from underground reservoirs; dissolution of limestone aquifers (i.e., sinkholes); the collapse of underground mines; drainage of organic soils; and initial wetting of dry soils (i.e., hydrocompaction). Fluctuations in the level of underground water caused by pumping or by injecting fluids into the earth can initiate sinking to fill the space previously occupied by water or soluble minerals. Overdraft of aquifers is the major cause of subsidence in the southwestern U.S., and as groundwater pumping increases (e.g., during periods of drought), land subsidence also will increase. In many aquifers, groundwater is pumped from the pore spaces between grains of sand and gravel. If an aquifer has beds of clay or silt within or next to it, the lowered water pressure in the sand and gravel causes slow drainage of water from the clay and silt beds. The reduced water pressure is a loss of support for the clay and silt beds. Because these beds are compressible, they compact (i.e., become thinner), and the effects are seen as a lowering of the land surface. Weight, including surface developments such as roads, reservoirs, and buildings, and manmade vibrations from such activities as blasting and heavy truck or train traffic, can accelerate the natural processes of subsidence or induce subsidence over manmade voids (USGS 2016).

The USGS has detected longer-term land subsidence within the Cuyama Valley due to significant rates of groundwater extraction since the 1940s. Through the use of Interferometric Synthetic Aperture Radar (InSAR) mapping from 2008 to 2012, USGS detected upwards of 1.6 inches of total land subsidence within the Cuyama Valley (USGS 2013). In addition to USGS land subsidence studies, the California Department of Water Resources' (DWR's) California Groundwater Update 2020 is a continuation of a series of earlier DWR Bulletin 118 publications and builds on the past progress and state of knowledge, synthesizes the most recent data to close the knowledge gap, including land subsidence information. The California Groundwater Update 2020 is the State's most up-to-date compendium of statewide data and information on the occurrences, types, uses, and conditions of California's groundwater resources and their management. DWR also provides an interactive map with information about land subsidence in California (2009-2018) that is presented in California's Groundwater Update 2020. The point

data in the map displays land elevation changes over varying periods as recorded by a collection of continuous global positioning system stations and is presented for groundwater basins within the county in Table 3.7-2 below. Based on both USGS and DWR monitoring data, while some limited amounts of subsidence occur throughout the county, the Cuyama Valley experiences much greater rates of subsidence than any other region.

Table 3.7-2. Land Subsidence for Groundwater Basins in Santa Barbara County (2018)

Groundwater Basin(s)	Vertical Displacement Total (feet)	Approximate Vertical Displacement Per Year (inches)
Carpinteria	0	0
Montecito	0	0
Santa Barbara	0	0
Foothill	-0.15	-0.18
Goleta	0	0
Santa Ynez River Valley	-0.04 to -0.08	-0.05 to -0.1
San Antonio Creek Valley	-0.63	-0.76
Santa Maria Valley	0.01	0.01
Cuyama Valley	-0.88	-1.06

Source: DWR 2021.

The California DWR created the California Statewide Groundwater Elevation Monitoring (CASGEM) Groundwater Basin Prioritization State-wide ranking system to prioritize California groundwater basins as either high-, medium-, low-, or very low-priority to determine groundwater level monitoring need. The Sustainable Groundwater Management Act (SGMA) requires medium- and high-priority basins to create Groundwater Sustainability Agencies (GSAs), develop GSPs, and manage groundwater for long-term sustainability. In Santa Barbara County, five basins are designated as medium- or high-priority basins: Cuyama Valley, San Antonio Creek Valley, Santa Ynez River Valley, Montecito, and Carpinteria. The GSPs prepared for these basins address geologic and groundwater conditions, including land subsidence.

3.7.2.6 Paleontological Resources and Unique Geologic Features

Paleontological resources are evidence of once-living organisms preserved in the geologic record and include fossilized remains of ancient plants and animals, trackways, imprints, burrows, or other traces of ancient life. In general, fossils are greater than 5,000 years old (i.e., Middle Holocene) and are typically preserved in sedimentary rocks. The potential to encounter paleontological resources is based on the geologic unit and an array of fossil resources known to be contained within that unit, within which excavations would occur.

Although different regions of the county have distinctive geologic profiles, there are several units that are found commonly throughout the county. Generally, the county is underlain mainly

by marine sedimentary rocks of late Mesozoic and Cenozoic ages (over 66 million years ago) (County of Santa Barbara 2023). However, agricultural lands are typically underlain primarily by much younger Holocene alluvial gravel, sand, and clay (Qa); Holocene stream alluvial sand and gravel (Qg); Pleistocene older alluvial sediments (Qoa); and Pleistocene older sand deposits (Qos). In many places, these geologic units and formations are considered to have low paleontological sensitivity, as alluvial and surficial deposits are typically displaced or disrupted.

Unique geologic features are an uncommon and widely varying resource within the county. The County generally classifies geologic units or features as unique if they:

- Are the best example of its kind locally;
- Embody the distinctive characteristics of a geologic principle that is exclusive locally or regionally;
- Provide a key piece of geological principle in geology or geologic history;
- Are a "type locality" of a geologic feature;
- Are a geologic formation that is exclusive locally or regionally;
- Contain a mineral that is not known to occur elsewhere; or
- Are used repeatedly as a teaching tool.

The County's Seismic Safety and Safety Element has identified the Point Sal area, Guadalupe Dunes, Nojoqui Falls, Carpinteria Tar Pits, Refugian Stage locality located in the Hollister Ranch in Santa Anita Canyon, and Zaca Lake as "areas of special geologic interest" within the Project area due to their unique geologic formations, sequencing, or properties. Of these areas, the Refugian Stage locality is considered an area of special geologic interest due to the presence of micro-fossil assemblages that are considered a classic example of the small life forms prevalent during the Cenozoic time (County of Santa Barbara 2023).

3.7.3 REGULATORY SETTING

Geologic resources and geotechnical hazards are governed primarily by local jurisdictions, although Federal and State laws would apply to some of the proposed uses and related development under the proposed Project. Federal, State, and local regulations that are directly relevant to the proposed uses and related development under the proposed Project are discussed below. The Conservation and Seismic Safety and Safety Elements of the County's Comprehensive Plan contain policies for the protection of geologic features and avoidance of hazards.

3.7.3.1 Federal

Earthquake Hazard Reduction Act

The purpose of the Earthquake Hazards Reduction Act is to reduce the risks to life and property from future earthquakes in the U.S. through the establishment and maintenance of an effective earthquake hazards reduction program. To accomplish this, the Act established the National Earthquake Hazards Reduction Program (NERHP). The NERHP was amended in November 2004 by refining the description of agency responsibilities, program goals, and objectives.

Federal Soil Conservation Law

The Federal Soil Conservation Law (16 U.S. Code [USC] §§590a-590q) provides permanently for the control and prevention of soil erosion by preventative measures, including but not limited to engineering operations, methods of cultivation, growing of vegetation, and changes in land use.

International Building Code

All proposed uses and related development would be required to comply with appropriate seismic design criteria in the International Building Code (IBC), adequate drainage facility design, and preconstruction soils and grading studies. Seismic design standards have been established to increase structural resilience to major earthquakes. In 2000, the IBC replaced the Uniform Building Code (UBC) in the U.S. to ensure consistency and standardized requirements throughout the nation. The IBC, most recently updated in 2021, is published by the International Code Council (ICC) and forms the basis for building codes in the U.S., including the California Building Code (CBC), established as Title 24 of the California Code of Regulations (CCR). The IBC has been adopted by the California Legislature with amendments to address the specific building conditions and structural requirements for California, as well as guide foundation design and structural engineering for different soil types.

Clean Water Act Section 402 (National Pollutant Discharge Elimination System Program)

The Clean Water Act (CWA) (33 USC §§1251 et seq.), formerly the Federal Water Pollution Control Act of 1972, was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the U.S. The CWA Section 402 mandates that certain types of construction activities comply with the requirements of the U.S. Environmental Protection Agency's (USEPA's) National Pollutant Discharge Elimination System (NPDES) program. Under SWRCB enforcement, the Central Coast Regional Water Quality Control Board (RWQCB) implements the NPDES program in Santa Barbara County. The program requires projects that involve disturbance of 1 acre of soil or more, or are part of a common plan that in total disturbs more than 1 acre, are required to obtain NPDES coverage under the NPDES General Permit for Storm Water Discharges Associated with Construction Activity (General Permit), Order No. 2009-0009-DWQ. The General Permit requires the development and

implementation of a Storm Water Pollution Prevention Plan (SWPPP), which includes Best Management Practices (BMPs) to protect stormwater runoff, including measures to prevent soil erosion. Requirements of the CWA and associated SWPPP requirements are described in further detail in Section 3.10, *Hydrology and Water Quality*.

3.7.3.2 State

Alquist-Priolo Earthquake Fault Zoning Act

The purpose of the Alquist-Priolo Act is to regulate types of development near active faults to mitigate the hazard of surface rupture. Under this Act, the State Geologist is required to delineate earthquake fault zones, or Alquist-Priolo Fault Zones, along known active faults in California and requires that geologic studies be conducted to locate and assess any active fault traces in and around known active fault areas before development of buildings for human occupancy. The Alquist-Priolo Act only addresses the hazard of surface fault rupture and is not directed toward other earthquake hazards. Local cities and counties must regulate certain development projects within the Earthquake Fault Zones, generally by issuing building permits only after geologic investigations demonstrate that development sites are not threatened by future surface displacement. A buffer prohibiting the construction of structures for human occupancy may be established. Typically, structures for human occupancy are not allowed within 50 feet of the trace of an active fault. Projects subject to these regulations include all land divisions and most buildings intended for human occupancy.

Seismic Hazards Mapping Act

To address the effects of strong ground shaking, liquefaction, landslides, and other ground failures due to seismic events, the State of California passed the Seismic Hazards Mapping Act of 1990. Under the Seismic Hazards Mapping Act, the State Geologist is required to delineate "seismic hazard zones." Cities and counties must regulate certain development projects within these zones until the geologic and soil conditions are investigated and appropriate mitigation measures, if any, are incorporated into development plans. The majority of the county is comprised of more than 40 unevaluated seismic hazard quadrangles, as mapped by the California Department of Conservation (California Department of Conservation 2022).

The State Mining and Geology Board provides additional regulations and policies to assist municipalities in preparing the Safety Element of their General Plan and encourage land use management policies and regulations to reduce and mitigate those hazards to protect public health and safety. Under Public Resources Code (PRC) Section 2697, cities and counties shall require, before the approval of a project located in a seismic hazard zone, a geotechnical report defining and delineating any seismic hazard. Each city or county shall submit one copy of each geotechnical report, including mitigation measures, to the State Geologist within 30 days of its approval.

Sustainable Groundwater Management Act (SGMA)

SGMA, enacted in 2014, encourages local agencies to work cooperatively in managing groundwater resources and is intended to increase local control and protection over groundwater basins. The intent of this legislation is to manage the use of groundwater in a manner that can be maintained long-term without causing chronic lowering of groundwater levels, overdraft, and significant reduction in groundwater storage, saline water intrusion, or subsidence. For each groundwater basin designated medium- and high-priority in California, the Groundwater Sustainability Agency – the agency responsible for management of the basin pursuant to SGMA – is required to prepare a GSP that is subject to review and approval by DWR. A required element of each GSP is the inclusion of monitoring components for subsidence that promote efficient use of groundwater resources. Provided below is a brief summary of the groundwater basins within the county for which a GSP has been prepared.

- **Cuyama Valley (Groundwater Basin 3-013):** The Cuyama Basin GSA is made up of members of the Cuyama Basin Water District, Santa Barbara County Water Agency, County of San Luis Obispo, County of Kern, and County of Ventura. The Cuyama Valley Groundwater Basin is designated as a high-priority basin in critical overdraft. The Cuyama Valley GSP was adopted on December 9, 2019, and submitted to DWR on January 28, 2020. On January 21, 2022, DWR deemed the Cuyama Valley GSP "incomplete" and a revised GSP was resubmitted to DWR on July 18, 2022. In March 2023, DWR issued approval of the Revised Cuyama Basin GSP. In January of 2025, the 2025 GSP Update was released for public review and comment; the update was released to comply with SGMA's requirement for the GSP to incorporate ways to achieve groundwater sustainability in the Basin by 2040 (Cuyama Basin GSA 2025).
- **San Antonio Creek Valley (3-014):** The San Antonio Creek Valley GSA is made up of members of the San Antonio Basin Water District and the Los Alamos Community Services District. The San Antonio Creek Valley Groundwater Basin is designated as a medium-priority basin. The San Antonio Creek Valley GSP was adopted on December 7, 2021, and submitted to DWR on January 21, 2022. The DWR approved the GSP in January 2024 (San Antonio Basin GSA 2025).
- **Santa Ynez Valley (3-015):** The Santa Ynez Valley Groundwater Basin is designated as a medium-priority basin and has been divided into the following three management areas:
    - *Western Management Area:* The Western Management Area (WMA) GSA is made up of members of City of Lompoc, Mission Hills Community Services District, Vandenberg Village Community Services District, Santa Ynez River Water Conservation Authority, and Santa Barbara County Water Agency. The Western Management Area GSP was adopted on January 5, 2022, and submitted to DWR on January 18, 2022. The DWR approved the GSP in January of 2024 (WMA SGA 2025).

- *Central Management Area:* The Central Management Area GSA is made up of members of the City of Buellton, Santa Ynez River Water Conservation Agency, and Santa Barbara County Water Agency. The Central Management Area GSP was adopted on January 3, 2022, and submitted to DWR on January 18, 2022. The DWR approved the GSP in 2024 (Santa Ynez River Groundwater Basin GSA 2025).
- *Eastern Management Area:* The Eastern Management Area GSA is made up of members of the City of Solvang, Santa Ynez River Water Conservation District Improvement District No. 1, Santa Ynez River Water Conservation District, and Santa Barbara County Water Agency. The Eastern Management Area GSP was adopted on January 6, 2022, and submitted to DWR on January 19, 2022. The DWR approved the GSP in 2024 (Santa Ynez River Groundwater Basin GSA 2025).

- **Montecito (3-049):** The Montecito Water District leads the Montecito GSA. The Montecito Groundwater Basin is designated as a medium-priority basin. The Montecito developed the Montecito GSP in March of 2023 and submitted to DWR in June of 2023. After the evaluation process was completed, DWR approved the GSP in February of 2025 (Montecito Groundwater Basin GSA 2025).
- **Carpinteria (3-018):** The Carpinteria Valley Water District leads the Carpinteria GSA. The Carpinteria Groundwater Basin is designated as a high-priority basin. The Carpinteria GSA prepared the Carpinteria GSP at the beginning of 2024 and DWR approved the GSP in February of 2025 (DWR 2026).

Of the seven medium- to high-priority groundwater basins for which a GSP has been prepared in the County, the Cuyama Valley Groundwater Basin faces the greatest challenges when it comes to the issue of subsidence.

State Water Resources Control Board Water Quality Control Policy for Siting, Design, Operation, and Maintenance of Onsite Wastewater Treatment Systems

In California, overall authority of OWTS lies with the SWRCB through the State Policy. The State Policy became effective in May 2013 and establishes a risk-based tiered approach for the regulation and management of OWTS. Under the tiered approach, Tier 1 establishes minimum standards for low risk new or replacement OWTS, while Tier 2 allows local agencies to develop customized management programs to address the conditions of OWTS. Pursuant to Tier 2 of the State Policy, in November 2015, the Santa Barbara County Environmental Health Services (EHS), at the direction of the Board of Supervisors (Board), prepared the LAMP for the County. Through a survey of existing septic systems within the County, the LAMP identified two Special Problem Areas which include the unincorporated community of Los Olivos and unincorporated residential neighborhood around Janin Acres. The LAMP provides general recommendations to improve overall management of septic systems in the county, as well as specific management recommendations for various focus areas. The LAMP also includes permit, inspection, and

reporting elements for OWTS within the county. Issuance of a permit by EHS is required for the construction of new OWTS as well as the repair, modification, or abandonment of existing systems. EHS' permit requirements for new or modified OWTS include preparation of soil engineering reports by a registered civil or soils engineer, system designs, building plans.

California Building Code

The State of California provides minimum standards for building design through the CBC, which is based on the IBC, but has been modified to account for California's unique geologic conditions, including the State's heightened seismicity risk. The CBC is updated triennially, and the most recent 2022 code became fully effective on January 1, 2023. The CBC applies across the state and is selectively adopted by local jurisdictions based on local conditions. As of January 1, 2023, the County, through the Santa Barbara County Code (County Code) Chapter 10, Building Code, has adopted the CBC, 2022 Edition, which adopts by reference the IBC, 2021 Edition, as part of its building regulations.

CBC Section 1803.5.3 states that in areas likely to have expansive soil, the Building Official shall require soil tests to determine where such soils do exist. Soils meeting all four of the following provisions shall be considered expansive, except that tests to show compliance with Items 1, 2, and 3 shall not be required if the test prescribed in Item 4 is conducted:

1. Plasticity index (PI) of 15 or greater, determined in accordance with American Society for Testing and Materials (ASTM) D-4318.
2. More than 10 percent of the soil particles pass a No. 200 sieve (75 micrometers), determined in accordance with ASTM D-422.
3. More than 10 percent of the soil particles are less than 5 micrometers in size, determined in accordance with ASTM D-422.
4. Expansion index greater than 20, determined in accordance with ASTM D-4829.

Public Resources Code Sections 5097.5 and 30244

PRC Section 5097.5 states that "a person shall not knowingly and willfully excavate upon, or remove, destroy, injure, or deface, any historic or prehistoric ruins, burial grounds, archaeological or vertebrate paleontological site, including fossilized footprints, inscriptions made by human agency, rock art, or any other archaeological, paleontological or historical feature, situated on public lands, except with the express permission of the public agency having jurisdiction over the lands." PRC Section 5097.5 also states that "a violation of this section is a misdemeanor, punishable by a fine not exceeding ten thousand dollars ($10,000), or by imprisonment in a county jail not to exceed one year, or by both that fine and imprisonment." This section defines public lands as "lands owned by, or under the jurisdiction of, the state, or any city, county, district, authority, or public corporation, or any agency thereof."

PRC Section 30244 states that "where development would adversely impact archaeological or paleontological resources as identified by the State Historic Preservation Officer, reasonable mitigation measures shall be required." Other state requirements for paleontological resources are included in PRC Section 5097.5 and PRC Section 30244.

Society for Vertebrate Paleontology Guidelines

The Society for Vertebrate Paleontology (SVP) has established standard guidelines that outline professional qualifications, protocols, and practices for paleontological resources assessments and surveys, monitoring and mitigation, data and fossil recovery, sampling procedures, specimen preparation, identification, analysis, and curation (SVP 2010). Most practicing professional vertebrate paleontologists adhere closely to the assessment, mitigation, and monitoring requirements as specifically provided in the SVP Guidelines. Most state regulatory agencies with paleontological resource-specific Laws, Ordinances, Regulations, and Standards (LORS) accept and use the professional standards set forth by the SVP.

California Coastal Act

The California Coastal Commission is tasked with the protection of coastal resources, including those having paleontological importance within the Coastal Zone. PRC Section 30244 of the California Coastal Act seeks to minimize the adverse impacts to paleontological resources within the Coastal Zone by requiring mitigation of adverse impacts to these resources by any development.

3.7.3.3 Local

County of Santa Barbara Comprehensive Plan

Seismic Safety and Safety Element

The Seismic Safety and Safety Element of the County's Comprehensive Plan is intended to guide land use planning by providing pertinent data regarding geologic, soil, seismic, fire, and flood hazards. Geologic, soil, and seismic factors affect the suitability of land for various uses and are considered in regard to land use planning in this element.

The Seismic Safety and Safety Element identifies the following geologic and seismic goals and policies:

Geologic and Seismic Goal 1: Protect the community to the extent feasible from risks associated with the effects of seismically induced surface rupture, ground shaking, ground failure, tsunami, seiche and dam failure; slope instability leading to mudslides and landslides; subsidence, liquefaction and other seismic hazards pursuant to Government Code Section 65302(g)(1), Chapter 7.8 (commencing with Section 2690) of Division 2 of the Public Resources Code, and other geologic hazards known to the legislative body.

Geologic and Seismic Protection Policy 1: The County shall minimize the potential effects of geologic, soil, and seismic hazards through the development review process.

Geologic and Seismic Protection Policy 2: To maintain consistency, the County shall refer to the California Building Code, the Land Use Development Code, County Ordinances, the Coastal Land Use Plan, and the Comprehensive Plan when considering the siting and construction of structures in seismically hazardous areas.

Geologic and Seismic Protection Policy 3: The County shall ensure compliance with State seismic and building standards in the evaluation, design, and siting of critical facilities, including police and fire stations, school facilities, hospitals, hazardous material manufacture and storage facilities, bridges, large public assembly halls, and other structures subject to special seismic safety design requirements pursuant to the California Code of Regulations, Title 24, Part 2 CBC.

Geologic and Seismic Protection Policy 4: The County Office of Emergency Services (OES) shall continue coordinating emergency planning for the Santa Barbara Operational Area pursuant to the California Emergency Services Act of 1970.

Geologic and Seismic Protection Policy 5: Pursuant to County Code Section 21-7(d)(4) and -(5), the County shall require a preliminary soil report prepared by a qualified civil engineer be submitted at the time a tentative map is submitted. This requirement may be waived by the Planning Director if he/she determines that no preliminary analysis is necessary. A preliminary geological report prepared by a qualified engineering geologist may also be required by the Planning Director.

Geologic and Seismic Protection Policy 6: The County should reference the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan when considering measures to reduce potential harm from seismic activity to property and lives.

Coastal Land Use Plan

The Coastal Land Use Plan (CLUP) is intended to protect coastal resources while accommodating land use development within the Coastal Zone. The other elements of the County's Comprehensive Plan are applicable within the Coastal Zone; however, when there is a conflict, the CLUP takes precedence.

The CLUP includes the following goals and policies, with Policies 3-4 and 3-6 largely applying to the Gaviota Coast within the Project area:

Bluff Protection Policy 3-4: In areas of new development, above-ground structures shall be set back a sufficient distance from the bluff edge to be safe from the threat of bluff erosion for a minimum of 75 years, unless such standard will make a lot unbuildable, in which case a standard of 50 years shall be used. The County shall determine the required setback. A geologic

report shall be required by the County in order to make this determination. At a minimum, such geologic report shall be prepared in conformance with the Coastal Commission's adopted Statewide Interpretive Guidelines regarding "Geologic Stability of Bluff top Development."

Bluff Protection Policy 3-6: Development and activity of any kind beyond the required bluff-top setback shall be constructed to insure (sic) that all surface and subsurface drainage shall not contribute to the erosion of the bluff face or the stability of the bluff itself.

Geologic Hazards Policy 3-8: Applications for grading and building permits, and applications for subdivision shall be reviewed for adjacency to, threats from, and impacts on geologic hazards arising from seismic events, tsunami run-up, landslides, beach erosion, or other geologic hazards such as expansive soils and subsidence areas. In areas of known geologic hazards, a geologic report shall be required. Mitigation measures shall be required where necessary.

Geologic Hazards Policy 3-9: Water, gas, sewer, electrical, or crude oil transmission and distribution lines which cross fault lines, shall be subject to additional safety standards, including emergency shutoff where applicable.

Geologic Hazards Policy 3-10: Major structures, i.e., residential, commercial, and industrial, shall be sited a minimum of 50 feet from a potentially active, historically active, or active fault. Greater setbacks may be required if local geologic conditions warrant.

Land Use Element

The Land Use Element of the County's Comprehensive Plan is intended to interrelate all different factors that contribute to population growth, urban development, and open land preservation with county-wide policies on land use. The Land Use Element contains Hillside and Watershed Protection policies that help protect and minimize impacts from new development. The most applicable policies of the Land Use Element on geologic and seismic-related issues include:

Hillside and Watershed Protection Policy 1: Plans for development shall minimize cut and fill operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.

Hillside and Watershed Protection Policy 2: All developments shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited to development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.

Hillside and Watershed Protection Policy 3: For necessary grading operations on hillsides, the smallest practical area of land shall be exposed at any one time during development and the

length of exposure shall be kept to the shortest practicable amount of time. The clearing of land should be avoided during the winter rainy season and all measures for removing sediments and stabilizing slopes should be in place before the beginning of the rainy season.

Hillside and Watershed Protection Policy 5: Temporary vegetation, seeding, mulching, or other suitable stabilization method shall be used to protect soils subject to erosion that have been disturbed during grading or development. All cut and fill slopes shall be stabilized as rapidly as possible with planting of native grasses and shrubs, appropriate non-native plants, or with accepted landscaping practices.

Hillside and Watershed Protection Policy 6: Provisions shall be made to conduct surface water to storm drains or suitable watercourses to prevent erosion. Drainage devices shall be designed to accommodate increased runoff resulting from modified soil and surface conditions as a result of development. Water runoff shall be retained onsite whenever possible to facilitate groundwater recharge.

Hillside and Watershed Protection Policy 7: Degradation of the water quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants, such as chemicals, fuels, lubricants, raw sewage, and other harmful waste, shall not be discharged into or alongside coastal streams or wetlands either during or after construction.

Hillside and Watershed Protection Policy 8: On any lands not Comprehensive Planned and zoned for agriculture, grading and "brushing" shall require a permit. Exceptions shall be grading of 50 cubic yards or less and "brushing" within a radius of 100 yards of a residential structure for fire purposes.

Community Plans and Land Use Element Area Goals

The Project area would be subject to the goals and policies of the following community plans:

- Eastern Goleta Valley Community Plan
- Gaviota Coast Plan
- Goleta Community Plan
- Santa Barbara County Comprehensive Plan Land Use Element Lompoc Area Goals
- Orcutt Community Plan
- Santa Ynez Valley Community Plan
- Summerland Community Plan
- Toro Canyon Community Plan
- Montecito Community Plan
- Mission Canyon Community Plan

County of Santa Barbara Grading Ordinance

Chapter 14 of the County Code is the Santa Barbara County Grading Code (Ord. No. 4766, 11-9-2010). The regulations, conditions, and provisions of this chapter constitute minimum standards and procedures necessary to protect and preserve life, limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials, location, and maintenance of grading, drainage, erosion, and sediment control, when required by these regulations within the County. The code also addresses compliance with the NPDES Phase II stormwater regulations and sets forth local stormwater requirements for the disturbance of less than 1 acre of soil, to avoid pollution of water courses and drainage ways with sediments or other pollutants generated on or caused by surface runoff on or across a construction site. Project-related development involving movement of 50 cubic yards or during grading may require a grading plan and would be subject to the following conditions in the Santa Barbara County Grading Code:

Erosion and Sediment Control Plan: An Erosion and Sediment Control Plan would be required as part of the Grading Plan and permit requirements. Erosion and Sediment Control Plans are designed to minimize erosion during construction and would be implemented for the duration of the grading period and until re-graded areas have been stabilized by structures, long-term erosion control measures, or permanent landscaping. The Erosion and Sediment Control Plan must include County-approved BMPs to stabilize the site, protect natural watercourses/creeks, prevent erosion, and convey storm water runoff to existing drainage systems keeping contaminants and sediments onsite.

County of Santa Barbara Building Code

Chapter 10 of the County Code is the Santa Barbara County Building Code (Ord. No. 4822, 1-17-2012). In certain areas of the county there are conditions and situations that require modification of California codes for buildings and related construction, and these conditions and situations require specific legislative action to provide for the safety and health of the populace of the county. The code addresses geological, topographical, and climatic conditions in the county including extreme weather conditions, firefighting resources, flammable vegetation, High Hazard Areas, extreme wind conditions, and seismic shaking and the minimum standards to safeguard and protect life, buildings, and structures within the county.

County of Santa Barbara Coastal Zoning Ordinance

The Article II, Coastal Zoning Ordinance (CZO) includes policies aimed to protect human life in regions where geologic hazards could be present. Section 35-174.3 states that Preliminary Development Plans must include the location of geologic, seismic, flood, and other hazards.

3.7.4 ENVIRONMENTAL IMPACT ANALYSIS

This section discusses the potential geology, soils, and palaeontologic resource impacts associated with the proposed Project.

3.7.4.1 Thresholds of Significance

California Environmental Quality Act Guidelines

Appendix G of the California Environmental Quality Act (CEQA) Guidelines states that a project would be considered to have a significant impact related to geology and soils if it would result in any of the following[1]:

a) Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving the following:

   i. Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault. Refer to Division of Mines and Geology Special Publication 42;

   ii. Strong seismic ground shaking;

   iii. Seismic-related ground failure, including liquefaction;

   iv. Landslides.

b) Result in substantial soil erosion or the loss of topsoil.

c) Be located on a geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in an on- or off-site landslide, lateral spreading, subsidence, liquefaction or collapse.

d) Be located on expansive soil, as defined in Table 18-1-B of the Uniform Building Code (1994), creating substantial direct or indirect risks to life or property.

e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems in areas where sewers are not available for the disposal of waste water.

f) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature.

[1] Per *California Building Industry Association v. Bay Area Air Quality Management District (2015)*, CEQA does not require analysis of impacts of existing environmental conditions on a project's future users or residents, unless a proposed project risks exacerbating those environmental hazards or conditions that already exist.

County of Santa Barbara Environmental Thresholds and Guidelines

The County's *Environmental Thresholds and Guidelines Manual* (2024)states that since geologic conditions are highly variable within Santa Barbara County, the guidelines are not fixed thresholds upon which a determination of significant impact would be made. They serve to point out when further study of site-specific conditions is required to assess geologic impacts. The County Planning and Development Department (P&D) staff (in consultation with licensed geologists and engineers, as necessary) assess the level of project geologic impacts (i.e., potentially significant, potentially significant but subject to mitigation, or insignificant) upon review of project plans, proposed mitigation measures, and site-specific geologic information.

Impacts are considered potentially significant if the project, including all proposed mitigation measures, could result in substantially increased erosion, landslides, soil creep, mudslides, and unstable slopes. In addition, impacts are considered significant when people or structures would be exposed to major geologic hazards upon implementation of a project (Appendix G of the CEQA Guidelines).

Impacts related to geology and soils have the potential to be significant if the project involves any of the following characteristics.

1. The project site or any part of the project is located on land having substantial geologic constraints, as determined by County P&D or the Public Works Department. Areas constrained by geology include parcels located near active or potentially active faults and property underlain by rock types associated with compressible/collapsible soils or susceptible to landslides or severe erosion. Special Problem Areas designated by the Board have been established based on geologic constraints, flood hazards and other physical limitations to development.
2. The project results in potentially hazardous geologic conditions such as the construction of cut slopes exceeding a grade of 1.5 horizontal to 1 vertical.
3. The project involves construction of a cut slope over 15 feet in height as measured from the lowest finished grade.
4. The project is located on slopes exceeding 20 percent grade.

Mitigation measures may reduce impacts to an insignificant level. These measures would include minor project redesign and engineering steps recommended by licensed geologists and engineers subsequent to detailed investigation of the site.

Methodology

Potential impacts to geology and soils would be unique to individual uses and related development (i.e., ground disturbance) at specific participating parcels. For example, some participating parcels may be located closer to a fault than others or may be underlain by hazardous soils subject to erosion, expansion, liquefaction, etc. As described in Section 1.3,

Program-Level EIR Analysis, site-specific details and locations for expanded rural recreational uses and supplementary agricultural uses are not available and are expected to evolve. Therefore, the impact analysis provided below is broad and qualitative, such that the findings would apply to any of the proposed uses and related development regardless of site-specific details.

The information and analysis in this section is based on information in previous long-range planning documents, Environmental Impact Reports (EIRs) prepared by the County of Santa Barbara (County), and associated technical studies. These include the 2021 Connected 2050: Regional Transportation Plan and Sustainable Communities Strategy EIR, the 2017 Cannabis Land Use Ordinance and Licensing Program EIR, the 2016 Gaviota Coast Plan EIR, the 2015 Eastern Goleta Valley Community Plan EIR, and the 2014 Cuyama Solar Facility and Comprehensive Plan/Land Use Development Code Amendments EIR as well as the Santa Barbara County Comprehensive Plan and associated Community Plans. The discussion of geologic and soil hazards in the Project area is broadly derived from the above sources as well as the Dibblee Geologic Foundation Maps for Santa Barbara County, United State Geologic Service (USGS) Quadrangle Maps, the Natural Resource Conservation Service (NRCS), the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP), and the various Groundwater Sustainability Plans (GSPs) submitted for groundwater basins within the county.

3.7.4.2 Project Impacts

Table 3.7-3 provides a summary of the proposed Project's impacts related to geology and soils. A detailed discussion of each impact follows.

Seismic-Induced Hazards

The county is located within a seismically active region near the San Andreas Fault system, with nine active faults identified within the county (Table 3.7-1). As with all land uses in the region, the Project would potentially expose new visitors and/or employees to moderate to strong seismic ground shaking in the event of an earthquake on a nearby fault (e.g., Big Pine, Mesa, More Ranch, Pacifico, Santa Ynez). A strong earthquake could result in substantial damage to existing older buildings, structures, and other infrastructure, including damage to foundations, shifting of frame structures, breaking of windows, and breaking of underground pipes or other utilities if new building design measures are not implemented. This type of damage would put new visitors and/or employees associated in danger from ground shaking and structural damage/collapse.

Table 3.7-3. Summary of Geology and Soils Impacts

Geology and Soils Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact GEO-1. The Project could have adverse effects due to exposure of buildings and people to seismically induced conditions, such as ground shaking, ground failure, liquefaction, and landslides, or other non-seismic related unstable earth conditions, such as erosion, landslide, lateral spreading, subsidence, liquefaction, collapse, or expansive soils.	Insignificant	No mitigation measures required.	Insignificant
Impact GEO-2. The Project could be located in areas with soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.	Insignificant	No mitigation measures required.	Insignificant
Impact GEO-3. The Project could potentially directly or indirectly cause disruption, alteration, destruction, or adverse effects on significant paleontological or unique geological resources.	Potentially significant	MM GEO-1 (Paleontological Resource Assessment and Monitoring) MM GEO-2 (Stop Work at Encounter)	Significant but Mitigable
Cumulative Impacts	Potentially significant	MM GEO-1 (Paleontological Resource Assessment and Monitoring) MM GEO-2 (Stop Work at Encounter)	Significant but Mitigable

Impact GEO-1. The Project could have adverse effects due to exposure of buildings and people to seismically induced conditions, such as ground shaking, ground failure, liquefaction, and landslides, or other non-seismic related unstable earth conditions, such as erosion, landslide, lateral spreading, subsidence, liquefaction, collapse, or expansive soils.

As described in Chapter 2, *Project Description*, the Project includes planned public parks, recreation, and trail projects that would develop new facilities or expand existing facilities in unincorporated areas in the county. and a package of amendments to the County Comprehensive Plan and zoning ordinances to foster development of parks and trails to help meet recreation needs in Santa Barbara County. Recreational development projects could range from minor alterations to existing facilities, curating unpaved trail extensions, or building large sports fields or complexes. The Project would create a strategic, long-range plan to fund and construct new public parks, trails, and recreational facilities as well as implement the Recreation Benefit Project (RBP) Program. The RBP would help fulfill recreation needs identified

within the Master Plan by fostering public-private partnerships to allow for private developers to contribute public recreational resources.

The potential for the Project to exacerbate seismic impacts is extremely low because parks, recreation facilities, trails, and related development would not measurably increase the existing danger from ground shaking and structural damage/collapse of existing structures. Outdoor recreation facilities, such as sports fields, courts, trails, and playgrounds, do not present structural hazards to users; rather, open, outdoor areas are some of the recommended safer locations to be during an earthquake. Structural development enabled by the Project would include buildings for community centers, aquatic complexes, campgrounds, or ancillary recreation support uses, as well as structures permitted subject to the County's zoning ordinances under the RBP Program. All projects that would require physical alteration of existing recreational structures or new recreational facilities or buildings would be required to adhere to the most the most current building standards of the County Code, including the County Building Regulations, which adopt CBC standards by reference with local amendments, as well as applicable County fire, building, and/or environmental health standards. Adherence to the County Code and County Building Regulations requirements would ensure the maximum practicable protection available for all structures. Specifically, Section 1613 of the CBC (Earthquake Loads) requires the seismic-resistant design for the project buildings to factor in a design earthquake that would create average peak ground accelerations of at least 1.0 g. Similarly, new development would be required to include the application of County Building Regulations seismic standards as the minimum seismic-resistant criteria. Adherence to the seismic design and construction parameters of the County Building Regulations would ensure the maximum protection feasible for structures and occupants during an earthquake. Resulting recreational development would also be required to comply with the proposed Project amendments related to geologic resources and/or hazards. For example, as described in Chapter 2, *Project Description*, all proposed parks and playgrounds must be developed in a way that does not create hazards to life and property, including flood, geologic, and fire hazards.

In addition, pursuant to Chapter 14 of the County Code, projects that would require a grading or building permit for site improvements may be required to prepare and submit an engineering geology report and/or a geotechnical (soil) engineering report prepared by a licensed professional geologist or geotechnical engineer for review and approval by the County Building Official. This requirement for an engineering geology report and/or geotechnical (soil) engineering report may only be waived at the discretion of the Building Official. The geotechnical report would identify design requirements for structures and foundations to maintain structural integrity during an earthquake to the maximum extent feasible. At the discretion of the Building Official, all recommendations and design features in the geotechnical report may be incorporated into plans prepared by the applicant. Therefore, compliance with

the County Code would reduce potential impacts related to seismic ground shaking to an *insignificant* level.

Geologic Hazards and Unstable Earth Conditions



Site preparation activities for trails and new recreational buildings or structures to support additional uses for eligible RBPs, such as vegetation clearing and grading, cut and fill, and building support facilities (e.g., roads and water supply facilities), could increase the potential for erosion or landslides.
Photo Sources: Santa Barbara County Trails Council

Recreational facilities and trails could involve ground disturbance during construction, such as excavation and grading for sports fields and courts and trail, and operation, such as horseback riding or mountain biking on a natural surface trail. Ground disturbance on lands subject to geologic hazards, including landslides, steep slopes, or soils prone to erosion, liquefaction, expansion, contraction, ground failure, or subsidence, could exacerbate these geologic risks. Development of recreational structures or uses that would require ground disturbance during construction could contribute to ongoing soil erosion in the county, especially in either the mountainous or coastal regions, which both have areas of steep slopes (i.e., greater than 30 percent) and erodible soils that are prone to erosion when soil is disturbed. These facilities may also require supplemental areas of ground disturbance associated with supporting uses (e.g., roads/paths, public service facilities, parking). Site preparation activities for buildings and ancillary facilities could increase the potential for erosion or slope failure and construction could destabilize soil surfaces and increase erosion. As the Project would allow for development in geologically hazardous areas (e.g., hillsides), there is potential for grading, clearing, soil disturbance, and development in areas with varying degrees of geologic hazards, including steep slopes and areas at risk of landslide, erosion, soil instability, subsidence, liquefaction, and expansion. Development associated with the proposed land uses and related development could exacerbate these geologic hazards, though potential development would be required to follow existing regulations related to geologic safety that apply to the design.

Additional impacts could occur if applicants construct ancillary support facilities, as previously mentioned. These could include exacerbation of geologic hazards described above.[2] Grading

[2] Per *California Building Industry Association v. Bay Area Air Quality Management District (2015)*, CEQA does not require analysis of impacts of existing environmental conditions on a project's future users or residents, unless a proposed project risks exacerbating those environmental hazards or conditions that already exist.

for building pads, roads and driveways, and trenching for infrastructure could occur on areas subject to such geologic hazards. Development of impervious surfaces or hardpacked natural surfaces could also increase water runoff, accelerate soil erosion, and increase runoff and siltation into surface waters (Section 3.10, *Hydrology and Water Quality*). Construction and use of trails could also lead to erosion of trails, thereby requiring maintenance to repair and maintain accessibility and safety. These impacts would be limited primarily to new uses involving land development such as those described above.

Impacts resulting from new structures and support facilities developed in these regions would exacerbate the most prevalent potential impacts from: landslides in the Rincon, Monterey, Point Sal formations and serpentine soils associated with the Franciscan Formation; ground failure in the Cuyama Valley; liquefaction in the low coastal areas with high groundwater, the valleys along the Santa Ynez River near Solvang, Buellton and Lompoc, and the Santa Maria River near Santa Maria and Guadalupe; subsidence in the Cuyama Valley; and expansive soils in the Rincon and Monterey Formations. This is particularly true in hilly areas subject to landslides and erosion hazards where high rainfall may strain drainage, erosion, or landslide protection measures, such as within the Tepusquet area or Lompoc hills (County of Santa Barbara 2023).

However, pursuant to the Seismic Safety and Safety Element of the County's Comprehensive Plan, Grading Ordinance (Ord. No. 4766, 11-9-2010), the Santa Barbara CBC (Ord. No. 4822, 1-17-2012), and the Santa Barbara County LUDC (Chapter 35 Section 35.82.080), development would be required to avoid exposure to unstable earth and unsuitable soil conditions. Site-specific geologic investigations are required as part of the current permitting process for applications requiring grading permits to identify unstable slopes. Future recreational development would occur over years and would be distributed in different areas in the county. All supporting development would be subject to the County Code and County's Comprehensive Plan policies, which enforce County development standards such as a geological study and/or soils engineering report, in addition to grading permit requirements, which would substantially reduce geologic hazard impacts. Additionally, trail design and construction projects in unincorporated areas of the county are required by County Parks to comply with County Parks' plan specification for trail development, consistent with the U.S. Forest Service's Plans for Trail and Trail Bridge Structures. These specifications would ensure any future maintenance or improvements to trails would retain their integrity, accessibility, and quality with no significant adverse impact related to erosion or loss of topsoil. Additionally, as part of the Project, the County would adopt new development standards for all public trail projects within the unincorporated areas. These would require that trails avoid or minimize impacts on known geologic resources. Accordingly, new park, trail, recreation facility, and related development proposed or enabled by the Project would not adversely impact geology and soils impacts would be *insignificant*.

Impact GEO-2. The Project could be located in areas with soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems.

The Project would range from small-scale pocket or neighborhood parks and minor alterations on existing facilities to larger-scale recreation development for additional allowed uses (e.g., outdoor soccer fields, equestrian facilities, lodging, etc.). Regardless of the type of recreational development, the allowance of additional allowed uses in agricultural (AG-I and AG-II), resource management, residential, commercial, and recreation zoning districts could potentially result in an increase in employment or visitation to a property, which could increase existing site wastewater demands, or require the modification or construction of new wastewater treatment systems. However, many of the proposed projects detailed in the Recreation Master Plan involve upgrading existing aging infrastructure, including water supply utilities and wastewater disposal and treatment plants to accommodate increases in demand.

Generally, within the county, rural areas, such as AG-II zoned lands (and even AG-I zoned lands), host properties or parcels that are not connected to sanitary sewer systems and must rely on an OWTS for treatment and disposal of wastewater. However, as described in Section 3.7.2.4, *Soil Hazards*, some agricultural areas of the county are underlain by soils that are not supportive of OWTS. This is due to the presence of soils that have low capacity to percolate and absorb septic effluent and which are considered to have a "very limited" rating for septic absorption, soils that can cause effluent to daylight and potentially cause runoff of such waters, or are located in areas with shallow groundwater.

Under the Project, prior to development, recreational projects would be required to evaluate existing and proposed wastewater demands and the capacity of existing OWTS or the need for modification or construction of new OWTS. EHS permit applications for existing systems include an Evaluation of Existing Onsite Wastewater Treatment System for Building/Site Clearance form that applicants must prepare in order to determine if an existing OWTS would be adequate to serve the proposed uses and related development or new or modified systems would be required. If new or modified OWTS are required, applicants would be required to comply with the existing permitting requirements of EHS, which include application for modification or construction of OWTS, and the County's LAMP. The County requirements for OWTS address potential issues associated with soils that have no or low capacity to support septic systems, including through preparation of a soil engineering report and design of sewage disposal systems by a registered civil or geotechnical engineering with special recommendation regarding the disposal method (e.g., leach lines and drywell) based on existing site constraints. Mandatory compliance with existing County/EHS permitting requirements for OWTS would ensure that the proposed uses and related development would involve the construction, modification, or maintenance of OWTS in a manner that would avoid impacts associated with

soils underlying agricultural lands that have inadequate capacity to support onsite sewage disposal. Therefore, impacts are *insignificant*.

Impact GEO-3. The Project could potentially directly or indirectly cause disruption, alteration, destruction, or adverse effects on significant paleontological or unique geological resources.

Paleontological Resources

Many paleontological resources or unique geologic resources exist throughout the county and could be present in the Project area. Physical improvement or alteration of rural areas or areas that have not been previously developed, such as the construction of new structures or grading of a site, could also disrupt or disturb such resources which are or could be designated as unique or significant resources.

As described in Section 3.7.2.6, *Paleontological Resources and Unique Geologic Features*, majority of land in the county is underlain by up to 35,000 feet of marine sedimentary rocks of late Mesozoic and Cenozoic ages (over 66 million years ago). The sedimentary rocks are diverse but are dominated by great thicknesses of sandstone and shale with lesser amounts of conglomerate, alluvial fan deposits, dune sand, and diatomite. Because rock units with vertebrate, plant, and trace fossils are commonly found across the county, the Project area would be considered as having high potential for containing additional significant paleontological resources. However, agricultural and other rural lands throughout the county are generally underlain by younger age alluvial sediments and surficial deposits that are considered to have low paleontological sensitivity due to the displaced or disturbed characteristics of the sediments. Generally, geologic units of sufficient age to contain paleontological resources are located much deeper below surficial alluvial sediments and surface deposits, and agricultural activities and some elements of construction with shallow excavations do not typically extend deep enough to encounter such resources. Therefore, the potential for new development proposed by the Project to adversely affect paleontological resources depends largely on the type of project/improvements and location of the project site.

Proposed projects involving development of new pocket park and neighborhood park projects are highly unlikely to have potential to disturb paleontological resources as they are typically located in urban areas or residential suburbs of the county that have experienced extensive past development and disturbance, or the development of which would involve relatively minor ground disturbance due to the nature and scale of development proposed. For instance, Mud Lake Neighborhood Park is located within a suburban area of Orcutt surrounded by tract home development and would involve the development of an existing flood control retention basin as a new neighborhood park. Development of the proposed improvements would likely involve some surficial grading that would not involve deep excavation or grading to depths that would extent below depths of existing disturbed soils. Similarly, projects involving the expansion or

improvement of existing park facilities or development of facilities on existing disturbed sites (e.g., active agricultural lands), such as the Guadalupe Campground & Community Park, or the South Coast Aquatic Center & Goleta Community Park would entail the replacement of existing facilities or site reconfigurations within areas that have already been highly disturbed. For these projects, the presence of paleontological resources to exist in the area that could be disturbed by development is considered very low.

Regarding projects involving the development of new trails, these projects are similarly considered to have little to no potential to cause direct impacts to paleontological resources. Except in cases where trails are proposed in areas of steep terrain, the development of new trails involves only surficial grading and ground disturbance. Additionally, trail design and construction projects in unincorporated areas of the county are required by County Parks to comply with County Parks' plan specification for trail development, consistent with the U.S. Forest Service's Plans for Trail and Trail Bridge Structures. These specifications would ensure any future maintenance or improvements to trails would retain their integrity, accessibility, and quality. Further, as part of the Project, the County would adopt new development standards applying to trails within the unincorporated area. These trail development standards would require that trails be sited within previously disturbed areas to the extent feasible and that trails otherwise avoid or minimize impacts to known areas with remains and/or traces of prehistoric life. As such, new trail development proposed or enabled by the Project are considered unlikely to result in impacts on paleontological resources.

As mentioned above, the larger community parks and campground projects proposed in areas that have experienced less human disturbance have a greater potential to cause direct impacts to paleontological resources. These projects involve much larger sites, greater areas of disturbance, and typically involve new structural development or site improvements that require a greater degree of grading and excavation. The proposed Union Valley Parkway Community Park, for instance, would entail the development of new athletic fields, hard courts (e.g., tennis and pickleball), and potentially a modern aquatic facility on an existing vacant site in the community of Orcutt. The types of improvements associated with this project would require extensive site grading and earthwork that has a much greater potential to adversely affect paleontological resources.

The Project proposes zoning ordinance amendments to support permitting of parks, recreation, and trail in unincorporated areas. These zoning ordinance amendments include objective development standards to ensure high-quality, safe, and accessible facilities to enhance community sustainability and protect natural resources. While implementation of and mandatory compliance with existing regulations and proposed Comprehensive Plan and zoning ordinance amendments would serve to reduce or avoid impacts to archaeological resources, potential would remain for certain planned park, recreation, and trail projects to cause direct adverse effects to paleontological resources, and impacts are considered *potentially significant*

and would require mitigation measure **MM GEO-1 (Paleontological Resource Assessment and Monitoring)** and **MM GEO-2 (Stop Work at Encounter)** to reduce impacts to an *insignificant* level.

Additionally, indirect impacts to paleontological resources could also occur as a result of adoption and implementation of the proposed LUDC and zoning ordinance amendments. As previously discussed, implementation of these amendments has the potential to encourage future development beyond what is anticipated or projected under the current land use framework. However, it is impossible to predict how, when, and where projects enabled under the proposed amendments, including eligible RBP Program projects, would take place. Likewise, it is difficult to predict the scope, scale, and extent of development proposed by these projects. Depending on the specific location of future uses and related development, projects enabled under the proposed amendments could result in disturbance of known and unknown paleontological resources, particularly if development involves ground disturbance with heavy construction activities (e.g., excavation or grading) or previously undisturbed sites with high potential for undiscovered, intact paleontological resources to exist.

As stated above, implementation of **MM GEO-1 (Paleontological Resource Assessment and Monitoring)** and **MM GEO-2 (Stop Work at Encounter)** would be required for projects in areas with a high potential for paleontological resources. The zoning ordinance amendments proposed under the Project which establish objective development standards to ensure high-quality, safe, and accessible facilities to enhance community sustainability and protect natural resources would also apply to future projects enabled under the zoning ordinance amendments. Future development indirectly enabled under the Project would be required to adhere to these policies and regulations on a case-by-case basis during County review of individual permit applications and/or as part of a discretionary process, depending on the scope and scale of proposed project and necessary permit approvals. Adherence to these policies and regulations would reduce any adverse effects on paleontological resources, and indirect impacts to archaeological resources associated with implementation of the Project on with be *significant but mitigable*.

Unique Geological Resources

Of the county's designated areas of special geologic interest, none of the identified areas overlap with any recreational development projects proposed in the Master Plan. In regard to future recreational development, Section 3.7.3, *Regulatory Setting*, describes objectives and policies in the County Comprehensive Plan, Article II CZO (Chapter 35 Section 35.174.3), and the County Grading Ordinance that require avoidance of impacts to geologic and soil problems. Under the proposed Project, all recreational development, including RBPs, would be subject to existing County codes, policies, and permit processes which would require detailed geologic and soil investigations for development in areas with possible soil or geologic problems,

including those areas of special geologic interest. Due to the requirements for mandatory compliance with existing regulations, Project impacts unique geological resources are considered *insignificant.*

3.7.4.3 Cumulative Impacts

Project approval would contribute to cumulative geologic and soils impacts associated with new development, including pending recreational development projects in the county that would collectively result in grading and land development. Cumulative impacts could include exacerbated potential for landslides, erosion, liquefaction, soils expansion or contraction, or ground failure. Concurrent development of commercial and additional allowable land uses with increased recreational development could potentially result in cumulatively considerable grading, soil disturbance, and geologic and seismic hazards.

Cumulative impacts associated with the proposed Project would include the potential to exacerbate geologic hazards such as erosion and soil instability resulting from increased recreational development and related ground disturbance. Increases in allowable land uses in combination with proposed development of parks, trails, and other recreational facilities under other County plans and projects would potentially exacerbate geologic hazards. However, all recreational development resulting from the proposed Project would be required to comply with existing County policies and regulations. The County would review zoning permit applications to ensure compliance with the Santa Barbara County Comprehensive Plan Seismic Safety and Safety Element, Grading Ordinance (Ord. No. 4766, 11-9-2010), Santa Barbara CBC (Ord. No. 4822, 1-17-2012), LUDC (Chapter 35 Section 35.82.080), and Article II CZO (Chapter 35 Section 35.174.3). Application of the CBC standards would address potential impacts to structures related to seismic events and soil-related hazards. Therefore, the contribution of the proposed Project to cumulative development that may exacerbate geologic hazards, such as erosion and soil instability, would be minor and cumulative impacts associated with the proposed Project would be *insignificant*.

A cumulative impact related to paleontological resources would result if the impacts associated with the proposed Project impacts, when combined with other past, present, and future projects, would cumulatively increase the potential for loss of paleontological resources. Cumulative development from projects may uncover previously undisturbed paleontological resources and could potentially result in damage or loss of such resources. However, in most cases, project-specific impacts would be addressed on a project-by-project basis. Additionally, implementation of **MM GEO-1 (Paleontological Resource Assessment and Monitoring)** and **MM GEO-2 (Stop Work at Encounter)** would be required for projects that have a high potential for paleontological resource findings. Development requiring ground disturbance and construction would also be required to comply with existing County codes, policies, and permit procedures, requiring preparation of site-specific studies and appropriate measures to be taken to assess

any inadvertently discovered resources. Implementation of these measures would reduce site-specific impacts of the proposed Project on paleontological resources to insignificant levels. Other cumulative development projects within the county would also be subject to similar mitigation or be required to conduct site-specific studies and mitigation measures to address impacts to paleontological resources or unique geologic resources. To the extent that impacts on paleontological and unique geologic resources from cumulative projects may occur, the proposed Project's impacts would not be cumulatively considerable, and the cumulative impacts of the proposed Project would be *significant but mitigable.*

3.7.4.4 Proposed Mitigation

MM GEO-1: Paleontological Resource Assessment and Monitoring. Development of County parks, permitted uses in Recreation zones, permitted parks and trails, and RBPs shall be sited to avoid adverse affects on significant paleontological resources to the extent feasible. Where projects ~~For individual recreation development projects and RBPs resulting from the Project that~~ are determined to have high or undetermined potential for significant paleontological resources, an intensive field survey and surface salvage should occur before earth-moving or ground-disturbing activities. The survey shall result in an adequate preconstruction paleontological resource impact assessment and a subsequent mitigation program, if applicable. If deemed necessary, for excavations in rock units of known high potential, the project paleontologist or paleontological monitor shall be present initially during 100% of the earth-moving activities. After 50% of excavations are completed in either an area or rock unit and no fossils of any kind have been discovered, the level of monitoring can be reduced or suspended entirely at the project paleontologist's discretion.

> **Plan Requirements and Timing**: The County shall confirm that a qualified paleontologist has been contacted and selected for assessment and monitoring before construction activities begin. To ensure compliance at the start of the project, a statement that confirms the site's paleontological potential, confirms the repository agreement with an established public institution, and describes the program for impact mitigation must be deposited with the lead agency and contractor(s) before any ground disturbance begins.
>
> **Monitoring:** County ~~P&D~~ compliance monitoring staff shall ensure compliance through a review of project plans and/or applicant/contractor-provided documentation.

MM GEO-2: Stop Work at Encounter. For individual recreation development projects and RBPs resulting from the proposed Project, all ground disturbing work shall stop or be redirected immediately if paleontological resources are encountered during grading, construction, landscaping, or other construction-related activity. A County-approved paleontologist who will salvage the fossils and assess the necessity for further mitigation measures, if applicable.

Plan Requirements and Timing: The County shall confirm that this paleontological resource protection standard is printed on all building and grading plans.

Monitoring: The County permit processing planner shall check plans before issuance of a permit for the proposed uses and related development. County compliance monitoring staff shall spot-check in the field throughout grading and construction.

3.7.4.5 Secondary Impacts

Implementation of **MM GEO-1** and **MM GEO-2** would not result in adverse secondary impacts.

3.7.4.6 Residual Impacts

Impact GEO-1. As discussed above, due to the Seismic Safety and Safety Element of the County's Comprehensive Plan, County Grading Ordinance (Ord. No. 4766, 11-9-2010), CBC (Ord. No. 4822, 1-17-2012), LUDC (Chapter 35 Section 35.82.080), and the Article II, CZO (Chapter 35 Section 35.174.3), residual geologic impacts associated with the proposed uses and related development would be *insignificant*.

Impact GEO-2. As discussed above, due to the County LAMP and EHS permitting requirements, residual impacts associated with new or modified OWTS would be *insignificant*.

Impact GEO-3. As discussed above, with the implementation of **MM GEO-1 (Paleontological Resource Assessment and Monitoring), MM GEO-2 (Stop Work at Encounter)**, and required compliance with the Seismic Safety and Safety Element of the County's Comprehensive Plan, Grading Ordinance (Ord. No. 4766, 11-9-2010), CBC (Ord. No. 4822, 1-17-2012), LUDC (Chapter 35 Section 35.82.080), and the Article II CZO (Chapter 35 Section 35.174.3), residual paleontological impacts associated with the proposed uses and related development would be *significant but mitigable*.

This page intentionally left blank.

3.8 GREENHOUSE GAS EMISSIONS

3.8.1 INTRODUCTION

This section describes the potential impacts related to greenhouse gas (GHG) emissions and climate change that could occur from the implementation of the Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (Project). This section provides a topical overview of GHGs and their relation to global climate change, describes the current understanding of the effects of climate change, provides an overview of existing known GHG emissions and their sources, and reviews applicable federal, state, and local plans, policies, and regulations pertaining to GHG emissions. This analysis addresses GHG emissions of sufficient nature and magnitude that result in significant contributions to the global effects of climate change that could result from future parks, trails, and related development as a result of the Project. Issues relating to the generation of criteria air pollutant emissions are discussed in Section 3.3, *Air Quality.*

3.8.2 ENVIRONMENTAL SETTING

As described in Section 3.3, *Air Quality, the* California Air Resources Board (CARB) has divided California into 15 regional air basins that correspond to topographic features that influence regional air quality conditions. Each basin is further divided into Air Pollution Control Districts (APCDs), which are responsible for managing and enforcing air quality regulations within their districts.

The Project area includes the unincorporated area of Santa Barbara County, which is located in the South Central Coast Air Basin (SCCAB). SCCAB comprises three air districts: San Luis Obispo County APCD, Santa Barbara County Air Pollution Control District (SBCAPCD), and Ventura County APCD. The Project area, which includes the five Recreation Planning Areas (RPAs; Lompoc Valley, Santa Maria Valley, Santa Ynez Valley, Cuyama Valley, and South Coast), is within the jurisdiction of SBCAPCD.

Land uses in unincorporated areas of the county are mostly agricultural, open space, residential communities, some commercial and industrial areas, and job centers. Passenger vehicles, motorcycles, and trucks are the primary sources of GHG emissions in the county. Additional sources of GHG emissions include the use of natural gas in buildings and facilities, agricultural practices, electricity use (generated in-state and imported), the operation of off-road equipment, solid waste, and water/wastewater.

3.8.2.1 Background

The natural process through which heat is retained in the Earth's troposphere is called the "greenhouse effect." The greenhouse effect traps heat in the troposphere through a three-fold process, summarized as follows: short-wave radiation emitted by the Sun is absorbed by the Earth; the Earth emits a portion of this energy in the form of long-wave (i.e., thermal) radiation; and GHGs in the upper atmosphere absorb this long-wave radiation and emit this long-wave radiation into space and toward the Earth. This "trapping" of the long-wave radiation emitted back toward the Earth is the underlying process of the greenhouse effect. The greenhouse effect provides a habitable climate on the planet, although large magnitudes of GHG emissions from anthropogenic sources since the Industrial Revolution have created an excess of these gases in the atmosphere.

GHGs are the result of both natural and human-influenced activities. Volcanic activity, forest fires, decomposition, industrial processes, landfills, and consumption of fossil fuels for power generation, transportation, heating, and cooling are the primary sources of GHG emissions. Without human activity, the Earth would maintain an approximate, but varied, balance between the emission of GHGs into the atmosphere and the storage of GHGs in oceans and terrestrial ecosystems. Increased combustion of fossil fuels (e.g., gasoline, diesel, and coal) has contributed to a rapid increase in atmospheric levels of GHGs over the last 150 years.

GHG pollutants most prevalently generated by human activities that have the greatest quantifiable influence on climate include carbon dioxide (CO_2), methane (CH_4), and nitrous oxide (N_2O). In addition to CO_2, CH_4, and N_2O, GHGs include hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), black carbon (black carbon is the most strongly light-absorbing component of particulate matter emitted from burning fuels such as coal, diesel, and biomass), and water vapor. Methodologies and regulations approved by the Intergovernmental Panel on Climate Change (IPCC), the U.S. Environmental Protection Agency (USEPA), and CARB focus on CO_2, CH_4, N_2O, and chlorofluorocarbons (CFCs). CO_2 is the most abundant pollutant that contributes to climate change through fossil fuel combustion. The other GHGs are less abundant but have higher Global Warming Potential (GWP) than CO_2. CFCs have been banned in the U.S. and have no natural source, so these GHGs are not included in this analysis.

- **CO_2.** The production and absorption of CO_2 from human activities occurs through the burning of fossil fuels (e.g., oil, natural gas, and coal), solid waste, and wood products, and as a result of other chemical reactions, such as those required to manufacture cement. CO_2 is constantly being exchanged among the atmosphere, ocean, and land surface as it is both produced and absorbed by many microorganisms, plants, and animals. However, emissions and removal of CO_2 by these natural processes tend to balance. Since the Industrial Revolution began around 1750, human-related activities have increased CO_2 concentrations

in the atmosphere by approximately 48 percent, primarily resulting from fossil fuel combustion and cement production (USEPA 2023d; World Meteorological Organization 2022). Globally, the largest source of human-related CO_2 emissions is the combustion of fossil fuels such as coal, oil, and gas in power plants, automobiles, and industrial facilities. CO_2 is sequestered (i.e., removed from the atmosphere) when it is absorbed by plants as part of the biological carbon cycle. When in balance, total CO_2 emissions and removals from the entire carbon cycle are roughly equal.

- **CH_4.** CH_4 is emitted from a variety of both human-related and natural sources. Anthropogenic sources of CH_4 include the production and transport of coal, natural gas, and oil, from livestock and other agricultural practices, and from the decay of organic waste in municipal solid waste landfills. It is estimated that up to 65 percent of global CH_4 emissions are related to human activities. Natural sources of CH_4 include wetlands, gas hydrates, permafrost, termites, oceans, freshwater bodies, non-wetland soils, and wildfires (USEPA 2020).
- **N_2O.** Microbial processes in soil and water, including those reactions that occur in fertilizer containing nitrogen, produce N_2O. In addition to agricultural sources, some industrial processes (e.g., fossil fuel-fired power plants, nylon production, nitric acid production, and vehicle emissions) also contribute to the atmospheric load of N_2O. Concentrations of N_2O began to rise at the beginning of the Industrial Revolution, reaching 314 parts per billion (ppb) by 1998 (USEPA 2020).

To account for this higher potential, emissions of other GHGs are frequently expressed in the equivalent of CO_2, denoted as carbon dioxide equivalent (CO_2e). CO_2e is a measurement used to account for the fact that different GHGs have different potential to retain infrared radiation in the atmosphere and contribute to the greenhouse effect. This potential, known as the GWP of a GHG, is dependent on the lifetime, or persistence, of the gas molecule in the atmosphere. Table 3.8-1 shows the GWP for some of the most environmentally prevalent GHGs.

Table 3.8-1. Global Warming Potential for Various GHGs

Pollutant	Lifetime (Years)	Global Warming Potential (Second Assessment)	Global Warming Potential (Fourth Assessment)
Carbon Dioxide (CO_2)	--	1	1
Methane (CH_4)	12	21	25
Nitrous Oxide (N_2O)	114	310	298
Nitrogen Trifluoride	740	Unknown	17,200
Sulfur Hexafluoride (SF_6)	3,200	23,900	22,800
Perfluorocarbons (PFCs)	2,600-50,000	6,500-9,200	7,390-12,200
Hydrofluorocarbons (HFCs)	1-270	140-11,700	124-14,800

Source: CARB 2025c.

3.8.2.2 Potential Effects of Climate Change

The primary effect of rising global concentrations of atmospheric GHG levels is a rise in the average global temperature of approximately 0.17 degrees Celsius (°C) per decade since 1901, determined from meteorological measurements worldwide between 1990 and 2005. Climate change modeling using 2000 emission rates shows that further warming is likely to occur given the expected rise in global atmospheric GHG concentrations from innumerable sources of GHG emissions worldwide (including from economically developed and developing countries and deforestation), which would induce further changes in the global climate system during the current century (USEPA 2024a). Scientists expect that the average global surface temperature could rise by 2–11.5 degrees Fahrenheit (°F) by 2100, with significant regional variation.

The scientific community's understanding of the fundamental processes responsible for global climate change has improved over the past decade, and its predictive capabilities are advancing. However, there remain some uncertainties in, for example, predictions of local effects of climate change, occurrence, frequency, and magnitude of extreme weather events, effects of aerosols, changes in clouds, shifts in the intensity and distribution of precipitation, and changes in oceanic circulation. As the study of climate change and climate science progresses, the science itself and our understanding of the effects of climate change become more accurate. Yet, due to the complexity of the Earth's climate system and the inability to precisely model it, the uncertainty surrounding climate change remains. Nevertheless, the IPCC stated that "observed increases in well-mixed GHG concentrations since around 1750 are unequivocally caused by human activities...[and] human influence has warmed the climate at a rate that is unprecedented in at least the last 2,000 years" (IPCC 2021). Thousands of studies conducted by tens of thousands of scientists around the world have documented changes in the climate, with many lines of evidence demonstrating that human activities, especially GHGs, are the primary cause (U.S. Global Change Research Program 2017).

According to California's Fourth Climate Change Assessment (California Natural Resources Agency [CNRA] 2018a), adverse effects from global climate change in California could:

- By 2050, increase intensity and frequency of heat waves, causing two to three times more heat-related deaths in cities.
- By 2100, increase average annual maximum daily temperature by 5.6°F to 8.8°F.
- By 2100, cause declines in the average water supply from snowpack by two-thirds from historic levels.
- By 2100, increase the frequency of extreme wildfires and increase the average area burned statewide by 77 percent.
- By 2100, completely erode 31 to 67 percent of Southern California beaches, increasing the risk of tidal inundation and coastal flood hazards.

Below is a summary of some of the potential effects that could be experienced in California and particularly within the Central Coast region as a result of global warming and climate change. Other types of environmental impacts related to air pollutant emissions are addressed in Section 3.3, *Air Quality*.

Air Quality and Heat-Related Public Health Impacts

Higher temperatures, conducive to air pollution formation, could worsen air quality in California. Climate change may increase the concentration of ground-level ozone (O_3), but the magnitude of the effect and, therefore, its indirect effects, are uncertain. If higher temperatures are accompanied by drier conditions, the potential for large wildfires could increase, which, in turn, would exacerbate air quality. Additionally, severe heat accompanied by drier conditions and poor air quality could increase the number of heat-related deaths, illnesses, and asthma attacks throughout the state (Langridge, R. [University of California, Santa Cruz] 2018). However, if higher temperatures are accompanied by wetter, rather than drier conditions, the rains would temporarily clear the air of particulate pollution and reduce the incidence of large wildfires, thus ameliorating the pollution associated with wildfires.

In 2021, the CNRA published the most recent iteration of the California Climate Adaptation Strategy, which was first prepared as a response to the Governor's Executive Order (EO) S-13-2008. The CNRA report lists specific recommendations for state and local agencies to best adapt to the anticipated risks posed by a changing climate. The California Energy Commission's Cal-Adapt website, an outcome of California's first Climate Adaptation Strategy, provides climate change scenarios and impacts beneficial to local decision-makers. The information provided on the Cal-Adapt website represents a projection of potential future climate scenarios. The data are comprised of the average values (i.e., temperature, sea level rise, and snowpack) from a variety of scenarios and models and are meant to illustrate how the climate may change based on a variety of different potential social and economic factors. According to the Cal-Adapt website, the county could experience an average increase in temperature of approximately 4.3°F to 74.3°F by 2070–2099, compared to the baseline 1961–1990 period (70.0°F), which is a potential increase of approximately 6 percent. Data suggest that the predicted future increase in temperatures as a result of climate change could potentially interfere with efforts to control and reduce ground-level ozone in the region (CEC 2023).

Water Supply and Water Quality

Uncertainty remains concerning the overall impact of global climate change on future water supplies in California. Studies have found that "[c]onsiderable uncertainty about precise impacts of climate change on California hydrology and water resources will remain until we have more precise and consistent information about how precipitation patterns, timing, and intensity will change." For example, some studies identify little change in total annual precipitation in projections for California, while others show significantly more precipitation.

Warmer, wetter winters would increase the amount of runoff available for groundwater recharge; however, this additional runoff would occur at a time when some basins are either being recharged at their maximum capacity or are already full. Conversely, a reduced snowpack coupled with increased rainfall during winters could lead to reductions in spring season runoff and higher evapotranspiration because higher temperatures could reduce the amount of water available for recharge.

These effects of climate change may also have adverse effects on water quality. Changes in precipitation and runoff entering waterbodies and more frequent flooding can exacerbate many forms of water pollution, including increases in erosion and discharge of sediments, or increasing runoff carrying harmful pollutants. Increases in water temperatures may also cause eutrophication and excess algal growth, as well as make it more difficult to attain water quality standards. These effects would impact natural processes, as well as the quality of much of California's water supplies (USEPA 2016).

Hydrology and Sea Level Rise

Climate change could potentially affect the amount of snowfall, rainfall, and snowpack, and the intensity and frequency of storms. As a result, climate change could lead to adverse flood hydrographs (e.g., flash floods, rain or snow events, and coincidental high tide and high runoff events), sea level rise and coastal flooding, coastal erosion, and the potential for saltwater intrusion. Sea level rise can be a product of global warming through two main processes, including the expansion of seawater as the oceans warm and the melting of ice over land. A rise in sea levels could result in coastal flooding and erosion and could jeopardize California's water supply. Increased storm intensity and frequency could affect the ability of flood control facilities, including levees and coastal armoring, to handle storm events. Along the county's coastline, sea levels are projected to rise by 8.4 inches by 2030, 30 inches by 2060, and 79.2 inches by 2100, increasing coastal flooding and dune and bluff erosion, which threatens many coastal communities and infrastructure. The projected rate of sea level rise, when coupled with coastal flooding from a 100-year storm event, could increase high tide levels by up to 48.4 inches by 2030, 70 inches by 2060, and 119.2 inches by 2100 and causing an average of 623 feet of dune erosion and 177 feet of bluff erosion (County of Santa Barbara 2021).

Agriculture

California has a $30 billion agricultural industry that produces half the country's fruits and vegetables. As described in Section 3.2, *Agricultural Resources*, there is a $1.9 billion agricultural industry in Santa Barbara County. Higher CO_2 levels can stimulate plant production and increase plant water-use efficiency. However, if temperatures rise and drier conditions prevail, water demand could increase, crop yield could be threatened by a less reliable water supply, and greater O_3 pollution could render crops more susceptible to pest and disease

outbreaks. In addition, temperature increases could change the time of year certain crops, such as wine grapes, bloom or ripen, and thus affect their quality.

Ecosystems and Wildlife

Increases in global temperatures and the potential resulting changes in weather patterns could have ecological effects on a global and local scale. Changes in the climate can affect terrestrial, coastal, and marine ecosystems by altering the hydrologic cycle and water quality, reducing the range of habitats, altering animal behavior and migration patterns, and altering the timing of natural processes such as flower blooms (USEPA 2023). Rising temperatures could have four major impacts on plants and animals: 1) timing of ecological events; 2) geographic range; 3) species' composition within communities; and 4) ecosystem processes such as carbon cycling and storage. Recent studies have found that in California, 16 of 29 vegetation communities are highly or nearly highly vulnerable to climate change (CNRA 2018b). The most vulnerable ecosystems in the county are the aquatic systems (e.g., streams, creeks, rivers, and lakes), particularly sloughs and coastal marshes in the North County and South Coast (County of Santa Barbara 2021).

3.8.2.3 Existing GHG Emissions from Human Activity

The burning of fossil fuels, such as coal and oil, especially for the generation of electricity and powering of motor vehicles, has led to substantial increases in CO_2 emissions (and thus substantial increases in atmospheric concentrations). In 2022, atmospheric CO_2 concentrations measured 421 parts per million (ppm) at the National Oceanic and Atmospheric Administration's (NOAA's) Mauna Loa Atmospheric Baseline Observatory in Hawaii, representing an increase from the level of 280 ppm that occurred for 6,000 years of human civilization before the Industrial Revolution (NOAA 2023).

Global GHG Emissions

The IPCC was formed by the World Meteorological Organization in 1988 to provide governments at all levels with scientific information that they can use to develop climate policies. The IPCC is the United Nations' body for assessing the science related to climate change and is responsible for tracking and reporting global emissions of GHGs. IPCC's Sixth Assessment Report, which was published in 2022, reported that global net anthropogenic GHG emissions were 59 ± 6.6 gigatons (Gt) CO_2e in 2019, approximately 12 percent (6.5 Gt CO_2e) higher than in 2010 and approximately 54 percent (21 Gt CO_2e) higher than in 1990. The annual average during the decade 2010-2019 was 56 ± 6.0 Gt CO_2e, 9.1 Gt CO_2e per year higher than in 2000–2009. This is the highest increase in average decadal emissions on record. The average annual rate of growth slowed from 2.1 percent per year between 2000 and 2009 to 1.3 percent per year between 2010 and 2019. Almost half (i.e., approximately 42 percent) of cumulative

anthropogenic CO_2 emissions between 1850 and 2019 have occurred in the last 30 years (IPCC 2021).

U.S. GHG Emissions

In 2020, the total gross U.S. GHG emissions were 6,340.2 million metric tons (MMT) of CO_2e. Total U.S. emissions have decreased by 2.3 percent from 1990 to 2021, down from a high of 15.8 percent above 1990 levels in 2007. Emissions decreased from 2020 to 2021 by 5.2 percent (314.3 MMT CO_2e). From 2019 to 2020, there was a sharp decline in emissions, which is largely due to the impacts of the COVID-19 Pandemic on travel and economic activity. However, the decline also reflects the combined impacts of long-term trends in many factors, including population, economic growth, energy markets, technological changes, energy efficiency, and the carbon intensity of energy fuel choices. Following this decrease, travel and economic activity began to increase again, and in 2021, CO_2 emissions from fossil fuel combustion increased by 6.8 percent from the previous year. Emissions from the energy and transportation sectors, associated with increases in consumption of natural gas, coal, and petroleum also increased. In 2021 overall, CO_2 emissions from fossil fuel combustion were 1.9 percent below 1990 levels. In 2022, the total U.S. GHG emissions by sector were 28.0 percent for the transportation sector, 25.0 percent for the electric power sector, 23 percent for industry, 13 percent for residential and commercial sectors, and 10.0 percent for agriculture (USEPA 2024b).

State of California GHG Emissions

In 2022, California generated approximately 371.1 MMT CO_2e, or approximately 5 percent of total U.S. emissions. This is due primarily to the size and population of California as compared to other states. Despite a population increase of 14.2 percent between 2000 and 2022, the gross per capita emissions in the state were reduced by 24 percent from 13.8 metric tons (MT) CO_2e per person in 2001 to 9.3 MT CO_2e per person in 2020, a 33 percent decrease (CARB 2024). This reduction indicates the contributions that energy conservation and energy efficiency have in reducing per capita emissions. Another factor that has reduced California's fuel use and GHG emissions is its mild climate compared to that of many other states.

Transportation is the source of approximately 36.8 percent of the state's GHG emissions, followed by industrial sources at 19.9 percent, and electricity generation – both in-state and out-of-state – at 16.1 percent. Residential and commercial sources account for 10.5 percent, combined, while agriculture accounts for 8.6 percent. High GWP, such as refrigerants, comprised 5.8 percent of California's GHG emissions in 2018. Waste accounted for approximately 2.4 percent of state emissions (CARB 2024).

County of Santa Barbara Emissions Inventory

As part of the County of Santa Barbara's (County's) 2030 Climate Action Plan, the County prepared a comprehensive GHG inventory using 2018 data. Based on this data, in 2018, the County produced 1,474,858 MT CO_2e. Compared to the County's prior 2007 GHG emissions

inventory, GHG emissions increased by approximately 11 percent. However, the relative contribution values of each emission source remain proportionately unchanged from 2007 to 2018. Transportation (on-road and off-road) and building energy use are the primary sources of GHG emissions in the county (County of Santa Barbara 2024a)

3.8.3 REGULATORY SETTING

Federal, state, and local regulations have been enacted to address GHGs and climate change in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future housing development under the Project and its associated impacts.

3.8.3.1 Federal

Federal Clean Air Act

To date, no national standards have been established for nationwide GHG reduction targets, nor have any regulations or legislation been enacted specifically to address climate change and GHG emissions reduction at the project level. Various efforts have been promulgated at the federal level to improve fuel economy and energy efficiency to address climate change and its associated effects.

The Federal Clean Air Act (Federal CAA) was passed in 1963 and amended in 1990, and was the first comprehensive federal law to regulate air emissions from stationary and mobile sources. Among other things, the law authorizes the USEPA to establish National Ambient Air Quality Standards (NAAQS), which help to ensure basic health and environmental protection from air pollution. The Federal CAA also gives the USEPA the authority to limit emissions of air pollutants coming from sources like chemical plants, utilities, and steel mills.

In April 2007, the U.S. Supreme Court ruled that GHGs are "air pollutants" under the Federal CAA. On December 7, 2009, two distinct findings regarding GHGs were signed under Section 202(a) of the Federal CAA. These include the “Endangerment Finding” and the “Cause or Contribution Finding.” The Endangerment Finding finds that the current and projected concentrations of the six key well-mixed GHGs in the atmosphere threaten the public health and welfare of current and future generations. The Cause and Contribution Finding finds that the combined emissions of these well-mixed GHGs from new motor vehicles and vehicle engines contribute to the GHG pollution that threatens public health and welfare.

In 1990, the U.S. Congress adopted the Federal CAA Amendments (CAAA), which updated the nation's air pollution control program. The Federal CAAA established several requirements, including new deadlines for achieving federal clean air standards.

The USEPA is the federal agency charged with administering the Federal CAAA and other air quality-related legislation. As a regulatory agency, USEPA's principal functions include setting NAAQS; establishing minimum national emission limits for major sources of pollution; and promulgating regulations.

The Federal CAAA requires USEPA to approve state implementation plans (SIPs) to meet and/or maintain the NAAQS. California's SIP is comprised of plans developed at the regional or local level.

The national emissions reduction requirements established in the USEPA's Clean Power Plan Rule were repealed on July 8, 2019 (84 Federal Register 32250), and the targets in the Paris Climate Accord were withdrawn in November of 2020. The emission reduction requirements established by the USEPA in the Affordable Clean Energy Rule, which replaced the Clean Power Plan Rule, were ultimately repealed through the final 2024 GHG Rule.

Energy Independence and Security Act

The Energy Independence and Security Act (EISA) of 2007 includes several key provisions that will increase energy efficiency and the availability of renewable energy, which will reduce GHG emissions as a result. The EISA facilitates the reduction of GHG emissions by requiring the following:

- Increasing the supply of alternative fuel sources by setting a mandatory Renewable Fuel Standard that requires fuel producers to use at least 36 billion gallons of biofuel in 2022.
- Prescribing or revising standards affecting regional efficiency for heating and cooling products, procedures for new or amended standards, energy conservation, energy efficiency labeling for consumer electronic products, residential boiler efficiency, electric motor efficiency, and home appliances.
- Achieving approximately 25 percent greater efficiency for light bulbs by phasing out old incandescent light bulbs between 2012 and 2014; requiring approximately 200 percent greater efficiency for light bulbs, or similar energy savings, by 2020.
- While superseded by the 2019 USEPA and National Highway Traffic Safety Administration (NHTSA) actions described in Section 3.3, *Air Quality*, the EISA included: a) establishing a minimum average fuel economy of 35 mpg for the combined fleet of cars and light trucks by 2020; and b) directing the NHTSA to establish a fuel economy program for medium- and heavy-duty trucks and create a separate fuel economy standard for trucks.

Additional provisions of EISA address energy savings in government and public institutions, promote research for alternative energy, additional research in carbon capture, international energy programs, and the creation of green jobs.

Vehicle Emissions Standards

In 2009, a national policy was adopted for fuel efficiency and emissions standards in the U.S. auto industry, which applies to passenger cars and light-duty trucks for model years 2012 to 2016 (referred to as the Pavley standards; Phase 1 standards). The standards surpass the prior Corporate Average Fuel Economy standards and require an average fuel economy standard of 35.5 miles per gallon (mpg) and 250 grams of CO_2 per mile by model year 2016, based on USEPA calculation methods. These standards were formally adopted on April 1, 2010.

In 2012, new standards were adopted for model years 2017 to 2025 for passenger cars and light-duty trucks. By 2020, new vehicles are projected to achieve 41.7 mpg – if GHG reductions are achieved exclusively through fuel economy improvements – and 213 grams of CO_2 per mile (Phase 2 standards). By 2025, vehicles are required to achieve 54.5 mpg (if GHG reductions are achieved exclusively through fuel economy improvements) and 163 grams of CO_2 per mile. According to the USEPA, a model year 2025 vehicle would emit approximately one-half of the GHG emissions of a model year 2010 vehicle.

On October 25, 2016, the USEPA established rules for a comprehensive Phase 2 Heavy-Duty National Program that established fuel consumption and CO_2 standards for each of the four regulatory categories of heavy-duty vehicles. The rule also included separate standards for the engines that power combustion tractors and vocational vehicles. These standards build upon the Phase 1 and Phase 2 standards for light-duty vehicles spanning model years 2012-2025.

On April 12, 2023, the USEPA announced new, more ambitious proposed standards to further reduce harmful air pollutant emissions from light-duty and medium-duty vehicles starting with model year 2027 and through 2032 (USEPA 2023c).

The Inflation Reduction Act of 2022

The Inflation Reduction Act was signed into law by President Biden in August 2022. The act includes specific investment in energy and climate reform and is projected to reduce GHG emissions within the United States by 40 percent as compared to 2005 levels by 2030. The act allocates funds to boost renewable energy infrastructure (e.g., solar panels and wind turbines), includes tax credits for the purchase of electric vehicles, and includes measures that will make homes more energy efficient.

The Inflation Reduction Act authorized the USEPA to implement the Greenhouse Gas Reduction Fund Program, which is a historic, $27 billion investment to mobilize financing and private capital to combat the climate crisis and ensure American economic competitiveness. The Greenhouse Gas Reduction Fund will be designed to achieve the following program objectives: reduce GHG emissions and other air pollutants; deliver the benefits of GHG- and air-pollution-reducing projects to American communities, particularly low-income and disadvantaged communities; and mobilize financing and private capital to stimulate additional deployment of

GHG and air-pollution-reducing projects (USEPA 2025). The Inflation Reduction Act confirms that reduction of GHGs is a core goal of the CAA and that the funding provided should allow the USEPA to increase the scope of its CAA rulemakings. The act also confirms applicability of the Inflation Reduction Act to GHGs in three specific areas: (1) California's ability to regulate GHG emissions from vehicles; (2) the USEPA's authority to regulate methane emissions from oil and gas facilities, and (3) the USEPA's authority to regulate GHG emissions from power plants.

However, as of January 20, 2025, President Trump issued EO 14154, "Unleashing American Energy," that pauses the disbursement of funds appropriated under the Inflation Reduction Act (Brasher, Malone, and Nickerson 2025).

2025 Presidential Actions

On January 20, 2025, President Trump issued a series of Presidential Actions related to climate change and GHGs. The Initial Recension of Harmful Executive Orders revoked EOs 13990 and 14008 and Putting America First in International Environmental Agreements. Additionally, Unleashing American Energy disbanded the Interagency Working Group on the Social Cost of Greenhouse Gases (IWG), which was established pursuant to EO 13990, as well as any guidance, instruction, recommendation, and documents issued by the IWG. This Presidential Action directed the Administrator of the USEPA to issue guidance to address the social cost of carbon, including consideration of eliminating the calculation from any federal permitting or regulatory decision. Before further guidance issued by the EPA, the Presidential Action directed agencies to "...ensure estimates to assess the value of changes in greenhouse gas emissions resulting from agency actions, including the consideration of domestic versus international effects and evaluating appropriate discount rates, are, to the extent permitted by law, consistent with the guidance contained in Office of Management and Budget (OMB) Circular A-4 of September 17, 2003 (Regulatory Analysis)."

Since then, President Trump has issued several other EOs with the potential for significant impacts on fossil fuel production, climate change initiatives, and other pollution-controlling regulations. These include an order requiring certain agencies, including the USEPA, to establish a sunset date for certain regulations, upon which date the agencies are directed to treat such regulations as "ceasing to be effective" and not enforce them. For existing regulations subject to the order, the sunset date must be one year after the rules establishing the sunset date take effect. For new regulations, the sunset date must be not more than five years after the effective date of the regulation. The order provides that the sunset date may be extended, following a public comment period focusing on the costs and benefits of the regulation, if the agency determines an extension is warranted (Malone 2025).

The regulatory sunset order does not specify which USEPA regulations will be required to establish a sunset date but instead directs USEPA to, within 30 days of the order, provide the

OMB a list of statutes vesting USEPA with regulatory authority that will be subject to this EO (Malone 2025).

3.8.3.2 State

California Air Resources Board

CARB, a part of the California Environmental Protection Agency (CalEPA), is responsible for the coordination and administration of both federal and state air pollution control programs within California. CARB ensures the implementation of the California Clean Air Act (CCAA) and responds to the Federal CAA. CARB is responsible for the control of vehicle emission sources, while the local APCD is responsible for enforcing standards and regulating stationary sources. CARB conducts research, sets California Ambient Air Quality Standards (CAAQS), compiles emission inventories, develops suggested control measures, provides oversight of local programs, and prepares the SIP. CARB is responsible for the control of vehicle emission sources, while the local APCD is responsible for enforcing standards and regulating stationary sources.

As directed by Assembly Bill (AB) 32, CARB adopted the first Scoping Plan, which presented a set of actions designed to reduce overall GHG emissions in California. This initial Scoping Plan provided an economy-wide approach to reducing emissions and highlighted the value of combining carbon pricing with other complementary programs to meet California's 2020 GHG emissions target while ensuring progress in all sectors. Relative to transportation, the Scoping Plan included nine measures or recommended actions related to reducing vehicle miles traveled (VMT) and transportation-related GHGs through fuel and efficiency measures. These measures would be implemented statewide rather than on a project-by-project basis.

AB 32 requires CARB to update the Scoping Plan at least every five years. CARB released the First Update to the Climate Change Scoping Plan in May 2014 to provide information on the development of specific regulations and to adjust projections in consideration of the economic recession. The 2014 Update to the Scoping Plan presented an update on the program and its progress toward meeting the 2020 limit. It also developed the first vision for long-term progress beyond 2020 and identified the need for a 2030 mid-term target to establish a continuum of actions to maintain and continue reductions, rather than only focusing on targets for 2020 or 2050.

In response to EO B-30-15 and Senate Bill (SB) 32, all state agencies with jurisdiction over sources of GHG emissions were directed to implement measures to achieve reductions of GHG emissions to meet the 2030 and 2050 targets. CARB was directed to update the Scoping Plan to reflect the 2030 target. The 2017 Update to the Climate Change Scoping Plan was approved by CARB on December 14, 2017 (CARB 2017). The 2017 Scoping Plan builds upon the framework established by the initial 2018 Scoping Plan and 2014 Update while identifying new,

technologically feasible, and cost-effective strategies to ensure that the state meets its GHG reduction targets.

Subsequent to the 2017 Scoping Plan, CARB adopted more aggressive SB 375 targets in 2018 as one measure to support progress toward the Scoping Plan goals, which encourage Sustainable Communities Strategies (SCSs) that plan to achieve, in aggregate, a 19-percent reduction in statewide per capita GHG emissions reductions relative to 2005 by 2035 from passenger vehicles. However, CARB recognized that additional state and local actions are needed to achieve the transportation system reductions necessary to meet adopted climate goals, which is approximately a 25-percent reduction in statewide per capita GHG emissions by 2035 relative to 2005.

In 2022, CARB released a 2022 Scoping Plan Update, which includes a discussion of the relationship between local government actions and achievement of the state's long-term GHG emissions reduction goals, and non-binding recommendations to support local governments in their efforts to reduce GHG emissions. The 2022 Scoping Plan Update also lays out a path to achieve targets for carbon neutrality and reduce anthropogenic GHG emissions by 85 percent below 1990 levels no later than 2045, as directed by AB 1279.

In response to AB 617 (C. Garcia, Chapter 136, Statutes of 2017), CARB established the Community Air Protection Program. The Program's focus is to reduce exposure in communities most impacted by air pollution (CARB 2025a). AB 617 requires CARB and the air districts to develop and implement Community Emission Reduction Programs (CERPs) to reduce exposures and emissions in communities that are the most impacted by poor air quality. Blueprint 2.0, approved by the Board in October 2023, is CARB's five-year statewide strategy to implement the program includes a streamlined process that delegates the Board's authority to approve CERPs to the EO. The new CERP approval process includes the following steps: CARB staff review of and report on the CERP submitted to CARB, a public comment period, CARB staff recommendation to the EO, EO review of staff recommendation on the CERP, and EO approval (CARB 2025b).

California Legislation on Climate Change

Other recent California legislation related to GHG emissions and climate change includes the following:

- AB 1493 – Requires CARB to define standards for cars and light trucks manufactured after 2009.
- EO S-3-05 – Announced GHG emission reduction targets.
- AB 32 (Global Warming Solutions Act of 2006) – Requires CARB to adopt regulations to evaluate statewide GHG emissions and then create a program and emission caps to limit statewide emissions to 1990 levels.

- EO S-01-07 – Requires a statewide goal to be established to reduce the carbon intensity of California's transportation fuels.
- EO B-16-12 – Requires state agencies to increase the number of zero-emission vehicles (ZEV) within the state fleet through the normal course of fleet replacement so that at least 10 percent of fleet purchases of light-duty vehicles are ZEV by 2015 and 20 percent by 2025.
- Senate Bill (SB) 97 – Acknowledges that climate change analysis is to occur in conjunction with the California Environmental Quality Act (CEQA) process and that the Governor's Office of Planning and Research is responsible for developing CEQA Guidelines.
- SB 375 – Creates a process whereby local governments and other stakeholders work together within their region to achieve the reduction of GHG emissions.
- EO B-30-15 – Established a new interim statewide GHG emission reduction target.
- Climate Change Scoping Plan – Designed to reduce overall carbon emissions in California.
- CARB GHG Emission Inventory – Creates GHG emissions limits and requires an emissions inventory for the industries determined to be significant sources of GHG emissions.
- SB 32 – Extension of AB 32 requiring the state to further reduce GHGs to 40 percent below 1990 levels by 2030 (the other provisions of AB 32 remain unchanged).
- SB 100 and 350 – Supports the reduction of GHG emissions from the electricity sector by accelerating California's Renewables Portfolio Standard (RPS) Program, which was last updated by SB 350 in 2015.
- SB 1383 – Requires CARB to approve and begin implementing a comprehensive strategy to reduce emissions of short-lived climate pollutants.
- EO B-55-18 – Established a new statewide goal of achieving carbon neutrality by 2045 and maintaining net negative emissions thereafter.
- EO N-79-20 – Established a new statewide goal of achieving 100 percent of in-state sales of new passenger cars and trucks will be ZEV by 2035, 100 percent of in-state sales of new medium and heavy-duty vehicles will be ZEV by 2045, and transition to 100 percent zero-emission off-road vehicles and equipment by 2035 where feasible.
- AB 1279 (California Climate Crisis Act) - Declares the policy of the state both to achieve net zero GHG emissions as soon as possible, but no later than 2045, and achieve and maintain net negative GHG emissions thereafter, and to ensure that by 2045, statewide anthropogenic GHG emissions are reduced to at least 85 percent below the 1990 levels. AB 1279 also requires the state to ensure that updates to the Scoping Plan identify and recommend measures to achieve these policy goals and to identify and implement a variety of policies and strategies that enable CO_2 removal solutions and carbon capture, utilization, and storage technologies in California.
- California Building Code, Title 24 – Sets several distinct standards and codes related to building construction, including plumbing, electrical, interior acoustics, energy efficiency, and handicap accessibility.

- SB 905 – Requires CARB to create the Carbon Capture, Removal, Utilization, and Storage Program to evaluate, demonstrate, and regulate carbon capture, utilization, and storage (CCUS) technologies and carbon dioxide removal (CDR) projects and technology. The bill requires CARB, on or before January 1, 2025, to adopt regulations creating a unified state permitting application for approval of CCUS and CDR projects. The bill also requires the Secretary of the Natural Resources Agency to publish a framework for governing agreements for two or more tracts of land overlying the same geologic storage reservoir for the purposes of a carbon sequestration project.
- SB 1020 – SB 1020 adds interim renewable energy and zero carbon energy retail sales of electricity targets to California end-use customers set at 90 percent in 2035 and 95 percent in 2040. It accelerates the timeline required to have 100 percent renewable energy and zero carbon energy procured to serve state agencies from the original target year of 2045 to 2035. This bill requires each state agency to individually achieve the 100 percent goal by 2035 with specified requirements. It also requires the California Public Utilities Commission, California Energy Commission (CEC), and CARB, on or before December 1, 2023, and annually thereafter, to issue a joint reliability progress report that reviews system and local reliability.

3.8.3.3 Local

Santa Barbara County Air Pollution Control District

SBCAPCD monitors and regulates GHG emissions in the county. As a responsible agency under CEQA, SBCAPCD reviews and approves environmental documents prepared by other lead agencies or jurisdictions to reduce or avoid impacts on air quality and to ensure that the Lead Agency's environmental document is adequate to fulfill CEQA requirements. As a responsible agency, the SBCAPCD comments on environmental documents and suggests mitigation measures to reduce GHG emissions.

Santa Barbara County Clean Air Plan

The Federal CAAA of 1990 and the CCAA of 1988 mandate the preparation of plans for the attainment of air quality standards that provide an overview of air quality and sources of air pollution and identify pollution-control measures needed to meet federal and state air quality standards. The SBCAPCD and the Santa Barbara County Association of Governments (SBCAG) are responsible for formulating and implementing air quality attainment plans for Santa Barbara County.

To comply with these regulations, the County prepared an Air Quality Attainment Plan (AQAP) in 1979. The 1979 AQAP demonstrated that the area could not attain the Federal O_3 standard by the required attainment date of 1982 despite the implementation of all reasonably available

control techniques on stationary sources. The Federal CAAA requires that air quality plans include "...such other measures as may be necessary to insure [sic] attainment and maintenance of such primary or secondary standards (for which the area is in a nonattainment status), including, but not limited to transportation controls..." To achieve this directive, land use control measures were and have been included in the AQAP to aid in future air quality planning efforts. Subsequent AQAPs have been issued in 1989 and 1991.

In 1994, the SBCAPCD began preparing a Clean Air Plan to triennially update the AQAP. The Clean Air Plan provides an overview of the regional air quality and sources of air pollution and identifies the pollution-control measures needed to meet clean-air standards. The schedule for plan development is outlined by federal and state requirements and is influenced by regional air quality. Clean Air Plans affect the development of SBCAPCD rules and regulations and other programs. They also influence a range of activities outside the district, including transportation planning, allocation of monies designated for air quality projects, and more (SBAPCD 2022a).

The SBCAPCD 2022 Ozone Plan is the most recent triennial update to the County AQAP required by the state to show how SBCAPCD plans to meet the state 8-hour O_3 standard. Note that past ozone plan updates addressed both the Federal and State O_3 standards, but this plan addresses the state standards only because the SCCAB is designated "attainment" for the Federal 8-hour O_3 standards. The 2022 Ozone Plan builds upon and updates the 2019 Ozone Plan and includes an inventory of O_3 precursor emissions in the county, the most prevalent of which are reactive organic compounds (ROCs) and nitrogen oxides (NO_x). The 2022 Ozone Plan focuses on reducing O_3 precursor emissions by predicting vehicle activity trends and applying both stationary source emission control measures and transportation control measures, which reduce mobile-source emissions, the primary source of ROC and NO_x emissions in the county. The 2022 Ozone Plan satisfies both federal and state planning requirements and was adopted by the SBCAPCD Board in December 2022 (SBCAPCD 2022).

County of Santa Barbara Climate Action Planning

In 2024, the County adopted its 2030 Climate Action Plan (CAP), with an emission reduction goal of 50 percent below 2018 levels by 2030 and achieving carbon neutrality by 2045 or sooner, which are in line with the State's GHG emission reduction goals. The CAP's six focus areas are: 1) Housing and Transportation; 2) Clean Energy; 3) Waste, Water, and Wastewater; 4) Nature-Based Solutions; 5) Low-Carbon Economy; and 6) Municipal Operations. The 2030 CAP is a qualified greenhouse gas emissions reduction plan pursuant to CEQA Guidelines Section 15183.5, which allows discretionary non-industrial proposed projects to tier their GHG emissions analysis off the 2030 CAP Programmatic Environmental Impact Report (PEIR) if the proposed project is found consistent with the 2030 CAP. To aid in determining a proposed project's consistency with the 2030 CAP, the County has developed the Climate Action Plan Consistency Checklist. A proposed project found to be consistent with the 2030 CAP that tiers

GHG emissions analysis off the 2030 CAP PEIR will have an insignificant environmental impact in regards to GHG emissions.

County of Santa Barbara Collaborative Reach Code

The County and the City of Goleta are collaborating to develop and adopt local "reach" codes to reduce carbon emissions from new construction and development. "Reach" codes are local code amendments that extend beyond state energy-efficiency requirements. They are intended to support energy efficiency, electrification, and renewable energy that can reduce GHG emissions through the electrification, or requirement for new construction to be all-electric. In 2021, the City of Santa Barbara adopted a local ordinance that effectively prohibited natural gas infrastructure in new construction with the exception of restaurants, labs, clean rooms, and public interest projects (County of Santa Barbara 2025). In September 2024, the Goleta City Council adopted an Electric Vehicle Reach Code to improve the amount of electric vehicle charging available across Goleta that went into effect in October 2024 (City of Goleta 2024). As of 2025, the County and the City of Goleta are conducting public outreach to present new reach codes focused on new construction for residential and non-residential buildings. The project proponents are aiming for adoption in 2025 (County of Santa Barbara 2025).

Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS)

SBCAG's 2050 Connected Regional Transportation Plan (RTP)/SCS integrates land use and transportation strategies to achieve required emission reductions per SB 375. The RTP describes how the region plans to invest in the transportation system in the next 20 years. This long-range planning document includes an SCS as required by SB 375 (SBCAG 2021).

Santa Barbara County Association of Governments 2050 Regional Growth Forecast

The purpose of the Regional Growth Forecast is to provide consistent long-range population, job, and household forecasts for use in long-range regional planning to the year 2050 for Santa Barbara County, its major economic and demographic regions, and its eight incorporated cities. The Regional Growth Forecast is a requirement of the Connected 2050 RTP/SCS. The forecast is adopted by the SBCAG board and used in a variety of applications such as local General Plans, public service district forecasts, business development, transportation forecasts, and air quality planning. This forecast is based on the land use capacity of local general plans and takes input from all jurisdictions, the public, and the SBCAG board. The forecast is updated periodically as new demographic data, land use policies, and changes in growth assumptions warrant.

3.8.4 ENVIRONMENTAL IMPACT ANALYSIS

This section discusses the potential GHG emission impacts associated with the proposed Project. Where there are potentially significant impacts, mitigation measures are proposed and the residual impact after mitigation is determined.

3.8.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For purposes of this EIR, implementation of the proposed Project may have a significant adverse impact on GHG emissions if it would:

a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment.

b. Conflict with an applicable plan, policy, or regulation adopted for the purpose of reducing the emissions of greenhouse gases.

County of Santa Barbara Environmental Thresholds and Guidelines

A CEQA lead agency may determine that a proposed project's incremental contribution to an existing cumulatively significant issue, such as climate change, is not significant based on supporting facts and analysis (CEQA Guidelines Section 15130, Discussion of Cumulative Impacts, Subsection [a][2]). The CEQA Guidelines direct that a proposed project's contribution to a significant cumulative impact will be rendered insignificant if the proposed project is required to implement or fund its fair share of a mitigation measure designed to alleviate the cumulative impact (CEQA Guidelines Section 15130[a][3]).

Concurrent with the adoption of the 2030 CAP, Santa Barbara County adopted new GHG emissions thresholds of significance for non-industrial stationary source proposed projects based on the County's 2030 GHG target (i.e., 50 percent below 2018 levels by 2030). The thresholds were developed and adopted consistent with CEQA Guidelines Section 15064.7, Thresholds of Significance. The thresholds are designed to identify: (1) a cumulatively considerable contribution to an existing adverse condition; and (2) a cumulatively significant impact in combination with other proposed projects causing related impacts. The County's updated *Environmental Thresholds and Guidelines Manual* describes the process County staff shall use to determine whether a plan or project would result in a significant impact related to GHG emissions relative to the thresholds of significance included in Appendix G of the CEQA Guidelines that are described above.

To determine whether a project would result in a significant GHG impact relative to CEQA Guidelines thresholds (a), the County's updated *Environmental Thresholds and Guidelines Manual* (2024b) describes the process County staff shall use to determine whether a plan or project would result in a significant impact related to GHG emissions depending on the type of project, as summarized below:

- For industrial stationary sources subject to discretionary approvals by the County, where the County is the CEQA lead agency, the project would result in a significant GHG impact if it would exceed the County's numerical bright-line threshold of 1,000 MT CO_2e/year.
- For a land use project or plan other than industrial stationary source projects, subject to discretionary approvals by the County, where the County is the CEQA lead agency, the land use project or plan is deemed not to result in a significant GHG impact if it is consistent with the measures included in the 2030 CAP, and that therefore the analysis of GHG emissions for that project or plan can be tiered off of the 2030 CAP PEIR consistent with CEQA Guidelines Section 15183.5. For a project or plan that is subject to discretionary review and triggers environmental review pursuant to CEQA, the determination of consistency with the 2030 CAP is based on the County's 2030 Climate Action Plan Consistency Checklist.[1]
- For a land use project or plan other than industrial stationary source projects, subject to discretionary approvals by the County, where the County is the CEQA lead agency, and that cannot be tiered off of the 2030 CAP PEIR due to inconsistency with the 2030 CAP, the land use project or plan would result in a significant GHG impact:
    - If it is a residential type project or plan, would generate more than 2.68 MT CO_2e/year per resident;
    - If it is a non-residential type project or plan, would generate more than 2.63 MT CO_2e/year per employee; and
    - If it is a mixed-use type project or plan, would generate more than 2.67 MT CO_2e/year per service person.[2]

Under the County's updated *Environmental Thresholds and Guidelines Manual,* a project would result in a significant GHG impact relative to CEQA Guidelines thresholds (b) if it would result in an inconsistency with the County's 2030 CAP and/or exceed the GHG emissions thresholds described above.

Methodology

As described in Chapter 2, *Project Description*, the Project entails a broad-ranging master plan document that proposes and would facilitate the future development of new parks, trails, and recreational facilities in unincorporated areas within the county to meet the identified recreational needs of county residents. The proposed Project would directly facilitate the development of new parks, trails, and recreational facilities, and also proposes changes to County policies and regulations to support the development of public parks, recreation, and trails, including public-private partnerships and the proposed Recreation Benefit Project (RBP)

[1] 2030 Climate Action Plan Consistency Checklist: https://cosantabarbara.app.box.com/s/coq90l9nrzb4bmctyuo0t6phgy4ib33y.

[2] Service person means resident of the residential land use or employee of the non-residential land use.

Program. Given the programmatic scope and planning level of the Project, according to the County's *Environmental Thresholds and Guidelines Manual,* the analysis of whether the Project would result in a significant impact related to GHG emissions is based upon the Project's determination of consistency with the 2030 CAP.

3.8.4.2 Project Impacts

Table 3.8-2 provides a summary of the Project's impacts related to GHG emissions. A detailed discussion of each impact follows.

Table 3.8-2. Summary of GHG Emissions Impacts

GHG Emissions Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact GHG-1. The Project would be consistent with the 2030 CAP, as well as other plans, policies, or regulations adopted to reduce the emissions of greenhouse gases (GHG), and would not generate GHG emissions that would have a significant impact on the environment.	Insignificant	No mitigation measures required.	Insignificant
Cumulative Impacts	Insignificant	No mitigation measures required.	Insignificant

Impact GHG-1. The Project would be consistent with the 2030 CAP, as well as other plans, policies, or regulations adopted to reduce the emissions of GHG, and would not generate GHG emissions that would have a significant impact on the environment.

As described in Section 3.8.4.1, *Thresholds of Significance*, under the County's *Environmental Thresholds and Guidelines Manual,* the analysis of whether the Project would result in a significant impact related to GHG emissions is based upon the Project's determination of consistency with the 2030 CAP. Determination of consistency with the 2030 CAP is made by completing the County of Santa Barbara Climate Action Plan Consistency Checklist for Future Development. The County of Santa Barbara Climate Action Plan Consistency Checklist for Future Development has been completed for the Project and is presented in Table 3.8-3 below. As presented therein, the Project would be consistent with the 2030 CAP. This is largely because the development of new parks, trails, and recreational facilities under the Project by the County is subject to mandatory consistency with adopted County plans and policies, including the measures identified in the 2030 CAP. Parks projects are generally consistent with CAP policies, including preserving open space and habitat, providing natural landscaping and vegetation, and sequestering carbon while providing shade and urban cooling. Parks and trails are generally viewed as advantageous components of community land use plans to reduce GHG

emissions, including locating parks, recreation, and trails within existing communities to reduce vehicle miles traveled (VMT; see also, Section 3.15, *Transportation*) and encouraging the use of active transportation modes like walking, biking, skating, and public transit. Accordingly, the Project can tier GHG emissions analysis from the 2030 CAP's EIR according to CEQA Guidelines Section 15183.5. Therefore, the Project would result in *insignificant* GHG emissions and would not result in a cumulatively considerable impact related to GHG emissions and climate change.

Through consistency with the 2030 CAP, the Project would be consistent with other State plans and policies adopted to reduce GHG emissions. The County Board of Supervisors adopted the 2030 CAP in 2024 as the County's GHG emission reduction plan. The 2030 CAP GHG emission reduction goal (50 percent reduction from 2018 levels by the year 2030) is consistent with the State's direction under SB 32 as codified in the California Health and Safety Code, Division 25.5, Part 4, Section 38566 (40 percent reduction below 1990 levels by 2030). CARB's 2022 Scoping Plan Update describes the State's strategy for achieving California's 2030 GHG emission reduction target. The Scoping Plan does not prescribe or require specific actions by local government agencies; rather, the Scoping Plan provides guidance to local agencies, and CARB supports programs that assist local agencies. Local government efforts to reduce emissions within their jurisdiction are critical to achieving the State's long-term GHG goals and can also provide important co-benefits, such as improved air quality, local economic benefits, more sustainable communities, and an improved quality of life. Thus, by demonstrating consistency with the County's 2030 CAP, it can be determined that the Project is consistent with the State's plans and targets for reducing GHG emissions. Therefore, impacts associated with consistency with plans, policies, and regulations for reducing GHG emissions are considered *insignificant*.

In addition to compliance with the 2030 CAP Checklist, the Project would help implement several measures and goals identified in the 2030 CAP. One major goal of the CAP is to reduce VMT, as outlined in Measure TR-2, and the Project would include developing trails that connect communities, such as the Orcutt Creek Trail, which would follow Orcutt Creek and connect communities along the creek. Similarly, the Mission Hills Community Trails project and the Vandenberg Village Community Trail are intended to provide walkable/bikeable connections between neighborhoods, schools, and commercial areas. Projects like this would increase multi-modal transportation to recreational facilities and reduce trip lengths spent on drives to recreational facilities. Measure NBS-1 states that the CAP would promote and support land management practices that sequester carbon, such as by planting drought-tolerant, native, fire-resistant vegetation at County facilities, which directly applies to the Project. Developing more parks under the Project would provide additional opportunities to plant drought-tolerant, native, fire-resistant species throughout the county. Therefore, the Project would not only be compliant with the CAP, it would also help implement the CAP.

Table 3.8-3. Climate Action Plan Consistency Checklist

Regulation	Requirements	Project / Plan Compliance	Explanation
Comprehensive Plan	1a. Does the Project/Plan include a Comprehensive Plan, Zoning Map, or Ordinance Amendment ? If "No", proceed to Section 2 – CAP Strategies Consistency. If "Yes", proceed to question 1b.	Yes	The Project includes amendments to the Comprehensive Plan and the County Zoning Map.
Comprehensive Plan	1b. Does the Comprehensive Plan, Zoning Map, or Ordinance Amendment result in an equivalent or less GHG-intensive project when compared to the existing designation? Rezones involving increases in density (e.g., residential density) are an increase in GHG intensity. Rezones between non-density based zones (e.g., commercial zones) may be equivalent, but will depend on the proposed development.	Yes	Amendments to the Comprehensive Plan and Zoning Map associated with the proposed Project would result in equivalent or less GHG-intensive projects when compared to the existing designations. The Project supports preservation of open space and public recreation land, which avoids GHGs associated with urban development. Projects enabled by the proposed amendments would be subject to County policies and zoning approvals through their own permitting processes that would ensure GHG emissions remain the same as existing uses. The RBP Program would support compatible uses within existing zoning districts, ensuring equivalent GHG emissions. Changing land uses to parks and recreational facilities would have minimal GHG emissions because construction activities would be minimal, and operations would mirror the surrounding community, such as trips already taken for recreation.
Clean Energy			
County 2030 Climate Action Plan (Measure CE-1)	2. All Project Types - Building Electrification. Will the Project/Plan (whether all new construction, remodel, or combination thereof) comply with 2030 Climate Action Plan Action CE-1.1 and be all-electric with no natural gas hookup?	Yes	Minimal new construction would be needed for the Project. For a few larger projects, such as the South Coast Aquatic Center and Goleta Community Sports Park, a new aquatics center and sports field with amenities would be constructed. Because this is a County project, all projects would be subject to the 2030 CAP. Therefore, new construction would be built with all-electric features and would be in compliance with the 2030 CAP.

Table 3.8-3. Climate Action Plan Consistency Checklist (Continued)

Regulation	Requirements	Project / Plan Compliance	Explanation
County 2030 Climate Action Plan (Measure CE-1)	3. All Project Types - Carbon Free Electricity. Will the Project/Plan (whether all new construction, remodel, or combination thereof) retain Central Coast Community Energy as the energy provider or otherwise utilize 100% carbon free electricity?	Yes	The Project is an action proposed by the County, and County actions are subject to mandatory compliance with adopted plans and policies, including the 2030 CAP. Therefore, any projects enabled by the Project would need to be compliant with the 2030 CAP and would retain a carbon-free electricity provider such as Central Coast Community Energy.
County 2030 Climate Action Plan (Measure TR-1) & County Municipal Code (Article XVII. – Expedited Permitting Procedures for Electric Vehicle Charging Station Review)	4. All Project Types - EV Charging Infrastructure. Will the Project/Plan (whether all new construction, remodel, or combination thereof) meet or exceed the requirements of the California Green Building Standards Code, Title 24, Part 11, (CALGreen) Tier II for EV charging infrastructure? New single-family or two-family dwellings are not required to include EV charging infrastructure. Multi-family dwellings (more than three dwellings) and non-residential project must include EV charging infrastructure based on the project size.	N/A	As the Project is a non-residential project, it would be required to include EV charging infrastructure. Because the Project is a County project, it must comply with all adopted plans and policies, including the 2030 CAP. Therefore, EV charging infrastructure would be provided at new construction facilities as required by the 2030 CAP. Additionally, the Project would amend the Comprehensive Plan with policies for sustainable parks and recreation facilities, including EV charging and renewable energy facilities collocated with parks.
County 2030 Climate Action Plan (Measure TR-3)	5. All Project Types - Off-Road Equipment Electrification. Will the Project/Plan (whether all new construction, remodel, or combination thereof) commit to the use of electrified off-road landscaping equipment (e.g., mowers, chippers, tractors) for ongoing operations and maintenance?	Yes	The Project would include maintenance of parks, trails, and recreational facilities, including existing facilities and facilities that would be built under the Project. Because the Project is being proposed by the County, it must comply with all adopted plans and policies, including the 2030 CAP. Therefore, all projects built under the Project and facilities analyzed by the Project (County parks) would be maintained with electric landscaping equipment.
Housing & Transportation			
County 2030 Climate Action Plan (Measure TR-2) & County	6. All Project Types- Reduce VMT. Will the Project/Plan demonstrate consistency with the County's Thresholds of Significance for	Yes	Analysis of the potential impacts related to the County's Thresholds of Significance for Transportation Impacts in the County Environmental Thresholds and

Table 3.8-3. Climate Action Plan Consistency Checklist (Continued)

Regulation	Requirements	Project / Plan Compliance	Explanation
Environmental Thresholds and Guidelines Manual	Transportation Impacts in the County Environmental Thresholds and Guidelines Manual by either: a. meeting the screening criteria for Vehicle Miles Traveled (VMT) to not require further analysis; or b. resulting in a reduction in VMT?		Guidelines Manual is presented in Section 3.15, Transportation. As described therein, the County's Thresholds of Significance for Transportation Impacts focus on measuring VMT in terms of "service population," which related primarily to trips generated by residential and commercial/industrial purposes and trips that bring people like commuters to their jobs or new residents to an area. In the case of recreational projects, it impossible to accurately calculate the "service population." Such thresholds are not designed to address recreational trip characteristics and are largely inapplicable to the proposed Project. Therefore, for the purposes of the transportation analysis, the analysis of the Project's VMT impact is based on the highly stringent land use project threshold. As described under Impact T-2, under this threshold, the Project's VMT impacts are considered significant and unavoidable, as the Project would involve development of new uses that would generate new trips and VMT, for which no feasible mitigation exists. However, the Project potential VMT impact does not inherently mean the Project is inconsistent with the County's 2030 CAP. The identified goals for Measure T-2 of the County's 2030 CAP focus on decreasing VMT by increasing public transit mode share, increasing bike mode share, and implementing land use/development strategies consistent with the Connected 2050 RTP/SCS and accommodating new housing growth identified through the County's Housing Element. The Project involves a recreation planning framework proposed by the County to meet existing identified recreational needs of the county, as well as accommodating the recreational needs of future residents. As described in Impact T-2, the vast majority

Table 3.8-3. Climate Action Plan Consistency Checklist (Continued)

Regulation	Requirements	Project / Plan Compliance	Explanation
			of proposed improvements under the Recreation Master Plan are not considered to result in an increase VMT, and in some cases could decrease VMT as a result of providing recreational facilities in communities currently lacking such facilities, where residents currently must travel longer distances outside of their communities to meet their recreational needs. Further, building new parks and trails within existing communities encourages the use of active transportation modes like walking, biking, skating, and public transit. While some other projects proposed or enabled under the Project are visitor-serving by nature, and would inherently result in increases in VMT, the Recreation Master Plan would be consistent with the land use/development strategies, goals, and objectives outlined in the Connected 2050 RTP/SCS and the County's land use plans. Further, as described elsewhere in this checklist, the development of new parks, trails, and recreational facilities under the Project by the County is subject to mandatory consistency with adopted County plans and policies, including the measures identified in the 2030 CAP.

Table 3.8-3. Climate Action Plan Consistency Checklist (Continued)

Regulation	Requirements	Project / Plan Compliance	Explanation
County 2030 Climate Action Plan (Measure TR-2)	7. Large Employers - Transportation Demand Management (TDM). If the Project/Plan will have 50 or more employees, will the Project/Plan (whether all new construction, remodel, or combination thereof) provide a commuter benefit program for employees with measures (such as subsidies for employees that bike, walk, or carpool, telework policy, and/or provide free transit passes for all employees) and achieve a 50-80% telework participation rate by eligible employees able to work remotely consistent with Connected 2050 RTP/SCS?	N/A	The Project would not create large employers. Parks, recreation, and trail projects do not generate substantial demand for new employment (see also, Chapter 5, *Other CEQA Considerations*).
Waste, Water, and Wastewater			
County 2030 Climate Action Plan (Measure W-1 and W-2)	8. All Project Types - Residential & Commercial Landfill Diversion Rate Goal. Will the Project/Plan (whether all new construction, remodel, or combination thereof) meet current legislation and 2030 Climate Action Plan goals to properly sort and collect recyclables and organic waste, as applicable, to reduce communitywide landfilled organics 80% by 2030 and 100% by 2045 by providing dedicated space for organic waste and/or recycling receptacles?	Yes	Because the Project is being proposed by the County, it must comply with all adopted plans and policies, including the 2030 CAP. Public parks and trailheads provide solid waste management facilities that comply with state law and County regulations. Therefore, all projects proposed by the Project would properly sort and collect recyclables and organic waste as the 2030 CAP specifies.

Table 3.8-3. Climate Action Plan Consistency Checklist (Continued)

Regulation	Requirements	Project / Plan Compliance	Explanation
County 2030 Climate Action Plan (Measure W-2	9. All Project Types - Residential & Commercial Organics Recycling Requirement. Will the Project/Plan (whether all new construction, remodel, or combination thereof) meet SB 1383 legislation requirements by posting education signage, as applicable, and sorting and collecting organic waste, as applicable, to achieve 0.08 tons per capita compost procurement requirements for the unincorporated County?	N/A	Because the Project is being proposed by the County, it must comply with all adopted plans and policies, including the 2030 CAP. Therefore, all projects proposed by the Project would include the signage required by the 2030 CAP.

3.8.4.3 Cumulative Impacts

Due to the global context of climate change, the analysis of GHG emissions is inherently cumulative because impacts are caused by cumulative global emissions. As described in Section 3.8.4.2, *Project Impacts*, the proposed Project would have *insignificant* impacts related to GHG emissions. Therefore, the implementation of the proposed Project would not have a considerable contribution to a cumulatively significant impact related to GHG emissions.

3.8.4.4 Proposed Mitigation

No mitigation measures are required.

3.8.4.5 Secondary Impacts

No mitigation measures are required to reduce Project impacts. Therefore, no direct secondary impacts would occur.

3.8.4.6 Residual Impacts

Impact GHG-1. Based on the County of Santa Barbara Climate Action Plan Consistency Checklist for Future Development completed for the Project, the Project would be consistent with the 2030 CAP. Residual impacts would be *insignificant*.

This page intentionally left blank.

3.9 HAZARDS AND HAZARDOUS MATERIALS

3.9.1 INTRODUCTION

This section describes potential impacts related to hazards and hazardous materials that could result from the implementation of the Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (Project). This section identifies existing hazards in Santa Barbara County, including hazardous materials, hazardous material sites, and land use operations, such as airports. Hazardous materials involve chemicals, such as petroleum products, solvents, pesticides, herbicides, paints, metals, asbestos, and other regulated materials, that can cause death, serious injury, long-lasting health effects, and damage to buildings, homes, and other property. Risks to public health and the environment may occur in areas contaminated by historical releases of hazardous materials. Contaminated soil or water may be released during ground disturbance, exposing people and the environment to potentially toxic substances.

A range of other types of hazards are addressed in other sections of this Program Environmental Impact Report (EIR) as follows: air pollution hazards, such as toxic air contaminants (TACs) and particulate matter, are addressed in Section 3.3, *Air Quality*; geologic hazards, such as earthquakes, are addressed in Section 3.7. *Geology;* water pollution hazards, such as groundwater contamination and surface runoff, are addressed in Section 3.10, *Hydrology and Water Quality*; urban hazards and response systems are discussed in Section 3.13, *Public Services*; hazardous solid waste disposal is addressed in Section 3.16, *Utilities and Water Supply*; and wildfire impacts are discussed in Section 3.17, *Wildfire*.

3.9.2 ENVIRONMENTAL SETTING

There are a variety of agricultural, commercial, and industrial uses within the county that involve the transport, use, storage, and disposal of potentially hazardous materials that could adversely affect the public and the environment. Current and former uses involving hazardous materials, resulting in the potential for past and/or ongoing site contamination, exist in each of the five recreation planning areas, as described in Chapter 2, *Project Description*. Hazardous materials may be found in the materials of older buildings, such as asbestos or lead-based paints, or may have been used routinely for the operation of certain land uses, such as auto repair shops, gas stations, oil and mining facilities, commercial agricultural fields, medical offices, dry cleaners, and photo processing centers. Potentially hazardous materials that currently occur throughout the county are commonly found in urban and agricultural areas and generally include cleaning and metal solvents, pesticides/herbicides, paints, oils, and lubricants. In addition, some properties in the county have experienced substantial historical

releases of hazardous materials, resulting in potentially contaminated soils and/or groundwater onsite and in the vicinity (Section 3.8.2.1, *Hazardous Sites*). Hazardous waste generators and contamination sites may have involved or continue to involve hazardous operations, contain aboveground storage tanks (ASTs) and underground storage tanks (USTs) containing fuel, utilize flammable or explosive substances and other hazardous compounds, and/or expose workers and people involved with nearby uses to known hazards associated with these heavy industrial and commercial uses. Land uses that are particularly sensitive to the release of hazards or hazardous materials include residential, educational, assisted living, daycare, and agricultural areas.

Several highways are the primary transportation routes through the county, which present a risk of possible spills of hazardous materials (Federal Motor Carrier Safety Administration 2009). Primary transportation routes include the U.S. Highway 101 (the main vehicular travel corridor within and through the county) as well as State Routes (SR) 1, 33, 135, 150, 154, 166, 192, 217, and 246, which primarily provide access within the county and connect many incorporated and unincorporated communities. Transportation of hazardous materials often occurs along major arterial roads and local streets through populated and urbanized areas.

In addition, the county includes the Santa Barbara Municipal Airport, Santa Maria Public Airport, Santa Ynez Airport, Lompoc Airport, and New Cuyama Airport, which present a potential for hazards associated with aviation incidents. Vandenberg Space Force Base (VSFB) also presents the potential for hazards associated with aviation, satellite launches, and ballistic missile testing.

3.9.2.1 Hazardous Sites

California Government Code Section 65962.5 requires the California Environmental Protection Agency (CalEPA) to compile, maintain, and update specified lists of hazardous material release sites. The California Environmental Quality Act (CEQA) Guidelines (Public Resources Code [PRC] Section 21092.6) require the Lead Agency to consult the lists compiled pursuant to Government Code Section 65962.5 to determine whether the Project and any alternatives are identified on any of the following lists:

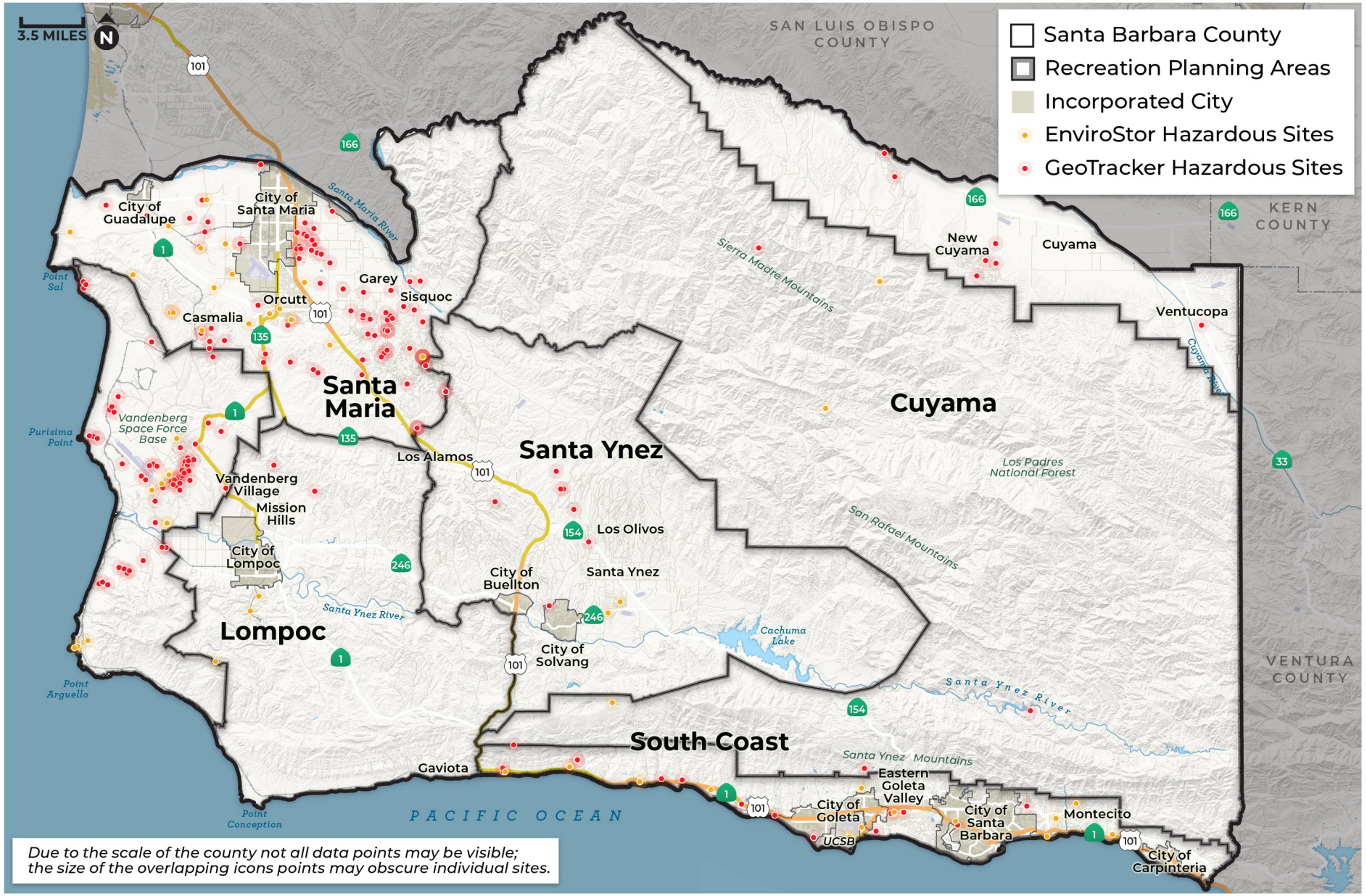
- **USEPA National Priorities List:** Lists all sites under the U.S. Environmental Protection Agency (USEPA) Superfund program, which was established to fund the cleanup of contaminated sites that pose risks to human health and the environment.
- **USEPA CERCLIS and Archived Sites**: The Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) list contains 15,000 sites nationally identified as hazardous sites. This would also involve a review of archived sites that have been removed from CERCLIS due to No Further Remedial Action Planned status.

- **USEPA RCRIS (RCRAInfo)**: Resource Conservation and Recovery Act Information System (RCRIS or RCRAInfo) is a national inventory system for hazardous waste handlers. Generators, transporters, handlers, and disposers of hazardous waste are required to provide information for this database.
- **DTSC Cortese List**: The California Department of Toxic Substances Control (DTSC) maintains the Hazardous Waste and Substances Sites (Cortese) List as a planning document for the use by state and local agencies to comply with the CEQA requirements in providing information about the location of hazardous materials release sites. This list includes the Site Mitigation and Brownfields Reuse Program Database (CalSites).
- **DTSC HazNet**: DTSC uses this database to track hazardous waste shipments.
- **SWRCB LUSTIS**: Leaking Underground Storage Tank Information System (LUSTIS). The State Water Resources Control Board (SWRCB) maintains an inventory of underground storage tanks and leaking underground storage tanks, which tracks unauthorized releases.

Review of the DTSC's EnviroStor database and the SWRCB's GeoTracker databases indicates there are various hazardous waste reporting facilities located throughout each of the county's five planning areas (Figure 3.9-1). There are 1,530 known past or existing regulated hazardous sites within the county, which have required regulatory oversight to address site contamination issues (SWRCB 2025; DTSC 2025). Of these known sites, 1,115 sites have completed the required remediation and monitoring procedures and acquired a "closed case" status.

Furthermore, a review of USEPA's Envirofacts was also conducted for the presence of brownfields. A brownfield is a property where the expansion, redevelopment, or reuse of the land may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. Two brownfields were identified in the county: the Goleta Old Town Project Area in the City of Santa Barbara and the New Continuation High School site in the City of Santa Maria.

There is one Superfund site within the county: the Casmalia Hazardous Waste Management Facility (also known as the "Casmalia Resources Superfund Site"). This site is a contaminated hazardous waste dumping site regulated under CERCLA (County of Santa Barbara 2022). Located within North County near the unincorporated community of Casmalia, the 252-acre site is an inactive commercial hazardous waste treatment, storage, and disposal facility that resulted in the contamination of soil, soil vapor, surface water, sediment, and groundwater. Since its designation as a Superfund site in the early 1990s, the USEPA has prepared a Remedial Investigation and Proposed Plan outlining the cleanup of the site. The Proposed Plan was approved by the USEPA on June 28, 2018 (County of Santa Barbara 2022).



wsp

Santa Barbara County Hazardous Sites

FIGURE 3.9-1

Table 3.9-1. Known Regulated Hazardous Sites within the Unincorporated County

Site Type	Number of Sites	Definition	Source of Definition
Active Project	4	Project (Beta) is a multipurpose site type varying from source investigation projects to a SWRCB grant-funded project for groundwater cleanup (e.g., Proposition 1 Groundwater Sustainability Program). A Project may be comprised of multiple sites or facilities, a single or group of impacted supply wells, or a groundwater plume of interest.	SWRCB 2025
Cleanup Program Site	688	Includes all "non-federally owned" sites that are regulated under the SWRCB's Site Cleanup Program and/or similar programs conducted by each of the nine Regional Water Quality Control Boards (RWQCBs). Includes pesticide and fertilizer facilities, rail yards, ports, equipment supply facilities, metals facilities, industrial manufacturing and maintenance sites, dry cleaners, bulk transfer facilities, refineries, mine sites, landfills, Resource Conservation and Recovery Act (RCRA) / Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) cleanups, and some brownfields. Unauthorized releases detected include, but are not limited to, hydrocarbon solvents, pesticides, perchlorate, nitrate, heavy metals, and petroleum constituents.	SWRCB 2025
Federal Superfund	1	Sites managed by the USEPA under the CERCLA, informally referred to as "Superfund sites."	USEPA 2022
Land Disposal Site	37	Includes sites with solid and/or liquid waste discharged to land, such as landfills, mines, surface impoundments, waste piles, and land treatment facilities.	SWRCB 2025
LUST Cleanup Site	660	Includes all UST sites that have had an unauthorized release (i.e., leak or spill) of a hazardous substance, usually fuel hydrocarbons, and are being cleaned up.	SWRCB 2025
Non-Case Information	53	Sites that either have no unauthorized release, have a release to the environment with minimal impact, or are currently evaluated for impacts and may result in the activation of a new case. Non-Case Information Sites contain environmental data, location data, or potential source information that may be considered important to a given area.	SWRCB 2025
NPDES	6	The National Pollutant Discharge Elimination System (NPDES) addresses water pollution by regulating point sources that discharge pollutants to waters of the U.S. These are sites with active NPDES permits.	SWRCB 2025
Other Oil and Gas Projects	8	Includes information regarding select oilfield activities that may not be associated with well-stimulation activities but may be pertinent to investigation activities in a given area.	SWRCB 2025

Table 3.9-1. Known Regulated Hazardous Sites within the Unincorporated County (Continued)

Site Type	Number of Sites	Definition	Source of Definition
Produced Water Ponds	48	Includes surface impoundments used to store and/or dispose of water produced during oil production.	SWRCB 2025
Underground Injection Control	26	Includes information regarding wells used for disposing of oilfield fluids by subsurface injection. Such injection is also sometimes used to enhance oilfield production.	SWRCB 2025
Total	1530		

Source: DTSC 2025, SWRCB 2025

3.9.2.2 Hazardous Materials Incidents

As described in the Santa Barbara County 2022 Multi-Jurisdictional Hazard Mitigation Plan (MJHMP), several significant hazardous material incidents have occurred in the county in the past century, including the oil spills in 1969, 1997, 2007, 2008, 2015, and 2020. Table 3.9-2 summarizes the 135 hazardous materials incidents reported to the California Office of Emergency Services (CalOES) Warning Center in 2024 based on county location and type of incident. This list does not capture all hazardous material spills within the county, only those that were significant enough to be reported to CalOES.

Table 3.9-2. Hazardous Materials Incidents in Santa Barbara County by Location and Type

Location	Incidents		Type	Incidents
Buellton (City of)	2		Chemical	8
Carpinteria (City of)	6		Petroleum	77
Cuyama	1		Railroad	8
Gaviota	2		Sewage	19
Goleta (City of)	24		Vapor	20
Guadalupe (City of)	3		Other	3
Isla Vista	1			
Lompoc (City of)	5			
Los Olivos	0			
Montecito	2			
Orcutt	4			
Santa Barbara (City of)	49			
Santa Maria (City of)	15			
Santa Ynez	2			
Summerland	2			
Other Unincorporated Areas	17			
Total	135			

Source: (CalOES 2024)

3.9.2.3 Hazardous Materials and Agriculture

Agricultural production activities, including both conventional and organic agriculture, occur throughout the county. (Section 3.2, *Agricultural Resources,* provides a more detailed discussion of agricultural land within the county.) Agricultural activities involve the use of regulated hazardous materials, particularly commercial pesticides. Pesticide use is regulated by the County Agricultural Commissioner's Office, with permits required for pesticide application. Such pesticide use is carefully regulated under state law and consistent with guidelines issued by the California Department of Pesticide Regulation (DPR). Such regulations generally govern the type of pesticide applied, as well as the location, timing, and rules of application. Special consideration is given to applications near schools. The Agricultural Commissioner's Office also regulates fumigation within the county and requires permits for the application of fumigants that incorporate DPR-suggested guidelines for use.

Pesticides – including rodenticides, insecticides, herbicides, fungicides, and other pest-controlling substances – are applied in various locations throughout the county to support the commercial cultivation of crops and to control pests on residential properties. Consequently, pesticides, fertilizers, and associated contaminants may be present in near-surface soils in residual concentrations at these locations. Many irrigated lands are currently required to operate under the Irrigated Lands Regulatory Program (ILRP) to regulate the runoff of pesticides, fertilizers, and sediments from irrigated lands through Waste Discharge Requirements issued by the SWRCB.

In addition, hazardous materials typically associated with commercial agricultural uses in the county include petroleum products (e.g., gasoline, diesel, oil) and other materials associated with the operation and maintenance of equipment (e.g., lubricants, antifreeze, solvents). Some agricultural properties within the county may also contain ASTs and USTs to store fuels and other potentially hazardous materials.

3.9.2.4 Pool Chemical Safety

Chemicals used to clean and disinfect pools can be hazardous, including chlorine. Common problems include eye damage, difficulty breathing, such as asthma, and skin burns. These injuries can occur among lifeguards, swimming instructors, maintenance employees, pool supply retail and delivery workers, janitors, and others who work near pools. Toxic chlorine gas releases at public aquatic venues can be prevented by regular testing of chemical control failsafe features, proper training of aquatic facility staff members, and by following standardized policies and procedures, including evacuating bathers from the pool before a recirculation pump is restarted. There are no known records of pool disinfectant injuries in Santa Barbara County.

3.9.2.5 Natural Gas Pipeline Rupture and Storage Facility Incidents

Pacific Gas & Electric (PG&E), which serves North County communities, and Southern California Gas (SoCalGas), which serves the South Coast, deliver natural gas through pipeline systems throughout the county. SoCalGas also operates a natural gas storage field, the La Goleta Storage Field, at More Ranch Road in the Eastern Goleta Valley. As summarized in the 2022 MJHMP, there are transmission lines and high-pressure distribution lines throughout the entire county, many of which are in areas with high seismic activity and crossing active faults (County of Santa Barbara 2022).

As documented in the 2022 MJHMP, there have been two recent natural gas incidents in the county. The post-Thomas Fire debris flows in Montecito on January 9, 2018, caused the failure of a natural gas line that runs along East Mountain Drive, and a massive explosion caused several homes to catch fire. Regionally, on October 23, 2015, SoCalGas crews discovered a leak at the natural gas storage well at Aliso Canyon, the largest natural gas storage facility in California. The storage facility is located in the Santa Susana Mountains of Los Angeles County. After several attempts, SoCalGas stopped the leak on February 12, 2016, sealing the well on February 15, 2016. It was plugged and abandoned before being reopened at reduced capacity in July 2017 (County of Santa Barbara 2022).

3.9.2.6 Oil Extraction Areas

As summarized in the County's 2022 MJHMP, Santa Barbara County has produced oil and gas since the late 1800s. In 1896, oil producers constructed piers to access the underwater portion of the Summerland Oil Field, marking the beginning of offshore oil production with intensive oil development along the shorelines of the Goleta and Gaviota coasts. Many of these older historic wells were improperly abandoned, presenting environmental hazards in the surf zone, offshore, and onshore. There are more than a dozen operational oil platforms located along the coast of Santa Barbara County, although several are moving toward decommissioning, and others stopped operating after a rupture caused by the 2015 Refugio Oil Spill. Onshore oil processing continues at facilities such as Las Flores Canyon on the Gaviota Coast. Although oil is not currently sent out of Las Flores Canyon, the oil conveyance infrastructure in the county includes the existing 123.4-mile pipeline system known as Lines 901 and 903. Line 901 stretches from Las Flores to Gaviota. Line 903 runs north from Gaviota to Pentland Station in Kern County through the Cuyama Valley. After the 2015 spill, Line 901, the line that ruptured, was shut down. Since then, seven offshore oil platforms have been shut down, including, from north to south, Hidalgo, Harvest, Hermosa, Heritage, Harmony, Hondo, and Holly (County of Santa Barbara 2022). Other facilities, such as the Chevron processing facilities pier in Carpinteria and production near Santa Maria, are initiating decommissioning.

Major onshore oil production continues throughout the county, with more than 4,000 producing onshore wells in the county. In the Santa Maria Valley, there are several petroleum-related oil and gas pipelines with major lines along Bradley Road and California Boulevard. Some of these lines are idle (not permanently abandoned) and have the potential to carry toxic H_2S. These lines extend south through the foothills and are tied into the Cat Canyon Oil Field in the Solomon Hills, approximately 10 miles southeast of Santa Maria, and the Orcutt Hill Oil Field in the Solomon Hills and Careaga Canyon south of Orcutt. High-pressure gas lines also exist along California and Solomon roads, as well as along portions of Blosser Road, Clark Avenue, and SR 1.

Oil spills can occur in any part of the county where existing oil and gas operations are located. This includes the offshore environment, where there are several platforms and undersea pipelines, or the onshore environment, through supply pipelines and well facilities. There have been 11 oil spills in the county between 1969 and 2020 (County of Santa Barbara 2022).

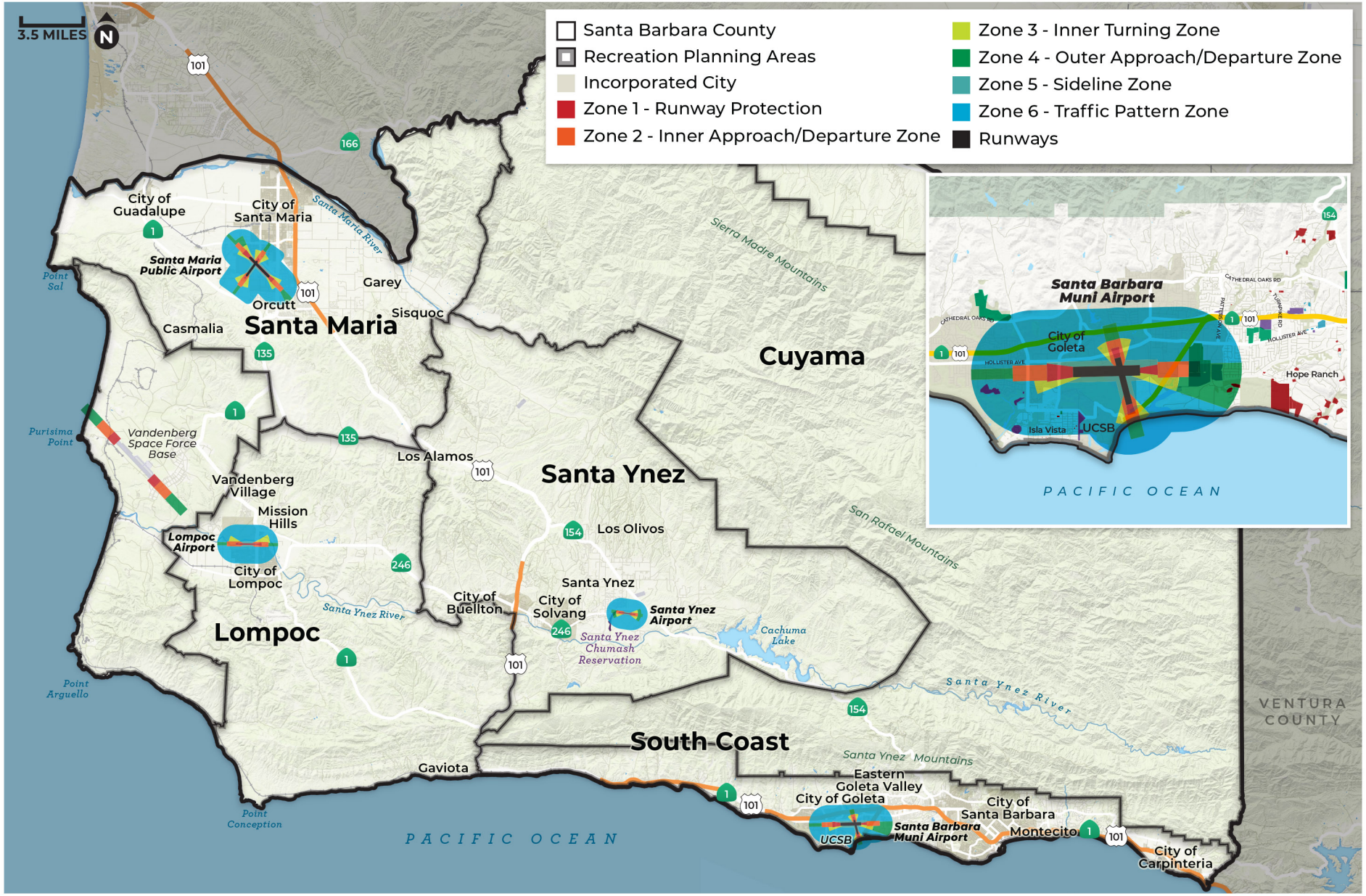
Ongoing oil production, processing, and associated transport (e.g., through the use of pipelines, vehicles, and limited train transport) in the county presents the potential for hazards due to spills, groundwater contamination, air pollutant emissions, etc.

3.9.2.7 Airport Safety Zones

In addition to being within the flight pattern of many airports providing regional flights (i.e., Los Angeles International, San Francisco International, Oakland, San Jose International, Burbank Airport, John Wayne Airport, Long Beach Airport, Ontario International Airport), the county has five airports located in Santa Maria, Lompoc, Santa Ynez, New Cuyama (recently re-opened in October 2022), and Santa Barbara. The county also has one military base, VSFB, which is located within the Lompoc Valley.

As the Airport Land Use Commission (ALUC) for Santa Barbara County, SBCAG is responsible for protecting public health, safety, and welfare by ensuring that vacant lands in the vicinity of airports are planned and zoned for uses compatible with airport operations. SBCAG's Airport Land Use Compatibility Plans (ALUCPs) serve as a tool for the ALUC to review land use plans and development proposals within Airport Influence Areas (AIA).[1] As discussed further in Section 3.11, *Land Use and Planning*, these plans also provide land use compatibility policies and criteria applicable to local jurisdictions in their preparation or amendments of the Comprehensive Plan. It should be noted that the Santa Barbara County ALUCPs do not address New Cuyama Airport. The Draft New Cuyama Airport ALUCP was not finalized.

[1] The Airport Influence Area (AIA) is a composite of the areas surrounding the airport that are affected by noise, height, and safety considerations.



wsp

Designated Airport Safety Zones

FIGURE 3.9-2

The designated safety zones for the airports within the county were developed by SBCAG based on guidance provided in the California Airport Land Use Planning Handbook, which includes dimensions for "generic" safety zones (California Department of Transportation [Caltrans] 2011). These safety zones are geometric shapes representing areas of the progressive degree of risk of aircraft accidents based on a statistical analysis of accident locations. Typically, the closer to the runway end, the higher the risk of an airplane accident. While the number of safety zones at an airport may vary based on the airport's unique operating conditions, the Handbook guides six safety zones. Table 3.9-3, below, describes these safety zones in detail, including the zone reference, typical aircraft activity, flight characteristics, and flying altitudes.

Table 3.9-3. Summary of Airport Safety Zones 1 - 6

Safety Zone	Description
Safety Zone 1	• Runway Protection Zone • Reflects areas where aircraft are on very close approach or departure • Altitude: Typically less than 200 feet above the runway
Safety Zone 2	• Inner Approach/Departure Zone • Aircraft overflying at low altitudes on final approach and straight-out departure • Altitude: Between 200 and 400 feet above the runway.
Safety Zone 3	• Inner Turning Zone • Aircraft (especially smaller, piston-powered aircraft) turning base to final on landing approach or initiating turn to en route direction on departure. • Altitude: Less than 500 feet above the runway, particularly on landing.
Safety Zone 4	• Outer Approach/Departure Zone • Approaching aircraft usually at less than traffic pattern altitude. Particularly applicable for busy general aviation runways (because of elongated traffic patterns), runways with straight-in instrument approach procedures, and other runways where straight-in or straight-out flight paths are common • Altitude: Less than 1,000 feet above the runway
Safety Zone 5	• Sideline Zone • Area not normally overflown; primary risk is with aircraft losing directional control on takeoff; excessive crosswind gusts or engine torque • Altitude: Runway elevation
Safety Zone 6	• Traffic Pattern Zone • Aircraft within a regular traffic pattern and pattern entry routes; • Altitude: Ranging from 500 to 1,500 feet above the runway.

Sources: Caltrans 2011.

Safety Zone 1 is the most restrictive zone around an airport and is subject to the greatest danger. Safety Zone 1 generally prohibits any type of development within this zone. Safety Zones 2 through 6 designate allowable development based on the type, design, and density of the development (SBCAG 2023a, 2023b, 2023c, and 2023d). For example, the ALUC has established building height limits. Acceptable building heights are based on the standards set

in the (1) Federal Aviation Regulations (FAR), Part 77, which addresses, safe, efficient use, and preservation of navigable airspace; (2) U.S. Standard for Terminal Instrument Procedures (TERPS); and (3) applicable airport design standards published by the FAA (SBCAG 2023c). For any construction or building alteration that is more than 200 feet above ground level, a project must file notice with the FAA (FAR Part 77). For projects exceeding the County's zoning height restrictions, or modifications to the height restrictions, the ALUC would determine safe height based on a calculation of the Approach Slopes (SBCAG 2023a, 2023b, 2023c, and 2023d).[2]

In addition to development requirements, the ALUCPs established open land requirements that allow for an emergency landing of an aircraft near an airport (SBCAG 2023a, 2023b, 2023c, and 2023d). As described in the ALUCPs, if a light aircraft is forced to land away from an airport, the risks to the people on board can best be minimized by providing as much "open land" area as possible within the airport vicinity. This concept is based on the fact that the majority of light aircraft accidents and incidents occurring away from an airport runway are controlled emergency landings in which the pilot has a reasonable opportunity to select the landing site. For business jets and other large or fast aircraft, including most military aircraft, the provision of "open land" for emergency landing purposes has minimal benefit unless the areas are very large and flat.

As described in the ALUCPs, to qualify as "open land," an area must (SBCAG 2023a, 2023b, 2023c, and 2023d):

1) Have minimum dimensions of approximately 75 feet by 300 feet (0.5 acres).
2) Consist of level (maximum 5% slope) ground with no major surface irregularities.
3) Be free of most structures and other major obstacles, such as walls, large trees or poles (greater than 4 inches in diameter, measured 4 feet above the ground), and overhead wires.
4) Not have buildings or other large obstacles more than 15 feet in height situated within 100 feet beyond the ends of the "open land" area. Shorter objects and ground surface irregularities are allowed. This clear airspace is intended to enhance the potential for aircraft to descend to an "open land" area.

The ALUCPs also describe that open land areas should be oriented with the typical direction of aircraft flights over the location involved.

[2] An approach slope, or the slope of the approach surface, is the path that an aircraft follows on its final approach to land on a runway.

3.9.2.8 Emergency Response and Evacuation

The Santa Barbara County Office of Emergency Management (SBCOEM), a division of the Santa Barbara County Executive Office, is responsible for emergency planning and coordination for the Santa Barbara Operational Area. The SBCOEM is responsible for developing and maintaining applicable emergency plans for the Operational Area, including the Emergency Operations Plan (EOP). The SBCOEM also maintains the Emergency Operations Center in a state of operational readiness to activate if an incident occurs. The SBCOEM and coordinating agencies have developed several plans and programs to minimize loss of life and damage to property in the event of natural disasters, such as Community Wildfire Protection Plans (CWPPs), the Tsunami Plan, Sea Level Rise Plans, and the Debris Management Plan. One of these, the Standardized Emergency Management System/Plan, addresses emergency responses associated with natural disasters, technological incidents, and national security emergencies, and assigns tasks and specifies policies and standard operating procedures for the coordination of emergency staff, resources, and service elements. County jurisdictions have also established various communication pathways to inform the public of emergencies and recommended protective actions, such as evacuations and sheltering in place.

In addition, the Santa Barbara County Fire Department (SBCFD) maintains a protocol for evaluating the adequacy of fire level of service to population ratios, response times, equipment condition levels, emergency service training, and other relevant emergency service information consistent with state standards. The SBCFD also maintains a protocol for wildfire defense zones for emergency services that includes fuel breaks, backfire areas, and staging areas that support safe fire suppression activities.

The County has mapped major evacuation routes, such as U.S. Highway 101, but does not prescribe specific evacuation routes in place to be followed in the event of a disaster. In such an emergency, local law enforcement agencies have the responsibility to direct hazard-related evacuations.

County Parks manages closures and evacuations of Jalama Beach and Jalama Beach County Park and Campground outside of VSFB in response to scheduled launches from nearby VSFB. During closures, all park visitors and staff must leave the park. Closures have typically been limited to 12 per year, but as planned launch activity accelerates, County Parks could experience more frequent and longer duration evacuations and temporary closures.

3.9.3 REGULATORY SETTING

Federal, state, and local regulations have been enacted to address hazards and hazardous materials in Santa Barbara County. The following section summarizes applicable policies and

regulations that may relate directly to future development enabled under the Project and its associated impacts.

3.9.3.1 Federal

Federal Toxic Substances Control Act/Resource Conservation and Recovery Act/Hazardous and Solid Waste Act

The Federal Toxic Substances Control Act (1976) and RCRA established a USEPA-administered program to regulate the generation, transport, treatment, storage, and disposal of hazardous waste. RCRA was amended in 1984 by the Hazardous and Solid Waste Act, which affirmed and extended the "cradle to grave" system of regulating hazardous wastes. Any business, institution, or other entity that generates hazardous waste is required to identify and track its hazardous waste from the point of generation until it is recycled, reused, or disposed of. DTSC is responsible for implementing the RCRA program and California's hazardous waste laws, which are collectively known as the Hazardous Waste Control Law. Under the Certified Unified Program Agency (CUPA) program, CalEPA has in turn delegated enforcement authority to the County for state law regulating hazardous waste producers or generators.

Comprehensive Environmental Response, Compensation, and Liability Act/Superfund Amendments and Reauthorization Act

CERCLA, commonly known as "Superfund," was enacted by Congress on December 11, 1980. This law (42 U.S. Code [USC] §103) provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA establishes requirements concerning closed and abandoned hazardous waste sites, provides for the liability of persons responsible for the release of hazardous waste at these sites, and establishes a trust fund to provide for cleanup when no responsible party can be identified. CERCLA also enabled the revision of the National Contingency Plan (NCP). The NCP (40 Code of Federal Regulations [CFR] Part 300) provides the guidelines and procedures needed to respond to releases and threatened releases of hazardous substances, pollutants, and/or contaminants. The NCP also established the National Priorities List. CERCLA was amended by the Superfund Amendments and Reauthorization Act on October 17, 1986.

Emergency Planning and Community Right-to-Know Act

The Emergency Planning and Community Right-to-Know Act of 1986 was created to help communities plan for emergencies involving hazardous substances. The Act establishes requirements for federal, state, and local governments, Native American tribes, and industry regarding emergency planning and reporting on hazardous and toxic chemicals. There are several major provisions of the Emergency Planning and Community Right-to-Know Act: Emergency Planning (Sections 301 – 303); Emergency Release Notification (Section 304);

Hazardous Chemical Storage Reporting (Sections 311 – 312); Toxic Chemical Release Inventory (Section 313); and the Clean Air Act Risk Management Plan Regulations (Clean Air Act Section 112[r]).

Clean Water Act/Spill Prevention, Control, and Countermeasure Rule

The Clean Water Act (CWA) (33 USC §1251 et seq., formerly the Federal Water Pollution Control Act of 1972) was enacted with the intent of restoring and maintaining the chemical, physical, and biological integrity of the waters of the U.S. As part of the CWA, USEPA oversees and enforces the Oil Pollution Prevention regulation contained in 40 CFR Part 112, which is often referred to as the "SPCC Rule" because it requires facilities to prepare, amend, and implement spill prevention, control, and countermeasure (SPCC) plans. A facility is subject to SPCC regulations if a single oil storage tank has a capacity greater than 660 gallons, the total aboveground oil storage capacity exceeds 1,320 gallons, or the underground oil storage capacity exceeds 42,000 gallons and, because of its location, the facility could reasonably be expected to discharge oil into or upon the "navigable waters" of the U.S.

Other federal regulations overseen by USEPA relevant to hazardous materials and environmental contamination include 40 CFR Part 1(D) (Water Projects) and 40 CFR Part 1(I) (Solid Wastes). Further, 40 CFR Part 1(D)(116) sets forth a determination of the reportable quantity for each substance that has been designated as hazardous, and 40 CFR Part 1(D)(117) applies to quantities of designated substances equal to or greater than the reportable quantities that may be discharged into waters of the U.S.

Occupational Safety and Health Administration

The Occupational Safety and Health Administration's (OSHA's) mission is to ensure the safety and health of American workers by setting and enforcing standards; providing training, outreach, and education; establishing partnerships; and encouraging continual improvement in workplace safety and health. The OSHA staff establishes and enforces protective standards and reaches out to employers and employees through technical assistance and consultation Projects. OSHA standards are listed in 29 CFR Part 1910.

Code of Federal Regulations, Part 77 – Navigable Airspace

Federal Regulation Title 14 Part 77 establishes standards and notification requirements for objects affecting navigable airspace. Part 77 allows the "FAA to identify potential aeronautical hazards in advance thus preventing or minimizing the adverse impacts to the safe and efficient use of navigable airspace. Navigable airspace is defined as the airspace at or above the minimum altitudes of flight that includes the airspace needed to ensure safety in the takeoff and landing of aircraft. U.S. Congress has charged the FAA with administering this airspace in the public interest as necessary to ensure the safety of aircraft and its efficient use. The ALUC criteria for determining the acceptability of a land use action with respect to height is based on

these as well as the TERPS and applicable airport design standards (SBCAG 2023c). For any construction or building alteration that is more than 200 feet above ground level, a project must file notice with the FAA. For projects exceeding the County's zoning height restrictions, or modifications to the height restrictions, the ALUC would determine safe height based on a calculation of the Approach Slopes (A. Orfila, SBCAG, personal communication, August 4, 2023; SBCAG 2023a, 2023b, 2023c, and 2023d).

3.9.3.2 State

California Department of Conservation Geologic Energy Management Division

The California Department of Conservation Geologic Energy Management Division (CalGEM) is the state agency responsible for supervising the drilling, operation, maintenance, plugging, and abandonment of oil, gas, and geothermal wells. CalGEM's regulatory program promotes the sensitive development of oil, natural gas, and geothermal resources in the state through sound engineering practices, pollution prevention, and the implementation of public safety programs. CalGEM requires any construction above or near plugged or abandoned oil and gas wells to be avoided and the remediation of wells to current CalGEM standards. CalGEM developed the Construction Site Plan Review Program to assist local permitting agencies in identifying and reviewing the status of oil or gas wells located near or beneath proposed structures.

Among CalGEM's Construction Site Plan Program are the following development requirements:

- The developer is required to submit a fully completed Well Review Program application to CalGEM;
- The developer is required to locate all known wells located on the development site property; and
- CalGEM will evaluate all known wells located on the development site property. The evaluation process consists of: 1) verifying the wells have a competent surface plug; and 2) verifying the wells are not leaking any fluids or gas.

Hazardous Materials Transportation

The transport of hazardous materials within the state is subject to various federal, state, and local regulations. It is illegal to transport explosives or inhalation hazards on any public highway not designated for that purpose unless the use of the highway is required to permit the delivery or the loading of such materials (California Vehicle Code, Sections 31602[b] and 32104[a]). The California Highway Patrol (CHP) designates routes to be used for the transport of hazardous materials. The transport of hazardous materials is restricted to such routes except in cases where travel from these routes is required to deliver or receive hazardous materials.

Hazardous Waste Control Act

The Hazardous Waste Control Act created the State Hazardous Waste Management Project, which is similar to but more stringent than the Federal RCRA Project. The act is implemented by regulations contained in Title 26 of the California Code of Regulations (CCR), which describe the following aspects of the requirements for the proper management of hazardous waste:

- Identification and classification;
- Generation and transportation;
- Design and permitting of recycling, treatment, storage, and disposal facilities;
- Treatment standards;
- Operation of facilities and staff training; and
- Closure of facilities and liability requirements.

These regulations list more than 800 materials that may be hazardous and establish criteria for identifying, packaging, and disposing of such waste. Under the Hazardous Waste Control Act and Title 26, the generator of hazardous waste must complete a manifest that accompanies the waste from the generator to the transporter to the ultimate disposal location. Copies of the manifest must be filed with the California DTSC.

Certified Unified Program Agency (CUPA)

Senate Bill (SB) 1082, passed in 1993, created the Unified Hazardous Waste and Hazardous Materials Management Regulatory Program (Unified Program), which requires the administrative consolidation of six hazardous materials and waste programs (Program Elements) under one agency, a CUPA. CUPAs maintain records regarding location and status of sites that use hazardous materials within their areas of jurisdiction and administer programs that regulate and enforce the transport, use, storage, manufacturing, and remediation of hazardous materials. The Unified Program consolidates six state environmental programs into one program at the local level, under the authority of a CUPA. The Program Elements consolidated under the Unified Program are as follows:

- Hazardous Waste Generator and Onsite Hazardous Waste Treatment Programs (i.e., Tiered Permitting);
- Aboveground Petroleum Storage Tank SPCC;
- Hazardous Materials Release Response Plans and Inventory Project (i.e., Hazardous Materials Disclosure or "Community Right-to-Know");
- California Accidental Release Prevention (CalARP) Program;
- UST Program; and
- Uniform Fire Code Plans and Inventory Requirements.

The Unified Program is intended to provide relief to businesses that comply with the overlapping and sometimes conflicting requirements of formerly independently managed

programs. The Unified Program is implemented at the local government level by CUPAs. Most CUPAs have been established as a function of a local environmental health or fire department. Some CUPAs have contractual agreements with another local agency (i.e., a participating agency) that implements one or more Program Elements in coordination with the CUPA.

2023 State of California Multi-Hazard Mitigation Plan

The State of California Multi-Hazard Mitigation Plan (SHMP) is the official statement of the state's hazard identification, vulnerability analysis, and hazard mitigation strategy. The goal of the SHMP is to guide implementation activities to achieve the greatest reduction of vulnerability, which results in saved lives, reduced injuries, reduced property damages, and protection for the environment. In particular, the SHMP helps administer the Local Hazard Mitigation Plan (LHMP) program for the state. The California Emergency Management Agency supports and assists local governments in the development of LHMPs and tracks the progress and effectiveness of plan updates and projects. It provides local governments with information on integrating hazard identification, risk assessment, risk management, and loss prevention into a comprehensive approach to hazard mitigation and helps them identify cost-effective mitigation measures and projects.

California Environmental Protection Agency

CalEPA was created in 1991. It unified California's environmental authority into a single cabinet-level agency and brought the California Air Resources Board, SWRCB, RWQCBs, California Department of Resources, Recycling and Recovery, DTSC, the Office of Environmental Health Hazard Assessment, and the DPR under one agency. These agencies were placed within the CalEPA "umbrella" for the protection of human health and the environment to ensure a coordinated deployment of state resources. Their mission is to restore, protect, and enhance the environment and ensure public health, environmental quality, and economic vitality.

Department of Toxic Substance Control

DTSC, a department of CalEPA, is the primary agency in California for regulating hazardous waste, cleaning up existing contamination, and finding ways to reduce the amount of hazardous waste produced in California. DTSC regulates hazardous waste primarily under the authority of RCRA and the California Health and Safety Code (primarily Division 20, Chapters 6.5 through 10.6, and Title 22, Division 4.5). Other laws that affect hazardous waste are specific to handling, storage, transportation, disposal, treatment, reduction, cleanup, and emergency planning.

Government Code 65962.5 (commonly referred to as the Cortese List) includes DTSC-listed hazardous waste facilities and sites; Department of Health Services lists of contaminated drinking water wells; sites listed by SWRCB as having UST leaks or discharges of hazardous

wastes or materials into the water or groundwater; and lists from local regulatory agencies of sites with a known migration of hazardous waste/material.

State Water Resources Control Board

SWRCB is responsible for statewide regulation of water resources. SWRCB's mission is to "ensure the highest reasonable quality for waters of the State of California while allocating those waters to achieve the optimum balance of beneficial uses." SWRCB thus has joint authority over water allocation and water quality protection. SWRCB supports the efforts of the individual RWQCBs, of which there are nine statewide. These are semiautonomous and consist of Board members appointed by the Governor and confirmed by the Senate. Regional boundaries are based on watersheds, and water quality requirements are based on the unique differences in climate, topography, geology, and hydrology for each watershed.

Each RWQCB makes critical water quality decisions for its region, including setting standards, issuing waste discharge requirements, determining compliance with those requirements, and taking appropriate enforcement actions. Water quality standards are defined in each RWQCB's respective Basin Plan. Basin plans must conform to the policies set forth in the Porter-Cologne Water Quality Control Act (Porter-Cologne Act) and established by SWRCB in its state water policy. The Porter-Cologne Act also provides that an RWQCB may include in its region a regional plan with water discharge prohibitions applicable to particular conditions, areas, or types of waste. The RWQCBs are also authorized to enforce discharge limitations, take actions to prevent violations of these limitations from occurring, and conduct investigations to determine the status of quality of any of the waters of the State of California within their region. Civil and criminal penalties are also applicable to persons who violate the requirements of the Porter-Cologne Act or SWRCB/RWQCB orders.

California Porter-Cologne Water Quality Control Act

The Federal CWA places the primary responsibility for the control of water pollution and for planning the development and use of water resources with the individual states, although it does establish certain guidelines for the states to follow in developing their programs.

California's primary statute governing water quality and water pollution is the Porter-Cologne Act, which grants the SWRCB and RWQCBs broad powers to protect water quality and is the primary vehicle for the implementation of California's responsibility under the CWA. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, to regulate discharges to surface and groundwater, to regulate waste disposal sites, and to require the cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, oil, or petroleum product.

California Office of Emergency Services (CalOES)

To protect public health and safety as well as the environment, the CalOES is responsible for establishing and managing statewide standards for business and area plans related to the handling and release, or threatened release, of hazardous materials. CalOES requires basic information regarding hazardous materials handled, used, stored, or disposed of (including location, type, quantity, and health risks) to be available to firefighters, public safety officers, and regulatory agencies. Typically, this information should be included in business plans to prevent or mitigate impacts on the environment or the health and safety of individuals from the release or threatened release of these materials into the workplace and environment. These regulations are covered under Chapter 6.95 of the California Health and Safety Code, Article 1, Hazardous Materials Release Response and Inventory Project (Sections 25500 to 25520), and Article 2, Hazardous Materials Management (Sections 25531 to 25543.3).

Title 19 of the CCR (Public Safety; Division 2; Office of Emergency Services; Chapter 4; Hazardous Material Release Reporting, Inventory, and Response Plans; Article 4 [Minimum Standards for Business Plans]) establishes minimum statewide standards for hazardous materials business plans. These plans must include the following: a hazardous material inventory, in accordance with Sections 2729.2 to 2729.7; emergency response plans and procedures, in accordance with Section 2731; and training Project information, in accordance with Section 2732. Business plans should contain basic information regarding the location, type, quantity, and health risks of hazardous materials stored, used, or disposed of in the state. Each business will prepare a hazardous materials business plan if that business uses, handles, or stores a hazardous material or an extremely hazardous material in quantities greater than or equal to the following:

- 500 pounds of a solid substance;
- 55 gallons of a liquid;
- 200 cubic feet of compressed gas;
- A hazardous compressed gas in any amount; and
- Hazardous waste in any quantity.

California Occupational Safety and Health Administration (Cal/OSHA)

The California Occupational Safety and Health Administration (Cal/OSHA) is the primary agency with responsibility for worker safety with respect to the handling and use of chemicals in the workplace. Cal/OSHA standards are generally more stringent than federal regulations. The employer is required to monitor worker exposure to listed hazardous substances and notify workers of exposure (8 CCR Sections 337–340). The regulations specify requirements regarding employee training, the availability of safety equipment, accident-prevention Projects, and hazardous substance exposure warnings.

Asbestos-Containing Materials Regulations

State-level agencies, in conjunction with USEPA and the Cal/OSHA, regulate removal, abatement, and transport procedures for asbestos-containing materials. Releases of asbestos from industrial, demolition, or construction activities are prohibited by these regulations, and medical evaluation and monitoring are required for employees performing activities that could expose them to asbestos. Additionally, the regulations include warnings that must be heeded and practices that must be followed to reduce the risk of asbestos emissions and exposure. Finally, federal, state, and local agencies must be notified prior to the onset of demolition or construction activities with the potential to release asbestos.

Polychlorinated Biphenyls

The USEPA prohibited the use of polychlorinated biphenyls (PCBs) in the majority of new electrical equipment starting in 1979 and initiated a phase-out for much of the existing PCB-containing equipment. The inclusion of PCBs in electrical equipment and the handling of those PCBs are regulated by the provisions of the Toxic Substances Control Act (15 USC §2601 et seq.). Relevant regulations include labeling and periodic inspection requirements for certain types of PCB-containing equipment and highly specific safety procedures for their disposal. The state likewise regulates PCB-laden electrical equipment and materials contaminated above a certain threshold as hazardous waste; these regulations require that such materials be treated, transported, and disposed of accordingly. At lower concentrations for non-liquids, RWQCBs may exercise discretion over the classification of such wastes.

Per- and Polyfluoroalkyls (PFAs)

The USEPA recognizes PFAs as a group of manufactured chemicals that have been used in industry and consumer products since the 1940s because of their useful properties. PFAS chemicals are a known carcinogen which can interfere with hormones, reproduction, immunity and cause developmental delays in children. There are thousands of different PFAs, some of which have been more widely used and studied than others. Perfluorooctanoic Acid (PFOA) and Perfluorooctane Sulfonate (PFOS), for example, are two of the most widely used and studied chemicals in the PFAS group. PFOA and PFOS have been replaced in the United States with other PFAs in recent years. One common characteristic of concern of PFAs is that many break down very slowly and can build up in people, animals, and the environment over time. PFAs can be present in water, soil, air, and food as well as in materials found in our homes or workplaces, including drinking water, landfills and hazardous sites, and consumer products. PFAs are also present in artificial turf and synthetic grass products and some recycled rubber playground surface materials. Synthetic turf is a man-made, non-living replacement of turfgrass that requires little water or maintenance. The grass blades are made of fibers such as nylon or plastic while the base is typically a crumb rubber made from used tires, plastic pellets or sand. SB 676, signed by Governor Newsom in October 2023, allows cities and counties

to ban or regulate synthetic grass or artificial turf, citing emerging scientific understanding of health concerns, particularly for children.

Public Swimming Pool Regulations

CCR Chapter 20, Sections 65501 - 65551 regulate the construction and operation of pools to ensure public health and safety. These regulations require public pools, when open or in use, to be disinfected continuously by a chemical, such as chlorine or bromine, that imparts a disinfectant at adequate concentrations. Additionally, spray grounds and water features are regulated using continuous ultraviolet light disinfection systems. The pool operator must test public pool water to ensure compliance with State law. Gas chlorination equipment is required to be always maintained and operational to protect the public from the adverse effects of chlorine.

Lead-Based Paint

Cal/OSHA's Lead in Construction Standard is contained in 8 CCR Section 1532.1. The regulations address all of the following areas: permissible exposure limits; exposure assessment; compliance methods; respiratory protection; protective clothing and equipment; housekeeping; medical surveillance; medical removal protection; employee information, training, and certification; signage; record keeping; monitoring; and agency notification.

California Highway Patrol

Under the California Vehicle Code, Section 32000.5, a valid license to transport hazardous materials, issued by the CHP, is required for the transport of either of the following.

- Hazardous materials for which the display of placards is required pursuant to Section 27903.
- Hazardous materials weighing more than 500 pounds for which the display of placards is required.

Additional requirements regarding the transport of explosives, inhalation hazards, and radioactive materials are enforced by the CHP under the authority of the California Vehicle Code. The transport of explosives generally requires consistency with rules and regulations pertaining to routing, safe stopping distances, and inspection stops (14 CCR Sections 6[1][1150–1152.10]). Inhalation hazards face similar but more restrictive rules and regulations (13 CCR Sections 6[2.5][1157–1157.8]). The transport of radioactive materials is restricted to specific safe routes.

Irrigated Lands Regulatory Program (ILRP)

The ILRP addresses waste discharge (e.g., sediments, pesticides, nitrates) from commercial irrigated lands, including nurseries, which are required to obtain regulatory coverage. Coverage is not required if a property is not used for commercial purposes, is not irrigated (dryland farmed), or if commercial irrigated lands are covered under another program (i.e., Dairy,

Poultry, or Bovine). Options for regulatory coverage include joining a Third-Party (coalition) group or obtaining Individual Regulatory Coverage. The goal of ILRP is to reduce impacts of agricultural discharges to groundwater and surface water. Under this program, growers must implement management practices and submit farm evaluations and nitrogen management data.

California Airport Land Use Planning Handbook

In October 2011, the Caltrans Division of Aeronautics approved the current California Airport Land Use Planning Handbook. The California Airport Land Use Planning Handbook is not a regulatory program or policy document. Rather, the purpose of the Handbook is to provide guidance for conducting airport land use compatibility planning as required by the Public Utilities Code, Article 3.5, Airport Land Use Commissions. Article 3.5 outlines the statutory requirements for ALUCs including the preparation of an ALUCP. Article 3.5 mandates that the Division of Aeronautics create a Handbook that contains the identification of essential elements for the preparation of an ALUCP. This Handbook is intended to: 1) provide information to ALUCs, their staffs, airport proprietors, cities, counties, consultants, and the public; 2) to identify the requirements and procedures for preparing effective compatibility planning documents; and 3) define exemptions where applicable.

3.9.3.3 Local

Santa Barbara County Association of Governments (SBCAG) / Airport Land Use Commission (ALUC)

The SBCAG ALUC is responsible for the protection of public health, safety, and welfare with respect to lands within the vicinity of airports within the county. To aid in the implementation of these responsibilities and as mandated by state law, SBCAG prepares and implements ALUCPs for the active airports within the county, as well as VSFB. Each ALUCP establishes a set of land use planning standards that local agencies should incorporate into planning and zoning efforts within the AIA.

Santa Barbara County Comprehensive Plan

The Santa Barbara County Comprehensive Plan addresses public safety, hazardous materials, and fire hazards for the county. Consistency with these policies is discussed in Section 3.10, *Land Use and Planning,* and Section 3.16, *Wildfire*.

Seismic Safety and Safety Element

The Seismic Safety and Safety Element (adopted in 1979, republished in May 2009, and amended in July 2023) is intended to guide land use planning by providing pertinent data regarding geologic, soil, seismic, fire, and flood hazards, as well as recommendations and

criteria to aid in land use planning to ensure that future development will be compatible with the environment.

Safety Element Supplement

The Safety Element Supplement was adopted in 2000 and republished in May 2009. Divided into two parts, Part A focuses on the role of land use planning in reducing the risk of public exposure to acutely hazardous materials. It draws upon the County's own experiences and recommended practices of other informed sources to guide consistent and well-informed land-use decisions with regard to public safety. Chapter I addresses facilities that handle acutely hazardous materials and are fixed in location to a single site; and Chapter II addresses gas pipelines, which are considered to be fixed in location to a corridor and, thus, represent a linear source of risk, which extends along the corridor.

The objectives and policies contained in these chapters address the following two goals:

- **Goal 1**: To provide sufficient guidance to affect well-informed, consistent, and equitable land use decisions.
- **Goal 2**: To prevent and minimize unnecessary risk to the public, recognizing it is impossible to obtain a zero-risk society.
    - **Policy Hazardous Facility Safety 1-A: Risk Estimates.** The County shall employ accurate estimates of risk associated with hazardous facilities to inform discretionary land use decisions. Where substantial, preliminary evidence indicates involuntary public exposure to significant risk may result from the land use decision.

Hazardous Waste Element

The Hazardous Waste Element was adopted in 1990 and republished in May 2009, which emphasizes the need for proper management of current and future hazardous wastes to minimize the amount of waste generated and reduce the hazard of what is generated. The County Hazardous Waste Management Plan is concerned primarily with hazardous waste issues and not hazardous materials issues. Hazardous wastes are substances of no further intended use, which need treatment or disposal, or both, while hazardous materials include new and usable substances. The handling and use of hazardous materials are regulated by a set of legislative and regulatory requirements that fall outside the scope of the Comprehensive Plan. The following goals and policies are relevant to the proposed Project:

Storage of Hazardous Waste

- **Goal 1:** To protect public health and safety and the environment from risks posed by improper storage of hazardous materials and hazardous waste.
    - **Policy 1:** The County and cities shall encourage the proper storage of hazardous materials and hazardous waste through continued inspection efforts and public education regarding proper storage methods and regulations.

Contaminated Sites

- **Goal 1:** To protect public health and safety and the environment from risks due to the presence of abandoned or contaminated sites.
  - **Policy 1:** The County and cities should work with other involved agencies to establish a coordinated interagency effort for the identification, regulation, mitigation, and notification of contaminated sites.
  - **Policy 2:** The County and cities in conjunction with the State Department of Health Services shall encourage onsite treatment and remediation to reduce the transport of hazardous waste from contaminated sites.

Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP)

The MJHMP was most recently updated in 2022 to comprehensively identify, evaluate, and mitigate the known hazards that Santa Barbara County faces. The MJHMP is used by local emergency management teams, decision-makers, and agency staff to implement needed mitigation to address known hazards. The MJHMP can also be used as a tool for all stakeholders to increase community awareness of local hazards and risks and provide information about options and resources available to reduce those risks. The MJHMP describes historical hazard events and the future probability of these hazards and their impact on communities within the county. Vulnerability assessments summarize the impacts of hazards on critical infrastructure, populations, and future development. The MJHMP identifies five goals and a Mitigation Plan, including measures to ensure future development is resilient to known hazards (County of Santa Barbara 2022).

Santa Barbara County Fire Department, Hazardous Waste Unit

The Santa Barbara County Fire Department (SBCFD) is certified by CalEPA as the CUPA for the County. The CUPA regulates businesses that handle hazardous materials, generate or treat hazardous waste, or operate aboveground or underground storage tanks. CUPA requirements can be found in Health & Safety Code Chapter 6.11 and CCR, Title 27, Division 1, Subdivision 4, Chapter 1. CUPA is responsible for administering and managing the Hazardous Materials Release Response Plans and Inventory Project, USTs, Hazardous Waste Generators, Onsite Hazardous Waste Treatment, Aboveground Petroleum Storage Act, and CalARP Program.

Santa Barbara County's Site Mitigation Program

The Site Mitigation Unit is administered by the Santa Barbara County Environmental Health Services and provides regulatory oversight for site assessment and corrective actions at properties where hazardous substance releases have occurred that are not associated with a LUST system. The primary goal of the Site Mitigation Unit is to protect human health and natural resources by ensuring appropriate steps are taken to mitigate and clean up land and water contaminated with hazardous materials. Site Mitigation cases include releases of crude

oil, other hazardous substances, and toxic heavy metals, oilfield restoration, properties contaminated by former industrial/commercial uses, and sites with historically contaminated fill.

Santa Barbara County Special Problem Areas

The County Code of Ordinances Section 10-15.2 states that "Special Problems Areas" are areas of the County designated by resolution of the Board of Supervisors as having existing or anticipated special and unique problems pertaining to flooding, drainage, soils, geology, access, sewage disposal, water supply, location, or an elevation which impact the health, safety, and welfare of the public. The following locations are designated as special problem areas:

- South County: Hollister Avenue at Modoc Road, Mission Canyon, Naples, Shepard Mesa, Summerland
- North County: Ballard, Janin Acres, Los Alamos, Los Olivos, Sweeney Road.

The "Special Problems Committee" is a committee composed of representatives of the following departments or divisions: planning and development, environmental health, fire, and public works.

Section 10-15.3 states the special problems committee shall review plans and specifications of buildings and structures (including the components of wastewater disposal systems) proposed for construction in a special problems area. Individual members of the committee may recommend to the county decision-makers any reasonable conditions of approval considered necessary to mitigate present or anticipated problems within the scope of the committee's charge or to prevent damage to public or private property, risk of injury to persons, or creation of a public nuisance. Where an individual member or members are unable to identify feasible mitigation of such problems, damage, or risk, each may recommend denial of the permit that would authorize the construction of the proposed buildings or structures.

Community and Regional Plans

As discussed in Section 3.11, *Land Use and Planning*, projects within the vicinity of the following community and regional plans would be subject to hazardous materials goals and policies of that plan:

Eastern Goleta Valley Community Plan	Montecito Community Plan
Gaviota Coast Plan	Orcutt Community Plan
Goleta Community Plan	Santa Ynez Community Plan
Los Alamos Community Plan	Summerland Community Plan
Mission Canyon Plan	Toro Canyon Plan

Montecito Community Plan Summerland Community Plan

3.9.4 ENVIRONMENTAL IMPACT ANALYSIS

This section discusses the potential hazards and hazardous materials impacts associated with the Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed and the residual impact after mitigation is determined.

3.9.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purposes of this Program EIR, implementation of the Project may have a significant adverse impact relating to hazards and hazardous materials if it would:

a. Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials.

b. Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment.

c. Emit hazardous emissions or involve handling hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school.

d. Be located on a site that is included on a list of hazardous materials sites compiled pursuant to Government Code Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment.

e. Be located within an airport land use plan area or, where such a plan has not been adopted, be within two miles of a public airport or public use airport, and result in a safety hazard or excessive noise for people residing or working in the project area.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

Non-applicable thresholds:

- Threshold (g) (*Wildfire*): Potential hazards associated with wildland fires and associated hazards are discussed in Section 3.16, *Wildfire*. Therefore, this issue is not discussed in this section.

County of Santa Barbara Environmental Thresholds and Guidelines

The County's *Environmental Thresholds and Guidelines Manual* (2021) includes thresholds for public safety, as summarized and presented below, that are relevant in determining project impacts related to hazards.

Public Safety

Impacts from risks stemming from the following facilities and activities would be significant if (a) they are subject to a discretionary land-use action (or would communicate their concerns for public safety to another jurisdiction that is making a discretionary decision, such as routes for shipping hazardous materials), and (b) initial analysis reveals substantial evidence to support a fair argument that the potential of a significant impact to public safety could result from approval of the project subject to such action:

1. Oil wells and gas wells (unless abandoned or undergoing abandonment), and associated production.
2. Gas and hazardous liquids pipelines, including oil if a significant risk is expected, but exempting existing natural gas pipelines owned by a Californian public utility regulated by the California Public Utilities Commission and operated for the purpose of delivering gas directly to the Goleta storage field or consumers (except activities related to liquefied natural gas), and exempting new low-pressure distribution pipelines (125 pounds per square in gauge or lower) operated by a Californian public utility and regulated by the California Public Utilities Commission.
3. Oil and/or gas processing and storage facilities, including facilities for removing sulfur, removing gas liquids, and compressing gas.
4. Oil refineries.
5. Handling, storage, and transport of compressed natural gas or methanol related to facilities for refueling motor vehicles with these materials.
6. All handling, storage, and transport of chlorine in containers with a capacity of one ton or more, or an equivalent amount of chlorine in bottles or cylinders connected through a common header.
7. Handling, storage, and transport of anhydrous ammonia in containers with a capacity of one ton or more, or an equivalent amount of anhydrous ammonia in bottles or cylinders connected through a common header.
8. Handling, storage, and transport of acutely hazardous rocket propellants such as nitrogen tetroxide (including instances where the County would communicate with other jurisdictions about discretionary actions that affect public safety in this County such as designation of routes for transporting hazardous materials).

9. Handling, storage, and transport of spent radioactive fuel and other high-level, radioactive materials (including instances where the County would communicate with other jurisdictions about discretionary actions that affect public safety in this County such as the designation of route for transporting hazardous materials).
10. Storage of natural gas liquids, including liquefied petroleum gas, unless such storage is limited to a single container with a maximum capacity of 10,000 gallons or less and does not require refilling more than once weekly.
11. Facilities of a type not addressed in 1-10 above, and not exclusively dedicated to retail distribution of consumer products (such as gasoline stations, or hardware, paint, and dry-cleaning stores) that: (a) use a classified Class A or B explosive (per Title 49, CFR, 171-179); or (b) use substances classified as high-level radioactive materials; or (c) use specified quantities of regulated substances (pursuant to Title 19 of the CCR, Division 2, Chapter 4.5) and meet all of the following criteria.
    a. The regulated substance(s) is stored as a compressed gas or liquefied compressed gas, or is expected to vaporize or evaporate quickly upon release (e.g., through failure of container, piping, or valve), or is stored as a liquid at a temperature that exceeds its boiling point.
    b. The regulated substance(s) has the potential to cause a significant risk to public safety according to the County's environmental thresholds. (For example, the regulated substance(s) exists as a gas or vapor upon accident release, and will either release into the open atmosphere or become dangerously explosive in a confined environment.)
    c. The regulated substance(s) is associated with a specific activity that is generally considered to be incompatible with surrounding land uses.
12. All development proposed in proximity to one or more existing hazardous facilities as described above, unless (a) the hazardous facility(ies) are inoperative for the purpose of abandonment, or (b) the proposed development is a single-family residential unit which the County considers to be a voluntary exposure to the hazardous facility, or (c) the proposed development does not require a discretionary land-use action.

In cases 1 through 11 listed above, these thresholds apply to risks imposed on present and reasonably projected future land use, considering principally permitted uses under current zoning along with any conditional uses that are permitted or under review.

With regard to land uses with transitory populations (e.g., parks, roads, pedestrian and bike paths), these thresholds apply only when these populations are considered to be often present or too often flow continuously (e.g., a frequently used recreational park or frequently traveled road). They do not apply when transitory populations are considered to be sporadic or often absent (e.g., hiking trails and other uses where the infrequent presence of people renders inclusion herein as overly speculative).

These thresholds do not apply to occupational safety (i.e., employees of the hazardous facility or people who visit the hazardous facility to provide services or conduct business).

In addition, impacts would be significant if a risk analysis conducted for a project results in a societal risk spectrum that falls in the amber or red zones of the public fatality or public injury risk spectrums as presented in Figures 1 and 2 of the Public Safety Thresholds section of the County's *Environmental Thresholds and Guidelines Manual* (2021).

Methodology

As described in Chapter 2, *Project Description*, the Project would facilitate the development of parks, recreational facilities, and trail projects within the county. The Project includes planned capital improvements and amendments to the County's policies and regulations to support the long-term development of recreation facilities to meet recreation needs within five recreation planning regions. This programmatic analysis reviews whether the potential changes would directly or indirectly increase hazards or hazardous materials in the Project area. The impact analysis considers the potential for projects enabled by the Project to release hazardous materials or present substantial risks to life and property. Wherever possible, illustrative examples are provided to describe particular areas of the county (e.g., airport hazard zones) where the Project could cause hazards and hazardous materials impacts.

Consistent with the County's *Environmental Thresholds and Guidelines Manual* (2021), this analysis recognizes that recreation land uses have transitory populations and, accordingly, the County's thresholds apply only when these populations are often present or too often flow continuously (e.g., a frequently used recreational park). Therefore, this analysis focuses on hazards related to recreation facilities such as sports complexes, campgrounds, aquatic facilities, and other community gathering areas. The analysis does not focus on transitory populations that are sporadic or often absent, such as trails, neighborhood parks, and other recreation uses where the infrequent presence of people renders inclusion herein as overly speculative.

The information and analysis presented in this section are based on available long-range planning documents, EIRs, and related technical studies that apply to the Project area. This programmatic analysis is supported by the review of existing adopted plans, including the 2022 MJHMP, and public databases, including SWRCB's GeoTracker Database, DTSC's EnviroStor Database, and USEPA's RCRA hazardous waste generators. Additionally, this section integrates relevant information from the 2021 Connected 2050: Regional Transportation Plan and Sustainable Communities Strategy EIR, the 2024 6th Cycle Housing Element Program EIR, the 2017 Cannabis Land Use Ordinance and Licensing Program EIR, the 2016 Gaviota Coast Plan EIR, the 2015 Eastern Goleta Valley Community Plan EIR, and the 2014 Cuyama Solar Facility and Comprehensive Plan/Land Use Development Code Amendments EIR.

3.9.4.2 Project Impacts

Table 3.9-4 provides a summary of the impacts related to hazards and hazardous materials related to the proposed Project. A detailed discussion of each impact follows.

Table 3.9-4. Summary of Hazards and Hazardous Materials Impacts

Hazards and Hazardous Materials Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact HAZ-1. The Project could involve the routine transport, use, or disposal of hazardous materials that could create a significant hazard to the public or result in the release of hazardous materials into the environment.	Potentially significant	MM HAZ-1 (Hazard Management for Public Parks)	Significant but mitigable
Impact HAZ-2. The Project could occur on hazardous sites or otherwise result in foreseeable upset involving the disturbance of existing soil or groundwater contamination.	Potentially significant	MM HAZ-1 (Hazard Management for Public Parks) MM HAZ-2 (Incidental Discovery of Contamination)	Significant but mitigable impacts
Impact HAZ-3. The Project would result in new community parks and recreation facilities within the Santa Barbara Municipal Airport Land Use Plan areas, presenting potential safety hazards to people in the area.	Insignificant	No mitigation measures required.	Insignificant
Impact HAZ-4. The Project would result in development that could potentially impair the implementation of or physically interfere with an emergency evacuation plan.	Insignificant	No mitigation measures required.	Insignificant
Cumulative Impacts	Potentially significant	MM HAZ-1 (Hazard Management for Public Parks) MM HAZ-2 (Incidental Discovery of Contamination)	Insignificant

Impact HAZ-1. The Project would involve the routine transport, use, or disposal of hazardous materials that could create a significant hazard to the public or result in the release of hazardous materials into the environment.

The Project would facilitate the development of new facilities and the expansion of existing facilities that would likely involve the routine use, transport, and disposal of hazardous materials. Hazardous materials associated with future development would vary depending on the type and scale of operations (e.g., neighborhood park, sports complex, public pool); however, there are common hazardous materials that would be used during construction and operation activities.

Construction activities would likely involve the use of petroleum products, solvents, paints, and other regulated materials. Such hazardous materials would be subject to various federal, state, and local regulations, including the Hazardous Waste Control Act (Title 26 of the CCR) by DTSC and SBCFD, which establishes procedure requirements for the handling, transportation, treatment, and disposal of hazardous materials. In addition, the California Vehicle Code Section 31602(b) and 32104(a) would regulate the transport of hazardous materials through licensing and designated route restrictions.

Project operations would entail routine cleaning and maintenance activities that involve commercially available hazardous materials. For example, landscape maintenance activities associated with parks that include natural turf and ornamental planting areas would require the routine use of pesticides, herbicides, and petroleum-based products (e.g., fuels and lubricants for maintenance activities). Furthermore, park facilities—such as community centers and gymnasiums—would likely involve the use of paints, solvents, sealants, and cleaning supplies. Such materials would not be in quantities that are commercially reportable and would be handled in compliance with all applicable Federal, State, and local regulations established by the USEPA, the California EPA, Occupational Safety and Health Administration (OSHA), California OSHA, and the Department of Toxic Substances Control.

In addition to the typical hazardous materials used during construction and operations, certain development projects may include specific design features or recreational facilities that necessitate the use of additional hazardous materials.

Aquatic Facilities. The Project plans for several public pools and aquatic facilities to meet community needs for aquatic recreation and cooling. For example, the South Coast Aquatic Center and the Lake Cachuma Campground and South Shore Facilities Improvements would include new public pools and water features. These aquatic facilities, along with others potentially enabled by the Project, would require the use and storage of pool treatment chemicals, such as chlorine, to maintain water quality and appropriate pH levels. Such hazardous materials would be subject to numerous state and local regulations, including, but not limited to, CCR Title 22 Division 4 Chapter 20 *Public Swimming Pools*, HSC Sections 116025-

116068 *Swimming Pool Sanitation and Safety*, and CBC Chapter 31B *Public Pools*, which collectively govern the design, operation, and maintenance of public pools, including requirements pertaining to chemical storage, equipment, and pool water quality. Additionally, the County Public Health's Recreation Health Program requires all public swimming facilities to be inspected and monitored to ensure recreational waters meet County health and safety requirements.

Artificial Turf Playing Fields. The Project would facilitate the development of new sports fields, such as Goleta Community Sports Park and the Guadalupe Community Park. While the site-specific design and materials for future sports fields are unknown, it is possible that artificial turf or synthetic grass may be proposed to reduce water demands for irrigation and maintenance requirements (e.g., mowing). However, artificial turf contains chemicals such as PFAS, VOCs, lead, benzene, arsenic, and heavy metals, and a growing body of scientific research indicates human health may be adversely affected by these chemicals, either directly from use of the artificial turf or indirectly from contamination of soil and water resources. Artificial turf also places rubberized crumbs and plastics, which contribute microplastics to soil and groundwater. Currently, there are no regulations at the local or state level limiting the use of artificial turf and no adopted thresholds of significance for use or exposure to PFAs, microplastics, and other chemicals associated with artificial turf. However, in 2023, the State passed SB 676 to allow local agencies to ban or regulate the use of artificial turf or synthetic grass.

Playground Surfaces. The Project would create new play structures and ground surfaces that may be constructed with plastics, rubber, and cork designed for child safety, aesthetics, and accessibility. All playground equipment and areas must adhere to technical performance standards set by the American Society for Testing and Materials (ASTM) and the Consumer Product Safety Commission (CPSC), which regulate playground design and surfacing materials. However, there are growing health risks associated with the exposure to materials within playground surfaces. Depending on specific materials and manufacturing method, playgrounds have the potential to contain lead, polyaromatic hydrocarbons (PAHs), benzothiazole, and antiozonants, which have known adverse human health effects. For example, exposure to PAHs can lead to eye irrigation, respiratory issues, and blood and liver abnormalities. Further, several types of PAHs and specific mixtures of PAHs are considered to be cancer-causing chemicals. Currently, there are no regulations at the local or state level limiting the use of synthetic playground surfaces, and no adopted thresholds of significance for use or exposure to PFAs and other chemicals associated with playground surfaces.

Campgrounds. The Project would facilitate new and expanded campground sites that would involve hazards associated with propane, firewood, lighter fluid, compressed gases, lithium-ion batteries, and holding tank additives (e.g., formaldehyde-based or enzyme cleaners for campground septic systems). All campgrounds would be subject to CCR Title 25 Division 1 Chapter 2.2 *Special Occupancy Parks,* which establishes fuel gas, plumbing, electrical, and fire

protection standards for parks. In addition, the CHSC and CFC include requirements for septic systems and wastewater disposal, open flame restrictions, and emergency access/egress.

Overall, the potential for use, transport, and disposal of hazardous materials related to parks, trails, and recreational facilities enabled by the Project is low and limited to select materials such as chlorine and PFAs. Chlorine use and transport for pool maintenance are highly regulated, and compliance with state and local regulations and procedures would ensure risk of chlorine exposure and upset is avoided. Similarly, campground hazards are regulated by State law and local management procedures to avoid risks. However, there are no regulations at the local or state level limiting the use of synthetic grass, artificial turf, or rubberized playground surfaces, and no adopted thresholds of significance for use or exposure to PFAs and other chemicals associated with these materials. To address this potential risk to public health, **MM HAZ-1 (Hazards Management for Public Parks)** would amend the County's zoning ordinances for public parks to prioritize natural materials in public parks and playgrounds unless the water supply is inadequate. This measure will reduce the risks associated with PFAs and other chemicals associated with synthetic grass, artificial turf, or rubberized playground surfaces, and impacts would be *significant but mitigable*.

Impact HAZ-2. The Project would occur on sites included on a list of hazardous materials sites, or within former oil or gas pipelines or well facilities, and create a significant hazard to the public or environment, or otherwise result in foreseeable upset involving the disturbance of existing soil or groundwater contamination.

Based on Chapter 2, *Project Description*, most planned parks, trails, and recreation facilities would not occur on hazardous sites described in Section 3.9.2.1 or oil and gas facilities described in Section 3.9.2.5 and Section 3.9.2.6. Accordingly, the Project would not facilitate development on sites that may feasibly contain known or unknown hazardous materials from prior land uses. Therefore, future construction and operation activities would not have the potential to disturb contaminated surface soil and groundwater, exposing workers, visitors, and neighboring land uses to hazardous materials. However, a limited set of planned projects may involve known contaminated sites. For example, the proposed Gaviota Marine Terminal Recreation Area project is located on an open Cleanup Program Site that is undergoing remediation. The site was previously developed with onshore oil and gas facilities that consisted of crude oil storage tanks, numerous underground and aboveground pipelines, a vapor recovery system, and offshore pipelines, mooring, and other equipment. The majority of these facilities and structures were abandoned and demolished in 2009, and the remaining facilities were abandoned and demolished from 2017 to 2019. The site has since undergone soil remediation and site restoration activities, with a groundwater monitoring program beginning in 2019. Public recreational uses at the former Gaviota Marine Terminal would only be available following complete site cleanup and clearance for public occupancy. This requirement for site

clean up prior to public use would also apply to other former oil and gas facilities in the county, such as the Mariposa Reina Facility immediately north of the former Gaviota Marine Terminal or the Los Flores Canyon facility on the Gaviota Coast. Additionally, the planned Guadalupe Community Park & Campground project site is immediately north of the Central West Produce property, which is enrolled in the Irrigated Lands Regulatory Program. The historical and ongoing agricultural activities may present environmental and human health hazards related to the use of pesticides, fertilizers, herbicides, and other agrochemicals, as well as potential contamination of soil, surface water, and groundwater. In addition to open hazardous sites, previously closed hazardous sites may still contain residual contamination that may adversely affect the public and the environment. For example, Lake Cachuma Campground and South Shore Facilities Improvements are located on two known closed LUST Cleanup Sites associated with gasoline contaminants at the onsite store and boat rental facility.

Future park sites also have the potential to contain soil or groundwater contamination that has not yet been discovered or listed as a hazardous site. Potentially hazardous materials that occur throughout the county are commonly found in urban and agricultural areas and generally include cleaning and metal solvents, pesticides/herbicides, paints, oils, and lubricants. For example, the planned Goleta Community Sports Park and Guadalupe Community Park & Campground could be located on land used for in-ground crop cultivation, which could have resulted in soil contamination with pesticides, herbicides, and agricultural chemicals. Therefore, future development would have the potential to expose these hazardous materials during construction activities (e.g., excavation, grading, etc.). Similarly, demolition or redevelopment of existing structures developed before the 1980s could result in the release of asbestos or lead-based paint, although this potential is very low considering the unlikelihood that the Project would require substantial building demolition (refer also to Section 3.4, *Cultural and Tribal Cultural Resources*).

All planned park, recreation, and trail projects would be subject to various existing regulatory processes that would minimize or avoid potential impacts related to hazards and hazardous materials. Such regulatory requirements include, but are not limited to, the RCRA, Hazardous Materials Release Response Plans and Inventory Act, Hazardous Waste Control Act, and the CalGEM Unified Program (Refer to Section 3.9.1 Regulatory Setting). For example, if a project site is listed in the Cortese List, the DTSC would provide regulatory oversight throughout the site assessment, remediation, and monitoring procedures to ensure the site does not pose a risk to human health or the environment.

The Project would also amend the County's zoning ordinances to establish land use regulations for parks, trails, and Recreation Benefit Projects (RBP) and all related developments on unincorporated lands. Uses enabled by the Project only for eligible RBPs could include overnight accommodation with small-scale campgrounds or inns, small cafes, special events, and other agricultural recreation uses. These proposed uses and related development would be required

to be located within existing disturbed areas to the maximum extent feasible, and shall be operated consistent with state and local laws and procedures to protect life and property. However, it is impossible to predict how, when, and where projects enabled under the proposed amendments, including eligible RBPs, would take place, and there is potential for projects enabled under the Project to be located on hazardous sites and create a hazard to the public and the environment. Therefore, impacts related to hazardous materials are considered potentially significant. **MM HAZ-1 (Hazards Management for Public Parks)** would amend the provisions set forth in the County's zoning ordinances to require the siting of development to avoid hazardous sites and the adverse effects of nearby hazardous sites to the maximum extent feasible. Further, **MM HAZ-2 (Incidental Discovery of Contamination)** would ensure that any project that encounters contamination of soil or water during construction would perform remedial actions to avoid significant release or exposure of contamination. Therefore, compliance with the existing regulatory framework and implementation of required mitigation would reduce any adverse effects related to hazardous material sites, and the direct and indirect impacts would be considered *significant but mitigable*.

Impact HAZ-3. The Project would result in new community parks and recreation facilities within the Santa Barbara Municipal Airport Land Use Plan areas, presenting potential safety hazards to people in the area.

Airport safety is primarily related to the potential for accidents related to aircraft operations, such as emergency landings or, in rare cases, crashes, excessive noise levels caused by frequent aircraft flyover, and ensuring that land use development is carried out in a manner that minimizes risks associated with aircraft hazards. Issues related to aircraft noise and land use compatibility are discussed in Section 3.12, *Noise,* and Section 3.11, *Land Use and Planning*, respectively. Minimizing or avoiding risks to properties within an AIA or ALUCP safety zones involve the designation of areas around the ends of runways that must be free of objects or sensitive land uses, limiting certain densities of development within certain zones, and understanding historical accident patterns (Section 3.9.2.7, *Airport Safety Zones*).

The Project plans park, recreation, and trail projects that would entail the physical development of new facilities or the expansion of existing facilities throughout the county. Among these projects, two projects are known to be located within an ALUCP safety zone of a nearby airport; thereby presenting a potential airport-related safety issue if development types and intensities exceed the standards established by the ALUCPs and the California Airport Land Use Planning Handbook. The following sections describe the known hazards within ALUCP safety zones and applicable Safety Compatibility Criteria policies for the respective airport. The Santa Maria Airport, Santa Ynez Airport, and Cuyama Airport are excluded from this discussion, as the Project does not propose a project within the Santa Maria Airport or Santa Ynez Airport AIAs, and the Cuyama Airport ALUCP has not been certified.

Santa Barbara Airport. The planned South Coast Aquatic Center and Goleta Community Sports Park projects would lie within two safety zones—the northern portion is located within Safety Zone 2 and the southern portion is located within Safety Zone 4. The South Coast Aquatic Center and Goleta Community Sports Project projects would include an outdoor aquatic center and multi-purpose sports fields that would support organized youth and adult sports leagues. In addition, the Obern Trail Play & Skate Project would include improvements to an existing multi-use pathway with segments in Safety Zone 4. Pursuant to the ALUCP Airport Safety Compatibility Criteria for the Santa Barbara Airport, parks with athletic fields may be compatible with restrictions on community assembly facilities under 80 persons per acre in Safety Zone 2. The planned Goleta Community Sports Park will be designed and operated to maintain occupancy at acceptable levels, subject to future review and approval by the ALUC. Other indoor and outdoor group assembly facilities that have an occupancy capacity of equal to or greater than 300 people are considered incompatible with Safety Zone 2. Similarly, Outdoor Small Assembly facilities (i.e., capacity of 50 to 299 people) are also considered incompatible with Safety Zone 2. Safety Zone 4 allows increased group assembly densities. Specifically, Indoor and Outdoor Small Assembly facilities (i.e., capacity of 50 to 299 people) are allowed on the condition that there is no fixed seating with a capacity of equal to or greater than 240 people. Similarly, Indoor and Outdoor Large Assembly facilities (i.e., capacity of 300 to 999 people) are allowed on the condition that there is no fixed seating with a capacity of equal to or greater than 300 people, and one additional exit is required in enclosed areas. Any indoor or outdoor group assembly facility that has an occupancy capacity of equal to or greater than 1,000 people would be incompatible with the Safety Zone 4.

Lompoc Airport. The Project does not directly propose any new recreational development projects within the Lompoc AIA. However, the implementation of the Project would involve amendments to the County's Land Use Element recreation mapping framework and apply the Public and Private Parks/Recreation Facility Overlay to Assessor's Parcel Number (APN) 093-051-010. This site is located along McLaughlin Road northeast of the City of Lompoc and is located within Safety Zones 2 and 3 of the Lompoc Airport. A small portion of the site also falls within Safety Zone 1. The purpose of applying the Public and Private Parks/Recreation Facility Overlay to this site is to help facilitate the City of Lompoc's proposed Riverbend Sports Complex Concept Plan. The ALUCP Airport Safety Compatibility Criteria for the Lompoc Airport places restrictions on large group recreation (team athletic fields) within Safety Zones 2 and 3. Recreational uses are considered incompatible within Safety Zone 1. While the proposed Project would help to facilitate the Lompoc Riverbend Sports Complex Concept Plan, the project is ultimately being proposed and led by the City of Lompoc, which will be responsible for ensuring proposed development does not conflict with the Lompoc Airport ALUCP or present potential airport-related public safety hazards. (Refer also to discussion under Section 3.9.4.3, *Cumulative Impacts*.)

VSFB. While no planned improvements under the Project would lie within the AIA of VSFB, the planned expansion of Jalama Beach County Park would place additional people within the park, increasing the number of people affected by mandatory evacuations on VSFB launch days. However, all visitors would be subject to the County's existing procedures to avoid public safety concerns.

Overall, future development of community parks within an AIA would be subject to the policies and compatibility criteria defined in the respective ALUCP. As such, each project would be individually planned and designed consistently with the ALUCP development standards, such as those regarding population densities, height limitations, lighting, and open space requirements. For example, the South Coast Aquatic Center and Goleta Community Sports Park projects would be designed to meet the compatibility criteria of the Santa Barbara Airport ALUCP, which would include, but not be limited to, properly siting the aquatic center facility and other higher intensity uses within Safety Zone 4 and prioritizing the location of sports fields and open space in Safety Zone 2.

In addition, the proposed zoning ordinance amendments may lead to indirect impacts related to airport safety hazards. The location, scope, and scale of development enabled under the Project cannot be known at this time; however, such future development would be required to adhere to their respective ALUCP and the County would review these policies and regulations on a case-by-case basis during County review of individual permit applications and/or as part of the discretionary processes, depending on the scope and scale of the proposed project and necessary permit approvals. Therefore, adherence to ALUCP policies and regulations would reduce any direct or indirect adverse effects related to airport safety to an *insignificant* level.

Impact HAZ-4. The Project would result in development that could potentially impair the implementation of or physically interfere with an emergency evacuation plan.

As previously described in Section 3.9.2.8, *Emergency Response and Evacuation*, County Parks manages closures and evacuations of Jalama Beach and Jalama Beach County Park and Campground in response to scheduled launches from nearby VSFB. During closures, all park visitors and staff must leave the park. Closures have typically been limited to 12 per year, but as planned launch activity accelerates, County Parks could experience more frequent and longer duration evacuations and temporary closures. The planned improvements to Jalama Beach County Park would increase the capacity of this County Park to accommodate overnight visitors, thereby increasing the potential total number of people subject to the existing mandatory closure and evacuation procedures enacted by County Parks, and the planned expansion would not impair these procedures.

Further, while options for evacuation routes on major roadways are mapped by the MJHMP, the County does not prescribe fixed emergency evacuation routes. In the event of an emergency,

local agencies work to identify the hazard, implement emergency response protocols, and define appropriate emergency evacuation routes for affected communities. Recreation projects in urban areas would be served by existing roads serving as evacuation routes. Parks can also support evacuation by providing a location for emergency personnel, staging, or evacuation rendezvous points. The location of proposed uses and related development in more remote areas of the county could increase difficulty with emergency evacuations, particularly within areas with narrow rural roads and limited access. Uses or activities in these areas could potentially impair implementation of or physical interference with adopted emergency response and evacuation plans, such as SBCOEM's EOP, if a project were to result in prolonged road closures, permanently alter a road used for evacuation, or introduce transient populations in areas with limited access. Uses such as campgrounds and sports complexes that concentrate transient populations in one location, for example, would increase vehicle trips and introduce temporary new populations. However, as transient populations, recreational users would not be subject to evacuation and response procedures for permanent uses, including residential and commercial development.

The Project would also amend the County's zoning ordinances to establish land use regulations for parks, trails, RBPs, and all related developments on unincorporated agricultural lands. Uses enabled by the Project only for eligible RBPs could include overnight accommodation with small-scale campgrounds or inns, small cafes, special events, and other agricultural recreation uses. These proposed uses and related development would be required to avoid hazards to life and property, including flood, geologic, and fire hazards. Park and trail projects, as well as RBPs, that cannot achieve this standard due to a greater potential for excavation, grading, or overcovering of agricultural soils would continue to be subject to permits such as a Minor CUP or Major CUP, more detailed policy and regulatory analyses and associated environmental review, with potential for additional mitigation measures to avoid impacts to agricultural resources. Each of these permit types would involve varying levels of County review processes that would ensure that the proposed uses and related development comply with the policies, regulations, and/or standards such as the MJMHP and Seismic Safety and Safety Element and would facilitate emergency response and preparedness in affected areas, especially in critical fire hazard areas. Therefore, significant issues related to emergency response and evacuation due to private development of parks, trails, and RBPs would not occur.

Outdoor recreation uses would not involve substantial modifications to existing infrastructure and would not affect existing site access or roadway conditions. Proposed uses that would require extensive building modifications would be subject to building codes, electrical codes, and review by the SBCFD. These uses would also be subject to existing policies and regulations pertaining to hazard mitigation and risk reduction, including road standards, vegetation management, and water supply for fire suppression, as well as flood protection and seismic hazard standards. Therefore, potential impacts would be addressed or avoided through the

proper implementation of existing codes and standards and would not interfere with the County's emergency response or evacuation plans. Impacts on emergency response plans or emergency evacuation plans would be *insignificant*.

3.9.4.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis*, the cumulative setting for the Project involves a variety of policies and initiatives in the county, as well as development projects in the unincorporated county and surrounding incorporated cities. The Project's direct and indirect impacts, along with potential impacts from pending and current planning or development projects, inform the cumulative impacts analysis. As such, this includes parks and trail projects within incorporated cities, state parks, and federal properties; master plan projects, such as those under the Active Transportation Plan and the California Coastal Trail Plan; programmatic plan projects, such as those under general plans, the County's Housing Element Update, and the County's Agricultural Enterprise Ordinance (AEO); and the County Planning & Development's cumulative project list.

Cumulative development would involve the transport, use, storage, and disposal of hazardous materials. However, as described in Impact HAZ-1, the handling, use, and storage of hazardous materials would continue to be governed by federal, state, and local laws and regulations. The Project would not substantially contribute to a cumulatively significant impact.

Additionally, cumulative development projects could occur on hazardous sites or sites with former oil and gas facilities that could present a hazard to the public or environment through a foreseeable upset involving the disturbance of contaminated soils or groundwater. However, as described in HAZ-2 and HAZ-3, future development would be required to conform to all applicable regulations (e.g., County Comprehensive Plan, County Code, CalGEM, Unified Program, CUPA) that address hazardous materials, including oil and gas, USTs, and contaminated soil and groundwater. In addition, the implementation of **MM HAZ-1 (Hazards Management for Public Parks)** would require development enabled under the Project to avoid siting park projects on hazardous sites and reduce the adverse effects of PFAs and other contamination associated with artificial turf. **MM HAZ-2 (Incidental Discovery of Contamination)** would ensure that the Project would remediate unknown contamination before it could contribute to cumulative impacts. Therefore, the Project would not considerably contribute to a cumulatively considerable impact related to hazardous sites.

Planned parks could operate within the existing safety zones for airports within the county, particularly in the South Coast Recreation Planning Areas. Project development and cumulative development projects, such as the Lompoc Riverbend Sports Complex Concept Plan, would be required to comply with the land use compatibility standards of their respective ALUCP, such as policies and design standards related to population densities, building heights, lighting, and

open space requirements. Additionally, new development projects that are subject to discretionary review would continue to be reviewed under CEQA for issues related to flight safety. Therefore, the Project would not considerably contribute to a cumulative considerable impact related to airport safety hazards. Potential impacts related to emergency response and evacuation would be addressed or avoided through the proper implementation of existing codes and standards and would not interfere with the County's emergency response or evacuation plans, including Jalama Beach Campground closure and evacuations during VSFB launches. Therefore, the Project's contribution to cumulative hazards and hazardous materials impacts would be *insignificant*.

3.9.4.4 Proposed Mitigation

MM HAZ-1: Hazards Management for Public Parks. Development of County parks, permitted uses in Recreation zones, permitted parks and trails, and RBPs shall be ~~All County Parks projects shall be subject to the following standards. The County shall amend the Santa Barbara County zoning ordinances to add the following requirements for permitted uses in Recreation zones and permitted parks and recreation facilities: Public parks and playgrounds shall be~~ located and designed to avoid hazardous sites and the adverse effects of nearby hazardous sites to the maximum extent feasible. Synthetic grass, artificial turf, or rubberized playground surfaces shall be allowed in public parks and playgrounds only if natural materials, surfaces, and turf is infeasible due to insufficient water supply.

> **Plan Requirements and Timing:** This measure shall apply to applicable projects immediately following the certification of this EIR.
>
> **Monitoring:** County compliance monitoring staff shall ensure compliance through a review of project plans and/or applicant/contractor-provided documentation.

MM HAZ-2: Incidental Discovery of Contamination. If previously unknown or unidentified soil and/or groundwater contamination that could present a threat to human health or the environment is encountered during construction at a development site enabled by the Project, construction activities near the contamination shall cease immediately. A qualified environmental specialist (e.g., a licensed Professional Geologist, a licensed Professional Engineer or similarly qualified individual) shall investigate to identify and determine the level of soil and/or groundwater contamination. If contamination is encountered, a Human Health Risk Management Plan shall be prepared and implemented that: 1) identifies the contaminants of concern and the potential risk each contaminant would pose to human health and the environment during construction and post-development; and 2) describes measures to be taken to protect workers, and the public from exposure to potential site hazards. Such measures could include a range of options, including, but not limited to, physical site controls during construction, remediation, long-term monitoring, post-development maintenance or access

limitations, or some combination thereof. Depending on the nature of contamination, if any, appropriate agencies shall be notified. If needed, a Site Health and Safety Plan that meets OSHA requirements shall be prepared and in place before commencement of work in any contaminated area.

> **Plan Requirements and Timing:** This measure shall apply to applicable projects immediately following the certification of this EIR.
>
> **Monitoring:** County compliance monitoring staff shall ensure that no further disturbance shall occur until the contaminants are identified and a soil management plan and/or remediation plan is prepared and implemented.

3.9.4.5 Secondary Impacts

Implementation of **MM HAZ-1** and **MM HAZ-2** would not result in adverse secondary impacts.

3.9.4.6 Residual Impacts

Impact HAZ-1. The potential for use, transport, and disposal of hazardous materials related to parks, trails, and recreational facilities enabled by the Project is low and limited to select materials such as chlorine and PFAs. To address this potential risk to public health, **MM HAZ-1** (**Hazards Management for Public Parks)** would amend the County's zoning ordinances for public parks to prioritize natural materials in public parks and playgrounds unless the water supply is inadequate. This measure will reduce the risks associated with PFAs and other chemicals associated with synthetic grass, artificial turf, or rubberized playground surfaces, and impacts would be *significant but mitigable*.

Impact HAZ-2. Future development facilitated by the Project could occur on hazardous sites or otherwise result in foreseeable upsets involving the disturbance of existing soil or groundwater contamination. However, the implementation of **MM HAZ-1 (Hazards Management for Public Parks)** would amend the County's zoning ordinances to require the siting of development to avoid hazardous sites and the adverse effects of nearby hazardous sites to the maximum extent feasible. **MM HAZ-2 (Incidental Discovery of Contamination)** would ensure that the Project would remediate unknown contamination. Therefore, residual impacts associated with Impact HAZ-2 would be *significant but mitigable.*

Impact HAZ-3. The Project would facilitate new park, recreation, and trail projects that may be located within an ALUCP safety zone of a nearby airport; thereby presenting a potential airport-related safety hazard. However, future development shall adhere to the policies and compatibility criteria defined in the respective ALUCP. As such, each project would be individually planned and designed consistently with the ALUCP development standards, such as those regarding population densities, height limitations, lighting, and open space requirements. Therefore, the residual impacts would be *insignificant*.

Impact HAZ-4. Potential impacts related to emergency response and evacuation would be addressed or avoided through the proper implementation of existing codes and standards and would not interfere with the County's emergency response or evacuation plans, including Jalama Beach Campground closure and evacuations during VSFB launches. Therefore, the Project's impacts would be *insignificant*.

This page was intentionally left blank.

3.10 HYDROLOGY AND WATER QUALITY

3.10.1 INTRODUCTION

This section describes potential impacts related to hydrology and water quality that could occur from the implementation of the Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (Project). Hydrology and water quality issues include surface runoff and water quality; groundwater quality, pollution, withdrawal, and recharge; and flood hazards. This analysis is based on the physical setting for hydrologic resources and water quality within the county and regulations that apply to:

- Water quality;
- Drainage and stormwater management;
- Management of groundwater resources and flood hazards; and
- Management practices and standards for new development in the unincorporated areas of the county.

Issues related to water resources are also addressed in other sections of this Program Environmental Impact Report (EIR), including Section 3.4, *Biological Resources* (e.g., sensitive habitats and natural communities) and Section 3.16, *Utilities and Water Supply* (e.g., potable water supply, including groundwater, and wastewater disposal, including septic systems).

3.10.2 ENVIRONMENTAL SETTING

3.10.2.1 Surface Water

Hydrologic Regions & Watersheds

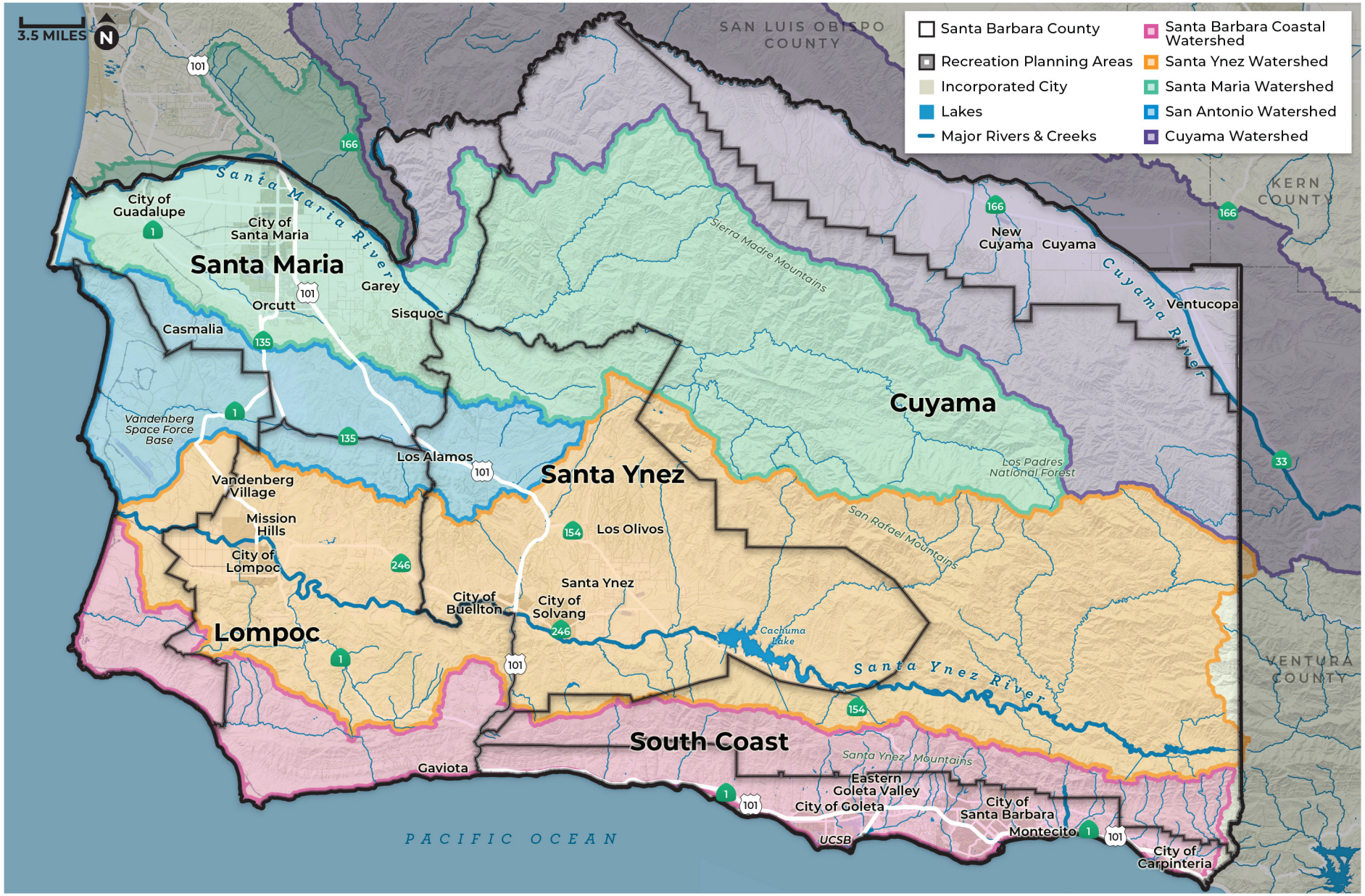
The California Department of Water Resources (DWR) identifies 10 hydrologic regions and 3 additional drainage areas within the State of California. Santa Barbara County is entirely located within the Central Coast Hydrologic Region. There are five major watersheds in the county: 1) the Santa Maria Valley Watershed; 2) the San Antonio Creek Watershed; 3) the Santa Ynez River Watershed; 4) the South Coast Watershed; and 5) the Cuyama River Watershed (Santa Barbara County Integrated Regional Water Management [IRWM] Cooperating Partners 2019). Each watershed comprises sub-watershed basins associated with specific drainages. Many rivers and creeks make up the surface water that drains these watersheds. Major rivers and creeks in the county that drain these watersheds include the Santa Ynez River, Santa Maria River, Sisquoc River, Cuyama River, and San Antonio Creek (Figure 3.10-1).

The abundance of surface water varies from region to region, depending on precipitation and water use. The watersheds described in this report are listed in Table 3.10-1 and depicted in Figure 3.10-1, along with the major surface waters that drain these watersheds.

Table 3.10-1. Surface Waters in Santa Barbara County

Watershed Region	Major Surface Waters
South Coast Region	Surface waters in the South Coast Region comprise several smaller creeks. Major drainages include Rincon, Carpinteria, Franklin, Santa Monica, and Toro Canyon Creeks in Carpinteria; Cold Springs, Hot Springs, San Ysidro, and Romero Creeks in Montecito; Sycamore, Mission, San Roque, and Arroyo Burro Creeks in Santa Barbara; Cieneguitas, Arroyo Burro, and San Roque Creeks in Foothill; and Atascadero, Maria Ygnacio, San Jose, Tecolotito, and San Pedro Creeks in Goleta. Jalama Creek, Canada De La Gaviota, Canada Del Refugio, Canada Del Capitan, Dos Pueblos Canyon Creek, Tecolote Creek, and Glen Annie Canyon also drain this watershed. Many of these surface waters drain into the Pacific Ocean.
Cuyama River	The Cuyama River drains the Cuyama Valley Watershed to the Twitchell Reservoir. Salisbury Creek is also included in this watershed.
Upper Santa Ynez	The Upper Santa Ynez Watershed is primarily drained by the Santa Ynez River. The Santa Ynez River drains the north slope of the Santa Ynez Mountains, the south slope of the San Rafael Mountains, and much of the southern half of Santa Barbara County. Smaller drainages include Alder Creek and Rancho Nuevo Creek.
Middle Santa Ynez	The Santa Ynez River is the major drainage of the Middle Santa Ynez Watershed and is interrupted by Lake Cachuma. Additional drainages such as the extensive Santa Cruz Creek watershed and the smaller Cachuma Creek also drain into Lake Cachuma.
Lower Santa Ynez	While the Santa Ynez River is a major drainage in this watershed, other drainages include Alamo Pintado Creek, Santa Rosa Creek, San Miguelito Creek, and Salsipuedes Creek. Additionally, Zaca Creek and Zanja de Cota Creek both drain into the Santa Ynez River.
San Antonio Creek	The watershed is drained westerly by the San Antonio Creek and discharges into the San Antonio Lagoon at the Pacific Ocean.
Sisquoc River	The Sisquoc River drains the north side of the San Rafael Mountains and much of the Sierra Madre Mountains east of Santa Maria upstream of its confluence with the Cuyama River, which then flows into the Santa Maria River.
Shuman Creek	This watershed is drained westerly by Shuman Canyon Creek and Casmalia Canyon Creek.
Santa Maria River	The Santa Maria River Hydrologic Area includes all areas tributary to the Santa Maria River. The Santa Maria River is formed by the confluence of the Cuyama and Sisquoc approximately seven miles southwest of Santa Maria.
Orcutt Creek	Orcutt Creek Watershed is drained by Orcutt Creek, Guadalupe Lake, Santa Maria River, and Greene Valley River.
Santa Clara River	Sespe Creek, a tributary of the Santa Clara River, originates within the boundaries of Santa Barbara County.
Ventura River	Matilija Creek originates in the Los Padres National Forest, within the boundaries of Santa Barbara County, before draining into the Ventura River.

Source: Santa Barbara County IRWM Cooperating Partners 2019a.



wsp

Santa Barbara County Hydrologic Setting

FIGURE 3.10-1

Reservoirs & Potable Water

The county's potable water supply is derived from several sources including groundwater, surface water, imported water from the State Water Project. In addition to potable water supplies, several water purveyors in the county also use non-potable recycled wastewater to irrigate parks, schools, golf courses, and other large, landscaped areas. Water recycling (or water reclamation) involves treating municipal wastewater to remove sediments and impurities for reuse. Using recycled water reduces reliance on increasingly scarce and expensive surface water and can minimize groundwater overdraft (extracting more water than is replenished).For example, Goleta Beach County Park contains recycled water lines conveying irrigation water from the Goleta Sanitation District's wastewater treatment plant to support landscaping in nearby areas, including UCSB. recycled water is a local, drought-resistant supply. Currently, the City of Santa Barbara and Goleta Water District distribute recycled water to some parks, schools, and commercial businesses to reduce the use of drinking water for landscapes. While not supplying water directly to landscape uses, the City of Santa Maria uses its treated wastewater to help recharge groundwater supplies. The Montecito Sanitary District also has a pilot recycled water facility installed in 2019 to offset the District's potable water demand for onsite treatment plant water and for sewer main cleaning. In 2022, the Montecito Sanitary District and Montecito Water District jointly studied the feasibility of recycled water, including different approaches to optimize the beneficial use of treated wastewater within the Montecito community.

Most of the water used in the North County comes from groundwater supplies. River water and rainwater are collected into reservoirs and combine with State Water Project supply to serve the majority of the South County population. The county's potable water supply is delivered to the public through a variety of water purveyors: incorporated cities, community service districts, water districts, private water companies, conservation districts and others (County of Santa Barbara 2025a).

There are four major reservoirs located in Santa Barbara County:

- Cachuma Reservoir (Lake Cachuma) – owned and operated by the U.S. Bureau of Reclamation (USBR)
- Twitchell Reservoir – owned by the USBR and operated by the Santa Maria Valley Water Conservation District
- Gibraltar Reservoir – owned and operated by the City of Santa Barbara
- Jameson Reservoir – owned and operated by the Montecito Water District

3.10.2.2 Groundwater

Hydrologic regions are divided into groundwater basins. These basins underlie both unincorporated communities and incorporated cities of Santa Barbara County. Within the

county, groundwater has historically accounted for the highest proportion of water use, supplying approximately 75 percent of domestic, commercial, industrial, and agricultural water from nine groundwater basins, which include the Carpinteria, Montecito, Santa Barbara, Foothill, Goleta, Santa Ynez River Valley, San Antonio Creek, Santa Maria River, and Cuyama Valley groundwater basins (Figure 3.10-2; Santa Barbara County IRWM Cooperating Partners 2019).

Groundwater monitoring results have shown water level fluctuations that correlate with varying weather patterns of the area's semi-arid climate, with water levels generally increasing in years of higher precipitation and decreasing in drier years (Central Coast Regional Water Quality Control Board [RWQCB] 2024). Causes of overdraft in these basins are due to agricultural, municipal, and/or industrial uses. Groundwater-dependent areas in the county include the Cuyama Valley, the unincorporated communities of Los Alamos, Mission Hills, and Vandenberg Village, and the City of Lompoc. An important consideration in groundwater trend analysis is surface water storage. Temperature, annual precipitation, and reservoir storage are directly related to groundwater pumping for domestic and agricultural use. In Santa Barbara County, nine of the past fifteen years had precipitation below normal averages, five years of which were near 50% or less of normal averages. The Precipitation Water Year 2023, from September 1, 2022 to August 31, 2023, had above-average rainfall at 202% of a normal water year. Water Year 2024 is above average at 143% of a normal water year. As a result of this recent precipitation, groundwater recharge occurred, including through spillage and conservation pooling at Lake Cachuma and Twitchell Reservoir, respectively (DWR 2025; Santa Barbara County Public Works Department 2024). Groundwater basins in the county are summarized in Table 3.10-2.

DWR created the California Statewide Groundwater Elevation Monitoring (CASGEM) Groundwater Basin Prioritization statewide ranking system to prioritize California groundwater basins to help identify, evaluate, and determine the need for additional groundwater level monitoring. Basin Prioritization is a technical process that utilizes the best available data and information to classify California's groundwater basins into one of four categories: high-, medium-, low-, or very low-priority. The process is based on the eight components that are identified in California Water Code Section 10933(b) (Section 3.10.3, *Regulatory Setting*). Each basin's priority determines which provisions of CASGEM and the Sustainable Groundwater Management Act (SGMA) apply. SGMA requires medium- and high-priority basins to establish groundwater sustainability agencies (GSAs), develop groundwater sustainability plans (GSPs), and manage groundwater for long-term sustainability. Low and very-low priority basins are not considered at risk of overdraft and do not require the establishment of GSAs or preparation of GSPs. GSPs must achieve groundwater sustainability within 20 years of GSP adoption (Section 3.10.3, *Regulatory Setting*).

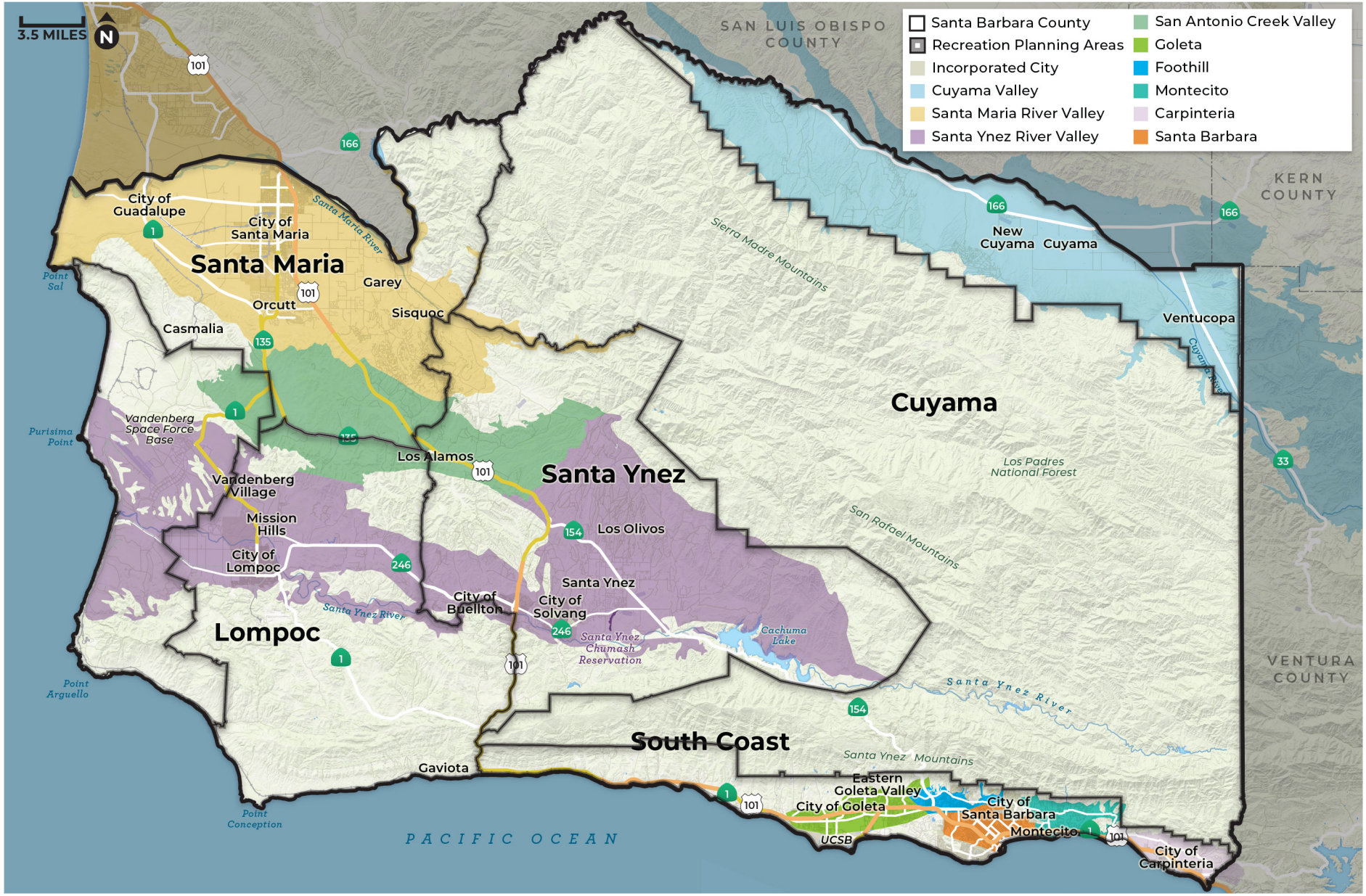
Groundwater is managed by several GSAs within Santa Barbara County. As required by SGMA, agencies in each medium- and high-priority basin in the county have adopted or begun the process of drafting GSPs. GSAs for groundwater basins are included in Table 3.10-2 with groundwater basin characteristics, including total acre-feet (AF) available water in storage and current annual draw rates in acre-feet per year (AFY).

Table 3.10-2. Status of Groundwater Basins in Santa Barbara County

Groundwater Basin(s)	GSA	Available Water in Storage (AF)	Annual Draw (AFY)	Groundwater % of Supply	Basin Priority[1]
Carpinteria	Carpinteria Valley Water District	19,000	8,623	69%	High
Montecito	Montecito Water District	14,400	3,084	45%	Medium
Santa Barbara	--	10,000	530	3%	Very Low
Foothill	--	5,000	284	8%	Very Low
Goleta	--	60,000	4,404	34%	Very Low
Santa Ynez River Valley	Central Management Area GSA, Eastern Management Area GSA, Western Management Area GSA	1,224,000	54,979	94%	Medium
San Antonio Creek Valley	San Antonio Basin Water District, Los Alamos Community Services District	800,000	23,750	97%	Medium
Santa Maria Valley	--	2,300,000	97,982	83%	Very Low
Cuyama Valley	Cuyama Basin Groundwater Sustainability Agency	400,000	41,059	100%	High

[1] As a part of the CASGEM Program, the DWR created the CASGEM Groundwater Basin Prioritization statewide ranking system to prioritize California groundwater basins to help identify, evaluate, and determine the need for additional groundwater level monitoring.

Sources: California DWR 2025; Santa Barbara County Public Works Department 2024.



Santa Barbara County Groundwater Basins

FIGURE 3.10-2

The draw and recharge rates of groundwater vary by region. On the South Coast, groundwater is a secondary source of potable water. In contrast, North County potable water demand is largely supported by groundwater and/or shallow, riparian basin water. Natural groundwater recharge occurs from seepage losses of major streams, rainfall percolation, and subsurface inflow. Natural drainages and built reservoirs and dams are major sources of groundwater recharge. Additional recharge occurs from agricultural return flow and percolation of treated wastewater. Groundwater within the county is monitored through a combination of the DWR's CASGEM Program, established in 2009, the Santa Barbara County Water Agency (SBCWA), and local GSAs.

In addition to groundwater reports, several public agencies within Santa Barbara County have adopted or are drafting groundwater management plans (i.e., GSPs) for their respective basins that reflect the hydrogeologic setting for the basin, describe groundwater conditions based on available data sources (e.g., monitoring well data, hydrographs), provide a groundwater budget, and establish sustainable management goals and minimum thresholds for long-term basin management. All medium- and high-priority basins within Santa Barbara County except Carpinteria have adopted GSPs. The Carpinteria GSA released its draft in the Fall of 2023 and it is anticipated to be adopted in 2024. In addition to GSPs, water is evaluated by the County on a project-by-project basis, using the County's *Environmental Thresholds and Guidelines Manual*, which describes the adopted County methodology for estimating the safe yield of bedrock aquifers (Section 3.10.4.1, *Thresholds of Significance*).

Salinity in the Santa Maria River Valley, Santa Ynez River Valley, Foothill, Montecito, and Santa Barbara basins can be attributed to saltwater intrusion experienced in recent years (DWR 2025). Historically, high nitrate concentrations have been documented within groundwater basins within the county, including the Santa Maria and Santa Ynez Eastern Management Area basins. Additionally, elevated sulfate and/or chloride concentrations impact some regions of the groundwater basins in the county. Point sources of sulfates and nitrates include sewage treatment plants, industrial discharges, and agricultural return flows. While sulfates are not considered toxic to plants or wildlife at normal concentrations, concentrations of 500-750 milligrams per liter (mg/L) may cause a temporary laxative effect in humans. Sulfates can also form strong acids and change the pH characteristics of a water body. Chloride concentrations are a particular problem in low-lying areas of the basins near tidal marshes and are an indication of seawater intrusion (County of Santa Barbara Public Works Department 2024).

A summary of each county groundwater basin, including current conditions, is detailed below in the following subsections.

South Coast Groundwater Basins

Carpinteria

The Carpinteria Groundwater Basin is designated high priority by DWR. A draft GSP for the Carpinteria Groundwater Basin was released for public review in October 2023 and adoption of the GSP occurred in January 2024. The basin encompasses a surface area of 12.7 square miles and is bounded on the north by consolidated rocks of the Santa Ynez Mountains, on the south and southwest by the Pacific Ocean, and on the west by consolidated rocks of Toro Canyon (DWR 2004a). The Carpinteria Basin is drained by the Carpinteria, Franklin, Gobernador, Rincon, Toro Canyon, and Santa Monica Creeks. Since 2017, annual precipitation in the basin has ranged from approximately less than 5 inches to 30 inches (Santa Barbara County Public Works Department 2024).

Natural recharge in the basin is derived from infiltration of precipitation and streamflow, and to a limited extent, underflow (DWR 2004a). The basin contains two groundwater storage units, which are separated by the Rincon Creek thrust fault. Storage Unit #1 consists of four distinct aquifers, which are hydrologically connected. One is within the Carpinteria Formation and three are within the Casitas Formation. In Storage Unit #2, the main source of water is the Santa Barbara Formation. The Casitas Formation is generally considered the principal source of groundwater in the basin. The primary drainages through which surface water empties into the Pacific Ocean are Rincon Creek, Carpinteria Creek, Franklin Creek, and Santa Monica Creek. Besides groundwater, imported surface water from the State Water Project and local surface water from Lake Cachuma are the other sources of water available to water users within the basin (County of Santa Barbara 2025a).

According to the 2024 Groundwater Basins Summary Report, water levels reached near historic minimums during the recent drought of 2012-2018, followed by continued increases in storage after above-average precipitation in 2017 and 2019. Data from 2024 indicate rising water levels throughout the Basin following two consecutive years of above-average precipitation. General trends indicate stability or continued increases in storage following above-average precipitation in 2017 and 2019 (Santa Barbara County Public Works Department 2024).

Montecito

The Montecito Groundwater Basin is designated as a medium priority by DWR and a GSP was adopted in May 2023 (County of Santa Barbara Public Works Department 2024). The Montecito Groundwater Basin encompasses a surface area of 9.8 square miles and is bounded on the north by the Santa Ynez Mountains and the Arroyo Parida fault, on the east by consolidated rocks, on the southeast by the Fernald fault, and on the northeast by a surface drainage divide that separates the Montecito and Carpinteria Groundwater Basins (DWR 2004b; County of Santa Barbara Public Works Department 2024). The offshore Rincon Creek fault and the Pacific

Ocean bound the basin on the south. The primary aquifers in the Montecito Basin are the unconsolidated alluvial deposits and the Casitas and Santa Barbara Formations.

The basin is drained by several creeks that flow from the Santa Ynez Mountains south to the Pacific Ocean, including Toro Canyon Creek. Natural recharge in the basin is derived from the infiltration of precipitation over the basin, seepage from streams, and subsurface inflow from consolidated rocks (DWR 2004b). Since 2017, annual precipitation in the basin has ranged from approximately less than 6 inches to 36 inches per year (County of Santa Barbara Public Works Department 2024).

According to the 2024 Groundwater Basins Summary Report, recent water level trends indicate stability or continued increases in storage following above-average precipitation in 2017 and 2019. Data from 2024 indicate rising water levels throughout the Basin following two consecutive years of above-average precipitation (County of Santa Barbara Public Works Department 2024).

Santa Barbara

The Santa Barbara Groundwater Basin is designated very low priority and is not currently subject to SGMA (County of Santa Barbara Public Works Department 2024). The Santa Barbara Groundwater Basin underlies an area of about 9.6 square miles (DWR 2004c; County of Santa Barbara Public Works Department 2024). Geologic faults define the borders of the basin and impede the flow of groundwater on its north, northwest, and southwest sides, as well as the Pacific Ocean to the south. The primary aquifer in the Santa Barbara Groundwater Basin is the Santa Barbara Formation, which is generally comprised of marine sands, silts, and clays. Drainages that traverse the basin are Sycamore, Mission, San Roque, and Arroyo Burro creeks; all of these creeks flow intermittently in their lower reaches where the surface water percolates into the unconsolidated deposits. The major sources of recharge are infiltration of precipitation, seepage from streams, subsurface inflow from consolidated rocks, and infiltration of return flows of water imported to the City of Santa Barbara (DWR 2004c). Since 2017, annual precipitation in the basin has ranged from approximately less than 5 inches to 37 inches (County of Santa Barbara Public Works Department 2024).

According to the 2024 Groundwater Basins Summary Report, recent water level trends show a steady increase starting in 2017 after above-average precipitation. Data from 2024 indicate rising water levels throughout the Basin following two consecutive years of above-average precipitation. (Santa Barbara County Public Works Department 2024).

Foothill

The Foothill Groundwater Basin is designated very low priority by DWR and is not currently subject to SGMA (County of Santa Barbara Public Works Department 2024). The Foothill Groundwater Basin encompasses approximately 4.9 square miles and is bounded on the north

and northeast by Tertiary sedimentary rocks of the Santa Ynez Mountains, on the northwest by the Goleta fault, on the southwest by the Modoc and Mesa faults, on the south by the More Ranch fault, and on the southeast by the Mission Ridge fault (DWR 2004d). Natural recharge in the basin is derived from the infiltration of precipitation, seepage from streams, and subsurface inflow from consolidated rocks of the Santa Ynez Mountains. Water imported from Lake Cachuma provides additional recharge. The Santa Barbara Formation is the primary aquifer of the basin. Since 2017, annual precipitation in the basin has ranged from approximately 7 inches to 36 inches (County of Santa Barbara Public Works Department 2024).

According to the 2024 Groundwater Basins Summary Report, recent water level trends show a steady increase starting in 2017 after above-average precipitation. Data from 2024 indicate rising water levels throughout the Basin following two consecutive years of above-average precipitation (Santa Barbara County Public Works Department 2024).

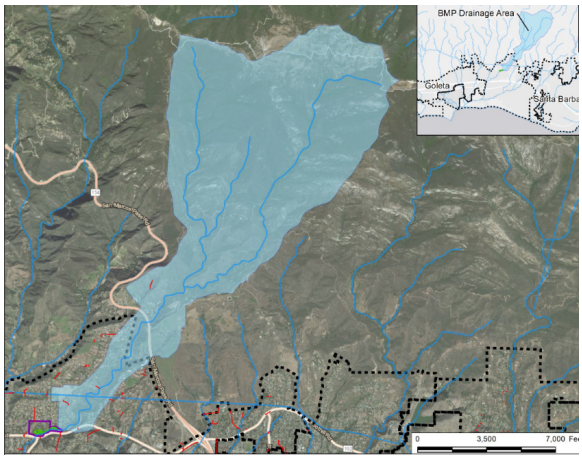
Goleta

The Goleta Groundwater Basin encompasses the Goleta Valley, an area of approximately 14.4 square miles, and is currently designated very low priority by DWR and is not currently subject to SGMA. The Goleta Groundwater Basin was adjudicated in 1989 (County of Santa Barbara Public Works Department 2024).[1] The basin is bounded on the west by the topographic divide east of Ellwood Canyon and on the southeast by the Modoc fault. This basin is divided into three subbasins: the Central Subbasin, the West Subbasin, and the North Subbasin (County of Santa Barbara Public Works Department 2024). The majority of available groundwater is within the North-Central Subbasin.

The principal water-bearing units in the Goleta Groundwater Basin are alluvium ranging in age from Holocene to Pleistocene, and the Santa Barbara Formation of Pleistocene age. Surface waters drain through the Maria Ygnacio, Atascadero, San Antonio, San Jose, and Los Carneros creeks, which eventually drain into the ocean. Natural recharge in the basin is derived from infiltration of precipitation, seepage from streams, and subsurface inflow from consolidated rocks (DWR 2004e). Since 2017, annual precipitation in the basin has ranged from approximately 9 to 32 inches (County of Santa Barbara Public Works Department 2024).

[1] An adjudication is a court ruling issued for basins or specific areas of a basin where water users are in dispute over legal rights to the water. The adjudication defines who the water rights owners are, how much groundwater those rights owners can extract, and how the groundwater in the area will be managed.

According to the 2024 Groundwater Basins Summary Report, water level trends began to stabilize starting in 2018 after significant declines. Data from 2024 indicate water levels are steadily increasing after two consecutive years of above-average precipitation and injection efforts (County of Santa Barbara Public Works Department 2024).



A drainage area in Tucker's Grove has the potential to recharge the Goleta Groundwater Basin by 98 AFY if stormwater improvement projects are implemented. Source: Santa Barbara County Cooperating Entities 2021.

A 2018 technical study prepared as part of the Santa Barbara Countywide Integrated Stormwater Resource Plan identified parcels in the county for future structural stormwater best management practice (BMP) opportunities. The study found that Tucker's Grove in northern Eastern Goleta Valley is a groundwater recharge site for the Goleta Groundwater Basin receiving water from San Antonio Creek. A 1.7-acre parcel located north of the Cathedral Oaks Road and North Turnpike Road intersection has the potential to supply 98 AFY of groundwater recharge with future stormwater improvements (Santa Barbara County Cooperating Entities 2021).

Santa Ynez Valley and Lompoc Valley Groundwater Basins

Santa Ynez River Valley

The Santa Ynez River Valley Groundwater Basin is defined by DWR as a medium-priority basin (County of Santa Barbara Public Works Department 2024). GSPs for this basin were adopted in January 2022. This basin covers approximately 319 square miles and is bounded by the Purisima Hills on the northwest, the San Rafael Mountains on the northeast, the Santa Ynez Mountains on the south, and the Pacific Ocean on the west. On the east and underlying the groundwater basin, the basin is bounded by consolidated non-water-bearing rocks of Tertiary age. Previous reports have divided the basin into five parts: Santa Ynez Uplands, Lompoc Plain, Lompoc Terrace, Lompoc Uplands, and the Buellton Uplands. However, the 2024 Groundwater Basins Summary Report divides the Santa Ynez Valley Groundwater Basin into three management areas: the western portion, comprised of the Lompoc Plain, Lompoc Terrace, and Lompoc Uplands and a portion of the Santa Ynez River Alluvium; the eastern portion, comprised of the Santa Ynez Uplands and a portion of the Santa Ynez River Alluvium; and the central portion, comprised of Buellton Uplands and a portion of the Santa Ynez River Alluvium (Santa Barbara County Public Works Department 2024). The water-bearing formations of the basin include unconsolidated alluvial and terrace deposits, such as the Orcutt Formation, and the Paso Robles and Careaga Formations. Recharge in the basin is derived from infiltration of

precipitation, stream flows, and percolation of irrigation water and wastewater effluent. Precipitation across the valley ranges from 15 to 21 inches, with an average of 17 inches (DWR 2004f). Since 2017, annual precipitation in the basin ranged from approximately 8 to 34 inches (County of Santa Barbara Public Works Department 2024).

According to the 2024 Groundwater Basins Summary Report, water levels within the Western Management Area/Lompoc Uplands have declined since records were available starting in 1930. Water levels within the river alluvium have historically remained stable. Recent 2024 water levels indicate declines in the Lompoc Plain and continued declines in the Santa Rita Uplands. A majority of the network is still above levels observed in 2022, before two consecutive years of above-average precipitation. However, the Santa Rita Uplands and the eastern portion of the Lompoc Uplands continue to decline. Water levels within the Central Management Area have historically remained relatively stable with minimal long-term declines in both the Buellton Aquifer and river alluvium. Levels rebounded following the 2012-2018 drought. Recent 2024 levels show declines one year within the alluvium, however, all network wells are about 3.5 feet above levels observed in 2022, before two consecutive years of above-average precipitation. A majority of water levels in the Eastern Management Area have declined over the past 10 years, but have recently shown improvement. Following two consecutive years of above-average precipitation, water level changes have generally ranged from maintaining stability to significant increases throughout the basin within both the Paso Robles (illustrated in the hydrograph) and Careaga Formations. Decreases were observed in a few wells south of Los Olivos and within the center of the Basin (County of Santa Barbara Public Works Department 2024).

Santa Maria Region Groundwater Basins

San Antonio Creek Valley

The San Antonio Creek Valley Groundwater Basin is a medium-priority basin (County of Santa Barbara Public Works Department 2024). The San Antonio Creek Valley Groundwater Basin GSP was adopted in March 2023. The San Antonio Creek Valley Groundwater Basin encompasses approximately 128 square miles and is bounded on the north by the Casmalia Hills and the Solomon Hills, on the south by the Purisima Hills and Burton Mesa, and on the west by the Pacific Ocean (DWR 2004g). The basin is drained by San Antonio Creek. Groundwater is found in alluvium, dune sand, terrace deposits, and the Orcutt, Paso Robles, and Careaga Formations. Natural recharge in the basin is derived from infiltration of precipitation and seepage from streams (DWR 2004g). Annual average precipitation in the western part of the San Antonio Creek Valley watershed where the basin is located is about 15 inches and 22 inches in the Solomon Hills and eastern uplands areas (USGS 2022).

Groundwater is the only water supply source within the basin. Land within the valley is used primarily for agriculture, and production shifted in the 1980s from non-irrigated pastureland to

irrigated crops and vineyards. This land use change resulted in an increase in groundwater withdrawals, which has exceeded recharge and reduced storage within the aquifer (County of Santa Barbara Public Works Department 2024).

According to the 2024 Groundwater Basins Summary Report, water levels have declined throughout the basin since the 1950s, with more rapid declines starting in about 2000. Recent water level results from 2024 following two years of significant above-average precipitation generally show increases or stability in a majority of the wells monitoring both the Paso Robles and Careaga Sandstone formations (County of Santa Barbara Public Works Department 2024).

Santa Maria River Valley

The groundwater basin is defined by DWR as a very low priority and is currently not subject to the SGMA. The groundwater basin was adjudicated in 2008 (County of Santa Barbara Public Works Department 2024). The Santa Maria River Valley Groundwater Basin covers 288 square miles and is bounded on the north by the San Luis and Santa Lucia Ranges, on the east by the San Rafael Mountains, on the south by the Solomon Hills and the San Antonio Creek Valley Groundwater Basin, on the southwest by the Casmalia Hills, and the west by the Pacific Ocean. The basin is drained westward by several rivers and creeks including the Sisquoc, Cuyama, and Santa Maria Rivers and the Orcutt, Arroyo Grande, Pismo, and Nipomo creeks. Groundwater is found in alluvium, dune sands, and the Orcutt, Paso Robles, Pismo, and Careaga Formations. Natural recharge in the basin is derived from seepage losses from the major streams, percolation of rainfall, and subsurface flow. Annual precipitation ranges from 13 to 17 inches, with an average of 15 inches (DWR 2004h). Since 2017, annual precipitation in the basin has ranged from approximately 6 inches to 22 inches (County of Santa Barbara Public Works Department 2024).

According to the 2024 Groundwater Basins Summary Report, water levels in the basin began to noticeably decline in 1945, coinciding with an increase in agricultural acreage and urban population and reached historic lows in the late 1960s. Levels have fluctuated significantly throughout the basin in recent decades as a result of climatic fluctuations, land use changes, discharge from the Sisquoc River, and Twitchell Reservoir storage availability. Although highly variable, water levels maintained general stability following the 1960s and reached near-historic highs in 2002. Water levels have been steadily declining since 2002, with more rapid drops starting at the beginning of the most recent drought in 2012. Most areas throughout the basin are currently at or near historic lows. However, water level data from 2024 show an increase throughout the area following two consecutive years of above-average precipitation. For example, water level data shows recharge along the Sisquoc River and the shallow Twitchell Recharge Zone as a result of river infiltration starting in Water Year 2017 (County of Santa Barbara Public Works Department 2024).

Cuyama Valley Groundwater Basin

The Cuyama Valley Basin is defined by DWR as a high-priority, critically over-drafted basin (County of Santa Barbara Public Works Department 2024). The Cuyama Valley Basin GSP was adopted in March 2023. The basin covers 230 square miles and is bound on the north by the Caliente Range and on the southwest by the Sierra Madre Mountains. The four formations in the Cuyama Basin that can supply water are the Morales Formation, Cuyama Formation, older and younger alluvium, and terrace deposits. The Morales Formation is the main aquifer in the basin, and its permeability varies greatly both laterally and vertically. Average annual precipitation in Cuyama Valley ranges from approximately seven inches on the valley floor and 15 inches in the eastern part of Cuyama Valley (USGS 2014). The basin is drained by the Cuyama River.

Groundwater is the only water supply source available within the Cuyama Valley Groundwater Basin (County of Santa Barbara Public Works Department 2024). Agriculture dominates land use in the valley. The petroleum industry located on the basin anticlines also uses groundwater for oil recovery and processing/transportation. Continued groundwater withdrawals during the last 80 years have exceeded recharge in many parts of the basin and reduced storage within the aquifer.

The Cuyama Valley Basin is further divided into six threshold regions: northwestern, western, central, eastern, southeastern, and badlands. The Badlands Threshold Region is not located within Santa Barbara County and no further water data is available. The Northwestern Threshold Region water levels have remained fairly stable. However, in 2015, a new vineyard was developed within the eastern portion of this subbasin and deep wells within the eastern portion of this region have experienced continued declines, with water levels dropping 40 feet on average since pumping began in 2016. Water levels in the Western Threshold Region have remained stable for decades. In the Central Threshold Region, water levels within this region have been steadily declining since the late 1940s, with long-term hydrographs showing declines of nearly 300 feet. Levels are at historic lows for many wells and continue to decline, although recent levels at some wells indicate stabilization or minor increases. Groundwater levels in the Eastern Threshold Region have historically remained stable, but the levels declined rapidly during the 2012-2018 drought. In recent years, water level data indicate that the aquifer has stabilized and storage has improved following above-average precipitation in 2017 and 2019 and near-average precipitation in 2020. Water level data from 2023 measurements indicate an increase in levels. Water levels in the Southeastern Threshold Region are shallow with a depth of 50 feet (County of Santa Barbara Public Works Department 2024).

3.10.2.3 Water Quality

Multiple surface water features in the county are listed under the State Water Resources Control Board's (SWRCB) 303(d) Impaired Water Bodies List (Table 3.10-3). The 303(d) List is required by the 1972 Amendments to the Federal Water Pollution Control Act, also known as the Clean Water Act (CWA), and is established to regulate water pollution in the U.S. There are many segments of water bodies within the county that are on the 303(d) List, including Greene Valley Creek, Casmalia Canyon Creek, Glen Annie Canyon Creek, Bradley Channel, Main Street Channel, Carpinteria Creek, Guadalupe Dunes, Ocean Beach, East Beach, North Main Street Channel, Arroyo Burro Beach, Devereux Creek, Tecolotito Creek, Bell Creek, Cieneguitas Creek, Sycamore Creek, Franklin Creek, Hope Ranch Beach, Leadbetter Beach, Hammonds Beach, Carpinteria State Beach, Goleta Beach, Jalama Beach, Refugio Beach, East Beach, Rincon Beach, Toro Canyon Creek, and an unnamed tributary to Orcutt Creek.

Listed water bodies greater than five miles in length are included in Table 3.10-3 below along with their identified pollutants and expected Total Maximum Daily Load (TMDL) completion dates. TMDLs are intended to bring receiving water bodies into compliance with water quality objectives for their designated beneficial use, and hence, removal from the 303(d) List. TMDLs establish a maximum concentration of a particular pollutant that is permitted to occur in a receiving water body. The primary pollutants affecting waters in the county are the result of land development and agricultural uses, and the primary pollutants of concern are chloride, E. coli, fecal coliform, nitrate, mercury, and sodium.

Table 3.10-3. Major Surface Waters in the Project Area on the California 303(d) List

Water Body	Miles Affected	Pollutant(s)	TMDL Status[1]	Expected Completion
Lake Cachuma	3,168.7 acres	Mercury	5A (TMDL required)	2035
Carpinteria Marsh (El Estero	200.9 acres	Nutrients, dissolved oxygen, priority organics	5A (TMDL required)	2027, 2035
Jameson Lake	118.4 acres	Mercury	5A (TMDL required)	2035
Bradley Canyon Creek	16.5	Dissolved turbidity,	5A/5B (TMDL required)	2035
Orcutt Creek	15	Arsenic, benthic community effects, boron, carbaryl, chloride, copper, imidacloprid, malathion, oxyfluofen, linuron, molybdenum, nickel, prometryn, specific conductivity, selenium, sodium, water temperature, turbidity, toxicity, zinc	5A/5B (TMDL required)	2027, 2035
Santa Barbara Harbor	98.3 acres	Arsenic, copper, dieldrin, and dissolved oxygen	5A (TMDL required)	2027, 2035
Sisquoc River	59.9	pH	5A (TMDL required)	2035
Santa Ynez River (Cachuma Lake to Lompoc)	40.7	Benthic community effects, molybdenum, dissolved oxygen, sedimentation/siltation, sodium, water temperature, toxicity, total dissolved solids	5A (TMDL required)	2027, 2035
San Antonio Creek (Rancho del las Flores Bridge at Highway 135 to Railroad Bridge)	29.3	Ammonia, arsenic, boron, chloride, E. coli, dissolved oxygen, nitrate, selenium, sodium, and toxicity	5A/5C (TMDL required)	2025, 2035
Santa Ynez River (above Lake Cachuma)	22.2	Water temperature, turbidity, and toxicity	5A (TMDL required)	2023, 2035
Santa Ynez River (Lompoc to the Pacific Ocean)	6.7	Benthic community effect, chloride, E. coli, molybdenum, dissolved oxygen, nitrate, sedimentation/siltation, sodium, water temperature, toxicity, and total dissolved solids	5A (TMDL required)	2025, 2027, 2035
San Miguelito Creek	10.1	Chloride, nitrate, dissolved oxygen, sodium, water temperature, pH, and toxicity	5A (TMDL required)	2023, 2025, 2035
Jalama Creek	10.6	Chloride, E.coli, and sodium	5A/5B (TMDL required)	2035

Table 3.10-3. Major Surface Waters in the Project Area on the California 303(d) List (Continued)

Water Body	Miles Affected	Pollutant(s)	TMDL Status[1]	Expected Completion
Salsipuedes Creek	9.0	Chloride, E.Coli, and sodium	5A (TMDL required)	2035
Canada De La Gaviota	7.1	Arsenic, boron, chloride, copper, nickel, selenium, and sodium	5A (TMDL required)	2035
Canada Del Refugio	6.9	Chloride, and sodium	5A (TMDL required)	2035
Dos Pueblos Canyon Creek	7.1	Sodium	5A (TMDL required)	2035
Santa Monica Creek	5	E. coli, pH, water temperature, and turbidity	5A (TMDL required)	2035
Tecolote Creek	6.9	Boron, chloride, copper, E. coli, dissolved oxygen, specific conductivity, total dissolved solids, and sodium	5A (TMDL required)	2035
Sloans Canyon Creek	6.7	Ammonia, pH, and turbidity	5A (TMDL required)	2023, 2027
Carneros Creek	6.1	Specific conductivity, enterococcus, E. coli, toxicity, and nitrate	5A/5B (TMDL required)	2027, 2035
San Pedro Creek	6.3	Enterococcus, E. coli, fecal coliform, pH, and sodium	5A (TMDL required)	2027, 2035
San Jose Creek	9.9	Chloride, dissolved oxygen, enterococcus, sodium, and specific conductivity	5A (TMDL required)	2027, 2035
Goleta Slough/Estuary	167.1 (acres)	Indicator bacteria, enterococcus, dissolved oxygen, pH, and priority organics	5A (TMDL required)	2027, 2035
Shuman Canyon Creek	8.7	Sedimentation/Siltations	5A (TMDL required)	2027
Maria Ygnacio Creek	7.2	Enterococcus, E. coli, sodium, and turbidity	5A (TMDL required)	2027, 2035
Atascadero Creek	6.2	Arsenic, benthic community effect, fecal coliform, chloride, enterococcus, manganese, nitrate, dissolved oxygen, pH, sodium, selenium, water temperature, total dissolved solids, and toxicity	5A (TMDL required)	2027, 2035
Arroyo Burro Creek	6.3	Selenium, toxicity, and dissolved oxygen	5A (TMDL required)	2035
Mission Creek	8.7	Chlorade, E. coli, fecal coliform, dissolved oxygen, and toxicity	5A (TMDL required)	2035
Canada Del Capitan	5.8	Toxicity	5A	2027

Table 3.10-3. Major Surface Waters in the Project Area on the California 303(d) List (Continued)

Water Body	Miles Affected	Pollutant(s)	TMDL Status[1]	Expected Completion
Santa Maria River Estuary	5.6	Oxyfluorfen, pH, prometryn,	5A (TMDL required)	2035
Rincon Creek	10.2	Ammonia, arsenic, boron, sodium, nitrate, chloride, copper, dissolved oxygen, selenium, nickel, specific conductivity, total dissolved solids, toxicity, and turbidity	5A (TMDL required)	2023, 2027
Romero Creek	5.1	pH	5A (TMDL required)	2027
Arroyo Paredon	5.3	Boron, chloride, copper, diazinon, E. coli, fecal coliform, nitrate dissolved oxygen, nickel, sodium, pH, selenium, specific conductivity, temperature, and toxicity	5A/5B (TMDL required)	2035
Pacific Ocean at Santa Cruz Island	129,820 acres	Mercury	5A (TMDL required)	2035
Pacific Ocean, Coal Oil Pt. to Rincon Pt.	43,849 acres	DDT (Dichlorodiphenyltrichloroethane)	5A (TMDL required)	2035

[1] Category 5A: standards are not met and TMDL still required; Category 5B: water quality being addressed by the United States Environmental Protection Agency (USEPA)-approved TMDL.

Source: SWRCB 2022.

3.10.2.4 Flood Hazards

Flood hazards in the county include coastal storm surges and inland flooding. High-hazard flood zones are concentrated in coastal areas, including bays, coastal inlets, and estuaries, and in watershed areas connecting local mountain ranges to the coastal region where flash floods may occur (County of Santa Barbara 2022). Flood hazards in the North County (Santa Ynez Valley, Lompoc Valley, Cuyama Valley, and Santa Maria Valley) are typically associated with three major rivers, the Santa Maria River, the Cuyama River, and the Santa Ynez River, as well as their major tributaries. Flooding hazards along the South Coast are typically associated with creeks and streams that flow from the Santa Ynez Mountains to the Pacific Ocean, as well as storm surges and coastal flooding (County of Santa Barbara 2022). These streams are subject to high flows following intense precipitation. Drainages along the coastline of the county are characterized by short-duration, high-intensity runoff events.

The Federal Emergency Management Agency (FEMA) uses Flood Insurance Rate Maps (FIRM) to show flood risk through a series of zones. Figure 3.10-3 depicts 100-year and 500-year flood hazard zones within the county. Zone categories include:

- Zone A – areas represent a 100-year flood zone and are defined as having a 1 percent chance of flooding annually. Zone A areas are located primarily near or adjacent to rivers

and creeks and downslope from mountain drainages where topography indicates an increased potential for flooding.

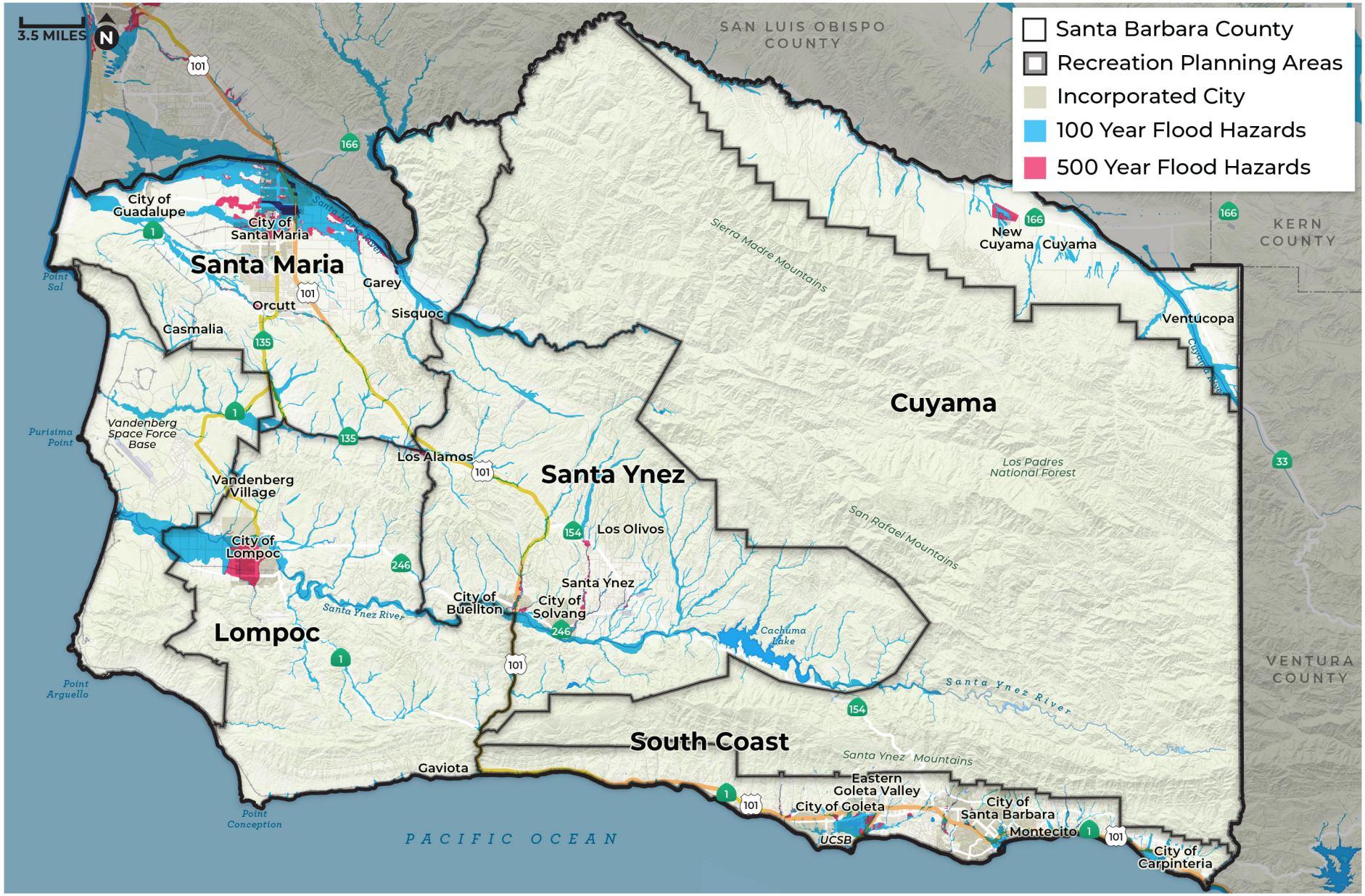
- Zone AE – areas have a 1 percent annual chance of flooding and flood base elevations;
- Zone AO – areas with river or stream flood hazard with a 1 percent or greater chance of shallow flooding annually;
- Zone V – coastal areas with a 1-percent or greater chance of annual flooding and with the additional hazard of storm waves;
- Flood Zone VE – areas with V zoning as well as base flood elevations;
- Zone D – areas with undetermined flood risk;
- Zone X – a non-special flood hazard area Zone X corresponds to areas outside of the 500-year flood zone and is defined as the flood insurance rate zone that corresponds to areas outside of the 0.2-percent annual chance floodplain, areas within the 0.2-percent annual chance floodplain, areas of 1-percent annual chance flooding where the contributing drainage is less than 1 square mile, and areas protected from the one percent annual chance flood by levees.

FEMA indicates that portions of the county are within flood hazard Zone A (i.e., 100-year or 1-percent annual chance flood zone), Zone X (i.e., 500-year or 0.2-percent annual chance flood zone), and Special Flood Hazard Areas (SFHAs). The Santa Ynez Valley contains the largest area of FEMA 1-percent annual chance flood zone areas in the county, particularly along the lower Santa Ynez River. Based on Geographic Information System (GIS) flood data analysis conducted for the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan (MJHMP), an estimated 9,190 residents are living in the 1-percent annual chance floodplain throughout the county (County of Santa Barbara 2022). Table 3.10-4 below shows the total acreage anticipated to be flooded under a 1-percent annual chance flood as provided by FEMA, broken down by Housing Market Area (HMA). As shown, as much as 5.98 percent or 48,818 acres could be inundated in a FEMA-recognized 100-year or 1-percent annual chance flood.

Table 3.10-4. FEMA Riverine 1-Percent Annual Chance Flood Acreage Inundation by HMA*

HMA	Flood Zone Acres	Total Acres	Percent
Cuyama Valley	9,782	112,783	8.67%
Lompoc Valley	10,102	195,287	5.17%
Santa Maria Valley	10,427	178,146	5.85%
Santa Ynez Valley	13,641	252,907	5.39%
South Coast	4,865	77,020	6.32%
Total	**48,818**	**816,143**	**5.98%**

* Includes unincorporated areas and incorporated cities within Santa Barbara County.
Source: County of Santa Barbara 2022.



wsp

Santa Barbara County Flood Hazards

FIGURE 3.10-3

Stormwater

The county encompasses approximately 2,800 square miles primarily consisting of rugged mountainous terrain, which can result in rapid local and regional watershed flow during major rain events. In the summer, the county's climate is generally warm and dry, while it is cool and wet in the winter months. The wet winter months normally occur during December, March, and April (County of Santa Barbara 2020).

Stormwater runoff from lands modified by human activities can harm surface water resources and in turn, cause or contribute to a failure to meet water quality standards, by changing natural hydrologic patterns, accelerating stream flows, destroying aquatic habitat, and elevating pollutant concentrations. Urban development can contribute to degraded water quality because activities and land uses associated with urban development contribute higher levels of pollutants than the natural watershed conditions. Such runoff may contain or mobilize high levels of contaminants, such as sediment, suspended solids, nutrients (e.g., phosphorous and nitrogen), heavy metals and other toxic pollutants, pathogens, oxygen-demanding substances, and floatables (e.g., trash, foliage, and grass clippings). After a rain event, stormwater runoff carries these pollutants into nearby streams, rivers, lakes, estuaries, and wetlands as well as the ocean. The highest concentrations of these contaminants often are contained in "first flush" discharges, which occur during the first major storm after an extended dry period. Individually and combined, these pollutants impair water quality, threatening designated beneficial uses and causing habitat alteration or destruction. To address these impacts the County has prepared the Countywide Integrated Stormwater Resource Plan (SWRP), which utilizes watershed-based natural solutions to capture, treat, and use stormwater and dry weather runoff (Santa Barbara County Cooperating Entities 2021).

Within agricultural areas of the county, stormwater can have the additional effect of increased sedimentation. When soil is disturbed by rain, it is transported through a watershed via storm runoff to natural drainages, or scouring of natural channels, due to increased flow from runoff of impervious surfaces. Stormwater flow along creeks with natural banks may be susceptible to scour, bank collapse, or deeper incising of portions of the channel with increased runoff.

The Santa Barbara County Flood Control and Water Conservation District (Flood Control District) is responsible for channel and basin maintenance, the design and construction of capital improvements, the review of new development, and a hydrologic data collection/flood warning system. The Flood Control District's Operation and Maintenance Program involves the operation of the Flood Control District's basins, channels, and other flood-protection facilities as well as routine and emergency maintenance and repair of these facilities. The Flood Control District operates and maintains dams, 264 miles of channels and storm drains, 78 retention/recharge/debris basins, and many major storm drain systems (County of Santa Barbara 2025b). Flood control facilities commonly provide open space and outdoor recreation

uses during dry seasons, including trails, fields, and open space. During flood events, the Flood Control District staff switch modes and become an emergency response organization, focusing on flood-fighting and support activities in coordination with the Santa Barbara County Office of Emergency Management (SBCOEM) (County of Santa Barbara 2022). Much of the costs from equipment and operations of these emergencies are funded by the Flood Control District's emergency reserve funds, while as little as 50 percent of the total disaster costs are reimbursed by the federal and state governments, which can happen months, or years, after the flood event (County of Santa Barbara 2022).

Tsunami and Seiches

Tsunamis are giant ocean waves generated during large coastal or submarine earthquakes. Seiches are changes in wave height of an enclosed body of water, such as a lake, during an earthquake. The County's Seismic Safety and Safety Element indicates that both tsunamis and seiches could occur within the county, but seiches would be more frequent (County of Santa Barbara 2023). The areas along the county's unincorporated coast that are subject to tsunami inundation are the mouth of the Santa Maria River, the mouth of the Santa Ynez River west of Lompoc, the Goleta Slough-Santa Barbara Airport area, Toro Canyon-Carpinteria, and the beaches of Refugio, El Capitan, and Gaviota. Per the Seismic Safety and Safety Element of the Comprehensive Plan, the County's policy for all coastal installation and development planning projects is to consider a 10-foot-high sea wave and use a contour elevation of 40 feet to establish the tsunami risk limit. Water bodies subject to seiches in the county include Lake Cachuma, Twitchell, and Gibraltar reservoirs, and Jameson and Zaca lakes. Small waves would pose little threat other than the potential damage to recreational facilities along their shores, but large waves caused by large landslides triggered by earthquakes could overtop a dam and cause damage to the area downstream (County of Santa Barbara 2023).

3.10.3 REGULATORY SETTING

Federal, state, and local regulations have been enacted to address hydrology and water quality in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future recreation development under the Project and its associated impacts.

3.10.3.1 Federal

Clean Water Act

In 1972, the Federal Water Pollution Control Act (later referred to as the Clean Water Act [CWA]) was amended to require that the discharge of pollutants into waters of the U.S. from any point source be effectively prohibited unless the discharge complies with a National Pollutant Discharge Elimination System (NPDES) permit. In 1987, the CWA was again amended to require

that the United States Environmental Protection Agency (USEPA) establish regulations for the permitting of stormwater discharges (as a point source) by municipal and industrial facilities and construction activities under the NPDES permit program. The regulations require that Municipal Separate Storm Sewer System (MS4) discharges to surface waters be regulated by an NPDES permit.

The CWA requires states to adopt water quality standards for water bodies and have those standards approved by USEPA. Water quality standards consist of designated beneficial uses for a particular water body (e.g., wildlife habitat, agricultural supply, and fishing), along with water quality criteria necessary to support those uses. Water quality criteria include quantitative set concentrations, levels, or loading rates of constituents—such as pesticides, nutrients, salts, suspended sediment, and fecal coliform bacteria—or narrative statements that represent the quality of water that supports a particular use.

On May 25, 2023, the U.S. Supreme Court issued a ruling on *Sackett et ux. v. Environmental Protection Agency et al.*(598 U.S. ___ [2023]) that limits the jurisdiction of the CWA. Under this ruling, the U.S. Supreme Court held that the CWA's use of "waters" under Section 1362(7) refers only to "geographic[al] features that are described commonly as "streams, oceans, rivers, and lakes" and to adjacent wetlands that are "indistinguishable" from those bodies of water due to continuous surface connection. Specifically, under this ruling, to assert jurisdiction, a party must establish "first, that the adjacent 'body of water constitutes'…'water[s]' of the United States (i.e., a relatively permanent body of water connected to traditional interstate navigable waters); and second, that the wetland has a continuous surface connection with that water, making it difficult to determine where the 'water' ends and the 'wetland' begins."

Clean Water Act, Section 303, List of Water Quality Limited Segments

Section 303 of the CWA requires that the state adopt water quality standards for surface waters. When designated beneficial uses of a particular water body are being compromised by water quality, Section 303(d) of the CWA requires identifying and listing that water body as impaired. Once a water body has been deemed impaired, a TMDL must be developed for each impairing water quality constituent. A TMDL is an estimate of the total load of pollutants from point, non-point, and natural sources that a water body may receive without exceeding applicable water quality standards (often with a "factor of safety" included, which limits the total load of pollutants to a level well below that which could cause the standard to be exceeded). Once established, the TMDL is allocated among current and future dischargers into the water body.

Clean Water Act, Section 402, National Pollutant Discharge Elimination System

Direct discharges of pollutants into waters of the U.S. are not allowed, except in accordance with the NPDES program established in Section 402 of the CWA. Non-point source discharges to stormwater are regulated under stormwater NPDES permits for municipal stormwater

discharges, industrial activities, and construction activities. These permits require development and adherence to Storm Water Pollution Prevention Plans (SWPPP).

Clean Water Act, Sections 401, Water Quality Certification

Section 401 of the CWA requires that an applicant for any federal permit obtain certification from the state, requiring the discharge to waters of the U.S. would comply with provisions of the CWA and with state water quality standards. For example, under Section 401 of the CWA, the SWRCB must certify all activities requiring a Section 404 permit.

Clean Water Act, Section, 404, Discharge of Dredged or Fill Material

Section 404 of the CWA, establishes a program to regulate the discharge of dredged or fill material into waters of the U.S., as defined by the CWA. Under Section 404, individual permits are reviewed by the United States Army Corps of Engineers (USACE).

FEMA National Flood Insurance Program

The National Flood Insurance Program offers flood insurance to homeowners, renters, and business owners if their community participates in the program. Participating communities agree to adopt and enforce ordinances that meet or exceed FEMA requirements to reduce the risk of flooding. Development in floodplain areas is subject to the standard conditions of approval of the Flood Control District, and the requirements and development standards set forth in the County Flood Plain Management Ordinance (Chapter 15-A of the County Code) and the Development Along Water Courses Ordinance (Chapter 15-B of the County Code).

Federal Antidegradation Policy

The Federal Antidegradation Policy (Title 40 Code of Federal Regulations Section 131.12) requires states to develop statewide antidegradation policies and identify methods for implementing them. Pursuant to the Code of Federal Regulations, state antidegradation policies and implementation methods shall, at a minimum, protect and maintain: 1) existing in-stream water uses; 2) existing water quality where the quality of the waters exceeds levels necessary to support existing beneficial uses unless the state finds that allowing lower water quality is necessary to accommodate economic and social development in the area; and 3) water quality in waters considered an outstanding national resource.

3.10.3.2 State

State Water Resources Control Board

The California Environmental Protection Agency (CalEPA) is charged with developing, implementing, and enforcing the state's environmental protection laws. The SWRCB and nine Regional Water Quality Control Boards (RWQCBs) – including the Central Coast RWQCB – operate under the regulatory authority of the USEPA. The SWRCB, a branch of CalEPA, and the

RWQCBs have the responsibility of granting NPDES permits for certain point source discharges. California issues NPDES permits to selected point source dischargers and issues either waste discharge requirements or conditioned water quality certification for other discharges. The RWQCBs also regulate CWA activities and issue water quality certifications and permits for those regulated activities.

California Water Code

The California Water Code includes 22 kinds of districts or local agencies with specific statutory provisions to manage surface water. Many of these agencies have statutory authority to exercise some forms of groundwater management. For example, a Water Replenishment District (California Water Code Section 60000 et seq.) is authorized to establish groundwater replenishment programs and collect fees for that service, while a Water Conservation District (California Water Code Section 75500 et seq.) can levy groundwater extraction fees. Through special acts of the Legislature, 13 local agencies have been granted greater authority to manage groundwater. Most of these agencies, formed since 1980, have the authority to limit export and control some in-basin extraction upon evidence of overdraft or the threat of an overdraft condition. These agencies can also generally levy fees for groundwater management activities and for water supply replenishment.

Porter-Cologne Water Quality Control Act

The CWA places the primary responsibility for the control of water pollution and planning the development and use of water resources, with the individual states; however, it does establish certain guidelines for the states to follow in developing their programs.

California's primary statute governing water quality and water pollution is the Porter-Cologne Act, which grants the SWRCB and RWQCBs broad powers to protect water quality and is the primary vehicle for the implementation of California's responsibility under the CWA. The Porter-Cologne Act grants the SWRCB and RWQCBs the authority and responsibility to adopt plans and policies, regulate discharges to surface and groundwater, regulate waste disposal sites, and require cleanup of discharges of hazardous materials and other pollutants. The Porter-Cologne Act also establishes reporting requirements for unintended discharges of any hazardous substance, sewage, oil, or petroleum product.

California Toxics Rule

The USEPA has established numeric water quality criteria for certain toxic substances in California via the California Toxics Rule. The California Toxics Rule establishes acute and chronic surface water quality standards for bodies of water such as inland surface waters and enclosed bays and estuaries that are designated by the RWQCBs as having beneficial uses protective of aquatic life (23 priority toxics) or human health (57 priority toxics). Numeric criteria established in the California Toxics Rule are the same as those recommended by the

USEPA in the CWA Section 304(a) guidance. the California Toxics Rule also includes provisions for compliance schedules to be issued for new or revised NPDES permit limits when certain conditions are met.

State Antidegradation Policy

In accordance with Federal Antidegradation Policy, the SWRCB adopted in Resolution No. 68-16, Statement of Policy with Respect to Maintaining High Quality Waters in California (more commonly referred to as the State Antidegradation Policy), which restricts the degradation of surface waters of the State and protects bodies of water where the existing water quality is higher than necessary for the protection of present and anticipated designated beneficial uses. The State Antidegradation Policy is implemented by the Central Coast RWQCB.

California Water Code Section 10933

California Water Code Section 10933(b) requires that DWR prioritize groundwater basins and subbasins for the purpose of implementing this section. In prioritizing the basins and subbasins, the department shall, to the extent data is available, consider all of the following:

1. The population overlying the basin or subbasin.
2. The rate of current and projected growth of the population overlying the basin or subbasin.
3. The number of public supply wells that draw from the basin or subbasin.
4. The total number of wells that draw from the basin or subbasin.
5. The irrigated acreage overlying the basin or subbasin.
6. The degree to which persons overlying the basin or subbasin rely on groundwater as their primary source of water.
7. Any documented impacts on the groundwater within the basin or subbasin, including overdraft, subsidence, saline intrusion, and other water quality degradation.
8. Any other information determined to be relevant by the department, including adverse impacts on local habitat and local streamflows.

California Water Code Section 13260

California Water Code Section 13260 requires that any person discharging or proposing to discharge waste that could affect the quality of the waters of the State, in a location other than the community sewer system, must submit a report of the waste discharge with the applicable RWQCB.

Central Coast Regional Water Quality Control Board

Central Coast Basin (Basin Plan)

The Central Coast RWQCB has adopted a Water Quality Control Plan for the Central Coastal Basin (Basin Plan) for its region of responsibility, which includes the County of Santa Barbara. The RWQCB has delineated water resource area boundaries based on hydrological features. For purposes of achieving and maintaining water quality protection, specific beneficial uses have been identified for each of the hydrologic areas described in the Basin Plan. The Basin Plan also establishes implementation programs to achieve water quality objectives to protect beneficial uses and requires monitoring to evaluate the effectiveness of the programs. These objectives must comply with the State Antidegradation Policy (SWRCB Resolution No. 68-16) described above.

Beneficial uses for surface water and groundwater are divided into 23 standard categories which include municipal and domestic supply, agricultural supply, industrial process supply, groundwater recharge, and water recreation.

The Basin Plan has established narrative and numeric water quality objectives that, in the Regional Board's judgment, are necessary for the reasonable protection of beneficial uses and the prevention of nuisances. If water quality objectives are exceeded, the RWQCB can use its regulatory authority to require municipalities to reduce pollutant loads to the affected receiving waters.

Central Coast Post-Construction Stormwater Requirements

The Central Coast Post-Construction Stormwater Requirements (Resolution R3-2013-0032) is intended to ensure that development projects that require approvals and/or permits issued by the County's planning or building departments reduce pollutant discharges to the maximum extent practicable and prevent stormwater discharges from causing or contributing to a violation of receiving water quality standards. The Post-Construction Stormwater Requirements apply to all new development or redevelopment projects that create and/or displace equal to or greater than 2,500 square feet (sf) of impervious surface. Performance requirements include site design, runoff reduction, water quality treatment, stormwater control plans, runoff retention, peak flow management, and other special circumstances to be implemented as part of the project.

NPDES (Construction General Permit)

The SWRCB regulates stormwater runoff from construction activities under Order No. 2009-009-Division of Water Quality (DWQ), as amended by 2010-0014-DWQ and 2012-0006-DWQ. Construction activities subject to the NPDES Construction General Permit include sites that disturb an area of one acre or more, and small construction sites less than one acre but part of

a larger common plan of one acre or more. The Order requires that, prior to beginning any construction activities, the applicant must obtain coverage under the General Construction Permit by preparing and submitting a Notice of Intent and an adequate SWPPP. The SWPPP has two major objectives: 1) to help identify the sources of sediment and other pollutants that affect the quality of stormwater discharges; and 2) to describe and ensure the implementation of BMPs to reduce or eliminate sediment and other pollutants in stormwater and non-stormwater discharges. Required elements of a SWPPP include 1) site description addressing the elements and characteristics specific to the site; 2) descriptions of BMPs for erosion and sediment controls; 3) BMPs for construction waste handling and disposal; 4) implementation of approved local plans; 5) proposed post-construction controls, including a description of local post-construction erosion and sediment control requirements; and 6) non-stormwater management. Additionally, the SWPPP must contain a visual monitoring program, a chemical monitoring program for "non-visible" pollutants to be implemented if there is a failure of BMPs, and a sediment monitoring plan if the site discharges directly to a water body listed on the CWA Section 303(d) List for sediment.

Sustainable Groundwater Management Act

SGMA went into effect on January 1, 2015, and encourages local agencies to work cooperatively as GSAs to manage groundwater resources and is intended to increase local control and protection over groundwater basins. This legislation intends to manage the use of groundwater in a manner that can be maintained long-term without causing the chronic lowering of groundwater levels, overdraft, a significant reduction in groundwater storage, saline water intrusion, or subsidence. SGMA requires the GSAs to develop GSPs for medium- and high-priority groundwater basins. The GSPs are required to set objectives to achieve sustainability within 20 years of plan implementation, report data to DWR, mitigate overdraft, and address groundwater-dependent ecosystems.

California Fish and Game Code

Applicable sections of the California Fish and Game Code include Section 2050 (California Endangered Species Act), Section 5650 (prohibits water pollution), Section 5652 (prohibits refuse disposal in or near streams), Section 5901 (prohibits any device that impedes fish passage), and Section 5937 (requires sufficient water bypass and fish passage, relating to dams).

3.10.3.3 Local

Santa Barbara County Comprehensive Plan

The County's Comprehensive Plan addresses the conservation of water resources in the county, including the coastal area, inland area, and community plan areas. Project consistency with the Comprehensive Plan is discussed in Section 3.10, *Land Use and Planning*. The Conservation

Element includes the Water Resources Section, which provides direction for the conservation, development, and utilization of water resources. As part of this effort, the County is directed to consider water resources during the permitting process. The Conservation Element provides the following recommendations:

- The County and the cities should support the Regional Water Quality Control Board in its establishment of discharge requirements for point source waste discharges, in order to protect surface and groundwater supplies.
- Use of streams from which groundwater recharge takes place should be regulated to ensure that the recharge capability of the channels is not impaired.
- Land use and development upstream from surface reservoirs should be regulated and monitored by the County Department of Public Works and the County Planning Department in order to minimize the production of water-polluting wastes.
- The County should initiate a study of land development in areas relying on septic tanks to assess the impact of alternate densities on water quality.
- On the basis of the adopted Water Quality Control Plan for the Central Coastal Region, the County and the cities should review their policies for protection of local water resources to determine what changes may be necessary.

The Seismic Safety and Safety Element profiles the goals, policies, objectives, and implementation measures adopted by the County to limit the negative effects of flooding and demonstrate compliance with applicable state laws.

Flood Goal 1: Protect the community from unreasonable risks of flooding pursuant to Government Code §65302(g) et seq.

> **Flood Objective 1:** Pursuant to County Code Chapter 15A-Flood Plain Management, promote the public, health, and general welfare, and minimize public and private losses due to flood conditions.
>
> > **Flood Policy 1:** The County shall avoid or minimize risks of flooding to development through the development review process pursuant to Government Code §65302(3)(g)(2)(i).
> >
> > **Flood Policy 2:** The County shall evaluate whether development should be located in flood hazard zones and identify construction methods or other methods to minimize damage if development is located in flood hazard zones pursuant to Government Code §65302(3)(g)(2)(ii).
> >
> > **Flood Policy 3:** The County shall maintain the structural and operational integrity of essential public facilities during flooding pursuant to Government Code §65302(3)(g)(2)(iii).

Flood Policy 4: The County shall locate, when feasible, new essential public facilities outside of flood hazard zones, including hospitals and health care facilities, emergency shelters, fire stations, emergency command centers, and emergency communications facilities, or identify construction methods or other methods to minimize damage if these facilities are located in flood hazard zones pursuant to Government Code §65302(3)(g)(2)(iv).

Flood Policy 5: The County shall establish cooperative working relationships among public agencies with responsibility for flood protection pursuant to Government Code §65302(3)(g)(2)(v).

Flood Policy 6: The County shall review current National Flood Insurance Program maps and state and local sources of information on a regular basis and utilize the data to assure that measures are taken to reduce potential risks from flooding pursuant to the National Flood Insurance Program of 1968.

Flood Policy 8: The County Public Works Department should continue working with the SBCOEM in updating flood information in the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan.

Flood Policy 9: The County shall utilize information on areas included in wildfires to determine areas subject to increased risk of flooding, including mudslides and flash flooding.

Flood Policy 10: The County should review the floodplain improvement projects identified in the Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan annually for progress and necessary revisions.

Flood Policy 11: The SBCOEM shall continue coordinating emergency planning for the Santa Barbara Operational Area pursuant to the California Emergency Services Act of 1970.

Flood Policy 12: The County should reference the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan when considering measures to reduce potential harm from flood-related activity to property and lives.

Santa Barbara County Code

Chapter 14 – Grading Code

Chapter 14 of the Santa Barbara County Code (County Code) contains the Santa Barbara County Grading Code which includes regulations and conditions designed to control the design, construction, quality of materials, location, and maintenance of grading, drainage, erosion, and sediment control within the county. Extensive operations are subject to the minimum standards and procedures provided in the code. The grading ordinance generally requires a grading permit

and an Erosion and Sediment Control Plan for all new grading, excavations, fills, cuts, borrow pits, stockpiling, compaction of fill, and land reclamation projects on privately owned land where the transported amount of materials exceeds 50 cubic yards, or the cut or fill exceeds three feet in vertical distance to the natural contour of the land. The County will accept a SWPPP in lieu of an Erosion and Sediment Control Plan if the SWPPP contains the requirements.

Chapter 15A – Floodplain Management

Chapter 15A of the County Code establishes prohibitions and/or standards for construction in all Special Flood Hazard Areas within the county to promote public health, safety, and general welfare, and to minimize public and private losses due to flood conditions in specific areas mapped on the FIRMs. This chapter addresses standards for the construction of new development, including standards for the anchoring of structures, approved construction materials and methods, approved elevation of structures and floodproofing requirements, standards for utilities, standards for subdivisions, standards for manufactured homes, and standards for recreational vehicles.

Chapter 15B – Development Along Watercourses

Chapter 15B of the County Code provides controls on development adjacent to watercourses. The goals of the controls are to prevent damage from flood waters, prevent development on parcels from causing detrimental impacts downstream in the event of a flood event, and protect public health, safety, and welfare. Development standards included in Chapter 15B state that development shall not occur within 50 feet of the bank of a watercourse.

Chapter 24-7 – Offenses – Miscellaneous

Chapter 24 Section 24-7 of the County Code prohibits the construction of any building or structure that would obstruct or divert the natural flow of water in a stream, creek, or other watercourse.

Chapter 29 – Storm Drains and Sanitary Sewers

Chapter 29 Article IV of the County Code states that no person shall discharge or cause to be discharged into the storm drain system any materials, including but not limited to pollutants or waters containing any pollutants that cause or contribute to a violation of applicable water quality standards, other than stormwater. The code also states that no person shall throw, deposit, leave, maintain, keep, or permit to be thrown, deposited, left, or maintained in or upon any public or private property, driveway, parking area, street, road, alley, sidewalk, component of the storm drain system, any refuse, rubbish, garbage, litter, or other discarded or abandoned objects, and accumulations, so that the same may cause or contribute to pollution. Wastes deposited in proper waste receptacles for routine collection are exempted from this prohibition. Stormwater discharges are enforced by the County Public Works Department.

Santa Barbara County Integrated Regional Water Management Program

The County's IRWM Program was developed in response to the State of California's IRWM program, and it shares the state's visions of IRWM as a collaborative effort to manage all aspects of water resources in a region. The County's IRWM intends to promote and practice integrated regional water management strategies to ensure sustainable water uses, reliable water supplies, better water quality, environmental stewardship, efficient urban development, and protection of agricultural and watershed awareness.

Santa Barbara Countywide Integrated Stormwater Resource Plan

The SWRP was developed for the SWRP Cooperating Entities (Cities of Buellton, Carpinteria, Goleta, Guadalupe, Solvang, County of Santa Barbara, Carpinteria Valley Water District, Montecito Water District, and the University of California, Santa Barbara) to identify and prioritize stormwater and dry weather runoff capture projects that provide multiple benefits, including to water quality, water supply, flood management, the environment, and community. To satisfy the Proposition 1 Stormwater Grants Program funding eligibility requirements, the SWRP includes all required and recommended elements per the Water Code and SWRP Guidelines. The SWRP will be submitted to the Santa Barbara County IRWM Group, thereby satisfying the Proposition 1 Stormwater Grants Program funding eligibility requirements.

County of Santa Barbara Storm Water Management Program

The County of Santa Barbara Storm Water Management Plan (SWMP) has been prepared pursuant to SWRCB Water Quality Order No. 2003-005-DWQ, NPDES General Permit No. CAS0000004 Water Discharge Requirements for Storm Water Discharges from Small Municipal Separate Storm Sewer Systems (General Permit). The General Permit establishes certain unincorporated areas on the South Coast, in the Santa Ynez Valley, and Orcutt within the Santa Maria Valley where the County is responsible for water quality and storm drains and surface drainages. The goals of the SWMP are to:

1. Protect the health of the public and the environment,
2. Meet CWA mandates through compliance with the General Permit requirements and applicable regulations, and
3. Increase public involvement and awareness.

The SWMP describes BMPs that will reduce, control, or eliminate identified pollutants of concern.

Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan

The SBCOEM prepared the MJHMP, which focuses on the assessment of identified risks and implementation of loss reduction measures to ensure critical County services and facilities survive a disaster. Among other topics, the plan covers risks associated with drought and water

shortage, flood, and coastal erosion in the unincorporated areas of the county. Additionally, the Mitigation Plan (Chapter 7) of the MJHMP identifies numerous flood control, channel maintenance, and drought management mitigation actions for the Flood Control District and water agencies.

Long Term Supplemental Water Supply Alternatives Report

The Long Term Supplemental Water Supply Alternatives Report is not a policy document. The report was created to identify options for increasing water supplies available to meet long-term Santa Barbara County demands. To help refine potential groundwater recharge options, the report provides an analysis to determine areas with the highest potential for favorable groundwater percolation recharge by looking at existing groundwater basin storage potential and recharge zones. The analysis concluded that the Santa Maria, San Antonio, Cuyama, and Santa Ynez Upland basins have the greatest groundwater storage potential (>100,000 AF). The Lompoc Plain, Santa Rita Upland, Santa Ynez River Alluvium, Goleta, and Montecito basins had medium (10,000 - 100,000 AF) groundwater storage potential and the Lompoc Terrace, Buellton Upland, Santa Barbara, and Carpinteria basins had the lowest (<10,000 AF) potential.

The report also determined stormwater and surface water flows from the Sisquoc River, Carpinteria Creek, Santa Ynez River, and Cuyama River could potentially be diverted to groundwater recharge basins and recycled and/or imported. Water supplied from the City of Guadalupe, Cuyama Community Service District, Montecito Sanitary District, and Carpinteria Sanitary District could potentially be used for groundwater recharge.

Santa Barbara County Flood Control and Water Conservation District Standard Conditions of Project Plan Approval

County Flood Control maintains adopted standard conditions that apply to new development projects that require development review within special flood hazard zones and near watercourses. For discretionary developments in the unincorporated county, Flood Control reviews projects to make sure they meet all of the requirements contained in the 2011 Standard Conditions document. Flood Control may also review non-discretionary projects within Special Problems Areas. County Flood Control ensures that flood risks are avoided through site design and stormwater management features, including basins and drains, are designed to accommodate and convey stormwater sufficiently. While the Standard Conditions are not regulations adopted into the zoning ordinances, they ensure compliance with the Floodplain Management Ordinance (Chapter 15A), Setback Ordinance (Chapter 15B), and Watercourse Ordinance (Chapter 24) of the County Code.

3.10.4 ENVIRONMENTAL IMPACT ANALYSIS

This section discusses the potential hydrology and water quality impacts associated with the proposed Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed, where feasible, and the residual impact after mitigation is determined.

3.10.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. For purposes of this Program EIR, implementation of the Project may have a significant adverse impact on hydrology and water quality if it would:

a) Violate any water quality standards or waste discharge requirements or otherwise substantially degrade surface or groundwater quality.

b) Substantially decrease groundwater supplies or interfere substantially with groundwater recharge such that the project may impede sustainable groundwater management of the basin.

c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces, in a manner which would:

   i. result in substantial erosion or siltation on- or offsite;

   ii. substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite;

   iii. create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or

   iv. impede or redirect flood flows.

d) In flood hazard, tsunami, or seiche zones, risk release of pollutants due to project inundation.

e) Conflict with or obstruct implementation of a water quality control plan or sustainable groundwater management plan.

County of Santa Barbara Environmental Thresholds and Guidelines

The following guidelines, taken from the County's *Environmental Thresholds and Guidelines Manual*, have been designated by the County to be used in conjunction with CEQA thresholds for the analysis of Project-related impacts on surface and stormwater quality. The assessment of impacts must account for construction-related impacts (i.e., vegetation removal, erosion,

use of construction materials on the site, and staging of construction activities) and post-construction (or post-development) impacts (i.e., increases in impervious surfaces and increased runoff, entrainment of pollutants, and effects of discharges on aquatic habitats and biota). A significant water quality impact is presumed to occur if the project:

- Is located within an urbanized area of the county and the project construction or redevelopment individually or as a part of a larger common plan of development or sale would disturb one (1) or more acres of land;
- Increases the amount of impervious surfaces on a site by 25 percent or more;
- Results in channelization or relocation of a natural drainage channel;
- Results in removal or reduction of riparian vegetation or other vegetation (excluding non-native vegetation removed for restoration projects) from the buffer zone of any streams, creeks, or wetlands;
- Is an industrial facility that falls under one or more categories of industrial activity regulated under the NPDES Phase I industrial stormwater regulations (facilities with effluent limitation; manufacturing; mineral, metal, oil and gas, hazardous waste, treatment or disposal facilities; landfills; recycling facilities; steam electric plants; transportation facilities; treatment works; and light industrial activity);
- Discharges pollutants that exceed the water quality standards set forth in the applicable NPDES permit, the Regional Water Quality Control Board's (RWQCB) Basin Plan, or otherwise impairs the beneficial uses of a receiving water body;
- Results in a discharge of pollutants into an "impaired" water body that has been designated as such by the State Water Resources Control Board or the RWQCB under Section 303 (d) of the Federal Water Pollution Prevention and Control Act (i.e., the Clean Water Act); or
- Results in a discharge of pollutants of concern to a receiving water body, as identified by the RWQCB.

Projects that are not specifically identified on the above list or are located outside of the "urbanized areas" may also have a project-specific stormwater quality impact. Stormwater quality impacts associated with these projects must be evaluated on a project-by-project basis for a determination of significance. The potential impacts of these projects should be determined in consultation with the county Water Agency, Flood Control Division, and RWQCB. The issues that should be considered are:

- Size of the development;
- Location (proximity to sensitive waterbodies, location on hillsides, etc.);
- Timing and duration of the construction activity;
- Nature and extent of directly connected impervious areas;
- Extent to which the natural runoff patterns are altered;
- Disturbance to riparian corridors or other native vegetation on or offsite;

- Type of stormwater pollutants expected; and
- Extent to which water quality BMP are included in the project design.

All projects determined to have a potentially significant stormwater quality impact must prepare and implement a Storm Water Quality Management Plan (SWQMP) to reduce the impacts to the maximum extent practicable The SWQMP shall include the following elements:

- Identification of potential pollutant sources that may affect the quality of the discharges to stormwater;
- Proposed design and placement of structural and non-structural BMPs to address identified pollutants;
- Proposed inspection and maintenance program; and
- Method of ensuring maintenance of all BMPS of the life of the project.

Implementation of BMPs identified in the SWQMP will generally be considered to reduce the storm water quality impact to a less than significant level.

An impact on the overuse of groundwater in an alluvial basin or other aquifer is considered significantly adverse if:

- The following alluvial basins are over-drafted by an AFY that exceeds the corresponding values:
    - Santa Ynez Uplands: 61 AFY
    - Buellton Uplands: 22 AFY
    - San Antonio: 23 AFY
    - Lompoc: 12 AFY
    - Santa Maria: 25 AFY
    - Cuyama: 31 AFY
    - Montecito: 4 AFY
    - Foothill: 4 AFY
    - Goleta North/Central: 2 AFY
- The amount of new pumpage in a consolidated rock aquifer would place the aquifer in a place of overdraft.

Methodology

As described in Chapter 2, *Project Description*, the Project plans for parks, trails, and recreational facilities in unincorporated areas within the county. As a result, the impact analysis provided below does not evaluate potential impacts on hydrology and water quality at a project- or site-specific level. Rather, the Project includes planned capital improvements and amendments to the County's policies and regulations to support the long-term development of recreation facilities to meet recreation needs within five recreation planning regions. This programmatic analysis reviews whether the potential changes would directly or indirectly

affect surface and groundwater quality, groundwater supply, drainage patterns, flood risk, and water quality management in the Project area. Impacts on hydrology and water quality would be unique to individual parks, recreation, and trail developments on specific sites. Wherever possible, illustrative examples are provided to describe particular areas of the county (e.g., FEMA Special Flood Hazard Areas) where the Project could cause hydrologic and water quality impacts.

Groundwater impacts are analyzed relative to current conditions and regulations under SGMA and applicable GSPs for local basins. The County's thresholds for groundwater impacts were prepared in 1992 prior to SGMA and current state requirements for the management of groundwater resources, the recent adoption of GSPs, or the adjudication of the Santa Maria Valley and Goleta groundwater basins. As a result, the County's numerical thresholds for determining if a project would result or contribute to overdraft conditions are largely outdated. Therefore, the analysis of potential impacts on local groundwater basins is primarily based on current overdraft conditions and sustainability criteria and thresholds of applicable GSPs. This is particularly true when discussing the potential impacts of the Carpinteria, Santa Ynez River Valley, the San Antonio Creek Valley, and Cuyama Valley groundwater basins, which are regulated under SGMA and have GSPs, as well as the Goleta and Santa Maria River Valley groundwater basins which are adjudicated. However, where the County thresholds may still be relevant or informative to the analysis of potential impacts for other groundwater basins in the County, a comparison of potential demand for groundwater supplies generated by the proposed Project to the County's thresholds for the relevant groundwater basin is presented.

The information in this section is based on the 2024 Central Coast RWQCB Water Quality Control Plan for the Central Basin Plan, the 2019 Final IRWM Plan, the Santa Barbara County 2024 Groundwater Basins Summary Report, the Santa Barbara County 2020 Hydrology Report, the 2015 FEMA Flood Insurance Study of Santa Barbara County, the 2023 MJHMP, available GSPs for local groundwater basins, and regional information available in previous EIRs prepared by the County, among other sources.

3.10.4.2 Project Impacts

Table 3.10-5 below provides a summary of hydrology and water quality impacts resulting from the Project. A detailed discussion of each impact follows.

Table 3.10-5. Summary of Hydrology and Water Quality Impacts

Hydrology and Water Quality Impacts	Impact Classification	Mitigation Measure	Residual Significance
Impact HWR-1. The Project would not violate any water quality standards or waste discharge requirements and would not conflict with applicable water quality control plans.	Insignificant	No mitigation measures required.	Insignificant
Impact HWR-2. The Project could adversely affect groundwater quality, supplies, and recharge, impeding sustainable management of local groundwater basins.	Potentially significant	MM HWR-1 (Recycled Water in Parks and Recreation Facilities)	Significant but mitigable
Impact HWR-3. The Project could have adverse effects on surface water runoff or water quality, or substantially increase the risk of release of pollutants in the event of inundation by flood hazards, tsunamis, and seiche.	Insignificant	No mitigation measures required.	Insignificant
Cumulative Impacts	Insignificant	No mitigation measures required.	Insignificant impacts

Impact HWR-1. The Project would not violate any water quality standards or waste discharge requirements and would not conflict with applicable water quality control plans.

Construction

All future parks, recreation, and trail development projects enabled by the Project would be subject to the County's review of Comprehensive Plan consistency, zoning ordinances, and grading and building permit regulations, which would ensure compliance with water quality standards and waste discharge requirements. Compliance with the NPDES program and the Santa Barbara County Comprehensive Plan Conservation Element, Seismic Safety and Safety Element, and Santa Barbara County Code (Chapter 14 – Grading Code and Chapter 29 – Storm Drains and Sanitary Sewers) ensures that new development controls runoff, prevents erosion, and limits pollution of surface water and groundwater. For example, the County's Grading Code requires an Erosion and Sediment Control Plan for all new projects with 50 cubic yards or more of soil or if the cut or fill exceeds three feet in vertical distance to the natural contour of the land. As such, small-scale projects that do not require the preparation of a SWPPP (less than one acre) would be subject to local regulation and review to ensure the protection of water quality. All projects determined to have a potentially significant stormwater quality impact would be required to prepare and implement a SWQMP to reduce the impacts to the maximum extent practicable. (See Section 3.10.4.1, *Thresholds of Significance*, for the list of elements required in an SWQMP).

Through compliance with the NPDES program and the County's policies and regulations to protect associated inland and coastal water quality, the potential development enabled by the Project would be consistent with these applicable water quality control plans. Therefore, the construction of potential parks, recreation, trails, and related uses would not violate water quality standards and would not conflict with applicable water quality control plans. Impacts would be *insignificant*.

Operation

County Parks is required to design and implement public park and trail improvements consistent with the Comprehensive Plan and all applicable policies and standards to protect surface and groundwater quality. For example, the Jalama Beach Campground Expansion & Upgrade Project and Jalama Bluff Trail projects would be designed in compliance with all applicable regulations, including the consideration of construction of a new package wastewater treatment plant to provide recycled water for landscaping and offset water demand. Similarly, in compliance with County policies in the Comprehensive Plan and the Eastern Goleta Valley Community Plan, the design and layout of Goleta Community Sports Park and the South Coast Aquatic Center would provide sufficient buffers and onsite stormwater management infrastructure to prevent site runoff from adversely affecting water quality in Maria Ygnatio Creek and Atascadero Creek. For non-County projects countywide, including RBPs, and County Parks projects in the Coastal Zone, the County reviews permit applications to ensure compliance with the Santa Barbara County Comprehensive Plan Conservation Element, Seismic Safety and Safety Element, Grading Ordinance (Ord. No. 4766, 11-9-2010), Santa Barbara County Code (Chapter 14 – Grading Code and Chapter 29 – Storm Drains and Sanitary Sewers), and the County's SWMP, if applicable. Further, the County's Storm Drains and Sanitary Sewers Code requires all new development and redevelopment to comply with the RWQCB's Resolution No. R3-2013-0032, Post-Construction Stormwater Management Requirements which constitutes minimum requirements needed to protect water quality from stormwater impacts caused by development. Discretionary development projects are also subject to the County Flood Control Standard Conditions of Approval, which ensure all projects adhere to the County Code and applicable regulations controlling runoff, stormwater management, onsite retention and conveyance, and water quality. With the implementation of state and local requirements, future parks, recreation, and trail development, as well as RBPs, enabled by the Project would not violate any water quality standards or waste discharge requirements, or otherwise degrade surface waters or groundwater for the operational phase, and impacts would be *insignificant*.

Impact HWR-2. The Project could adversely affect groundwater quality, supplies, and recharge, impeding sustainable management of local groundwater basins.

Decrease in Groundwater Supplies

Impacts of the Project could occur where the development and operation of parks, recreation facilities, trails, and related development could unsustainably draw groundwater resources or inhibit groundwater recharge. Increased demand for groundwater could occur from new parks being established in areas of the county where groundwater provides a water source for parks, including irrigation for landscaping and fields, and potable water in restrooms and other recreation facilities, particularly where the groundwater basin serving that demand is overdrafted. As discussed in Section 3.16, *Utilities and Water Supply*, new parks could increase countywide water demands, with a substantial portion of water coming from groundwater sources. Development enabled by the Project would include parks of various sizes, ranging from small pocket parks to larger community parks. Water consumption would be greater for parks with higher irrigation requirements because of natural turf, sports fields, or landscaping.

This increase in groundwater extraction would impact the level of supply available in the aquifers, especially in areas of scarce groundwater supplies. Additionally, several groundwater basins in the county are considered medium- and high-priority basins as determined by DWR, including the Santa Ynez, San Antonio, Cuyama, Carpinteria, and Montecito Groundwater Basins (refer to Table 3.10-2; DWR 2025). Since parks and related development enabled by the Project would rely on local groundwater supplies in some areas, the Project has the potential to increase demand for such local supplies. However, any increase in demand for groundwater supplies would be negligible to support the water demands of parks, recreation, and trails projects. As discussed above, the Cuyama Valley Basin is defined by DWR as a high-priority, critically over-drafted basin, and groundwater is the only water supply source available in the Cuyama Valley Groundwater Basin (County of Santa Barbara Public Works Department 2022). The Cuyama Valley Basin reports an annual draw of 41,059 AFY (DWR 2025) and represents one of the most critical basins in the county. Based on local data collected for recreation land uses in the City of Ventura from 2013 to 2018 (during a multi-year drought), neighborhood parks and community parks demand 1,217 GPD/acre and 1,096 GPD/acre, respectively (City of Ventura 2020). Under the Cuyama Valley Basin worst-case scenario, improvements to Richardson Park to irrigate approximately an acre of sports fields could add approximately 1.4 AFY, or 0.003 percent, to the Cuyama Valley Groundwater Basin's annual draft. These additional extractions would be negligible and would not reduce the sustainability of the groundwater basin.

Even if groundwater supplies are adequate to support the nominal needs of new parks and recreation facilities, recreation development enabled by the Project would incrementally increase water demand in a region prone to fluctuations in groundwater in response to multi-year droughts. The Project would require irrigation for landscaping and onsite facilities such as restrooms, concessions, and facilities such as community centers or aquatic facilities, which could draw substantially from groundwater, particularly in the North County. Parks would also

be developed with infrastructure to improve water supply and wastewater treatment abilities. For example, the Jalama Beach Campground Expansion & Upgrade Project would involve renovation of aging infrastructure, including water and wastewater facilities, and consideration of construction of a new package wastewater treatment plant to provide recycled water for landscaping. To ensure continued sustainability of groundwater supplies, **MM HWR-1 (Recycled Water in Parks)** would ensure use of recycled water, either from onsite or municipal sources, whenever possible for new parks.

Further, any new buildings, such as restrooms or pool facilities, would be subject to County Code Chapter 10, Building Regulations. All new park development would be required to be designed and constructed in accordance with state and local codes regulating water efficiency. Additionally, all future development enabled under the Project within medium- and high-priority groundwater basins would be required to comply with the respective GSP, to ensure the individual project does not obstruct the GSP or long-term sustainability of the groundwater basin. Therefore, impacts on groundwater supply would be *significant but mitigable*.

Reductions in Groundwater Recharge & Quality

The Project would foster the construction of parks and recreation facilities in Santa Barbara County. Groundwater quality impacts could occur where the development and operation of the parks, recreation, and trails enabled by the Project could introduce pollutants into groundwater that threaten the identified beneficial uses of these subsurface water supplies. The introduction of sediment or pollutants could occur from spills and leaks of petroleum products or other chemicals associated with construction equipment, vehicles, and pumps. The operational risk of groundwater contamination is generally limited to sites where ground surfaces remain undeveloped and permeable. Development of impermeable surfaces (i.e., pavement, concrete) largely precludes pollutants from reaching groundwater and instead directs them to stormwater systems subject to MS4 and NPDES controls. Additionally, while not requiring irrigation, the development of artificial turf fields, if proposed by a future park project, could impact groundwater quality by leaching contaminants into groundwater supplies, including PFAS, VOCs, lead, benzene, arsenic, and heavy metals. Further, fertilizers and herbicides used for landscaping purposes could impact groundwater quality.

The potential for groundwater contamination would be higher for development sites located near or adjacent to water bodies and overlying groundwater basins, such as Orcutt Creek, Santa Ynez River, Maria Ygnatio Creek, and Atascadero Creek. Because the Project would result in future new development and would distribute parks in different regions of the county, potential impacts on groundwater resources could occur in all nine groundwater basins. Degraded groundwater quality conditions could occur if site hydrology is not managed to prevent contamination from percolating. Potential impacts to groundwater resources would likely occur within local watersheds where proposed development sites are clustered, particularly within

the South Coast and Santa Ynez Valley watersheds, where potential parks or trails and RBPs may be located near each other.

However, as described in Impact HWR-1, all Project actions would comply with applicable water quality standards and water quality control plans. Grading required to construct new park facilities would occur in accordance with the County's Grading Ordinance (County Code Chapter 14). If grading for a proposed park exceeds 1 acre, the site would also be subject to a General Construction Permit from the RWQCB. Construction and operation of facilities would be subject to the provisions of Article IV, Storm Water Management and Discharge Control, of the County Code, which regulates discharges, and requires BMPs to control the volume, flow rate, and potential pollutant load of storm water runoff from residential, commercial, or industrial activities within the unincorporated area of the county.

Additionally, the County would implement required low-impact development standards for parks and recreation development, including County Flood Control project conditions, including for landscaping, field materials, onsite retention, and groundwater recharge. The development and operation of parks and trails, including campgrounds, hiking, and horseback riding, would continue to enable the infiltration of groundwater. Parks are outdoor land uses providing open space and other pervious surfaces, which would encourage groundwater recharge and be compatible with recharge features like ponds and retention basins.

All hazardous materials used in the construction and operation of parks, recreation, and trail facilities would be stored and used in accordance with applicable federal, state, and local regulations, which would prevent their introduction into receiving water bodies. Construction of parks facilities, including potential restrooms, pools, and turf fields, would be subject to the same County policies and regulations that address surface water quality. Further, park sites would be subject to Section 29-47, Discharge prohibitions, of the County Code, which prohibit the discharge of pollutants or waters containing any pollutants that cause or contribute to a violation of applicable water quality standards. Therefore, the impacts of the Project related to the inhibition of groundwater recharge and groundwater quality would be nominal and *insignificant*.

Consistency with Groundwater Management Plans

The Project could facilitate development of new recreation areas or changes to existing parkland within medium and high-priority basins: Cuyama Valley, San Antonio Creek Valley, Santa Ynez River Valley, Carpinteria, and Montecito. All medium and high-priority basins have adopted GSPs governing the sustainable management of their respective groundwater resources. These GSPs outline potential projects and management actions to help address basin overdraft and achieve sustainability of the basins' groundwater supplies. Prepared GSPs include future groundwater budgets which take into account regional growth forecasts to project future use of groundwater supplies for domestic use. The Project would not result in increased

population growth or residential development, and therefore would not exceed the planned service populations supported by the county's groundwater basins. As a result, the Project would not substantially increase water demand beyond available supplies, particularly long-term and under drought conditions, and would not obstruct the management actions and sustainability strategies for these basins. Impacts are therefore considered *insignificant*.

Impact HWR-3. The Project could have adverse effects on surface water runoff or water quality, drainage patterns and systems, or substantially increase the risk of release of pollutants in the event of inundation by flood hazards, tsunamis, and seiche.

Stormwater and Runoff

The Project has the potential to result in significant earthwork associated with future parks, recreation, and trail development, including the potential demolition of any existing pavements and structures, removal of vegetation, and excavation, grading, and trenching, which would disturb the underlying soils and expose them to potential erosion and mobilization from wind, rain, and onsite watering activities. These activities could result in sediment transport into nearby storm drain inlets or creeks and drainages discharging into larger surface water bodies, such as Atascadero Creek in Eastern Goleta Valley – particularly during storm events or during onsite watering – where park sites are located nearby, resulting in the degradation of surface water quality. Additionally, construction activities have the potential to contribute to polluted stormwater runoff due to the delivery, handling, and/or storage of construction materials and wastes, as well as potential leakage and spills of construction materials (e.g., oil, grease, paints, solvents, or cleaning agents) (Section 3.9, *Hazards and Hazardous Materials*). Operation of parks and trails could impact runoff, largely due to erosion from trail use, including bikes, hikers, horses, and dogs. For example, the Cachuma Equestrian Trails Project would expand the trail network on the north side of Lake Cachuma to support equestrians, which could increase erosion and pollute runoff.

New developments at previously undeveloped (i.e., vacant) or agricultural sites, particularly those adjacent to creeks or drainages, are especially at risk of creating stormwater runoff and sedimentation that could affect the quality of receiving surface waters or groundwater basins. Multiple sites near one another and located along the same river or creek corridor could collectively contribute to degraded water quality conditions if site hydrology is not managed during construction and/or operation to prevent contamination from running off the site. For example, construction of the Goleta Community Sports Park and South Coast Aquatic Center could disturb soils or lead to spills that could flow to Maria Ygnatio Creek or Atascadero Creek, which flow to the Goleta Slough and the Pacific Ocean. In addition, the potential for sediment loading would be higher from construction and associated grading on sites with steep slopes, such as potential new trails in Mission Hills or the South Coast Foothill Mountain Bike Park.

However, future parks, recreation, and trail development, as well as RBPs enabled by the Project, would adhere to local, state, and federal regulations pertaining to water quality standards, as applicable. This includes compliance with the County's SWMP, which requires the incorporation of measures to control construction site runoff, the California Green Building Standards Code, which requires the incorporation of BMPs for materials and waste storage, handling, equipment maintenance, vehicle maintenance, and fueling to reduce the potential discharge of polluted runoff from construction sites. Further, future developments enabled under the Project that would disturb at least one acre would be required to adhere to the requirements of the NPDES Construction General Permit (SWRCB Order No. 2012-0006- DQA) to prepare and implement a SWPPP for construction activities. The SWPPP is required to identify BMPs that protect stormwater runoff and ensure avoidance of substantial degradation of water quality. A Notice of Intent would be filed with the RWQCB to comply with the requirements of the Construction General Permit. Compliance with and the application of existing water quality regulations to future potential projects enabled by the proposed Project would avoid dry and wet-weather runoff and erosion during construction-related activities. These requirements would substantially reduce or eliminate impacts on surface water quality from polluted runoff during construction. Therefore, impacts would be *insignificant*.

Flooding

To help meet recreation needs in Santa Barbara County, the Project includes planned public parks, recreation, and trail projects that would develop new facilities or expand existing facilities in unincorporated areas in the county. The Project would allow for construction and operation of parks and trails in Santa Barbara County, some of which may be located in or near flood hazards. Project impacts could include site preparation and grading activities to create level foundations for new or expanded buildings and structures as well as development of structures to support recreational facilities. The county's watersheds are defined by the topography of the county, and landscape-level changes to the existing drainage patterns would not occur. Site grading may result in small-scale alterations to onsite runoff and storm water flows, especially for sites located within flood zones, such as the South Coast Aquatic Center and Goleta Community Sports Park.

The potential for new development enabled by the Project to adversely affect hydrologic resources depends largely on the type of project/improvements. Improvements to existing public parks and trails or the development of new pocket parks and neighborhood park projects are highly unlikely to disturb hydrologic resources. These projects are typically located in urban areas or residential suburbs of the county that are already developed around existing hydrologic resources, or where development would involve relatively minor ground disturbance due to the nature and scale of development proposed. For instance, Oak Knoll Neighborhood Park is located within a suburban area of Orcutt surrounded by residential development and would involve the development of an existing flood control retention basin as a new

neighborhood park. Development of the proposed improvements would retain the function of the basins while accommodating additional public open space and recreation amenities. Additionally, projects involving the expansion or improvement of existing park facilities or development of facilities on existing disturbed sites (e.g., existing parkland, former developed sites, active or former agricultural lands), such as the Lake Cachuma Campground and South Shore Facilities Improvements, the Guadalupe Community Park & Campground, Gaviota Marine Terminal Recreation Area, or the Goleta Community Sports Park would entail the replacement of existing facilities or site reconfigurations within areas that have already been highly disturbed and lie outside existing rivers, creeks, drainages, vernal pools, basins, and other hydrologic features. For these projects, the potential for adverse effects on hydrological resources is considered very low.

As previously discussed, there exists within the county the potential for tsunamis or seiches; however, the occurrence of a tsunami or seiche is directly associated with the occurrence of an earthquake within the region. Implementation of the proposed Project would have no effect on the occurrence of tsunamis or seiches. Further, the County provides development standards to prevent inundation by seiche, tsunami, or mudflow. For example, the County's policy for all coastal installation and development planning projects is to consider a 10-foot high sea wave and use a contour elevation of 40 feet to establish the tsunami risk limit.

The zoning ordinance amendments proposed under the Project which establish objective development standards to ensure high-quality, safe, and accessible facilities to enhance community sustainability and protect natural resources, including significant hydrologic resources would also apply to future projects enabled under the LUDC and zoning ordinance amendments. Future development enabled under the Project would be required to adhere to these policies and regulations on a case-by-case basis during County review of individual permit applications and/or as part of a discretionary process, depending on the scope and scale of proposed project and necessary permit approvals. Adherence to these policies and regulations would reduce any adverse effects on hydrologic resources, and indirect impacts to hydrologic resources associated with implementation of the Project on with be *insignificant*.

Drainage Systems and Patterns

Construction of sites, particularly existing vacant sites with exposed soils, could result in a substantial alteration to the existing drainage patterns of a site. However, as discussed above, potential future development enabled by the Recreation Master Plan causing ground disturbance of one acre or greater would be required to comply with state and County stormwater management standards, such as the preparation of a SWPPP or Erosion and Sediment Control Plan to reduce onsite erosion and offsite siltation. Adherence to these standards and implementation of BMPs outlined in the SWPPP would ensure minimal stormwater runoff. Additionally, parks, recreation, and trail development would have a positive

impact on site drainage due to the pervious nature of these projects. Much of the development enabled under the Project would increase pervious surfaces rather than developing large, impervious structures. As described in the development standards for recreation structures or buildings in the zoning ordinance, new development must not create hazards to life and property, including flood, geologic, and fire hazards. These regulatory standards are designed to ensure future development of a site reduces or addresses flood hazards and prevents or regulates the construction of barriers that might unnaturally divert floodwaters or increase flood hazards in other areas. Mandatory compliance with these existing regulations would ensure future development enabled by the Project would not result in substantial increases in on- or offsite erosion or siltation, and impacts would be *insignificant*.

3.10.4.3 Cumulative Impacts

Cumulative impacts on water resources would occur as a result of cumulative countywide development that could increase stormwater runoff carrying pollutants that could infiltrate into the surface waters and water-bearing formations of the underlying groundwater basin, affecting the quality of groundwater resources. While it is not possible to estimate the surface and groundwater quality impacts of individual recreational development projects, it is reasonably foreseeable that construction projects in the county could occur proximate to one another with sometimes concurrent or overlapping schedules, introducing water pollutants and altering drainage patterns to the same areas. All new development disturbing one or more acres of ground would be required to adhere to existing stormwater management requirements, such as the County's Storm Drain and Sanitary Sewers County Code (Chapter 29 Article IV) and the County of Santa Barbara SWMP which protect against pollutants in water quality. Projects occurring outside of County jurisdiction, such as incorporated cities would be subject to their jurisdiction's SWMP and local regulatory setting regarding stormflows and water quality protections. As a result, cumulative impacts would be considered *insignificant*.

In addition, the Project in combination with cumulative pending development countywide could adversely affect groundwater resources and quality. As discussed above, polluted runoff that may be generated during construction and post-construction activities of cumulative development and Santa Barbara County projects considered in this analysis would be required to adhere to existing stormwater management and construction requirements, such as the Santa Barbara County Comprehensive Plan Conservation Element, Seismic Safety and Safety Element, Grading Ordinance, Santa Barbara County Code (Chapter 14 – Grading Code and Chapter 29 – Storm Drains and Sanitary Sewers), and the County's SWMP. Individual projects that would disturb an area of one acre or more would also be required to comply with the requirements of the NPDES Construction General Permit (SWRCB Order No. 2012-0006-DQA). These existing regulations would ensure individual cumulative development projects substantially reduce or avoid the discharge of pollutants to surface waters or other areas that

could percolate into groundwater and affect the quality of groundwater supplies. The cumulative impacts of the Recreation Master Plan would be *insignificant.*

With respect to groundwater recharge, all new development would be required to comply with the NPDES MS4 Permit and State Water Board Construction General Permit, as applicable. Additionally, the County's licensing process, along with compliance with state and local regulations governing water quality, would ensure that development projects use BMPs that would limit impacts where the aquifers intersect with the ground surface. Therefore, the Recreation Master Plan would not substantially contribute to any cumulative impacts on groundwater recharge and impacts would be *insignificant*.

Similar to the Project, all new development located within the County's jurisdiction and FEMA-designated flood areas would be required to comply with standard FEMA provisions and County Code floodplain management standards provided in County Code Chapter 15A, Floodplain Management, and 15B Development Along Watercourses. Adherence to these measures, along with the implementation of project-specific mitigation measures for reducing or avoiding flood hazards, would ensure cumulative impacts are reduced. Cumulative impacts would be *insignificant.*

3.10.4.4 Proposed Mitigation

MM HWR-1: Recycled Water in Parks and Recreation Facilities. All County Parks projects shall be subject to the following standards. The County shall amend the Santa Barbara County zoning ordinances to add the following requirements for permitted uses in Recreation zones, permitted parks and recreation facilities, and public recreational components of RBPs:

- For recreation projects including sports fields, campgrounds, or other features requiring a substantial water supply, such as landscaping, a Recycled Water Feasibility Assessment shall be prepared during the design phase to determine the site-specific water reuse strategies based on site conditions, service availability, and cost-effectiveness.
- Landscaped areas (e.g., sports fields) shall be designed to use recycled water for irrigation where available.
- Parks shall connect to existing recycled water lines or use recycled water infrastructure when feasible, as determined by the Recycled Water Feasibility Assessment.

  Plan Requirements and Timing: This measure shall apply to applicable projects immediately following the certification of this EIR.

  Monitoring: County ~~P&D~~ compliance monitoring staff shall ensure compliance through a review of project plans and/or applicant/contractor-provided documentation.

3.10.4.5 Secondary Impacts

Implementation of **MM HWR-1** would not result in adverse secondary impacts.

3.10.4.6 Residual Impacts

Impact HWR-1. Future development enabled by the Project would be subject to compliance with existing regulations addressing impacts on surface water quality, including the Santa Barbara County Comprehensive Plan Conservation Element, Seismic Safety and Safety Element, Grading Ordinance, County Code, and the County's SWMP and IRWM, and various other local and state regulations addressing the protection of surface water quality. Compliance with these policies would ensure that the proposed Project would not violate any water quality standards or substantially degrade surface water quality. Therefore, residual impacts associated with Impact HWR-1 would be *insignificant*.

Impact HWR-2. All new park development would be required to be designed and constructed in accordance with state and local codes regulating water efficiency. Water demand associated with the Project would not undermine groundwater sustainability plans but water demands would increase in areas supplied by groundwater. To reduce reliance on local groundwater sources, **MM HWR-1 (Recycled Water in Parks)** would ensure new parks use recycled water whenever possible. Additionally, all future development enabled by the Project within medium- and high-priority groundwater basins would be required to comply with the respective GSP, to ensure the individual project does not obstruct the GSP or long-term sustainability of the groundwater basin. Therefore, impacts on groundwater supply and recharge would be *significant but mitigable*.

Impact HWR-3. Future parks, recreation, and trail development, as well as RBPs enabled by the Project, would adhere to local, state, and federal regulations pertaining to water quality standards, as applicable. This includes compliance with the County's SWMP, which requires the incorporation of measures to control construction site runoff, the California Green Building Standards Code, which requires the incorporation of BMPs for materials and waste storage, handling, equipment maintenance, vehicle maintenance, and fueling to reduce the potential discharge of polluted runoff from construction sites. Further, future developments enabled under the Project that would disturb at least one acre would be required to adhere to the requirements of the NPDES Construction General Permit (SWRCB Order No. 2012-0006- DQA) to prepare and implement a SWPPP for construction activities. Therefore, impacts on the release of pollutants due to runoff or flooding would be *insignificant*.

This page intentionally left blank.

3.11 LAND USE AND PLANNING

3.11.1 INTRODUCTION

This section describes potential impacts related to conflicts in land use and planning that could occur from the implementation of the Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (Project). This section describes the existing land uses in the Project area as well as the goals, policies, and regulations that affect land use planning, particularly the County's Comprehensive Plan and its implementing plans and ordinances such as the County's Zoning Ordinances and community plans. Additionally, this section reviews the consistency of the Project with state and regional plans and regulations, including, the Santa Barbara County Association of Governments (SBCAG) 2050 Connected Regional Transportation Plan/Sustainable Communities Strategy (RTP/SCS). This section also describes the changes in land use patterns that could result from the Project and evaluates the consistency of those changes with adopted state, regional, and local plans and regulations.

3.11.2 ENVIRONMENTAL SETTING

Santa Barbara County is one of 58 counties in the State of California. Located approximately 300 miles south of San Francisco and 100 miles north of Los Angeles, the county is bordered by Ventura County to the east and south, a corner of Kern County to the east, San Luis Obispo County to the north, and the Pacific Ocean to the west and south (Figure 2-1). Santa Barbara County covers approximately 2,735 square miles of land area along the central coast of California, extending approximately 45 miles north from the south-facing coastal segment and approximately 65 miles inland from the west-facing coastline. One-third of the county's land area is located within the boundaries of the Los Padres National Forest (LPNF). Santa Barbara County has 110 miles of coastline and encompasses four of the eight Channel Islands (including their marine environments): San Miguel Island, Santa Rosa Island, Santa Cruz Island, and Anacapa Island. Santa Barbara County includes diverse geographies, infrastructure, and economies. The county has a $1.8 billion agricultural industry, a strong tourism industry, and various urban, suburban, and rural communities and associated assets.

Santa Barbara County includes eight incorporated cities and 19 census-designated places, as well as the sovereign nation of the Santa Ynez Band of Chumash Indians. Santa Barbara County's urban communities are geographically distinctive and separated within the five Recreation Planning Areas – South Coast, Santa Maria Valley, Lompoc Valley, Santa Ynez valley, and Cuyama Valley Unincorporated communities in the county range from suburban communities such as Orcutt and Eastern Goleta Valley to small rural towns such as Sisquoc, Los

Olivos, Santa Ynez, and Los Alamos. Most county residents live in well-developed urbanized areas with approximately 70 percent of residents living in the eight incorporated cities and 30 percent residing in unincorporated communities and rural areas. The largest proportion of people live in the Santa Maria Valley, along the eastern and central reach of the South Coast from Goleta to Carpinteria, and, to a lesser extent, the Lompoc Valley and Santa Ynez Valley. Within these regions, most residents live in the cities of Santa Maria, Santa Barbara, Goleta, and Lompoc. The most populous unincorporated communities are Orcutt, Eastern Goleta Valley, and Isla Vista.

Each of the five Recreation Planning Areas are described further below in Section 3.11.2.3, *Unincorporated Planning Area Summaries*.

3.11.2.1 Land Use and Zoning

Land use in the unincorporated area is governed by the County's Comprehensive Plan – particularly the Land Use Element. Land Use Element maps define boundary lines that characterize the intensity of development in the county, and include the following five boundary areas (Figure 3.11-1):

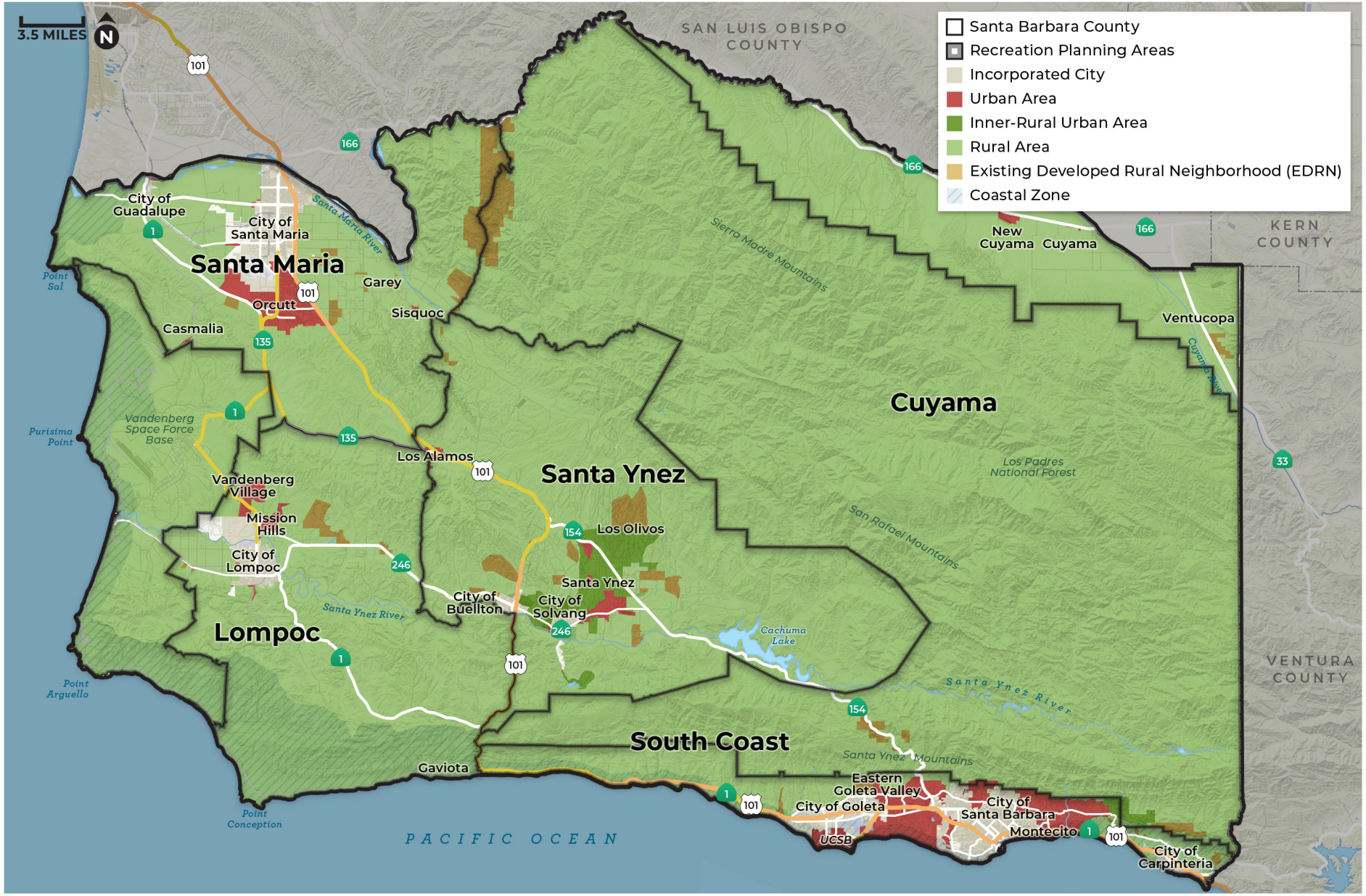
- **Coastal Zone** – The coastal zone spans 110 miles of coastline and includes approximately 184 square miles. The offshore islands of Santa Cruz and Santa Rosa are entirely within the coastal jurisdiction. For most of the coastline, this area only extends 1,000 yards, but it extends further inland in several areas due to the presence of important habitat, recreational, and agricultural resources. These areas include the lands surrounding the Guadalupe Dunes, Point Conception, portions of the Gaviota Coast, including Hollister Ranch, and most of the Carpinteria Valley.
- **Urban Area** – An area within which the development of residential, commercial, and industrial activity, and their related uses, buildings, and structures, including schools, parks, and utilities, are permitted. Open spaces and recreational activities are permitted and encouraged throughout the Urban Area. Agriculture is permitted and encouraged in this area when it is surrounded by urban uses, but when adjacent to a Rural Area, agriculture shall stay in the Rural Area.
- **Inner-Rural Area** – An area where development is limited to rural uses such as agriculture and its accessory uses, mineral extraction and its accessory uses, recreation (public or private), ranchette development, and uses of a public or quasi-public nature. The minimum permitted lot size is 5 acres. Agricultural and open space preserves and related uses are encouraged. The Inner-Rural Area is located adjacent to the Urban Area.
- **Rural Area** – An area where development is limited to agriculture and related uses, mineral extraction and related uses, utility-scale solar photovoltaic facilities (if located in the Rural Area of Cuyama Valley), recreation (public or private), low-density residential and related

uses, and uses of a public or quasi-public nature. The minimum lot size permitted in this area is 40 acres.

- **Existing Developed Rural Neighborhood (EDRN)** – A neighborhood area that has developed historically with lots smaller than those found in the surrounding Rural Area or Inner-Rural Area. The purpose of the neighborhood boundary is to keep pockets of rural residential development from expanding into adjacent agricultural lands. Within the EDRN boundary, infilling of parcels at densities specified on the land use plan maps is permitted.

The Land Use Element guides the physical development of the county, establishes a pattern of land utilization, and sets out standards for both the density of population and the intensity of development for each of the land use designations and classifications. The Land Use Element describes land use classifications, diagrams the distribution of land uses throughout the unincorporated county, and addresses the policies established for each urban community, either within the Land Use Element or within 10 separate community plans. Figure 3.11-2 illustrates the County Comprehensive Plan's land use classification types as designated countywide.

While land use designations characterize the physical uses and the intensity of each allowed land use, zoning ordinances legally define permitted uses and development standards for those uses within zoning districts. Under state general plan law, zoning in the county must be consistent with the County's Comprehensive Plan. The County has three zoning ordinances to carry out the policies and actions of the Comprehensive Plan by classifying and regulating the uses of land within the County (County Code Chapter 35). The County Land Use and Development Code (LUDC) applies to all areas of the unincorporated county except for areas within the Coastal Zone boundary and the Montecito Planning Area. The Montecito Land Use and Development Code (MLUDC) applies to inland portions of the Montecito Planning Area only. Article II Coastal Zoning Ordinance (CZO) applies to all unincorporated areas within the Coastal Zone. The following sections describe the land use designations and zoning districts that exist within the county.



Santa Barbara County Land Use Element Boundaries

FIGURE 3.11-1

3.11.2.2 Recreational Land Use and Zoning

Recreation planning in the County is guided by the Comprehensive Plan, including the 1980 Land Use Element and the Coastal Land Use Plan (CLUP), and ten community plans. These plans define land uses within the County, mapping the boundaries between different allowable uses within distinctive communities. Community plans often identify specific new parks and trails. The Comprehensive Plan also enacts policies to guide land use decision-making and provision of County services.

Under the Comprehensive Plan, unincorporated lands with Recreational/Open Space land use designations include lands designated for existing public or private recreation and/or open spaces. The land use designation is defined by the Land Use Element of the County's Comprehensive Plan as follows:

- **Existing Public or Private Recreation and/or Open Space:** The purpose of this designation is to provide opportunities for various forms of outdoor recreation, of a public or private nature, which require access to open spaces and natural settings for their realization. These open space recreational uses include, but are not limited to, the following:
  - public parks containing facilities for picnicking, camping, riding, hiking, walking, biking, on a day or longer use basis;
  - flood control easements providing access to and along stream channels and other drainage areas; and
  - golf courses.

  Structures or other facilities shall be limited to those required to support the recreational activities. These may include parking areas, corrals and stabling areas, picnic and camping areas, trails, water and sanitary facilities, safety and first aid stations, ranger stations, and limited concession facilities. Other recreational structures and facilities of a more intensive nature, such as swimming and tennis clubs, may be permitted. More intense commercial recreational development shall be limited to areas classified as commercial. For example, fairgrounds, amusement parks, and large indoor recreational complexes shall be classified as commercial uses.

There are 11,367 acres of land currently designated for Public or Private Recreation and/or Open Space in the unincorporated areas and generally include land owned by the County, California State Parks, the federal government, and some privately owned land. Most recreation land (37 percent) is designated in the South Coast recreation planning area. Cuyama has the least area designated for recreation (0.2 percent), followed by Santa Maria Valley (5 percent), Santa Ynez Valley (13 percent), and Lompoc Valley (33 percent) (Table 3.11-1). In addition, 11 percent of recreation-designated land lies within the Los Padres National Forest, which includes campgrounds, as well as limited areas of Vandenberg Space Force Base (VSFB).

Table 3.11-1. Acres of Designated Existing Public or Private Recreation and/or Open Space Land Use

Recreation Planning Region	Acres
South Coast	4,218
Santa Maria Valley	560
Lompoc Valley	3,793
Santa Ynez Valley	1,471
Cuyama Valley	23
Other (LPNF, VSFB)	1,302
Total	**11,367**

The County has also identified an overlay to help identify future sites to be designated for recreation as follows:

- **Proposed Public or Private Park/Recreational Facility Overlay:** This designation identifies by an overlay those lands suitable for future inclusions within the recreational designation defined above. These lands include the following:
  - lands selected by the County Park Department from those sites designated as having the highest suitability for recreational use;
  - areas designated by advisory committees;
  - shoreline areas designated within the County coastal zone; and
  - additional access along creeks and drainage ways.

There are currently only four locations designated with the Proposed Public or Private Park/Recreational Facility Overlay totaling 134 acres. In the South Coast, there are three sites with this overlay, including the Las Varas Ranch and Dos Pueblos Ranch on the Gaviota Coast, and a 23-acre vacant parcel in the center of the Eastern Goleta Valley that is planned for residential and recreational uses. The fourth site within this overlay lies in New Cuyama and currently supports Richardson Park. These sites have been designated with this overlay for decades and only one (Richardson Park) has been developed with recreation uses.

Additionally, the following land use designation directly relates to Recreation/Open Space land use designation, providing visitor-serving commercial uses proximate to designated recreation areas:

- **Resort/Visitor Serving Commercial (V):** This designation intends to cater to the needs of visitors to recreational areas. Visitor-serving commercial uses will normally be found adjacent to important recreational resource areas, at special points of interest, or in special neighborhoods or communities. The intensity of the commercial development shall be subordinate to the character of the recreational setting. Uses shall include, but not be limited to, the following:
  - resort hotels;

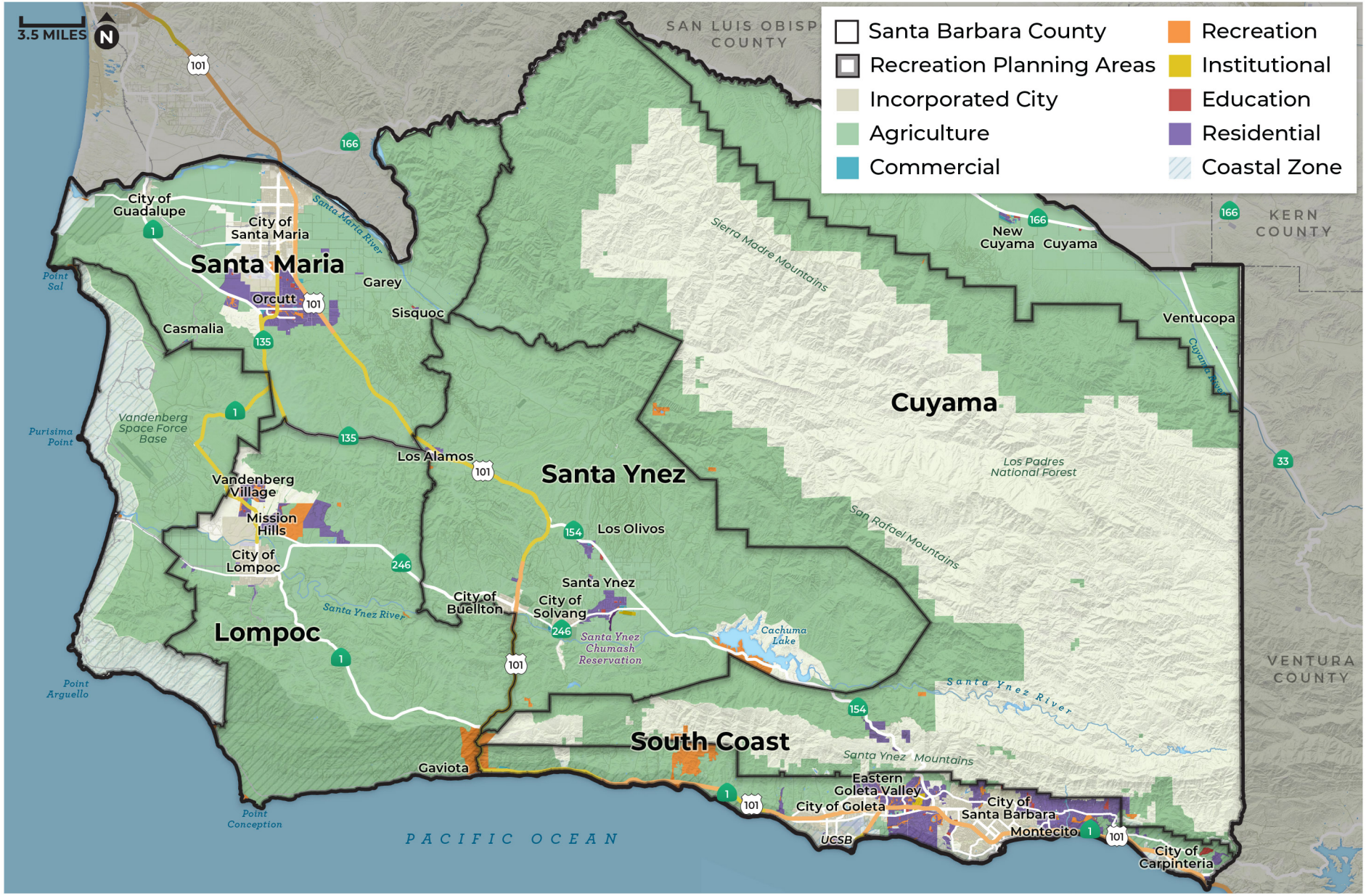
- motels;
- restaurants;
- country clubs;
- guest ranches;
- riding stables; and
- beach clubs.

Uses, buildings, and structures customarily incidental and accessory to such recreational facilities, including commercial uses and services, are also permitted. Uses not permitted under this designation include other retail services, unrelated office and professional services, highway-related services for transients normally found at major highway interchanges or highway exits.

There are currently 52.3 acres of land designated for Resort/Visitor Serving Commercial in the unincorporated areas, with 97 percent located in the South Coast recreation planning area, including sites such as San Ysidro Ranch, the Four Seasons Biltmore, and the Miramar Hotel and Resort in Montecito; no other planning area contains this land use designation. In addition, 3 percent of resort/visitor-serving commercial-designated land lies within the Los Padres National Forest which includes the northern portions of San Ysidro Ranch.

Within the county, the Recreational/Open Space land use designation and other existing or proposed recreational uses are supported by the Recreation (REC) zoning district, which the County defines as follows:

- **REC (Recreation).** The REC zone is applied to provide public or private open space areas that are appropriate for various forms of outdoor recreation. The intent is to encourage outdoor recreational uses that will protect and enhance areas with the potential to accommodate both active and passive recreation because of their beauty and natural features. Proposed recreational uses should complement and be appropriate to the area because of the natural features.



Santa Barbara County Land Use Designations

FIGURE 3.11-2

3.11.2.3 Unincorporated Planning Area Summaries

South Coast

The South Coast spans approximately 243 square miles along the southernmost coastline of Santa Barbara County. This coastal area is located between the ridgeline of the Santa Ynez Mountains and the Pacific Ocean from Gaviota Pass to the Ventura County line. Urban development is concentrated within the eastern region of the South Coast between Goleta and Carpinteria, while the western extent along the Gaviota Coast is mostly rural and sparsely populated. In addition, the South Coast Region supports the greatest amount of State Parks, as well as the University of California, Santa Barbara (UCSB) campus and portions of the LPNF. The South Coast includes the incorporated cities of Santa Barbara, Goleta, and Carpinteria, and the unincorporated communities of Gaviota, Isla Vista, Eastern Goleta Valley, Mission Canyon, Toro Canyon, Montecito, and Summerland. Land use and planning considerations within these unincorporated communities are guided by the Gaviota Coast Plan as well as the Goleta, Eastern Goleta Valley, Mission Canyon, Montecito, Summerland, and Toro Canyon community plans.

Within the unincorporated county, the South Coast includes approximately 15,813 acres of residential land uses, approximately 12 percent of the total unincorporated areas of the South Coast. Commercial land uses comprise nearly 253 acres, less than 1 percent of the total unincorporated areas of the South Coast. Open space land uses, which include agricultural and recreation lands, span 115,894 acres, approximately 86 percent of the total unincorporated South Coast.

Santa Maria Valley

The Santa Maria Valley spans approximately 277 square miles in the northernmost areas of the county adjacent to San Luis Obispo County. The Santa Maria Valley is bounded by the Santa Maria River to the north, the Casmalia Hills to the west, the San Rafael Mountains to the east, and the Solomon Hills to the south. This region contains the incorporated cities of Santa Maria and Guadalupe, and the unincorporated communities of Orcutt, Casmalia, Garey, Sisquoc, and Los Alamos. Land use and planning considerations within the unincorporated community of Orcutt are guided by the Orcutt Community Plan.

The City of Santa Maria and the unincorporated community of Orcutt combine to comprise the largest urban population in the county. Residential land uses within the unincorporated areas of the Santa Maria Valley comprise 7,397 acres, approximately 5 percent of the total unincorporated area. Outside of this area, the Santa Maria Valley is largely rural and undeveloped. Land use in the Santa Maria Valley is predominantly agricultural land (approximately 148,946 acres or 92 percent of the unincorporated area), consisting of vineyards, pastures, and industrial agricultural areas cultivated with row crops and lands

developed with greenhouses, with agriculture-related commercial facilities, light industrial uses, ranchette, and low-density residential development that support the agriculture industry.

Lompoc Valley

The Lompoc Valley constitutes the western-most portion of the county and includes the incorporated City of Lompoc as well as the unincorporated communities of Vandenberg Village Mission Hills, and Mesa Oaks, which are largely suburban residential areas north of the City of Lompoc.

The Lompoc Valley covers approximately 461 square miles in the westernmost portion of the county. This region includes the incorporated City of Lompoc and the unincorporated communities of Vandenberg Village and Mission Hills. Additionally, this region includes the federally-owned VSFB, which spans 155 square miles, more area than the incorporated cities of Lompoc, Santa Maria, and Guadalupe combined. Land uses within the unincorporated areas of the region are primarily agricultural and contain open spaces, vineyards, agricultural fields, pastures, and ranch-style residences. Residential areas within the Lompoc Valley comprise less than 2 percent of the unincorporated areas excluding VSFB. Within the unincorporated communities, residential parcels are primarily located in Mission Hills and Vandenberg Village.

Santa Ynez Valley

The Santa Ynez Valley spans approximately 405 square miles within the central portion of the county. This region includes the incorporated cities of Buellton and Solvang as well as the unincorporated communities of Ballard, Los Alamos, Los Olivos, and Santa Ynez. Several EDRNs surround these Urban Areas, including Ballard Canyon, West Olivos, Bobcat Springs, West Buellton, Woodstock Oak Trails, East Baseline Ranch Estates, Meadowlark, and State Route (SR) 246 EDRNs.

Agriculture is the predominant land use designation within the Santa Ynez Valley with 242,823 acres, approximately 95 percent of the unincorporated area. Residential land uses within the unincorporated area are predominately concentrated in Ballard, Los Alamos, Los Olivos, and Santa Ynez and cover just 2,741 acres, just 1 percent of the unincorporated areas. The townships and incorporated cities of the Santa Ynez Valley are surrounded by the Inner-Rural land use designation, which serves as a buffer between urban and rural uses. Development within the Inner-Rural Area is limited to agricultural, recreational, and ranchette-style residential uses. Parcel sizes in the Inner-Rural area generally range from 5 to 40 acres. The Rural Area is characterized by larger parcels (40 to several hundreds of acres), less development, and larger-scale agricultural uses (County of Santa Barbara 2009).

Cuyama Valley

The Cuyama Valley constitutes the largest area of the county, approximately 1,164 square miles, and approximately 43 percent of the total land area within the county. The Cuyama

Valley includes the northeast and easternmost portion of the county and is primarily comprised of the federally owned lands of the LPNF. The region along the county's northern boundary constitutes the Cuyama Valley Rural Region, which contains the small communities of Cuyama, New Cuyama, and Ventucopa. These communities are predominantly agricultural in use, with small areas of commercial, educational, industrial, recreational, and residential uses limited to the Cuyama and New Cuyama communities. Land use in the Cuyama Valley consists primarily of irrigated agriculture, dry farming, grazing pastures, and rural residential development. Agricultural land uses comprise approximately 355,351 acres, with residential land uses comprising just 240 acres, or 48 percent, and far less than 1 percent of the unincorporated area, respectively.

3.11.3 REGULATORY SETTING

State and local plans, policies, and regulations have been enacted to address land use and planning in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future recreational development under the proposed Project and its associated impacts. There are no federal regulations that pertain to local land use and planning impacts.

3.11.3.1 State

Government Code Section 65300 (General Plans)

Government Code Section 65300 requires that each county and city prepare a general plan that serves as the blueprint for how that particular jurisdiction will develop over time. The general plan expresses the community's development goals and embodies public policy relative to the distribution of future land uses, both public and private. Zoning ordinances, specific plans, development projects, capital improvements, and development agreements are required to conform to the general plan. In addition, preparing, adopting, implementing, and maintaining the general plan serves to identify the community's land use, circulation, environmental, economic, and social goals and policies as they relate to future growth and development. A general plan consists of individual sections, or elements, that address a specific area of concern, but collectively, they comprehensively make up an integrated planning approach for the jurisdiction. State law requires that general plans include seven elements: land use, transportation, conservation, noise, open space, safety, and housing. Each county and city may choose to have additional elements as part of their general plan.

3.11.3.2 Local

Santa Barbara County Comprehensive Plan

The County's Comprehensive Plan is a "comprehensive, long-term general plan" that governs the future growth and development of the unincorporated county. The County's Comprehensive Plan contains land use goals, policies, and implementation measures within each of its elements. The County's Comprehensive Plan provides general goals, policies, and programs applicable to the unincorporated portions of the county. The County's Comprehensive Plan expresses the community's development goals, embodies public policy relative to the distribution of future public and private land uses, and is required to maintain internal consistency between all adopted elements. State-mandated elements included in the County's Comprehensive Plan are the Land Use, Circulation, Conservation, Housing, Noise, Open Space, and Seismic Safety and Safety elements. In addition, the County's Comprehensive Plan contains the following elective elements: Agricultural, Energy, Environmental Resource Management, Scenic Highways, and Hazardous Waste. The County is also in the process of developing an Environmental Justice Element in compliance with the state's June 2020 General Plan Guidelines. Select elements of the County Comprehensive Plan that relate to recreational land use and planning are profiled below.

Open Space Element

The Santa Barbara County Comprehensive Plan Open Space Element discusses designated regions within the county that should remain open space and the reasons why. The reasons for the designation of open space are for public health and safety, for the managed production of resources, for outdoor recreation, and for the preservation of natural resources. Open space for public health and safety includes consideration of fire hazard areas.

Land Use Element

The Santa Barbara County Comprehensive Plan Land Use Element was adopted in 1980 and comprises a variety of research findings, Advisory Committee goals and policies, and proposals from the other Comprehensive Plan Elements. The purpose of this element is to interrelate all of the different factors that affect population growth, urban development, and open land preservation and to represent the County's policy on land use. The Land Use Element includes a Recreation Section that provides a statement of policy concerning the County's responsibility for providing facilities to improve the quality of life. The Recreation Section determined that 4.7 acres of parkland are needed for every 1,000 persons. Per the Land Use Element, the number of trail miles for riding and hiking paths have not been quantified, but it is acknowledged that the desire by the public for easy and close access to trails and bikeways requires many additional miles of trails and paths to meet demand from residents and visitors.

The Parks, Recreation and Trails Maps (PRT Maps) are also an aspect of the Land Use Element. The PRT Maps consist of five maps adopted by the Board of Supervisors and which establish the envisioned comprehensive parks, recreation, and trails network for the unincorporated area. Specifically, the PRT Maps delineate existing and proposed parks, open areas, joint use facilities, on road trails, and off road trails countywide and in the Montecito-Summerland-Carpinteria area, Goleta-Santa Barbara area, Lompoc area, and Santa Maria area. In addition, in 1997, the Board of Supervisors adopted amendments to the PRT Maps to eliminate the Orcutt Area from the Santa Maria Area PRT Map and adopt by reference the Orcutt Community Plan PRT Map of the Orcutt Community Plan. The goal of the PRT Maps is to provide a tool whereby informed land use decisions can be made with advanced knowledge of planned trail locations early in the County's discretionary review process. The lines which represent trails on the PRT Maps do not show exact locations of existing or proposed trails, and instead represent general corridors where trails exist or are proposed to exist. The PRT Maps also provide guidance on the designation of trails, the acquisition of proposed trails, and trail design standards.

Noise Element

The Noise Element identifies and appraises noise problems within the community and influences the distribution of land uses based on the noise level associated with those land uses. In the planning of land use, a 65 A-weighted decibels (dBA) day-night average sound level is regarded as the maximum exterior noise exposure compatible with noise-sensitive uses unless noise mitigation features are included in project designs. Section 3.12, *Noise* lists the specific Noise Element policies that related to the Project and provides an analysis of noise impacts relative to the County's adopted noise thresholds.

Seismic Safety and Safety Element

The Seismic Safety and Safety Element (adopted in 1979 and most recently amended in August 2023) is intended to guide land use planning by providing pertinent data regarding geologic, soil, seismic, fire, and flood hazards (County of Santa Barbara 2023). The Seismic Safety and Safety Element provides information concerning geology, soils, seismicity, and fire and flood hazards of Santa Barbara County, and provides recommendations and criteria to aid in land use planning to ensure that future development will be compatible with the environment. The Seismic Safety and Safety Element was recently updated to revise wildfire policies and incorporate the 2022 Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) by reference. Phase two of the Safety Element Update is currently underway and will address evacuation planning and climate change vulnerability considerations, including drought. Hazard impacts related to the Seismic Safety and Safety Element's policies are addressed in Section 3.8, *Hazards and Hazardous Materials*.

Circulation Element

The Circulation Element applies to all roadways and intersections within the unincorporated area of the county, except for those roadways and intersections located within an area included in an adopted community or area plan (County of Santa Barbara 2014). The Circulation Element of the Comprehensive Plan provides specific policies related to traffic and transportation implications of the proposed development and establishes guidelines to determine the project-related traffic impacts on County roadways. Consistency with the Circulation Element is addressed in Section 3.15, *Transportation*.

Community and Area Plans

Santa Barbara County has 10 community or area plans for unincorporated communities. Each community plan contains goals, objectives, policies, action/programs, and development standards guiding the development of the community it serves and supplements the policies and goals of the Comprehensive Plan. A policy is a specific statement that guides decision-making. Development standards are measures that will be applied to development projects consistent with relevant policies of the community plan. Development standards typically specify how and where development is designed and constructed. All of the community plans include policies related to parks, recreational, and trails. An overview of each adopted community/area plan is provided below.

Lompoc Area Interpretive Guidelines

The unincorporated Urban Areas of the Lompoc Valley consist of three unincorporated communities: Vandenberg Village, Mission Hills, and Mesa Oaks, which are largely suburban residential areas north of the City of Lompoc. The Lompoc Area Interpretive Guidelines amend the Land Use Element to outline general policies that apply to the Lompoc Valley and address specific issues of the Lompoc Valley, including support for new facilities providing recreational activities for all ages in proximity to residential areas.

Eastern Goleta Valley Community Plan

The Eastern Goleta Valley encompasses the unincorporated coastal plain and foothills reaching from Camino Cielo Road on the north to the Pacific Ocean on the south and covering approximately 23,300 acres of land between the incorporated cities of Santa Barbara and Goleta. Of this area, about 15,300 acres lie within the designated Rural Area, and 7,900 acres lie within the designated Urban Area where the majority of the approximately 36,000 residents of Eastern Goleta Valley live. The Eastern Goleta Valley Community Plan highly encourages the use of mixed use zoning within the planning area to allow for maximum compatibility and complementary transitions between uses. Policies applicable to parks and recreation include policies encouraging diverse outdoor and indoor recreational opportunities to meet existing and future needs of residents, locating new recreational resources in underserved areas and within

walking or biking distances of residential uses, and priorities for acquisition of new parks, trails, and open spaces.

Goleta Community Plan

Land use in Goleta Valley, except for the incorporated area of the City of Goleta and the eastern portion, is guided by the Goleta Community Plan. The western portion of the Goleta Valley Planning Area lies north and west of the City of Goleta, extending northward to the crest of the Santa Ynez Mountains, and from approximately the intersection of Los Carneros Road and Cathedral Oaks Road westward to the eastern boundary of the Gaviota Coast Planning Area. In addition, several isolated pockets of unincorporated land in the southwest, such as Isla Vista, which are surrounded by the City of Goleta and UCSB, are part of the western portion of Goleta Valley. Policies applicable to parks and recreation include policies encouraging diverse outdoor and indoor recreational opportunities to meet existing and future needs of residents, and priorities for acquisition of new parks, trails, and open spaces.

Orcutt Community Plan

The Orcutt Community Plan updates the Santa Barbara County Comprehensive Plan for the unincorporated area of Orcutt and sets goals, policies, programs, actions, and development standards for all future development in Orcutt. The Orcutt Community Plan area is located within the Santa Maria Valley, south of the City of Santa Maria. It encompasses 14,650 acres of mostly urbanized areas and designates approximately 425 acres of land for recreation/open space use. Policies applicable to parks, recreation, and trails promote the development of diverse passive and active recreational activities in the plan area, the designation of regional retention basins as dual flood control/recreational uses, and establish trail siting and design guidelines.

Santa Ynez Valley Community Plan

The Santa Ynez Valley Community Plan provides policy direction for issues and development trends specific to the Santa Ynez Valley and sets the framework for planning future development. The Santa Ynez Valley Community Plan applies to the unincorporated Urban Areas of Santa Ynez, Los Olivos, and Ballard, EDRNs within the vicinity of these communities, and surrounding Rural and Inner-Rural Areas within the Community Plan area. The plan area contains approximately 11 acres of area designated for recreation and open space uses. Policies related to parks and recreation place priority on the provision of new recreation and park facilities (including sports/playing fields) and multi-use trails through local agency partnerships to serve the needs of valley residents.

Los Alamos Community Plan

The Los Alamos Community Plan establishes and regulates land uses in the community of Los Alamos within the Santa Ynez Valley. Residential uses currently occur directly north and south of U.S. Highway 101, and future uses could occur within the jurisdiction of the area, but primarily within Planned Residential Development zoned parcels in the southeast corner of the community as well as the mixed use zone along the Bell Street corridor. The plan area contains two parks and approximately 52.5 acres of existing parkland. In total, the Los Alamos Community Plan designates 55.64 acres of land for recreational/open space uses, with REC zoning. Policies related to parks and recreation emphasize encouraging diverse outdoor and indoor recreational opportunities.

Gaviota Coast Plan

The Gaviota Coast planning area is a rural landscape within the South Coast, extending west of the City of Goleta to Jalama Beach County Park. Much of the area is managed for recreation, including 5,000 acres managed by State Parks and 15,634 acres managed by the U.S. Forest Service. Three major state parks and one County park exist within the Gaviota Coast: Gaviota State Park, El Capitan State Beach, Refugio State Beach, and Jalama Beach County Park. Industrial land uses in the Gaviota Coast are limited to approximately 100 acres of oil facilities contained within three industrial developments: Plains Exploration and Production Company Point Arguello, ExxonMobil's Las Flores Canyon Processing Facility, and the Tajiguas Landfill. Residential development is scattered throughout Gaviota but mainly focused close to the coast, with a few homes along U.S. Highway 101 and in the foothills. Policies related to parks, recreation, and trails include protecting public access and promoting the expansion of trails, coastal access, and recreational opportunities in a manner that is compatible with the setting and natural resources of the plan area.

Mission Canyon Community Plan

The planning area for the Mission Canyon Community Plan is approximately 1,122 acres located in the lower foothills of the Santa Ynez Mountains, immediately north and contiguous to the City of Santa Barbara. The land uses consist almost exclusively of single-family residential development except for some commercial and public uses, and parcels zoned for agricultural use in the northern portion of the plan area. The planning area contains approximately 85 acres of land designated for recreation/open space and zoned REC. Policies related to parks, recreation, and trails focus on providing public recreational opportunities (primarily trails) for residents and visitors. This planning area also is designated a Special Problems Area, given existing or anticipated special and unique problems pertaining to flooding, drainage, soils, geology, access, sewage disposal, water supply, location, or elevation that have the potential to affect public health, safety, and general welfare. A Special Problems Committee (Committee) of interdepartmental County staff reviews proposed buildings and structures. The Committee

may impose conditions to prevent or mitigate present or anticipated problems that may result from a development project. The Committee has the authority to prohibit construction if the Committee unanimously agrees that there is no other feasible way to prevent a serious risk of substantial damage to property, public or private, or injury to persons.

Montecito Community Plan

The Montecito Plan Area is located in the South Coast immediately east of the City of Santa Barbara and west of Summerland. The plan area is divided into three areas: the central urban sub-area, the coastal sub-area, and the mountain sub-area. The plan identifies potential residential buildout in all three sub-areas and identifies related goals such as preserving the low intensity semi-rural character of the community, providing affordable housing through secondary units and new development, and adding residential uses to other land uses, such as commercial and educational sites. Key recreation planning actions of the Montecito Community Plan to create and maintain recreational facilities in the area include a focus on updating the Manning Park Master Plan and developing operational guidelines for Manning Park to consider noise, traffic, and neighborhood compatibility, continuing the development joint-use agreements with Montecito Union School District, and increasing public access to Fernald Point.

Summerland Community Plan

The Summerland Plan Area is located in the South Coast between the cities of Santa Barbara and Carpinteria in the South Coast Rural Region. The Plan Area boundary includes the unincorporated area of the county known as Summerland. The Plan Area is bordered by Ortega Ridge Road on the west, the Montecito Planning Area on the west and north, Padaro Lane and the Toro Canyon Planning Area on the east, and the Pacific Ocean on the south. Summerland contains approximately 38 acres designated for recreational use. Policies related to recreational development discuss priority areas for coastal dependent and related recreational activities and support facilities and improving coastal access and recreation.

Toro Canyon Plan

The Toro Canyon Plan was adopted in 2002 and certified by the California Coastal Commission in 2004. The southern portion of Toro Canyon lies within the coastal zone and includes Padaro and Santa Claus Lanes. The existing land uses within Toro Canyon include large agricultural areas, low-density residential development, a few more concentrated and scattered residential developments predominantly along U.S. Highway 101 and in the southwestern part of the community, two small commercial areas, recreation, and undeveloped open space. Toro Canyon contains approximately 148 acres designated for recreational with REC zoning. Policies related to recreational development include providing new park facilities (e.g., a new neighborhood park) near to and accessible by residential uses, increasing beach access at Padaro and Santa Claus Lanes, and pursuing, requiring, and maintaining trail facilities.

Coastal Land Use Plan

The CLUP lays out the general patterns of development throughout the coastal areas of the county. Its purpose is to protect coastal resources while accommodating land use development within the Coastal Zone. The policies govern land uses, including environmentally sensitive habitat areas and agricultural lands, recreational resources, the marine environment, scenic resources, and air quality. While the focus of the policies is on resource protection, the policies also govern land use, industrial development, and public works facilities to encourage well-planned and orderly development that is compatible with resource protection and conservation. The other elements of the Comprehensive Plan are applicable within the Coastal Zone; however, when there is a conflict, the CLUP takes precedence.

Pursuant to the Coastal Act, each of the 15 counties and 53 cities along the California coast is required to prepare a Local Coastal Plan (LCP). The LCP consists of the local government's land use plans, zoning ordinances, zoning district maps, and implementing actions that, when taken together, meet the requirements and implement the provisions and policies of the Coastal Act at the local level.

County Zoning Ordinances

Santa Barbara County Land Use and Development Code

The LUDC, a portion of Chapter 35 (Zoning) of the Santa Barbara County Code, carries out the policies of the Comprehensive Plan by classifying and regulating the uses of land and structures within the inland areas of the county, consistent with the Comprehensive Plan. The LUDC is adopted to protect and promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents and businesses in the county (LUDC Section 35.10.010 – Purpose of Development Code).

The County uses the LUDC as a tool to implement the goals, objectives, and policies of the Comprehensive Plan, including any applicable community, specific, or area plans. Provisions of the LUDC and any land use, subdivision, or development approved in compliance with these regulations must be consistent with other components of the Comprehensive Plan, including any applicable community, specific, or area plans.

Montecito Land Use Development Code (MLUDC)

The Montecito Land Use Development Code (MLUDC) constitutes a portion of Section 35 of the County Code and implements the County's Comprehensive Plan and the Montecito Community Plan by classifying and regulating the uses of land, buildings, and structures in Montecito located outside of the coastal zone.

Santa Barbara County Coastal Zoning Ordinance (CZO)

Article II CZO, a part of Chapter 35 (Zoning) of the Santa Barbara County Code, applies to the unincorporated Coastal Zone within Santa Barbara County as well as the Channel Islands. The CZO implements the CLUP by classifying and regulating the uses of land, buildings, and structures in the Coastal Zone. Pursuant to Public Resources Code Section 30500 of the California Coastal Act of 1976, the County must prepare an LCP for the unincorporated areas of the county within the Coastal Zone. The ordinance contains the coastal zoning district maps, which apply the regulations of the ordinance to the properties in the coastal areas.

SBCAG Airport Land Use Compatibility Plans

In addition to being within the flight pattern of many airports providing regional flights (i.e., Los Angeles International, San Francisco International, Oakland, San Jose International, Burbank Airport, John Wayne Airport, Long Beach Airport, Ontario International Airport), the county has five commercial aviation airports: 1) Santa Maria; 2) Lompoc; 3) Santa Ynez; 4) New Cuyama; and 5) Santa Barbara. The county also has one military base, VSFB, which is located within the Lompoc Valley.

As the Airport Land Use Commission (ALUC) for Santa Barbara County, SBCAG is responsible for protecting public health, safety, and welfare by ensuring that vacant lands in the vicinity of airports are planned and zoned for uses compatible with airport operations. SBCAG's Airport Land Use Compatibility Plans (ALUCPs) serve as a tool for the ALUC to review land use plans and development proposals within Airport Influence Areas (AIAs). ALUCPs provide land use compatibility policies and ensure that vacant lands in the vicinity of airports are planned and zoned for uses compatible with airport operations. The County's ALUCPs address areas within the AIAs for four airports and one military base in Santa Barbara County: Santa Barbara Airport (SBA), Santa Maria Airport (SMX), Lompoc Municipal Airport (LPC), Santa Ynez Airport (IZA), and VSFB.

3.11.4 ENVIRONMENTAL IMPACT ANALYSIS

This section discusses the potential land use and planning impacts associated with the proposed Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed and the residual impact after mitigation is determined.

3.11.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purposes of this Program Environmental Impact Report (EIR), the proposed Project may have a significant adverse impact on land use and planning if it would:

a. Physically divide an established community.

b. Cause a significant environmental impact due to a conflict with any land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

County of Santa Barbara Environmental Thresholds and Guidelines

In addition to the land use and planning thresholds of significance from Appendix G of the CEQA Guidelines, the County's *Environmental Thresholds and Guidelines Manual* (2024) includes consideration of "Quality of Life" issues. Quality of life effects can be broadly defined as the aggregate effect of a project's impacts on individuals, families, communities, and other social groups, and on how those groups function. They are social changes that result from a project, rather than physical effects on the environment. Quality of life effects are typically subjective and not based on quantifiable measures. However, quality of life issues, while hard to quantify, are often of primary concern to the community affected by a project. The County's *Environmental Thresholds and Guidelines Manual* states that although changes to quality of life resulting from a project are not treated as significant effects on the environment pursuant to CEQA, many quality of life considerations are addressed in Comprehensive Plan policies, which are the subject of this section of the Program EIR. Further, project-caused changes to quality of life are social changes that may be used: 1) to identify physical impacts caused by a change in quality of life; and 2) when related to a physical change, to determine whether the physical change is a significant effect on the environment. The thresholds of significance referenced in other impact areas include quality of life considerations. For example, the noise threshold relies on quality of life considerations to determine when noise experienced by a sensitive receptor is considered "significant." The following quality of life issues referenced in the County's *Environmental Thresholds and Guidelines Manual* and the County's Comprehensive Plan policies are relevant to the proposed Project and used herein to inform the determination of impacts related to land use and planning:

1. Loss of privacy
2. Neighborhood incompatibility
3. Nuisance noise levels (not exceeding noise thresholds)
4. Increased traffic in quiet neighborhoods (not exceeding traffic thresholds)

5. Loss of sunlight/solar access

Methodology

As described in Chapter 2, *Project Description*, the Project plans for public parks, trails, and recreational facilities in unincorporated areas within the county. The Project also changes County policies and regulations to support the development of public parks, recreation, and trails through public-private partnerships. This programmatic analysis reviews potential impacts anticipated to be enabled under the Project and considers whether these changes would be potentially consistent or inconsistent with the land use plan, policy, or regulation adopted for the purpose of avoiding or mitigating an environmental effect.

This section is based on information from the County's Comprehensive Plan (e.g., the General Plan Elements, community plans), the County's CLUP, the County's Zoning Ordinances, and other applicable regional plans (e.g., ALUCPs, 2050 Connected RTP/SCS). This analysis complies with CEQA Guidelines Section 15125(d), which requires that an EIR "...shall discuss any inconsistencies between the project and applicable general plans and regional plans." The analysis presented below provides a broad overview of the Project's potential consistency with existing plans and programs, only referencing specific policies to provide illustrative examples of how the Project would or would not result in a potential inconsistency. Decision-makers must make findings of Project consistency with the applicable Comprehensive Plan or applicable regional plan policies as part of Project consideration. The preliminary determinations regarding the consistency of the proposed Project with these plans are presented in this section for informational purposes to inform the CEQA analysis only. All final consistency determinations will be made by the Board of Supervisors (Board) during consideration of the proposed Project. While a preliminary determination of inconsistency with these plans in itself would not constitute an impact on the physical environment, an inconsistency with an adopted plan or policy might suggest that the proposed Project would be conducted in such a way that it could result in an impact on the physical environment. Should the Board determine that the proposed Project is inconsistent with an existing County's Comprehensive Plan or regional plan policy, the proposed Project could not be approved unless measures are identified to eliminate this inconsistency.

Thus, significant impacts are considered relative to their consistency or inconsistency with applicable policies, where a potential inconsistency with a policy that is adopted for the purpose of avoiding or mitigating significant physical environmental impacts might occur.

3.11.4.2 Project Impacts

Table 3.11-2 provides a summary of the proposed Project's impacts related to land use and planning. A detailed discussion of each impact follows.

Table 3.11-2. Summary of Land Use and Planning Impacts

Land Use and Planning Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact LU-1. The proposed Project would not divide an established community.	Insignificant	No mitigation measures required.	Insignificant
Impact LU-2. The proposed Project would not result in adverse environmental impacts due to potential conflicts with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.	Insignificant	No mitigation measures required.	Insignificant
Impact LU-3. The proposed Project would not cause a potential adverse quality-of-life effects on existing communities due to visual incompatibility, noise, and traffic, or other physical environmental impacts.	Potentially significant	MM NOI-1 (Recreation Noise Standards)	Significant but mitigable
Cumulative Impacts	Insignificant	No mitigation measures required.	Insignificant

Impact LU-1. The proposed Project would not divide an established community.

The Project proposes and would enable future recreational development throughout the county to meet identified recreational needs of county residents. Future recreational development, enabled by the proposed Project, would be located within Urban, Inner-Rural, and Rural areas of the county, but would primarily be concentrated within existing communities near residential uses. These land use and development changes would not introduce incompatible land uses into existing neighborhoods, would not involve reconfigurations of the existing roadway network or general layout of existing communities, would not degrade multimodal access, and would not separate existing uses from one another. As discussed further below, the proposed Project would be consistent with sustainable community development goals to focus recreational resources within or in close proximity to existing communities. As discussed in Section 3.15, *Transportation,* the Project may potentially benefit local mobility and community connectivity by adding to the existing inventory of sidewalks, bike paths, and other active transportation routes that allow people to visit parks and connect to other population centers. Further, approval of the proposed Project would not enact any goals, policies, or programs that would divide a community.

Additionally, short-term construction impacts would be constrained within the development sites; however, offsite improvements for utilities or transportation infrastructure would be

required for some of the sites (Section 3.15, *Transportation* and Section 3.16, *Utilities and Water Supply*). These offsite improvements would be constructed within existing roadway rights-of-way and would not block access between existing communities. Therefore, existing roadways would not be blocked, and construction would not limit access to a community or restrict movement within a community.

Therefore, impacts related to dividing an established community would be *insignificant*.

Impact LU-2. The proposed Project would not result in adverse environmental impacts due to potential conflicts with applicable land use plans, policies, or regulations adopted for the purpose of avoiding or mitigating an environmental effect.

The following discussion of County policies and preliminary determinations regarding the consistency of the proposed Project with these policies is presented to comply with CEQA Guidelines Section 15125(d), which requires that an EIR "...shall discuss any inconsistencies between the proposed Project and applicable general plans and regional plans." This analysis focuses on the relevant local and regional plans identified in Section 3.11.3, *Regulatory Setting* above.

Consistency with the County Comprehensive Plan and Zoning Ordinances

As previously described, the County's Comprehensive Plan contains land use goals, policies, and implementation measures within each of its elements. The County's Comprehensive Plan, including the community and area plans, provides general goals, policies, and programs applicable to the unincorporated portions of the county. The County's Comprehensive Plan expresses the community's development goals, embodies public policy relative to the distribution of future public and private land uses, and is required to maintain internal consistency between all adopted elements. The County's zoning ordinances, which include the County's LUDC, MLUDC, and Article II CZO, carry out the policies of the Santa Barbara County Comprehensive Plan by classifying and regulating the uses of land and structures within the County, consistent with the Comprehensive Plan and CLUP.

The proposed Project would involve the adoption and implementation of the proposed Recreation Master Plan, a strategic long-range plan to fund and construct new public parks and trails to meet current and future recreation needs countywide, the needs of which have been identified consistent with the County's adopted standards for acreage of parkland per 1,000 residents in the currently adopted Recreation Section of the Land Use Element, are identified through policy and planning priorities of the County's various community and area plans, and in some cases, the County's adopted PRT Maps. The Recreation Master Plan is intended to complement and advance the recreation-based goals and policies of the Comprehensive Plan by proposing new parks, trails, and recreational development. The Project also proposes to amend the County Comprehensive Plan and zoning ordinances to facilitate

private development of parks, trails, and recreation facilities to meet the recreational needs of communities.

The Project proposes the future development of new park, recreation, and trail projects that would entail the physical development of new facilities or the expansion of existing facilities throughout the county. These projects would be implemented by County Parks and as such are subject to mandatory compliance with all applicable policies of the County's Comprehensive Plan and community and area plans. The Project also proposes amendments to the County's Comprehensive Plan and zoning ordinances which would establish additional policies and objective development standards to ensure high-quality, safe, and accessible facilities to enhance community sustainability and protect natural resources in a manner that aligns with the existing adopted objectives, goals, and policies of the Comprehensive Plan. Mandatory compliance with which would further foster internal consistency with other policies of the County's Comprehensive Plan that were adopted for the purpose of avoiding or mitigating environmental effects of development within the county.

Similar to the new park, recreation, and trail projects proposed as part of the Project, future parks, recreation, and trail development, as well as Recreation Benefit Projects (RBPs), enabled by the Project's proposed zoning ordinance amendments would be subject to mandatory compliance with all applicable policies of the County's Comprehensive Plan and community and area plans. This also includes mandatory compliance with the additional policies and objective development standards proposed as part of the Project to protect agricultural, cultural, biological, hydrological, and other natural resources. The applicability of and compliance with these policies would be determined on a case-by-case basis during County review of individual permit applications. Of note, as analyzed in Section 3.2, *Agricultural Resources*, the proposed Project plans for new parks on sites currently designated for agriculture. To address this potential inconsistency with the Land Use Element, the proposed Project would amend the Public and Private Park/Recreation Facility Overlay to identify those sites as planned park sites, including Goleta Community Park and the South Coast Aquatic Center, Guadalupe Community Park and Campground, and the Lompoc River Bend Community Park expansion. The proposed Project would also amend the County's zoning ordinances to allow public parks and trails as allowed uses within agriculturally zoned lands, subject to rigorous development standards to protect agricultural resources consistent with the Agricultural Element and Land Use Element of the Comprehensive Plan. Adherence to these policies and regulations would ensure that all future development enabled under the Project is implemented consistently with the goals, objectives, policies, and development standards of the Comprehensive Plan and zoning ordinances, which are adopted for the purpose of avoiding or mitigating environmental effects of development within the county. Therefore, implementation of the Project would not conflict with the Comprehensive Plan or the County's zoning ordinances, and impacts would be *insignificant*.

In addition to land use and planning issues broadly addressed in this section, a range of other types of policy consistency issues are addressed in other sections of this Program EIR as follows: consistency with applicable visual resources and aesthetics plans and policies are addressed in Section 3.1, *Aesthetics and Visual Resources*; consistency with agricultural resource protection and preservation policies are discussed in Section 3.2, *Agricultural Resources*; consistency with the Santa Barbara County Air Pollution Control District (APCD) plans and policies (e.g., Clean Air Plan, Ozone Plan), as well as the Comprehensive Plan Land Use Element – Air Quality Supplement, is addressed in Section 3.3, *Air Quality*; climate change and greenhouse gas (GHG) plans and policies (e.g., County Climate Action Plan) are addressed in Section 3.8, *Greenhouse Gas Emissions*; consistency with County public service standards (e.g., County Fire Department and Sheriff's Office staffing and service) are addressed in Section 3.13, *Public Services*; consistency with County goals and policies for the provision of parks and recreation are discussed in Section 3.14, *Recreation*; and consistency with regional and local transportation plans and policies are addressed in Section 3.15, *Transportation*.

Consistency with the Connected 2050 RTP/SCS

The Connected 2050 RTP/SCS established objectives that are oriented towards achieving the plan's five overarching goals of promoting and protecting: 1) Environment; 2) Mobility & System Reliability; 3) Equity; 4) Health and Safety; and 5) A Prosperous Economy. To achieve these goals, the objectives of the RTP/SCS aim to foster growth and transportation improvements in a manner that protects natural resources, encourages mixed use development, focuses future growth within existing urbanized areas, reduces or limits new trip generation and vehicle miles traveled (VMT), provide equitable access to transit and alternative transportation, and reduce traffic congestion. The Project would support these goals by planning for and promoting new recreational development to meet the existing needs of local communities, focusing new park, recreation, and trail development projects in proximity to the local communities or on sites already developed with or appropriately designated for recreational development. As described above and in Section 3.15, *Transportation,* the Project may potentially benefit local mobility and community connectivity by adding to the existing inventory of sidewalks, bike paths, and other active transportation routes that allow people to visit parks and connect to other population centers, as well as by siting new recreational development in closer proximity to existing residential areas. Further, the Project does not propose or enable new development which would substantially increase local resident populations or induce unanticipated growth which could conflict with the underlying growth assumptions of the Connected 2050 RTP/SCS which inform its objectives, goals, and strategies. Therefore, implementation of the Project would not conflict with the Connected 2050 RTP/SCS, and impacts would be *insignificant*.

Consistency with Airport Land Use Compatibility Plans

The Project plans park, recreation, and trail projects that would entail the physical development of new facilities or the expansion of existing facilities throughout the county. Among these projects, several projects are known to be located within an ALUCP safety zone of a nearby airport; thereby presenting a potential airport-related compatibility issue if development types and intensities exceed the standards established by the ALUCPs and the California Airport Land Use Planning Handbook. Specifically, the ALUCPs establish objectives, policies, and standards to address airport compatibility impacts related to exposure of people to aircraft noise, the safety for people on the ground and in aircraft, airport airspace, and annoyance and other general concerns related to aircraft overflight. These issues and the compatibility of planned park, recreation, and trail projects are discussed in further detail in Section 3.9, *Hazards and Hazardous Materials,* and Section 3.12, *Noise*.

As described under Impact HAZ-4 in Section 3.9, *Hazards and Hazardous Materials,* the ALUCPs include Airport Safety Compatibility Criteria, which establish the allowable uses and densities for development within the various safety zones. There are no planned park, recreation, or trail projects located within Safety Zones 1, 3, or 5, and no projects would be located within the AIA of the Lompoc Municipal Airport, Santa Maria Airport, Santa Ynez Airport, or VSFB. The planned South Coast Aquatic Center and Goleta Community Sports Park projects would be located within two safety zones of the Santa Barbara Airport—the northern portion would be located within Safety Zone 2 and the southern portion would be located within Safety Zone 4. In addition, the Obern Trail Play & Skate Project would include improvements to an existing multi-use pathway with segments in Safety Zone 4. The Lompoc Riverbend Sports Park Concept Plan envisioned by the City of Lompoc is recognized in the Recreation Master Plan, and the proposed project would apply the Public and Private Park/Recreation Facility Overlay to this location. Within these zones, the ALUCP for the Santa Barbara Airport consider parks with athletic fields and outdoor group assembly facilities to be compatible with restrictions on the capacity of the facilities, among other development standards (e.g., additional emergency exits for enclosed spaces), depending on the safety zone. Recreational uses that exceed these capacities would be considered incompatible with the objectives, policies, and standards to address airport compatibility impacts.

Overall, future development of community parks within an AIA would be subject to the policies and compatibility criteria defined in the respective ALUCP. Accordingly, each project would be individually planned and designed consistently with the ALUCP development standards, such as those regarding population densities, height limitations, lighting, and open space requirements. In addition, the proposed zoning ordinance amendments may lead to indirect impacts related to airport safety hazards. The location, scope, and scale of development enabled under the Project cannot be known at this time; however, such future development would be required to adhere to their respective ALUCP and the County or other applicable

permitting agency would review these policies and regulations on a case-by-case basis during the review of individual permit applications, depending on the scope and scale of the proposed project and necessary permit approvals. Therefore, implementation of the Project would not directly result in any inconsistencies or incompatibilities with the respective ALUCP. For future projects enabled under the Recreation Master Plan that are proposed within an AIA, adherence to ALUCP policies and regulations would ensure future projects are sited, designed, and operated in a manner that is compatible with the ALCUP.

With respect to compatibility with airport noise, as discussed under Impact NOI-4 in Section 3.12, *Noise,* the proposed County parks projects (refer to Section 2.5.1, *Planned Parks, Recreation, and Trail Projects under the Recreation Master Plan*) do not overlap or otherwise interact with high-noise contours, including those of airports in the county. CEQA also specifies that a significant impact is only achieved when *residents or workers* are exposed to excessive airport noise, not temporary visitors. Visitors to recreational facilities within airport zones would be exposed to airport noise, potentially in excess of 70 to 75 decibel day-night average noise levels, though the potential for such is extremely low, but the nuisance would be temporary and would likely not cause long-term health effects. In addition, noise from recreational uses and the construction of new recreation facilities would be compatible with the existing noise environment surrounding an airport.

Therefore, implementation of the proposed Project would not result in any inconsistencies or incompatibilities with the respective ALUCP, and associated impacts are considered *insignificant*.

Impact LU-3. The proposed Project would not cause a potential adverse quality-of-life effects on existing communities due to visual incompatibility, noise, and traffic, or other physical environmental impacts.

The County's *Environmental Thresholds and Guidelines Manual* states that although changes to quality of life resulting from a project are not treated as significant effects on the environment pursuant to CEQA, many quality of life considerations are addressed in Comprehensive Plan policies, which are the subject of this section of the Program EIR. As such, quality of life issues related to aesthetics, noise, traffic, and incompatible land use and development are discussed below to inform the environmental review and decision-making process for the proposed Project.

As described in Chapter 2, *Project Description*, the Project entails a broad-ranging master plan document that proposes and would facilitate the future development of new parks, trails, and recreational facilities in unincorporated areas within the county to meet the identified recreational needs of county residents. The Project proposes or would directly facilitate the development of 27 new parks, trails, and recreational facilities, and also proposes changes to County policies and regulations to support the development of public parks, recreation, and

trails through public-private partnerships. The environmental impacts analyzed in other sections of this Program EIR that may result from adverse quality of life effects are described further below with references to applicable resources.

Aesthetic and Visual Quality of Life Impacts

As described in Section 3.1, *Aesthetics and Visual Resources*, with respect to the Rural Area, public parks provide vegetated open space, trees, and landscaping that are visually consistent with the visual character and quality of rural and agricultural landscapes. Public trails within open spaces are also visually compatible uses that do not degrade the scenic quality of rural areas while preserving natural vegetation and topographic features. Parks and trail projects that adhere to the surrounding character would serve as scenic and aesthetic enhancements and have beneficial impacts in rural areas. Recreational development projects in the Urban Area would enhance the visual quality and surroundings of existing communities. Public parks provide trees, landscaping, pathways, gathering areas and facilities, playgrounds, pools and aquatic facilities like splash pads, and lighting that visually blend into and enhance neighborhood visual character.

Similarly, in the Urban Area, recreational development would primarily consist of improvements to existing recreational facilities and the development of public parks ranging from small neighborhood parks to larger community parks providing recreation facilities such as sports fields and courts, aquatic facilities, and community trails. Public parks, trails, recreation facilities, and related uses such as parking areas, landscaping, and open space are visually compatible elements of urban areas and neighborhoods and are considered important visual resources in development areas. Projects that increase public parkland and provide parks and trails as public amenities would improve the visual character of the Urban Area and would be consistent with the County's policies for visual resources. Further, all parks, trails, recreation facilities, and related development must be consistent with the Comprehensive Plan's visual resource protection policies and must comply with all provisions of the zoning ordinances to preserve the visual character and ensure visual compatibility and protection of scenic quality. Any recreation project that cannot fulfill all requirements of the zoning ordinances and the Comprehensive Plan would be subject to the County's permitting processes, which address site design and visual quality and compatibility.

With proposed development standards for public parks and trails included in the Project, the Project would not result in an environmental impact, resulting from a potential adverse quality of life impact with regard to aesthetics and visual resources. Refer to the discussion under Impact AV-2 and Impact AV-3 for further analysis of the Project's potential impacts on existing visual character, quality of public views, and scenic quality.

Noise Quality of Life Impacts

As described in Section 3.12, *Noise*, construction noise from the Project would relate primarily to equipment such as trucks, tractors, pavers, and backhoes used during site preparation and paving. Most recreation developments planned under the Project would generate only minor construction noise. Some larger projects, such as the development of new community parks and campgrounds, would likely have louder construction noise because larger recreation facilities and structural elements would require heavier equipment and longer construction durations. These types of facilities would also be constructed nearer to existing potential sensitive receptors in urban environments and neighborhoods. As required by the policies and standards contained within the County's Comprehensive Plan, construction within 1,600 feet of sensitive receptors shall be limited to weekdays between the hours of 8:00 a.m. to 5:00 p.m. only. Noise attenuation barriers and muffling of grading equipment may also be required to ensure that sensitive receptors within 1,600 feet of the construction site would not be affected by noise levels over 65 dBA equivalent noise level. Additionally, larger projects involving more extensive construction activities that have potential to exceed these standards would undergo review by the County to determine compliance with permitting and regulatory requirements. With the application of the County's noise thresholds and regulatory standards, the noise impacts from temporary construction would be substantially reduced and nuisance noise would be minimized and contained so as not to degrade the quality of life in adjacent neighborhoods.

Operationally, the expected increase in transportation noise levels from the most impactful type of recreation project, community parks, would be less than 1 dBA, which would cause a nearly imperceptible difference in roadways noise level and would not exceed the County's noise threshold of 3 dBA. However, the Project would indirectly result in development that could generate operational noise from use and special events held on private property, particularly as part of non-recreational development included in RBPs, that may create an adverse quality of life impact. The indirect impact would only occur when an RBP is proposed to draw visitors for events in large groups and with live or amplified music or other noise devices (e.g., whistles) in low-noise areas with nearby sensitive receptors. Indirect impacts could also occur from special events and facility uses, such as permitted outdoor theaters or amphitheaters, outdoor shooting ranges, and motorized riding parks.

Though future recreational development would be subject to the limitations of allowed uses and development standards for public parks, trails, and RBPs, including permitting requirements to ensure proposed uses are designed and operated consistent with County zoning ordinances, adverse noise impacts are possible because it is impossible to predict how, when, and where projects enabled under the Project, including eligible RBP Program projects, would take place. Likewise, it is difficult to predict the scope, scale, and extent of development proposed by these projects. However, it is reasonably foreseeable that special events and additional allowed uses on Recreation land and in eligible zone districts as part of the RBP

Program, as proposed by the Project, could generate noise that exceeds County thresholds. Implementation of **MM NOI-1 (Recreation Noise Standards)**, which would enforce stricter noise standards (e.g., timing and volume for amplified noise), would ensure impacts from events, recreation facilities, and the additional allowable uses enabled through the Project's proposed amendments to the County's zoning ordinances would be *significant but mitigable.*

Therefore, with mitigation, the Project would not result in an environmental impact resulting from a potential adverse quality of life impact with regard to noise. Refer to discussion under Impact NOI-1, Impact NOI-2, and Impact NOI-3 for further analysis of the Project's potential impacts on the existing noise environment.

Transportation Quality of Life Impacts

As discussed in Section 3.15, *Transportation*, the construction activities associated with individual recreation development projects proposed or enabled by the Project could affect the traffic safety environment. However, regardless of the type of recreational development enabled under the proposed Project, standard construction approval would require the development of construction management plans, signage, flagging, etc. All proposed and future recreational development projects would need to be consistent with County policy that would prevent construction-related impacts. Parks, playgrounds, trail development projects, and RBPs would also be subject to proposed development standards included as part of the Project's proposed Zoning Ordinance amendments, which would require that development be consistent with the Comprehensive Plan and support public health, safety, and welfare. Consistency with the existing and proposed policies, development standards, and permit approval process for each of these projects would address construction traffic routing and control, vehicle, bicycle, and pedestrian safety, street closures, and construction parking. Thus, construction activities under the Project would not adversely affect existing neighborhoods or quality of life.

Operationally, the County's thresholds for determining a significant transportation quality of life impact is based on whether a project would increase traffic in quiet neighborhoods. The Project proposes or would enable recreational development in urban and rural areas of the county. Within the urban areas and near existing residential neighborhoods, proposed improvements consist primarily of small, local, community-serving parks, trails, and recreational facilities that would not generate a substantial increase in traffic or vehicle trips within these neighborhoods. Many other planned recreational development projects are also located in rural areas of the county, far from urban or residential centers, and any increases in vehicle trips or traffic are not anticipated to affect quiet neighborhoods. As previously described, parks, playgrounds, and trail development projects would also be subject to proposed development standards included as part of the Project's proposed Zoning Ordinance amendments, which would require that development be consistent with the Comprehensive

Plan and support public health, safety, and welfare. As such, implementation of the Project is not considered to result in a potential adverse quality of life impact with regard to transportation. Impacts are therefore considered *insignificant*.

3.11.4.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis*, the cumulative setting for the proposed Project involves a variety of policies and initiatives in the county, as well as development projects in the county. Potential impacts relating to land use associated with the proposed Project, along with potential impacts from pending and current planning or development projects, could create cumulative impacts on such resources. Cumulative projects range from programmatic projects, such implementation of the various Housing Elements Updates of the County and eight incorporated cities and the Agricultural Enterprise Ordinance, to individual projects such as the Calle Real Campus Master Plan Project. The most significant cumulative projects with potential impacts on land use and planning are the various housing element updates being prepared by each of the incorporated cities.

With respect to the potential for cumulative development to divide an established community (Impact LU-1), the proposed Project would result in an *insignificant* impact. Park, recreation, and trail projects proposed or enabled by the Project would not divide an established community. In fact, the Project may potentially benefit local mobility and community connectivity by adding to the existing inventory of sidewalks, bike paths, and other active transportation routes that allow people to visit parks and connect to other population centers. Further, approval of the proposed Project would not enact any goals, policies, or programs that would divide a community. Therefore, the proposed Project, when considered along with the other cumulative projects, would not substantially contribute to a cumulatively significant impact.

The proposed Project would result in cumulatively considerable impacts if, in combination with other cumulative pending plans and projects, it would result in substantial adverse environmental impacts associated with inconsistencies with applicable plans and policies. Each resource section of this Program EIR addresses the cumulative environmental impacts of the proposed Project. As analyzed in this Program EIR, the proposed Project would have potentially significant cumulative impacts on air quality, cultural and tribal cultural resources, geology and soils, hazards and hazardous materials, noise, public services, and transportation. Project-specific mitigation measures are identified and would be required to reduce impacts such that the Project would not result in a cumulatively considerable contribution to a significant impact related to these issues. However, the proposed Project would significantly contribute to a cumulatively significant impact to agricultural resources, such that the Project's contribution would be significant and unavoidable. Regardless, these impacts do not result from or cause an inconsistency with any existing plans or policies. As described in Impact LU-2 above, the

Project would not result in any inconsistencies with plans or policies adopted for the purpose of avoiding or mitigating an environmental effect. Therefore, the proposed Project would not substantially contribute to a cumulatively significant impact relating to an inconsistency with the Comprehensive Plan, zoning ordinances, Connected 2050 RTP/SCS, or ALUCPs, and impacts would be *insignificant*.

As described in Impact LU-3, implementation of the proposed Project would not result in any aesthetic and visual or transportation quality of life impacts. Future development recreation development enabled under the Project could have the potential to generate noise that exceeds County thresholds, which could be compounded by other cumulative development occurring in the surrounding area. However, implementation of **MM NOI-1 (Recreation Noise Standards)** would ensure Project-specific impacts, as well as the Project's contribution to a cumulatively significant noise impact, would be reduced to a significant but mitigable level.

3.11.4.4 Proposed Mitigation

Implementation of **MM NOI-1 (Recreation Noise Standards)** would be required to reduce indirect operational noise impacts and ensure substantial adverse impacts on quality of life are avoided.

3.11.4.5 Secondary Impacts

Implementation of required mitigation measures would not result in result in any adverse secondary impacts.

3.11.4.6 Residual Impacts

Impact LU-1. Implementation of the Project would not introduce incompatible land uses into existing neighborhoods, would not involve reconfigurations of the existing roadway network or general layout of existing communities, would not degrade multimodal access, and would not separate existing uses from one another. Therefore, impacts are considered *insignificant*.

Impact LU-2. Based on the preliminary analysis of consistency with applicable land use plans, implementation of the Project would not conflict with the Comprehensive Plan or zoning ordinances, the Connected 2050 RTP/SCS, or applicable ALUCPs. The Project is intended to complement and advance the recreation-based goals and policies of the Comprehensive Plan by proposing new parks, trails, and recreational development, or amend the County Comprehensive Plan and zoning ordinance amendments to facilitate private development of parks, trails, and recreation facilities in order to meet the recreational needs of communities. Park, recreation, and trail development proposed or enabled under the Project would be sited, designed, and operated consistent with the goals, objectives, policies, and development

standards of the Comprehensive Plan and zoning ordinances, as well as the compatibility criteria of applicable ALUCPs. Therefore, impacts would be *insignificant*.

Impact LU-3. The project would not result in direct impacts to quality of life with respect to aesthetics and visual resources, noise, and transportation. Indirectly, the Project could create an adverse quality of life impact with respect to noise as a result of future recreational development enabled through proposed zoning ordinance amendments. Implementation of **MM NOI-1 (Recreation Noise Standards)** would reduce significant impacts from noise and potentially incompatible land use and development associated with adverse effects on quality of life. See Impacts AV-2, AV-3, NOI-1, NOI-2, and NOI-3 for a discussion of the residual impacts in the context of quality of life considerations.

This page intentionally left blank.

3.12 NOISE

3.12.1 INTRODUCTION

This section describes potential noise impacts that could occur from the implementation of the Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (Project). This section describes existing noise sources in the Project area and reviews applicable federal, state, and local noise policies and standards. This analysis addresses temporary construction-related impacts and long-term operational noise impacts that could result from future parks, trails, and related development as a result of the Project. For analysis of noise impacts on sensitive biological resources such as riparian habitats and nesting bird habitats, please refer to Section 3.4, *Biological Resources*.

3.12.2 FUNDAMENTALS OF SOUND AND NOISE

Sound is described in terms of the loudness and pitch of the sound. Loudness is the amplitude of sound waves combined with the reception characteristics of the ear. Pitch is the height or depth of a tone or sound, depending on the relative rapidity (frequency) of the vibrations by which it is produced. Higher-pitched signals sound louder to humans than sounds with a lower pitch.

Noise is defined as unwanted or objectionable sound that interferes with normal activities or otherwise diminishes the quality of the environment. It is usually objectionable because it is disturbing or annoying. The objectionable nature of noise can be caused by its pitch or its loudness, as well as its duration. Prolonged exposure to high levels of noise is known to have several adverse effects on people, including hearing loss, communication interference, sleep interference, physiological responses, and annoyance. (See additional discussion under *Human Response to Noise* below.)

Decibels and Frequency

Several noise measurement scales are used to describe noise. The decibel (dB) is a unit of measurement that indicates the relative amplitude (loudness) of a sound. Zero on the decibel scale is based on the lowest sound pressure that a healthy, unimpaired human ear can detect. Sound levels in decibels are calculated on a logarithmic basis. An increase of 10 dB represents a tenfold increase in acoustic energy, while 20 dB is 100 times more intense, 30 dB is 1,000 times more intense, and so on. Frequency relates to the number of pressure oscillations per second, or Hertz (Hz). The range of sound frequencies that can be heard by healthy human ears is from about 20 Hz at the low-frequency end to 20,000 Hz (20 kilohertz [kHz]) at the high-frequency end.

There is a relationship between the subjective noisiness or loudness of a sound and its level. Each 10-dB increase in sound level is perceived as approximately a doubling of loudness over a wide range of amplitudes. Because decibels are logarithmic units, sound pressure levels are not added arithmetically. When two sounds of equal sound pressure levels are added, the result is a sound pressure level that is 3 dB higher. For example, if the sound level is 80 dB when one generator is operating, then it would be 83 dB when two generators are operating at the same distance from the observer. Doubling the amount of energy would result in a 3-dB increase in the sound level. Noise levels do not substantially change much when a quieter noise source is added to relatively louder ambient noise levels. For example, if a 60 dB noise source is added to 70 dB ambient noise levels, the resulting noise level is equal to 70.4 dB at the location of the new noise source.

Sound levels diminish as the distance from the source increases. For a point source of sound in free space, the rate at which the sound attenuates is inversely proportional to the square of the distance from the source. This means the sound level will drop 6 dB each time the distance from the source is doubled. Air and ground absorption of sound waves will further attenuate sound levels. The rate at which these factors attenuate sound depends on the frequency content of the sound, air temperature, relative humidity, terrain, and type of ground cover.

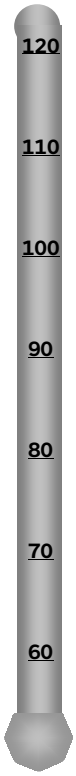
There are several methods for characterizing sound. The most common is the dBA. This scale gives greater weight to the frequencies of sound to which the human ear is most sensitive. Studies have shown that dBA is closely correlated with annoyance to traffic noise. Other frequency weighting networks, such as C-weighting, or dBC, have been devised to describe noise levels for specific types of noise (e.g., explosives).

Commonly used technical acoustical terms are defined in Table 3.12-1. Table 3.12-2 shows typical A-weighted noise levels that occur in human environments.

Table 3.12-1. Definitions of Acoustical Terms

Term	Definition
Decibel (dB)	A unit describing the amplitude of sound equal to 20 times the logarithm to the base 10 of the ratio of the pressure of the sound measured to the reference pressure. The reference pressure for air is 20 micropascals.
Sound Pressure Level	Sound pressure is the sound force per unit area, usually expressed in micropascals (or micronewtons per square meter), where 1 pascal is the pressure resulting from a force of 1 newton exerted over an area of 1 square meter. The sound pressure level is expressed in decibels as 20 times the logarithm to the base 10 of the ratio between the pressures exerted by the sound to a reference sound pressure (e.g., 20 micropascals in air). Sound pressure level is the quantity that is directly measured by a sound level meter.
Frequency (Hertz [Hz])	The number of complete pressure fluctuations per second above and below atmospheric pressure. Normal human hearing is between 20 and 20,000 Hz. Infrasonic sounds are below 20 Hz, and ultrasonic sounds are above 20,000 Hz.
A-Weighted Sound Level (dBA)	The sound pressure level in decibels as measured on a sound level meter using the A-weighting filter network. The A-weighting filter de-emphasizes the very low- and very high-frequency components of the sound in a manner similar to the frequency response of the human ear and correlates well with subjective reactions to noise.
Ambient Noise Level	The composite of noise from all sources near and far. The normal or existing level of environmental noise at a given location.
Intrusive	Noise that intrudes over and above the existing ambient noise at a given location. The relative intrusiveness of a sound depends upon its amplitude, duration, frequency, time of occurrence, and tonal or informational content as well as the prevailing ambient noise level.

Table 3.12-2. Typical Noise Levels in the Environment

Noise Level dBA	Extremes	Home Appliances (at 3 Feet)	Speech (at 3 Feet)	Motor Vehicles (at 50 Feet)	General Type of Community Environment
	Jet aircraft at 500 feet				
	Jet aircraft at 1,000 feet	Chain saw			
		Gas lawnmower		Diesel truck (not muffled)	
		Shop tools	Shout	Diesel truck (muffled)	
		Blender	Loud voice	Automobile at 70 mph	Major metropolis
		Dishwasher	Normal voice	Automobile at 40 mph	Urban (daytime)
		Air conditioner	Normal voice (back to the listener)	Automobile at 20 mph	Suburban (daytime)
		Refrigerator			Rural (daytime)
	Threshold of hearing				

Source: Harris Miller Miller & Hanson Inc. 2006; California Department of Transportation (Caltrans) 2013.

Noise Descriptors

The noise environment typically includes background noise generated from both near and distant noise sources as well as sound from individual local sources. These can vary from an occasional aircraft or train passing by to continuous noise from sources such as traffic on a major road. Because sound levels can vary markedly over a short time, a method for describing either the average character of the sound or the statistical behavior of the variations is utilized. Several rating scales have been developed to analyze the adverse effect of community noise (i.e., ambient or environmental noise) on people. Since community noise fluctuates over time, these scales consider the total acoustical energy content of the noise, as well as the time of day when the noise occurs, as follows:

- **Equivalent Noise Level (L_{eq})** is the average acoustic energy content of noise for a stated period. Thus, the L_{eq} of a time-varying noise and that of a steady noise are the same if they

deliver the same acoustic energy to the ear during exposure. For evaluating community impacts, this rating scale does not vary, regardless of whether the noise occurs during the day or the night. L_{eq} is one of the most frequently used noise metrics as it considers both duration and sound pressure level. Typically, L_{eq} is summed over a 1-hour period.

- **Day-Night Average Noise Level (L_{dn})** is the average A-weighted noise level during a 24-hour day obtained after the addition of 10 dB to levels measured in the night between 10:00 p.m. and 7:00 a.m. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.4 L_{dn}. L_{dn} is used to reflect a person's cumulative exposure to sound over a 24-hour period, expressed as the noise level for the average day of the year based on annual noise generation. The L_{dn} noise metric provides a mechanism to describe the effects of environmental noise simply and uniformly. L_{dn} is the standard noise metric used for all Federal Aviation Administration (FAA) studies of aviation noise exposure in airport communities and the U.S. Housing and Urban Development (HUD) noise compatibility guidelines. L_{dn} is also a metric for the County's thresholds for noise compatibility (County of Santa Barbara 2024).
- **Community Noise Equivalent Level (CNEL)** is a 24-hour average L_{eq} with a 5 dBA "weighting" during the hours of 7:00 p.m. to 10:00 p.m. and a 10 dBA "weighting" added to noise during the hours of 10:00 p.m. to 7:00 a.m. to account for noise sensitivity in the evening and nighttime, respectively. The logarithmic effect of these additions is that a 60 dBA 24-hour L_{eq} would result in a measurement of 66.7 CNEL. CNEL is often used due to its utility in identifying noise-related sleep disturbance effects, often a key community concern for increases in noise levels. Most California noise laws specify levels using the CNEL metric and most federal laws use the L_{eq} metric. CNEL is also a metric for the County's thresholds for noise compatibility (County of Santa Barbara 2024).
- **Minimum Instantaneous Noise Level (L_{min})** is the minimum noise level experienced during a given period.
- **Maximum Instantaneous Noise Level (L_{max})** is the **maximum** noise level experienced during a given period.

The County's noise thresholds utilize L_{dn} and CNEL as the two metrics commonly used to describe the 24-hour average (County of Santa Barbara 2024). Both include penalties for noise during the nighttime hours (10:00 p.m. to 7:00 a.m.). CNEL also penalizes noise during the evening hours (7:00 p.m. to 10:00 p.m.). CNEL and L_{dn}, which are normally within 1 dBA of each other, are used interchangeably in this section.

Noise Propagation and Attenuation

Noise is either propagated or attenuated depending on the factors discussed below.

- **Geometric spreading:** In the absence of obstructions, sound from a single source (i.e., a "point" source) radiates uniformly outward as it travels away from the source in a spherical

pattern. The sound level typically attenuates (or drops off) at a rate of 6 dBA for each doubling of distance. Highway or railway noise is not a single stationary point source of sound. The movement of vehicles on a highway or trains on a track makes the source of the sound appear to emanate from a line (i.e., a "line" source) rather than from a point. This results in cylindrical spreading rather than the spherical spreading resulting from a point source. The drop-off in sound level from a line source is typically 3 dBA per doubling of distance.

- **Ground absorption:** Usually the noise path between the source and the observer is very close to the ground. Noise attenuation from ground absorption and reflective wave canceling adds to the attenuation caused by geometric spreading. Traditionally, the excess attenuation has also been expressed in terms of attenuation per doubling of distance. This approximation is done for simplification only; for distances of less than 200 feet, prediction results based on this scheme are sufficiently accurate. For acoustically "hard" sites (i.e., sites with a reflective surface, such as a parking area or a smooth body of water, between the source and the receptor), no excess ground attenuation is assumed. For acoustically absorptive or "soft" sites (i.e., sites with an absorptive ground surface, such as soft dirt, grass, or scattered bushes and trees), an excess ground attenuation value of 1.5 dBA per doubling of distance is normally assumed. When added to the geometric spreading, the excess ground attenuation results in an overall drop-off rate of 4.5 dBA per doubling of distance for a line source and 7.5 dBA per doubling of distance for a point source.
- **Atmospheric effects:** Research by the U.S. Department of Transportation (DOT) and the Federal Transit Administration (FTA) has shown that atmospheric conditions can have a major effect on noise levels (Harris Miller Miller & Hanson Inc. 2006). Wind is the single most important meteorological factor within approximately 500 feet, whereas vertical air temperature gradients are more important over longer distances. Other factors, such as air temperature, humidity, and turbulence, also have major effects. Receptors located downwind from a source can be exposed to increased noise levels relative to calm conditions, whereas locations upwind can have lower noise levels. Increased sound levels can also occur because of temperature inversion conditions (i.e., increasing temperature with elevation).
- **Shielding by natural or human-made features:** A large object or barrier in the path between a noise source and a receptor can substantially attenuate noise levels at the receptor. The amount of attenuation provided by this shielding depends on the size of the object, proximity to the noise source and receptor, surface weight, solidity, and the frequency content of the noise source. Natural terrain features (e.g., hills and dense woods) and human-made features (e.g., buildings and walls) can substantially reduce noise levels. Walls are often constructed between a source and a receptor specifically to reduce noise. A barrier that breaks the line of sight between a source and a receptor will typically result in

at least 5 dB of noise reduction. A higher barrier may provide as much as 20 dB of noise reduction.

In summary, noise levels from a particular source decline (i.e., attenuate) as the distance to the receptor increases. Other factors, such as the weather and reflecting or shielding by buildings or other structures, also intensify or reduce the noise level at a location. A common method for estimating roadway noise is that for every doubling of distance from the source, the noise level is reduced by approximately 3 dBA at acoustically "hard" locations (i.e., mostly asphalt, concrete, hard-packed soil, or other solid materials) and 4.5 dBA at acoustically "soft" locations (i.e., exposed soil or landscaping, such as grass). Noise from stationary sources – including construction noise – is reduced by approximately 6 to 7.5 dBA for every doubling of distance at acoustically hard and soft locations, respectively. Noise levels may also be reduced by intervening structures; generally, a single row of buildings between the receptor and the noise source reduces the noise level by approximately 5 dBA, while a solid wall or berm can reduce noise levels by up to 5 to 10 dBA. The manner in which older homes in California were constructed generally provides a reduction of exterior-to-interior noise levels of about 20 to 25 dBA with closed windows. The exterior-to-interior reduction of newer residential units is generally 30 dBA or more (Harris Miller Miller & Hanson, Inc. 2006).

Human Response to Noise

Sensitive Receptors

Noise-sensitive land uses are generally defined as locations where people reside or where the presence of unwanted sound or vibration could adversely affect the current or planned land uses. Human response to noise varies widely depending on the type of noise, time of day, and sensitivity of the receptor. The definition of "sensitive uses" found in the County's *Environmental Thresholds and Guidelines Manual* and the Noise Element includes:

- Residential, including single and multifamily dwellings, mobile home parks, dormitories, and similar uses.
- Transient lodging, including hotels, motels, and similar uses.
- Hospitals, nursing homes, convalescent hospitals, and other facilities for long-term medical care.
- Public or private educational facilities, libraries, churches, and places of public assembly

Studies have shown that under controlled conditions in an acoustics laboratory, a healthy human ear can discern changes in sound levels of 1 dBA. In a normal environment, changes in the noise level of 3 dBA are considered just noticeable to most people. A change of 5 dBA is readily perceptible, and a change of 10 dBA is perceived as being twice as loud.

Noise and Health

Several studies have linked increases in noise with health effects, including hearing impairment, sleep disturbance, cardiovascular effects, psychophysiological effects, and potential impacts on fetal development (Wolfgang 2005). Potential health effects appear to be caused by both short- and long-term exposure to very loud noises and long-term exposure to lower levels of sound. Acute sounds (i.e., L_{AF}[1] greater than 120 dB) can cause mechanical damage to hair cells of the cochlea (the auditory portion of the inner ear) and hearing impairment (Wolfgang 2005). An L_{AF} greater than 120 dB is equivalent to a rock concert or an airplane flying overhead at 984 feet.

The World Health Organization and the U.S. Environmental Protection Agency (USEPA) consider a L_{eq} equal to 70 dBA to be a safe daily average noise level for the ear. However, even this "ear-safe" level can cause disturbance to sleep and concentration and may be linked to chronic health impacts such as hypertension and heart disease (Wolfgang 2008).

Many studies have looked at the potential health effects of chronic lower noise levels, such as traffic, especially as these noise levels affect children. In a study of schoolchildren in Germany, blood pressure was significantly higher in a group of students exposed to road traffic noise from high-traffic transit routes (Wolfgang 2008). A study by Kawada (2004) showed that exposure to airplane noise was found to be associated with decreased fetal body weight in pregnant women (Kawada 2004).

Noise Annoyance

People's responses to environmental noise are subjective and vary considerably from individual to individual. Noise in the community has often been cited as a health problem, not in terms of actual physiological damage, such as hearing impairment, but in terms of inhibiting general well-being and contributing to stress and annoyance. When community noise interferes with human activities or contributes to stress, public annoyance with the noise source increases. Annoyance may occur at noise levels well below levels known to cause direct physiological harm.

Annoyance is a cumulative measure of the general adverse reaction of people to noise that causes interference with speech, sleep, the desire for a tranquil environment, and the ability to use the telephone, radio, or television satisfactorily. Unwanted noise interferes with human activities by distracting attention and making activities more difficult to perform, especially when concentration is needed. Interference from noise can even make some activities (e.g., communication or sleep) virtually impossible. However, except in the case of interference with verbal communication, the degree of interference is difficult to quantify or to relate to the level of noise exposure (USEPA 1979). Several factors affect the extent of annoyance that a noise causes, including loudness, duration, frequency, and time of day or night, as well as whether

[1] L_{AF} = sound level with "A" frequency weighting and fast-time weighting.

the noise occurs against a backdrop of other noises or in an otherwise quiet place (FAA 2023). Further, noise perception may vary based on the individual receptor, including whether the receptor has previous experiences with intrusive noise and the overall attitude toward the noise source and noise characteristics. Noises that can be particularly annoying include pure tones (e.g., truck backup beepers), low-frequency noise (e.g., rumbling of heavy equipment), and impulsive noise (e.g., helicopters, pile drivers) (USEPA 1979).

Vibration

Vibration is sound radiated through the ground. In the context of noise, groundborne vibration is the vibration, or oscillation, of the ground, floor, and walls. The vibration of floors and walls may cause perceptible vibration, rattling of items such as windows or dishes on shelves, or a rumbling noise. The rumble is the noise radiated from the motion of the room surfaces. In essence, the room surfaces act like a giant loudspeaker causing what is called groundborne noise. Groundborne vibration is rarely annoying to people who are outdoors. Although the motion of the ground may be perceived, without the effects associated with the shaking of a building, the motion does not provoke the same adverse human reaction. In addition, the rumbling noise that usually accompanies the building vibration is perceptible only inside buildings.

Vibration Definitions & Perception

The ground motion caused by vibration is measured as particle velocity in inches per second (in/sec); in the U.S., this is referenced as vibration decibels (VdB) (Harris Miller & Hanson Inc. 2006). The peak particle velocity (PPV) is defined as the maximum instantaneous peak of the vibration signal. The PPV is most frequently used to describe vibration impacts on buildings and is usually measured in inches per second (in/sec). The root mean square (RMS) amplitude is most frequently used to describe the effect of vibration on the human body. The RMS amplitude is defined as the average of the squared amplitude of the signal.

Table 3.12-3. Human Response to Different Levels of Groundborne Vibration (PPV)

Human Response	Transient PPV (in/sec)	Continuous PPV (in/sec)
Barely perceptible	0.035	0.012
Distinctly perceptible	0.24	0.035
Strongly perceptible	0.9	0.1
Severe/Disturbing	2	0.4

Source: Caltrans 2020.

Note: Transient sources create a single isolated vibration event, such as blasting or drop balls. Continuous/frequent intermittent sources include impact pile drivers, pogo-stick compactors, crack-and-seat equipment, vibratory pile drivers, and vibratory compaction equipment.

The vibration velocity level threshold of perception for humans is approximately 65 VdB. A vibration velocity level of 75 VdB is the approximate dividing line between barely perceptible and distinctly perceptible levels for many people. Most perceptible indoor vibration is caused by sources within buildings, such as the operation of mechanical equipment, the movement of people, or the slamming of doors. Typical outdoor sources of perceptible groundborne vibration include construction equipment (e.g., heavy haul trucks, concrete trucks) and traffic on rough roads. If a roadway is smooth, the groundborne vibration from automobile traffic is rarely perceptible, although larger trucks carrying heavy loads can generate perceptible vibration. The range of interest (velocity level) for groundborne vibration is from approximately 50 VdB to 100 VdB. General human responses to different levels of groundborne vibration velocity levels are described in Table 3.12-3. A velocity level of 50 VdB is the typical background vibration velocity level, while a velocity level of 100 VdB is the general threshold where minor damage can occur in fragile buildings (Harris Miller Miller & Hanson Inc. 2006).

Effects of Vibration

Vibration can cause buildings to shake and rumbling sounds to be heard. Some common sources of vibration are trains, buses on rough roads, and construction activities, such as rock blasting, pile driving, and heavy earth-moving equipment. It is unusual for vibration from sources such as buses and trucks to be perceptible, even in locations close to major roads.

In contrast to noise, vibration is not a common environmental problem. Ground-borne vibration levels rarely affect human health. Instead, most people consider ground-borne vibration to be an annoyance that can affect concentration or disturb sleep. Similar to noise, high vibration levels are also known to affect animal behavior. High vibration levels can interfere with mating activities, stress wildlife, and disturb nesting habitats (Section 3.4, *Biological Resources*).

High levels of ground-borne vibration can damage fragile buildings, including historic structures, or interfere with equipment that is highly sensitive to ground-borne vibration (e.g., electron microscopes). Factors that influence ground-borne vibration effects include the foundation type and building materials (e.g., masonry). Typical human and structural responses to vibration are shown in Table 3.12-4. PPV (in/sec) levels that could cause structural damage are shown in Table 3.12-5; fragile buildings in the Project area could be affected by continuous (i.e., ongoing) vibrations of 0.1 in/sec and transient (i.e., singular events) vibrations of 0.2 in/sec.

Table 3.12-4. Human and Structural Responses to Typical Levels of Vibration

Human/Structural Response	Vibration Velocity Level (VdB)	Typical Sources
Threshold, minor cosmetic damage to fragile buildings	100	Blasting from construction projects
Difficulty with tasks (e.g., reading a screen)	90	Bulldozers and other heavy-tracked construction equipment
Residential annoyance, transient events	80	Commuter rail, upper range
Residential annoyance, continuous events	70	Rapid transit, typical
Human threshold of perception and limit for vibration-sensitive equipment	65	Bus or truck, typical
No human response	50	Typical background vibration

Source: FTA 2018.

Table 3.12-5. Vibration Thresholds for Potential Structural Damage

Structure and Condition	Transient (in/sec)	Continuous (in/sec)
Extremely fragile historic buildings, ruins, ancient monuments	0.12	0.08
Fragile buildings	0.2	0.1
Historic and some old buildings	0.5	0.25
Older residential structures	0.5	0.3
New residential structures	1	0.5
Modern industrial/commercial buildings	2	0.5

Source: Caltrans 2020.

3.12.3 ENVIRONMENTAL SETTING

This section discusses the existing noise and vibration environment in the Project area, including community sources, transportation sources, and recreation sources. Major transportation noise sources in the county include: 1) major roadways (i.e., highways and major local roadways); 2) the Union Pacific Railroad (UPRR); and 3) airports. The County regards 60-65 dB(A) L_{dn} as the maximum exterior noise exposure compatible with noise-sensitive land uses. Noise in the immediate vicinity of airports, railroads, and highways may exceed County noise standards and health and welfare criteria for noise exposure in relation to residential uses. While noise from industrial, agricultural, recreational, commercial, and residential activities may be part of the ambient level at any location, rarely do these generate noise of the same magnitude as transportation sources. The County requires noise-sensitive uses proposed in areas where the day-night average sound level is 65 dBA or greater to be designed so that the interior noise

levels attributable to the exterior sources do not exceed 45 dBA (County of Santa Barbara 2024).

Community Noise Sources

Land uses within urbanized areas include a range of residential, commercial, agricultural, industrial, and recreational uses. Stationary sources of noise in the urban environment include machinery noise (e.g., fans) from building HVAC and utility systems, sounds generated from solid waste management facilities (e.g., dumpsters and trash hauling operations), and regular deliveries or other building services (e.g., backup beepers, loading docks, large doors, forklifts, and other equipment). Commercial, industrial, agricultural, residential, and recreational activities rarely generate noise at a magnitude or duration to cause adverse impacts on sensitive receptors. However, periodic community noise may cause nuisances that affect quality of life.

In urbanized locations outside the immediate influence of major transportation noise sources, ambient day-night average levels typically range from 46 dBA to 57 dBA. Although localized noise nuisances may exist in these areas (e.g., barking dogs, amplified music, delivery trucks, outdoor sports), generally ambient noise levels are acceptable, based on health and welfare criteria (County of Santa Barbara 2024). In residential areas, noise levels are similar to those found throughout the nation in locations the USEPA describes as “Quiet Suburban” (50 dB L_{dn}) or “Normal Suburban (55 dB L_{dn}). Within commercial areas, noise conditions are often associated with shopping centers and public facilities but are most commonly affected by transportation noise. (See additional discussion in *Roadway Noise* below). Noise from typical residential and recreational activities could be termed "population noise". Sources of population noise include playgrounds, organized events, and parties. While these kinds of noise are usually accepted in a residential setting, occasionally they become sources of annoyance to people and subjects of complaint to the County government (County of Santa Barbara 2009).

In the county’s rural areas, land uses consist primarily of agriculture, rural recreation, and low-density residential. While rural areas generally have low ambient noise, agricultural operations in these areas can produce high noise levels or nuisance noise during planting and harvest due to the operation of machinery, equipment, and increased vehicle trips. Typical noise levels generated by agricultural activities in the county can range from 74 dBA to 116 dBA; however, ambient noise levels are generally much lower except in the vicinity of active agricultural machinery use and roadways. Higher ambient noise levels in rural areas are typically associated with specific roads with higher levels of noise generation, including U.S. Highway 101 and State Routes (SRs) 1, 154, 135, and 246 (County of Santa Barbara 2009).

Transportation Noise Sources

Roadway & Railroad Noise

Highways and some major local roadways carry traffic volumes that can produce L_{dn} levels that exceed County thresholds for noise-sensitive land uses. L_{dn} from traffic on major roadways can be estimated from information about total traffic volume, truck traffic volume, traffic speed, distribution of traffic between daytime and nighttime hours, and physical characteristics of the roadway. For example, L_{dn} at 50 feet from U.S. Highway 101 varies from a low of approximately 70 dBA (between Buellton and Los Alamos) to a high of approximately 78 dBA (between Mission Street and Las Positas in Santa Barbara).[2] These noise levels drop to 60 dBA or less beyond approximately 200 feet from the highway segment between Buellton and Los Alamos; along the stretch of highway between Mission Street and Las Positas, these noise levels are 60 dBA or less beyond approximately 800 feet. Combining the influence of the freeway with the railroad along the South Coast, L_{dn} of 60 dBA or more exists within 1,000 feet of the freeway/railroad corridor. For arterial streets where vehicle flows are between 10,000 and 20,000 per day and where traffic speed is 45 miles per hour or less, sound levels reach 80-85 dBA at 50 feet from the roadway. L_{dn} of 62 dBA to 68 dBA is typical at 50 feet, attenuating to 60 dBA beyond approximately 150 feet from the roadway (County of Santa Barbara 2009).

Two railroad companies, the Southern Pacific Railroad and the Santa Maria Valley Railroad, operate in Santa Barbara County along the UPRR. The Southern Pacific generally follows the coast through the county with two branches off the main line. One branch, at Surf, serves the City of Lompoc and the diatomaceous earth mining operation south of the city. A second branch serves Vandenberg Space Force Base (VSFB). Two passenger trains and an average of 12 freight trains traverse the Southern Pacific main line daily. The Santa Maria Valley Railroad connects with the Southern Pacific at Guadalupe and serves the City of Santa Maria. A short spur connects with Santa Maria Airport to the south (County of Santa Barbara 2009).

Along the Southern Pacific main line, maximum sound levels from passing trains at 100 feet from the tracks reach 96 dBA to 100 dBA. At the same location, CNEL values, representing the weighted average of all train noise for a 24-hour period, are between 70 dBA and 75 dBA. CNEL values are 60 dBA or less beyond approximately 800 feet from the tracks. Along the Santa Maria Valley Railroad, CNEL values of 65 dBA or more exist within about 150 feet of the tracks. Beyond about 300 feet from the tracks, CNEL values are 60 dBA or less (County of Santa Barbara 2009).

[2] Day-Night Average Sound Levels represent a weighted average of noise levels experienced over an entire day and depend on total traffic volume, percent truck traffic, and other parameters. For example, while Day-Night Average Sound Levels range from 70 dBA to 78 dBA 50 feet from U.S. Highway 101, maximum noise levels from individual trucks can reach 85 dBA to 90 dBA and maximum levels from automobiles can reach 75 dBA to 80 dBA at this distance.

Along higher noise segments of highways and/or railways, it is common to employ attenuation strategies, such as sound walls and setbacks for sensitive land uses in a combination that effectively reduces roadway noise to acceptable levels. Topography and intervening structures can also reduce the direct effects of roadway noise on sensitive adjacent land uses. For interior spaces, buildings can use a variety of design approaches to block exterior noise sources, such as noise-dampening insulation and windows and building orientation to minimize occupant exposure. These ground-based noise attenuation strategies must be considered based on the specific conditions along a travel corridor and the proposed land use and design approach for the affected adjacent areas.

Airport Noise

Airports generate high noise levels from daily operations, and jet traffic generates the loudest noise levels. According to the FAA, numerous factors determine how much aircraft noise is experienced on the ground, including the model aircraft and what type of engines are being used for each flight, whether the aircraft is taking off or landing, the flight path of the flights going overhead, how quickly each plane ascends and descends, and whether the aircraft is operating at full power or partial power. Noise experienced on the ground also depends on flight schedules, which can vary depending on the time of day, season of the year, or other operational factors. Weather also plays a large role, since sound attenuates (dissipates) differently depending on weather conditions (e.g., wind speed and direction, temperature) (FAA 2023).

Airport noise compatibility maps depict the contours for 65, 70, and 75 dB L_{dn} noise levels geographically to inform land use planning and decision-making in areas around airports. The purpose of noise compatibility policies is to avoid the establishment of new incompatible land uses and exposure of the users to levels of aircraft noise that can disrupt the activities involved (FAA 2023).

Public and private airports in Santa Barbara County include the following:

- Santa Barbara Airport, located adjacent to Eastern Goleta Valley and the City of Goleta on the South Coast
- Santa Maria Airport, located adjacent to Orcutt in the Santa Maria Valley
- Lompoc Airport, located north of the City of Lompoc adjacent to the Santa Ynez River
- Santa Ynez Airport, located immediately east of Santa Ynez and SR 246 in the Santa Ynez Valley
- New Cuyama Airport, located immediately south of New Cuyama in the Cuyama Valley

The county also has one military base, VSFB, which is used exclusively for military operations. VSFB is in the Lompoc Valley midway between the City of Lompoc and the City of Santa Maria. There are no other private airstrips located within the Project area.

The Airport Land Use Commission (ALUC) for the Santa Barbara County Association of Governments (SBCAG) is responsible for protecting public health, safety, and welfare by ensuring that vacant lands in the vicinity of airports are planned and zoned for uses compatible with airport operations. SBCAG's Airport Land Use Compatibility Plans (ALUCPs) serve as a tool for the ALUC to review land use plans and development proposals within Airport Influence Areas (AIAs).[3] As discussed further in Section 3.11, *Land Use and Planning*, these plans also provide land use compatibility policies and criteria applicable to local jurisdictions in their preparation or amendments of General Plans/Comprehensive Plans. The ALUCPs identify airport noise levels and provide guidance relative to noise constraints for adjacent land uses. The ALUCPs adopt a baseline noise threshold of 55 dB CNEL to compel evaluation of land use compatibility with airport noise, as well as acceptable noise levels for recreational uses in the Urban and Rural Areas (Table 3.12-6). Land uses in rural settings oftentimes are more sensitive to noise disturbances than their urban counterparts because the ambient noise levels are lower in rural settings.

Based on noise compatibility maps in the ALUCPs, there are some existing recreational uses within the applicable noise threshold contours of the Santa Barbara Airport. Girsh Park, a public community park provided by a private foundation, provides sports fields and courts, a children's playground, picnic facilities, seating, parking lots, trails, and pathways within the 60 - 65 dB CNEL noise contour. Additionally, Deckers Cabrillo Park, a privately owned, publicly accessible open space in Goleta, provides trails and sports courts within the 65 – 70 dB CNEL noise contour.



Girsh Park in Goleta provides sports fields and courts, playground, open space, walking paths, an indoor ice rink, and parking within the 60-65 db CNEL noise contour of the Santa Barbara Airport.

The Santa Ynez Airport, Lompoc Airport, and New Cuyama Airport are rural airports that are not commonly a source of noise nuisance complaints due to fewer flights and smaller planes. In contrast, airports within urban communities that provide jet services often produce noise at a loudness, frequency, and duration that can cause community-level noise nuisances and substantial levels of complaints. In the county, Santa Maria Airport and Santa Barbara Airport are both urban airports with operations audible to surrounding rural and urban neighborhoods. These airports have a history of noise complaints that influence airport operations.

[3] The Airport Influence Area (AIA) is a composite of the areas surrounding the airport that are affected by noise, height, and safety considerations.

Table 3.12-6. Maximum Airport-Related Noise Thresholds for Recreational Uses at Airports in Santa Barbara County

Recreational Uses	Airport Noise Compatibility Criteria by Airport[1]					
	Santa Barbara Airport	Santa Maria Airport	Lompoc Airport	Santa Ynez Airport	New Cuyama Airport[2]	Vandenberg Space Force Base[3]
Airport Type	*Urban*	*Urban*	*Rural*	*Rural*	*Rural*	*Military*
Children-oriented neighborhood parks; playgrounds; interactive nature exhibits	65 dB CNEL	65 dB CNEL	65 dB CNEL	65 dB CNEL	N/A	80 L_{dn}
Campgrounds; recreational vehicle/motor home parks	65 dB CNEL	65 dB CNEL	-	-	N/A	70 L_{dn}
Community parks; regional parks; golf courses; tennis courts; athletic fields; outdoor spectator sports; fairgrounds; water recreation facilities; horse stables	70 dB CNEL	70 dB CNEL	70 dB CNEL	70 dB CNEL	N/A	80 L_{dn}
Recreation buildings; gymnasiums; club houses; athletic clubs; dance studios	75 dB CNEL	75 dB CNEL	-	-	N/A	80 L_{dn}

Notes:

[1] Recreational uses are either compatible (C) or conditionally compatible (CC) based on adopted Noise Compatibility Criteria.

[2] The Santa Barbara County ALUCPs do not address New Cuyama Airport; noise compatibility policies were not developed for the New Cuyama Airport because underlying data has never been prepared for the private airport in the past. Further, the Draft New Cuyama Airport ALUCP (2019) was not finalized along with the other ALUCPs. New Cuyama Airport reestablished operations in October 2022.

[3] VSFB noise contours overlie federally-owned property and associated land uses.

Source: SBCAG 2023.

A unique source of airport noise is sonic booms generated by rocket launches from VSFB. VSFB's Space Launch Delta 30 supports West Coast launch activities for the Air Force, Department of Defense, National Aeronautics and Space Administration (NASA), national programs, and various private industry contractors (United States Space Force 2025). Depending on numerous

factors such as aircraft size, speed, altitude, and distance, sonic booms can generate enormous amounts of sound energy. This sound energy is presented in terms of peak sound pressure level in pounds per square foot (psf). Whether or not these sonic booms are perceptible by an individual is highly dependent on factors such as launch trajectory and meteorological conditions.

In recent years, with the increase in commercial launch operations at VSFB, the occurrence of sonic booms being perceived by county residents has become more frequent. On some occasions, sonic booms with high peak sound pressure levels generate noise and vibration that can be compared to the sound of thunder or a car crash, startling residents, shaking houses, and setting off car alarms. The occurrence of disruptive sonic boom events may increase over as VSFB plans to increase commercial launch operations. For instance, in 2025, it is anticipated that VSFB will increase the annual SpaceX Falcon launch cadence from 50 launches per year to 100 launches per year (Department of the Air Force 2025).

Recreation Noise

Excessive noise can adversely affect the enjoyment of recreational pursuits in designated parks, trails, and open spaces. Conversely, parks, open spaces, and trails can be used to buffer sensitive land uses from noise sources. Parks, trails, and open spaces can also effectively exclude other land uses from excessively noisy areas.

Recreational land uses typically have low noise levels compared to other land uses, such as commercial, agricultural, and industrial. Parks, sports fields, campgrounds, and community centers generate noise during hours of use, which are typically limited to daytime hours in public parks. Recreational noise levels are typically minor and associated with normal activities such as team sports, unstructured outdoor play, and social gatherings. Larger sporting events, recreation programs, and private recreation events also generate noise from traffic, cheering, and other typical noises. Amplification or equipment such as buzzers, whistles, or bullhorns could also generate temporary noise during hours of use. A public address system can require 6dB to 10 dB more than crowd noise to perform adequately during a sporting event, though this peak noise level is infrequent and avoidable when the public address system is offset from peak crowd noise.

Some sports facilities produce unique sources of nuisance noise, such as pickleball courts. Pickleball is played with a plastic paddle and plastic ball, and the characteristically “popping” noise of the paddle hitting the ball can reverberate loudly. Indoors or outdoors, the average pickleball game generates 70 dBA, whereas tennis generates just 40 dBA (Massachusetts Pickleball 2025). Four pickleball courts can fit in one tennis court, potentially quadrupling the number of people playing on the court at one time. Socializing and celebrating during and after the game can also generate potentially nuisance sounds. Acoustic fences, screens, foam

pickleballs, and quieter paddles can reduce the audible sounds of the game when built close to residential areas.

Dog barking can also contribute to noise nuisances, and dog parks may provide a hub for dog-related noise. One study found that barking from happy dogs and barking in urban areas tends to be less annoying to nearby humans (Nikolett Jégh-Czinege et al. 2019). However, dog parks established near residential areas may cause nuisance noise from barking, playing, fighting, and socialization. Sound barriers and posted park rules may help to mitigate noise impacts. Dog barking can also generate nuisance noise for other recreational users of parks and trails, including playgrounds with young children and equestrian facilities.

Other recreational facilities such as campgrounds, public parks, and trails typically generate negligible noise nuisances due to regulation of park hours. Campgrounds observe quiet hours and restrict the volume and use of amplified noise, generators, and other noise sources, helping to mitigate noise that may disturb nearby uses. While some trails and parks may be adjacent to residential uses, activity on trails includes pedestrians, equestrians, bikers, and dog walkers. Talking at a normal level would not amplify sound to nearby areas, and the lack of motorized vehicles on trails reduces the potential for noise nuisances. Other types of facilities (dog parks, sports facilities, some public parks) close at sunset, helping to quell noises that may disturb nearby residential uses.

Local regulations control noise from recreational facilities in the unincorporated county. Per the County's Nighttime Noise Restrictions (Section 3.12.4, *Regulatory Setting*), amplified noise discernable from 100 feet from the property line is prohibited between the hours between the hours of 10:00 p.m. and 7:00 a.m. Sunday through Thursday and between the hours of midnight and 7:00 a.m. on Friday and Saturday.

3.12.4 REGULATORY SETTING

State and local regulations have been enacted to address noise in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future housing development under the proposed Project and its associated impacts.

No federal noise requirements or regulations apply to local actions of the County. However, federal regulations influence local actions where federal funding is involved. The FHWA requires abatement of highway traffic noise for highway projects through rules in 23 Code of Federal Regulations (CFR) Part 772. Further, the FTA and Federal Railroad Administration (FRA) each recommend thorough noise and vibration assessments through comprehensive guidelines for any mass transit or high-speed railroad projects that would pass by noise-sensitive areas.

3.12.4.1 Federal

Noise Control Act

The Noise Control Act of 1972 recognized the role of the federal government in dealing with major commercial noise sources that require uniform treatment. Since Congress has the authority to regulate interstate and foreign commerce, regulation of noise generated by such commerce also falls under congressional authority. The federal government specifically preempts local control of noise from aircraft, railroads, and interstate highways. The USEPA has identified acceptable noise levels for various land uses to protect the public, with an adequate margin of safety, and to establish noise emissions standards for interstate commerce. The U.S. HUD standards define L_{dn} at or below 65 dB for outdoors as acceptable for residential areas.

Airport Noise and Capacity Act

The FAA implemented the Airport Noise and Capacity Act (ANCA) in 1990. ANCA limited the ability of airport sponsors to propose and implement new restrictions and/or fines on aircraft operating into or out of airports after 1990. Access restrictions have the potential to violate the federal obligation to make the airport available for public use on reasonable terms and without unjust discrimination as required by Grant Assurance 22, Economic Non-discrimination.

FAA Regulations – 14 CFR Part 150

14 CFR Part 150, Airport Noise Compatibility Planning, is the primary federal regulation guiding and controlling planning for aviation noise compatibility on and around airports. Part 150 establishes procedures, standards, and methodologies to be used by airport operators for the preparation of Airport Noise Exposure Maps (NEMs) and Airport Noise Compatibility Programs (NCPs). The Part 150 process is a balanced approach for mitigating the noise impacts of airports upon their neighbors/community while protecting or increasing both airport access and capacity, as well as maintaining the efficiency of the national aviation system. The procedures contained in Part 150 are voluntary and airport operators are not required to participate.

3.12.4.2 State

California Noise Control Act

The California Noise Control Act states that excessive noise is a serious hazard to public health and welfare and that exposure to certain levels of noise can result in physiological, psychological, and economic damage. It also recognizes that continuous and increasing bombardment of noise exists in urban, suburban, and rural areas. This act declares that the State of California has the responsibility to protect the health and welfare of its citizens by the control, prevention, and abatement of noise.

California Code of Regulations Section 65302(f)

California Code of Regulations, Section 65302(f), requires local land use planning jurisdictions to prepare a general plan. The noise element is a mandatory component of the general plan. It may include general community noise guidelines developed by the California Department of Health Services and specific planning guidelines for noise/land use compatibility developed by the local jurisdiction. The state guidelines also recommend that the local jurisdiction consider adopting a local noise control ordinance.

State Office of Land Use and Climate Innovation

The California Office of Land Use and Climate Innovation (OLCI; formerly the Office of Planning and Research) developed guidelines for community noise acceptability for use by local agencies in Appendix D, Noise Element Guidelines, of the State General Plan Guidelines. Selected relevant levels are as follows (L_{dn} may be considered nearly equal to CNEL):

- CNEL below 70 dBA – normally acceptable for playgrounds, neighborhood parks
- CNEL of 70 dBA to 75 dBA – conditionally acceptable for playgrounds, neighborhood parks
- CNEL below 75 dBA – normally acceptable for golf courses, riding stables, water recreation, cemeteries
- CNEL below 75 dBA – conditionally acceptable for sports arenas, outdoor spectator sports
- CNEL of 70 to 80 dBA – conditionally acceptable for golf courses, riding stables, water recreation, cemeteries

"Normally acceptable" is defined as satisfactory for the specified land use, assuming that normal conventional construction is used in buildings. "Conditionally acceptable" may require some additional noise attenuation or special study. Under most of these land use categories, overlapping ranges of acceptability and conditionally acceptable are presented, leaving some ambiguity in areas where noise levels fall within the overlapping range.

California Department of Transportation

The Caltrans Transportation and Construction Vibration Guidance Manual provides guidance and procedures that "...should be treated as screening tools for assessing the potential for adverse vibration effects related to human perception, structural damage, and equipment. This document is not an official policy, standard, specification, or regulation, and should not be used as such."

As discussed above, the Caltrans vibration criteria for assessing structural damage and human perception are shown in Table 3.12-4 and Table 3.12-5 above.

California Air Resources Board Anti-Idling Measure

In 2004, the California Air Resource Board adopted an Airborne Toxic Control Measure to limit heavy-duty diesel motor vehicle idling (California Code of Regulations, Title 13, Section 2485).

The measure applies to diesel-fueled commercial vehicles with gross vehicle weight ratings greater than 10,000 pounds that are licensed to operate on highways, regardless of where they are registered. This measure does not allow diesel-fueled commercial vehicles to idle for more than 5 minutes at a time at a location, thereby minimizing vehicle noise from idling vehicles.

3.12.4.3 Local

Santa Barbara County Comprehensive Plan Noise Element and Environmental Thresholds

The County Comprehensive Plan is a "comprehensive, long-term general plan" that governs the future growth and development of the unincorporated county. The County Comprehensive Plan contains land use goals, policies, and implementation measures within each of its elements. The Noise Element identifies and appraises noise problems within the community and influences the distribution of land uses based on the noise level associated with those land uses.

Additionally, development located within the jurisdiction of each of the County's community plans would be subject to the noise goals and policies of the respective community plan, the goals and policies of which implement the goals and policies of the Noise Element.

County Zoning Ordinances

The County's Land Use and Development Code (LUDC), Montecito Land Use and Development Code (MLUDC), and Article II – Coastal Zoning Ordinance (CZO) of the Santa Barbara County Code (Chapter 35), carry out the policies of the Comprehensive Plan by classifying and regulating the uses of land and structures within the inland and coastal areas of the county, consistent with the Comprehensive Plan. These County codes are adopted to protect and promote the public health, safety, comfort, convenience, prosperity, and general welfare of residents and businesses in the county. The LUDC, MLUDC, and CZO establish various standards for regulating noise or noise exposure which are applicable to development within specific zones or zones located within overlay areas.

County of Santa Barbara Nighttime Noise Ordinance

Under Chapter 40 of the County Code, loud and unreasonable amplified noise is prohibited in the unincorporated area of the county during any of the following periods: 1) The night and following morning of any Sunday, Monday, Tuesday, Wednesday, or Thursday between the hours of 10:00 p.m. and 7:00 a.m. the following morning; or, 2) the morning hours after midnight of any Friday or Saturday, between midnight and 7:00 a.m. the following morning.

County of Santa Barbara Grading Code

Chapter 14 of the County Code is the Santa Barbara County Grading Code (Ord. No. 4766, 11-9-2010). The regulations, conditions, and provisions of this chapter constitute minimum standards and procedures necessary to protect and preserve life, limb, health, property, and public welfare by regulating and controlling the design, construction, quality of materials,

location, and maintenance of grading, drainage, erosion, and sediment control when required by these regulations within the County. The regulation of construction activities under this chapter also regulates construction-related noise. Though Chapter 14 does not specify noise level limits, Section 14-22 restricts grading work (except emergency operations) to take place between the hours of 7:00 a.m. and 7:00 p.m., unless the County finds that such operations are unlikely to cause significant public nuisance or must, by necessity, be accomplished at other times and authorizes such night operations in writing.

Airport Land Use Compatibility Plans

Airport Land Use Compatibility Plans provide land use compatibility policies and ensure that vacant lands in the vicinity of airports are planned and zoned for uses compatible with airport operations (SBCAG 2018). The County's ALUCPs address areas within the AIAs for five airports in Santa Barbara County: Santa Barbara Airport, Santa Maria Airport, Lompoc Municipal Airport, VSFB, and Santa Ynez Airport. (See Section 3.9, *Hazards and Hazardous Materials.*)

Noise compatibility around airports follows state regulations. In Section 5006, the regulations state that "[t]he level of noise acceptable to a reasonable person residing in the vicinity of an airport is established as a CNEL value of 65 dB for purposes of these regulations. This criterion level has been chosen for reasonable persons residing in urban residential areas where houses are of typical California construction and may have windows partially open. It has been selected with reference to speech, sleep, and community reaction."

3.12.5 ENVIRONMENTAL IMPACT ANALYSIS

This section discusses the potential noise impacts associated with the Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed and the residual impact after mitigation is determined.

3.12.5.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purposes of this Program Environmental Impact Report (EIR), the Project may have a significant adverse impact relating to noise if it would:

a. Generate a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies;

b. Generate excessive groundborne vibration or groundborne noise levels;

c. For a project located within the vicinity of a private airstrip or an airport land use plan or, where such a plan has not been adopted, within 2 miles of a public airport or public

use airport, the project would expose people residing or working in the project area to excessive noise levels.

County of Santa Barbara Environmental Thresholds and Guidelines Manual

The CEQA Guidelines (Appendix G) criteria are expanded and made more specific in the County's noise thresholds contained in the County's *Environmental Thresholds and Guidance Manual* (2024). The following noise thresholds will be applied in the impact analysis to determine the significance of noise impacts for the Project (L_{dn} may be considered nearly equal to CNEL):

a. If existing exterior noise levels, including in outdoor living areas, experienced by sensitive receptors are below 65 dBA CNEL, and if the proposed project will generate noise that will cause the existing noise levels experienced by the sensitive receptors to exceed 65 dBA CNEL – either individually or cumulatively when combined with other noise-generating sources – then the proposed project is presumed to have a significant impact.

b. If existing exterior noise levels, including in outdoor living areas, experienced by sensitive receptors exceed 65 dBA CNEL, and if the proposed project will generate noise that will cause the existing noise levels experienced by the sensitive receptors to increase by 3 dBA CNEL – either individually or cumulatively when combined with other noise-generating sources – then the proposed project is presumed to have a significant impact.

c. If existing noise levels experienced by sensitive receptors in interior living areas are below 45 dBA CNEL, and if the proposed project will generate noise that will cause the existing noise levels experienced by the sensitive receptors in interior living areas to exceed 45 dBA CNEL – either individually or cumulatively when combined with other noise-generating sources – then the proposed project is presumed to have a significant impact.

d. If existing noise levels experienced by sensitive receptors in interior living areas exceed 45 dBA CNEL, and if the proposed project will generate noise that will cause the existing noise levels experienced by the sensitive receptors in interior living areas to increase by 3 dBA CNEL – either individually or cumulatively when combined with other noise-generating sources – then the proposed project is presumed to have a significant impact.

e. Noise from grading and construction activity proposed within 1,600 feet of sensitive receptors, including schools, residential development, commercial lodging facilities, hospitals, or health care facilities, would generally result in a potentially significant

impact. According to USEPA guidelines, average construction noise is 95 dBA[4] at a 50-foot distance from the source. A 6 dB drop typically occurs with a doubling of the distance from the source. Therefore, locations within 1,600 feet of the construction site would be affected by noise levels over 65 dBA.[5] To mitigate this impact, construction within 1,600 feet of sensitive receptors shall be limited to weekdays between the hours of 8 a.m. to 5 p.m. only. Noise attenuation barriers and muffling of grading equipment may also be required. Construction equipment generating noise levels above 95 dBA may require additional mitigation.

Methodology

As described in Chapter 2, *Project Description*, the Project plans for public parks, trails, and recreational facilities in unincorporated areas within the county. The Project also changes County policies and regulations to support the development of public parks, recreation, and trails through public-private partnerships. Project-level siting and design details are not known, so the impact analysis does not evaluate individual noise and/or vibration hazards at a project- or site-specific level. The programmatic analysis provided by this Program EIR addresses the potential for future parks, recreation, trails, and related development under the Project to significantly increase noise levels within the county or expose residents to unacceptable noise levels during construction or operation. The potential impacts relative to the existing noise environment are assessed qualitatively and/or estimated based on known approximate noise levels of future project activities, such as construction equipment or increased transportation or recreational noise. Wherever possible, illustrative examples are provided to describe particular areas of the county (e.g., within transportation noise corridors) where the Project could have adverse impacts.

The County has established a general planning policy that the maximum exterior noise exposure compatible with noise-sensitive uses (without noise mitigation features) is 65 dBA (County of Santa Barbara 2024). The County thresholds define noise-sensitive uses as residential uses, transient lodging, hospitals and other medical care facilities, educational facilities, libraries, churches, and places of assembly. The County does not give specific thresholds for parks, trails, or recreational developments and does not consider these uses to be noise-sensitive. However, the California General Plan Guidelines, Appendix D, Noise Element Guidelines indicate that an L_{dn} below 70 dBA would be normally acceptable for playgrounds and neighborhood parks. Therefore, for this analysis, noise impacts would be significant if the proposed Project could:

1. Involve construction activities within 1,600 feet of sensitive receptors that could generate noise levels over 65 dBA L_{eq}

[4] These noise levels represent L_{eq} measurements, not CNEL or L_{dn} day-night averages.

2. Generate noise levels that would expose sensitive receptors to exterior community noise levels above 65 dB L_{dn}
3. Place neighborhood parks or playgrounds within an L_{dn} above 70 dBA
4. Place community parks, outdoor sports facilities, water recreation, or other recreational facility within an L_{dn} above 75 dBA

During construction, the analysis considers the potential equipment and methods used. The specific construction details (e.g., scheduling/phasing, equipment, building construction size, grading, etc.) for future projects under the Project are unknown at this time and would vary annually. During operation, the analysis considers the potential noise sources that would be generated from the use of parks, recreation facilities, and trails, as well as related uses. Further, permanent increases in roadway noise would occur from changes to vehicle traffic resulting from the Project, which would potentially affect sensitive receptors. As such, the analysis includes a programmatic assessment of transportation noise. For this Program EIR, transportation noise modeling and mapping for high-volume travel corridors is not feasible as roadway operations (i.e., level of service) data is not available for the proposed Project. (See Section 3.15, *Transportation* for more information regarding potential impacts to transportation.)

Groundborne vibration levels that could be generated by construction equipment have also been qualitatively described and compared to applicable thresholds of significance. Groundborne vibration levels resulting from construction activities are estimated using the published data in the 2020 Caltrans *Transportation and Construction Vibration Guidance Manual*. Potential vibration levels are identified for on and offsite locations that are sensitive to vibration, including nearby residences and historic structures. The CEQA Guidelines and County thresholds do not define the levels at which groundborne vibration or groundborne noise is considered "excessive." For this analysis, groundborne vibration impacts would be significant if the Project could generate vibration exceeding the threshold of 0.1 in/sec within 25 feet of any building. Per Caltrans, this threshold corresponds to the level at which vibration can cause a "strongly perceptible" degree of human annoyance and has the potential to cause structural damage in fragile buildings as shown in Table 3.12-4 and Table 3.12-5. However, activities such as demolition, blasting, and jackhammering, which contribute significantly to groundborne vibrations, would be rare or not needed for parks, trails, and recreation facilities.

Key resources or data used in the preparation of this section include the Santa Barbara County Comprehensive Plan Noise Element, the Noise Ordinance of the County Code, USEPA Noise Effects Handbook, U.S. HUD's Noise Assessment Guidelines, Caltrans Transportation and Construction Vibration Guidance Manual, and various noise publications such as the FAA Part 150 guidance. The information and analysis presented in this section are based on available long-range planning documents, EIRs, and related technical studies that apply to the Project

area. This programmatic analysis is supported by the review of existing plans, including SBCAG's ALUCPs for all airports in the county. Additionally, this section integrates relevant information from the 2021 Connected 2050: Regional Transportation Plan and Sustainable Communities Strategy EIR, the 2023 – 2031 Santa Barbara County Housing Element Update Program EIR, the 2016 Gaviota Coast Plan EIR, the 2015 Eastern Goleta Valley Community Plan EIR, and the 1997 Orcutt Community Plan.

3.12.5.2 Project Impacts

Table 3.12-7, below, provides a summary of the noise impacts related to the Project. A detailed discussion of each impact follows.

Table 3.12-7. Summary of Noise Impacts

Noise Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact NOI-1. The Project would generate temporary noise or groundborne vibration from the construction of public parks, trails, and recreational facilities, or related uses.	Insignificant	No mitigation measures required.	Insignificant
Impact NOI-2. The Project would generate noise associated with park and recreation activities and associated vehicle traffic on roadways.	Insignificant	No mitigation measures required.	Insignificant
Impact NOI-3. The Project would support outdoor special events, which could result in periodic temporary increases in ambient noise levels.	Potentially significant	MM NOI-1 (Recreation Noise Standards)	Significant but mitigable
Impact NOI-4. Outdoor events and recreational activities could result in a substantial periodic increase in ambient noise levels.	Insignificant	No mitigation measures required.	Insignificant
Cumulative Impacts	Potentially significant	MM NOI-1 (Recreation Noise Standards)	Significant but mitigable

Impact NOI-1. The Project would generate temporary noise or groundborne vibration from the construction of public parks, trails, and recreational facilities, or related uses.

As described in Chapter 2, *Project Description*, the Project would include the future development of County parks, trails, and recreational facilities to serve residents within five recreation planning areas. The Project would also enable the development of public recreation facilities and related development through zoning changes to allow public parks and trails and create the Recreation Benefit Project (RBP) Program. Construction activities would occur incrementally throughout the Project planning horizon, with associated construction noise temporarily and

intermittently affecting localized areas. Though precise locations would vary over time, construction activity would occur in phases over the life of the Project, but it is unlikely that multiple recreation projects would be developed concurrently and in the same location; therefore, construction noise would not compound. Construction of recreation projects would require a range of equipment and processes that could generate temporary noise and groundborne vibration. However, for many parks and trail projects, construction noise would be minor and temporary and would not generate noise that would expose sensitive receptors to exterior noise levels above 65 dB L_{eq} or generate vibration levels that would adversely affect sensitive populations and structures. As analyzed below, construction of new structures such as restrooms, covered gathering areas, patios, or site improvements would generally be small-scale and require limited construction equipment. Larger recreation facilities such as aquatic facilities, pools, and community centers would comply with existing permitting and regulatory requirements to control construction activities and related noise and vibration.

Construction Noise

Construction noise levels differ depending on the equipment being used. Peak construction equipment noise can range from 68 dBA L_{eq} (pumps, vibrators) up to 101 dBA L_{eq} (pile driver) at 50 feet from the source (Table 3.12-8). While the use of pile drivers for Project activities would likely be rarely or not needed, other higher peak noise-generating equipment, such as heavy haul trucks, jackhammers, backhoes, tractors, and scrapers/graders generating maximum noise levels of 93 dBA L_{eq} to 98 dBA L_{eq}, would be used through demolition (if needed), site preparation, grading, and foundation phases for each project. Many potential recreation project sites are currently vacant, so it is expected that some projects would require heavy equipment for site development.

The grading/excavation phase of development tends to create the highest construction noise levels because of the operation of equipment. As shown in Table 3.12-9, site excavation and grading present some of the loudest construction noise, as well as building finishing, which can generate up to 86 dBA L_{eq} at 50 feet away with mufflers on the equipment. As described in Section 3.12.2, *Fundamentals of Sound and Noise,* noise levels generated by specific construction equipment or collectively during different construction phases would diminish rapidly with distance from the construction site, at a rate of approximately 6 dBA per doubling of distance as equipment is generally stationary or confined to specific areas during construction. For example, a noise level of 86 dBA measured at 50 feet from the noise source to the receptor would reduce to 80 dBA at 100 feet from the source to the receptor and reduce by another 6 dBA to 74 dBA at 200 feet from the source to the receptor. During grading operations, the equipment would be dispersed in various portions of the site in both time and space. Physically, a limited amount of equipment can operate near a given location at a particular time.

Table 3.12-8. Noise Ranges of Typical Construction Equipment

Construction Equipment	Noise Levels in dBA L_{eq} at 50 Feet
Pile Driver	95-101
Auger Drill Rig	80-85
Front Loader	73–86
Trucks	82–95
Cranes (moveable)	75–88
Cranes (derrick)	86–89
Vibrator	68–82
Saws	72–82
Pneumatic Impact Equipment	83–88
Jackhammers	81–98
Pumps	68–72
Generators	71–83
Compressors	75–87
Concrete Mixers	75–88
Concrete Pumps	81–85
Backhoe	73–95
Tractor	77–98
Scraper/Grader	80–93
Paver	85–88

Note: Machinery equipped with noise control devices or other noise-reducing design features does not generate the same level of noise emissions as that shown in this table.
Source: FHWA 2006.

Table 3.12-9. Typical Noise Levels by Construction Phase and Activities

Construction Phase	Noise Levels in dBA Leq at 20 Feet	Noise Levels in dBA Leq at 50 Feet with Mufflers	Noise Levels in dBA Leq at 100 Feet with Mufflers
Ground Clearing	90	82	76
Excavation, Grading	94	86	80
Foundations	85	77	71
Structural	91	83	77
Finishing	94	86	80

Source: USEPA 1971.

Public park, recreation, and trail projects planned for the Project area would entail the physical development of new facilities or the expansion of existing facilities. Construction noise from the Project would relate primarily to equipment such as trucks, tractors, pavers, and backhoes used during site preparation and paving. Installation of park and trail equipment such as signs, benches, tables, shade structures, playgrounds, lighting, irrigation, and landscaping requires power tools and hand tools that do not generate substantial noise levels. Further, all construction activities would be subject to existing regulations limiting construction activities.

Most recreation developments planned under the Project would have minor construction noise. For example, the development of neighborhood parks like the Vandenberg Village Park, Oak Knoll Neighborhood Park, Ben Page Neighborhood Park, or Mission Hills Neighborhood Park would involve the installation of a playground, small open lawn areas, walking paths, and shaded seating areas with landscaping. Similarly, creating recreational trails such as Point Sal Trails & Coastal Access Improvements, Mission Hills Community Trail, or the Surf Beach to Ocean Beach Boardwalk typically requires hand tools and potentially a small earthmover or grader, which do not generally create high construction noise levels. Heavy construction equipment is not needed for these types of improvements and, therefore, would not affect nearby sensitive receptors. The duration of small recreation projects would also be relatively short, which would limit the potential for construction noise to adversely affect community noise levels. Further, several recreation projects involve new construction in remote areas away from urban communities, such as the Jalama Beach Campground Expansion & Upgrade Project, Mission Hills Mountain Bike Park, South Coast Foothill Mountain Bike Park, and Drum Canyon Trail, and thus would have no impact on sensitive receptors.

However, community parks such as the South Coast Aquatic Center, Goleta Community Sports Park, and the Guadalupe Community Park & Campground would likely have louder construction noise because larger recreation facilities would require heavier equipment and longer construction durations. Campgrounds and related facilities could also require more intensive equipment and structural development. In some cases, these types of facilities would also be constructed nearer to existing potential sensitive receptors in urban environments and neighborhoods. Potential construction-related noise impacts on sensitive uses would be dependent on the relative distance of the sensitive use from construction activities. Further, construction near sensitive biological resources, such as riparian habitats and nesting bird habitats could generate noise that would significantly disturb sensitive species (Section 3.4, *Biological Resources*).

According to the County Code of Ordinances (Chapter 14 Grading Restrictions; Ord. No. 4766, 11-9-2010), grading work is prohibited between the hours of 7:00 p.m. and 7:00 a.m. (or as required within the land use permit). Additionally, as required by the policies and standards contained within the County's Comprehensive Plan, construction within 1,600 feet of sensitive receptors shall be limited to weekdays between the hours of 8:00 a.m. to 5:00 p.m. only. Noise attenuation barriers and muffling of grading equipment may also be required to ensure that sensitive receptors within 1,600 feet of the construction site would not be affected by noise levels over 65 dBA L_{eq}. These instances would be minimal given the location of planned recreation projects, the substantial distances to off-site sensitive receptors, and the limited construction equipment required to construct parks, trails, recreation facilities, and related development associated with the Project. Additionally, larger projects involving more extensive construction activities would undergo review by the County to determine compliance with

permitting and regulatory requirements. With the application of the County's noise thresholds and regulatory standards and the temporary nature of potential impacts to a given sensitive receptor, construction-related noise impacts would be *insignificant*.

Groundborne Vibration

Construction activity can generate varying degrees of vibration, depending on the construction procedure and the construction equipment used. The operation of construction equipment generates vibrations that spread through the ground and diminish in amplitude with distance from the source. The degree and amplitude of groundborne vibration would vary, depending on the soil type, ground profile, distance to the receptor building, and the construction characteristics of the receptor building. The results from vibration can range from no perceptible effects at the lowest vibration levels to low rumbling sounds and perceptible vibration at moderate levels, and to damage to the structure and/or infrastructure at the highest levels.

The ground motion caused by vibration can be measured as peak particle velocity (ppv) in inches per second (in/sec) (FTA 2018; California Department of Transportation [Caltrans] 2020). The vibration level at which continuous or frequent vibration is strongly perceptible is 0.1 in/sec. For transient groundborne vibration (i.e., a single isolated vibration event), 0.035 in/sec is barely perceptible while 2.0 in/sec is felt severely (Caltrans 2020). The CEQA Guidelines do not define the levels at which groundborne vibration or groundborne noise is considered "excessive." Per Caltrans guidelines, groundborne vibration impacts associated with human annoyance would be significant if the proposed project exceeds the threshold of 0.1 in/sec within 25 feet of a sensitive use or a fragile building. According to FTA's Transit Noise and Vibration Impact Assessment Manual, the vibration levels from a bulldozer are 0.089 PPV and less than 0.1 in/sec at 25 feet. Groundborne vibration from construction equipment is rarely perceived at distances greater than 25 feet given the large distances to off-site sensitive receptors and the relatively limited scale of the proposed uses and related development. The Project would mostly include modifications to existing structures and would not involve demolition of existing facilities. Construction activities on this scale would not require the extensive use of heavy construction equipment and therefore would not result in groundborne vibration. Therefore, significant human annoyance and structural damage would not occur and impacts associated with typical construction vibration would be *insignificant*.

Impact NOI-2. The Project would generate noise associated with park and recreation activities and associated vehicle traffic on roadways.

A noise impact could occur if public parks, trails, recreation facilities, and related development generate operational noise that exceeds the County's thresholds. These thresholds are dependent on existing noise levels, and the greater the existing noise level, the smaller the threshold. In areas where the pre-project ambient noise level is below 60 dBA, a substantial

increase is 5 dBA; where the pre-project ambient noise level is between 60 dBA and 65 dBA, a substantial increase is 3 dBA; and where the ambient pre-project noise level exceeds 65 dBA, a significant increase is 1.5 dBA. Operational impacts would also occur if future parks are located in high-noise areas (i.e., above 70 dBA). However, as described below, the operational noise associated with recreation uses is generally low and associated with common sounds for residential neighborhoods and developed areas. Further, public parks envisioned under the Project would not be located in high-noise areas, including nearby airports.

Ambient Noise from Transportation Sources

Long-term impacts associated with noise from traffic would occur if the development of projects proposed by the Recreation Master Plan generates enough additional vehicle trips on an adjacent roadway to result in long-term roadway noise increases exceeding the thresholds listed in Section 3.12.5.1, *Thresholds of Significance*. Under typical circumstances, and where roadway conditions are constant (i.e., size, configuration, and speed limit), projected traffic volumes generally need to double over existing volumes for associated noise levels to increase by approximately 3 dBA, the increase in noise level that is generally perceptible to the human ear in outdoor settings (Federal Highway Administration (FHWA) 2017).

At a programmatic level, the Project would not significantly generate additional trips, and therefore would not perceptibly change roadway noise levels. Most parks, recreation facilities, and trail projects would not substantially increase vehicle trips or traffic volumes along any one road or intersection, as most new recreation projects would be small-scale and dispersed across a relatively wide area within the county. Perceptible changes to roadway noise levels would be most likely on roadways carrying relatively low traffic volumes in rural areas that would experience a substantial permanent increase in traffic associated with the Project. High-volume roadways, such as U.S. Highway 101, already generate substantial noise from daily trip volumes, so the addition of Project-related trips is incremental and not audibly perceptible. For example, the proposed Ben Page Neighborhood Park proposes the expansion of recreational facilities at the Ben Page Youth Center and the development of a neighborhood park. This project site directly abuts U.S. Highway 101 and Union Pacific Railroad. Increased traffic to the project site would not substantially increase ambient noise in the area and the change would not be audible. Similarly, planned community parks, which would draw more traffic for daily use and sporting events, are planned in existing urban areas with high-noise roadways such as SR 217 and U.S. Highway 101 in Eastern Goleta Valley and Union Valley Parkway in Orcutt. The proposed Guadalupe Community Park & Campground would attract visitors coming to use the sports fields and to camp and would increase vehicle traffic in the residential area in northwest Guadalupe, increasing visitors using local roads such as Guadalupe Street and 11th Street, which could increase roadway noise on currently low-volume roads. However, precedent analysis conducted for the Nipomo Community Park Master Plan in San Luis Obispo County

indicates that large community parks only increase daily vehicle trips between 0.8 and 2.5 percent, which equates to a maximum increase in noise level of 0.1 (San Luis Obispo County 2012). The human ear can barely perceive noise level changes of 3 dBA. Since the expected transportation noise level increase from the most impactful type of recreation project, community parks, would be less than 1 dBA, traffic noise impacts are not expected to occur due to traffic generated by new parks, recreation facilities, trails, and related development. Therefore, due to the relatively low number of expected additional trips (compared to existing conditions), the estimated maximum noise level increases due to Project generated traffic are expected to be negligible (0.0 to 0.1-dB increase) and impacts related to roadway noise would be *insignificant*.

Ambient Noise from Stationary Operational Noise Sources

Operation of public parks, recreation facilities, trails, and related uses would contribute to new sources of noise that would incrementally increase noise levels during operational hours. The loudest activities associated with outdoor recreation include multi-game sports tournaments. These events concentrate visitors into the area and can involve amplification of announcements and music along with cheering from spectators. Nuisance noise may also be generated and perceived following the end of such events when members of the crowd or sports team begin to disperse, in which generated noise would again be temporary and unlikely to exceed standard exterior noise levels for residential uses. A single shouting person can generate a noise level of approximately 80-90 dBA from a distance of 3 feet (ACOUSTICS 2011), while a crowd of 20 screaming people can generate a maximum noise level of approximately 69 dBA at a distance of 50 feet (Culbertson, Adams & Associates, Inc. 2002). The use of a public address system can require six to 10 dB more than crowd noise to perform adequately during a sporting event, though this peak noise level is infrequent and avoidable when the public address system is offset from peak crowd noise.

Noise sources at outdoor sports facilities would be loudest when the crowd is cheering, which would occur at random intervals throughout the event and last only a few seconds or moments at a time. Precedent analysis conducted for the Nipomo Community Park Master Plan in San Luis Obispo County indicates that sports fields only generate 66.5 dBA Leq at 25 feet from the center of the field, 59.1 dBA Leq at 50 feet from the center of the field, and 54 dBA Leq at 100 feet from the center of the field. Most of the noise generated came from crowd cheering during exciting play and very little noise was generated by participants or action on the field (San Luis Obispo County 2012). The sound level typically attenuates (or drops off) at a rate of 6 dBA for each doubling of distance. This indicates a safe-distance offset could be estimated to determine the distance between uses to comply with the noise thresholds identified in the Noise Element. For a hypothetical multi-game soccer event, the nearest field would need to be no closer than approximately 30 feet from the sensitive receptor (i.e., residence property line) to

meet the County exterior noise thresholds of 65 dBA. The Project would not result in multi-sport outdoor fields within 30 feet of residential uses. Other facilities such as dog parks and pickleball courts may introduce new noises in communities. Dogs barking, people socializing, and balls bouncing can all introduce new sources of nuisance noise, especially if built too close to residential uses; however, these intermittent noises from the use of public park facilities would not generate noise that would increase ambient noise above County noise thresholds. Given these factors, operational noise levels perceptible at residences located near proposed projects are not expected to exceed a maximum of 65 dBA, which is within the acceptable noise levels for residential uses.

Additionally, public parks, trails, and recreation facilities are daytime uses and subject to closure. County parks and trails are typically open from 6 am to sunset daily. Campgrounds in the county observe quiet hours and restrict the volume and use of amplified noise, generators, and other noise sources. This is done to ensure that campground users have an enjoyable experience and has the added benefit of minimizing off-site noise. These uses would also be subject to the County's Nighttime Noise Restrictions (Section 3.12.4, *Regulatory Setting*), which prohibit amplified noise discernable from 100 feet from the property line between the hours between the hours of 10:00 p.m. and 7:00 a.m. Sunday through Thursday and between the hours of midnight and 7:00 a.m. on Friday and Saturday. Operational noise from public recreational development would not result in substantial increases in stationary sources and this impact would be *insignificant*.

Impact NOI-3. Outdoor events and recreational activities could result in a substantial periodic increase in ambient noise levels.

The Project includes amendments to the Comprehensive Plan and zoning ordinances to enable expanded uses in Recreation zoning and for permitted RBPs, which would include a public recreation component in addition to a private development component as allowed by the zoning ordinances. As a result, the Project would indirectly result in development that could generate operational noise from use and special events held on private property, particularly as part of non-recreational development included in RBPs. The indirect impact would only occur when an RBP is proposed to draw visitors for events in large groups and with live or amplified music in low-noise areas with nearby sensitive receptors. Indirect impacts could also occur from special events and facility uses, such as permitted outdoor theaters or amphitheaters, outdoor shooting ranges, and motorized riding parks.

Most recreation project types and locations would have extremely limited potential to generate high noise levels due to the limitations of allowed uses and development standards for public parks, trails, and RBPs, including permitting requirements to ensure proposed uses are designed and operated consistent with County zoning ordinances. Further, any proposed RBP would be subject to the County's existing regulations protecting noise-sensitive receptors.

Even though the potential for indirect impacts is low, adverse noise impacts are possible because it is impossible to predict how, when, and where projects enabled under the Project, including eligible RBP Program projects, would take place. Likewise, it is difficult to predict the scope, scale, and extent of development proposed by these projects. However, it is reasonably foreseeable that special events and use of allowed uses on Recreation land and within RBPs, as proposed by the Project, could generate noise that exceeds County thresholds. Therefore, the Project could result in indirect impacts to noise. With the implementation of **MM NOI-1 (Recreation Noise Standards)**, which would enforce stricter noise standards (e.g., timing and volume for amplified noise), impacts from events and recreation facilities enabled through the Project's proposed amendments to the County's zoning ordinances would be *significant but mitigable*.

Impact NOI-4. The Project would potentially expose people to high noise levels and airport noise.

To help meet recreation needs in Santa Barbara County, the Project includes 30 planned public parks, recreation, and trail projects that would develop new facilities or expand existing facilities in unincorporated areas in the county. The potential for the Project to expose people to noise levels exceeding 70 - 75 dB L_{dn} is extremely low. The proposed County parks projects (listed in Section 2.5.1) do not overlap or otherwise interact with high-noise contours, including those of airports in the county. CEQA also specifies that a significant impact is only achieved when *residents or workers* are exposed to excessive airport noise, not temporary visitors. Visitors to recreational facilities within airport zones would be subject to airport noise, but the nuisance would be temporary and would likely not cause long-term health effects. In addition, noise from recreational uses and the construction of new recreation facilities would be compatible with the existing noise environment surrounding an airport. Therefore, impacts are considered *insignificant*.

3.12.5.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis*, the cumulative setting for the Project involves a variety of policies and initiatives in the county, as well as development projects in the unincorporated county and surrounding incorporated cities. These projects include parks and trail projects within the cities, state parks, and federal properties; related projects such as master plans and the California Coastal Trail; other plans such as General Plan updates; and the County's current cumulative projects list. Cumulative noise impacts would occur if projects that are enabled under the Recreation Master Plan and cumulative development projects would affect the same noise environment. Such cumulative projects would range from programmatic projects such as the Housing Element Update, the Agricultural Enterprise Ordinance, and development and annexations proposed under the general plans and housing elements of several cities within the county, as well as individual development projects.

As discussed in Impact NOI-1, construction activities anticipated to occur under the proposed Project may involve the use of construction equipment that could produce temporary noise and vibration levels. Depending on the individual recreation development project and its location, construction projects occurring concurrently with other projects could generate construction noise and ground-borne vibration that could cumulatively affect the same sensitive receptors. However, construction noise and vibration would be contained within site development enabled by the Project and would not adversely affect offsite structures near or adjacent to recreation development sites. Therefore, significant noise levels, human annoyance, and structural damage would not occur when the Project is combined with offsite cumulative projects. The Project's contribution to cumulative noise would be nominal, and cumulative impacts would be *insignificant*.

As discussed in Impact NOI-2, ambient noise impacts from operations would occur primarily as a result of incremental increases in traffic volumes on local roadways and highways (e.g., U.S. Highway 101, SR 217, SR 135). The Project would contribute to a nominal increase in vehicle trips, which would increase roadway noise on local roads directly serving new recreational facilities. While there is a potential for an increase in stationary noise sources to produce a cumulative increase in noise, new recreation development projects planned for under the Recreation Master Plan are not anticipated to result in substantial operational noise and, therefore, the Project would not contribute to cumulative operational noise and impacts would be *insignificant*.

As discussed in Impact NOI-3, the Project could generate noise from special events and recreational uses that could exceed County thresholds, which could combine with cumulative project noise to exacerbate adverse effects. However, with **MM NOI-1 (Recreation Noise Standards)**, the Project's cumulative impacts related to noise would be *significant but mitigable*.

As discussed in Impact NOI-4, new recreation development would not be located within 70-75 dB L_{dn} noise levels, including airports. Recreational land uses are compatible with airport noise and would not expose workers or residents to additional airport noise. Therefore, the Project would not substantially contribute to impacts from airport noise and other high-noise areas for residents and workers and cumulative impacts would be *insignificant*.

3.12.5.4 Proposed Mitigation

MM NOI-1: Recreation Noise Standards. All county Parks projects shall be subject to the following standards. The County shall amend the Santa Barbara County zoning ordinances to add the following requirements for permitted uses in Recreation zones, permitted parks and trails, and RBPs:

- Outdoor amplified sound and other uses generating maximum noise levels above 65 dBA associated with public parks, trails, recreation facilities, and Recreation Benefit Projects shall not exceed 65 dBA at the property boundary and the amplified sound shall cease by 10:00 p.m.

  Plan Requirements and Timing: This measure shall be incorporated with proposed Project amendments to the zoning ordinances and standards shall apply to applicable projects immediately following the certification of this EIR.

  Monitoring: Permit compliance monitoring staff shall ensure compliance through a review of project plans and/or applicant/contractor-provided documentation.

3.12.5.5 Secondary Impacts

Implementation of **MM NOI-1** would not result in adverse secondary impacts.

3.12.5.6 Residual Impacts

Impact NOI-1. Future construction of recreational developments would generate transient and continuous noise and vibration from equipment and heavy haul trucks subject to existing County grading regulations. With the application of the County's noise thresholds and regulatory standards and the temporary nature of potential impacts to a given sensitive receptor, construction-related noise impacts would be *insignificant*.

Impact NOI-2. The Project would contribute to a nominal increase in vehicle trips, which would increase roadway noise on local roads directly serving new recreational facilities. New recreation development projects planned for under the Recreation Master Plan are not anticipated to result in substantial operational noise and, therefore, the Project would not generate significant operational noise and impacts would be *insignificant*.

Impact NOI-3. Special events and proposed allowed uses on Recreation land and within RBPs, as proposed by the Project, could generate noise that exceeds County thresholds. Therefore, the Project could result in indirect impacts to noise. With the implementation of **MM NOI-1 (Recreation Noise Standards)**, which would enforce stricter noise standards (e.g., timing and volume for amplified noise), impacts from events and recreation facilities enabled through the Project's proposed amendments to the County's zoning ordinances would be *significant but mitigable*.

Impact NOI-4. Airports in the county generate high noise levels, but park visitors within airport zones would only be temporarily subjected to excessive airport noise. Therefore, noise impacts on workers and residents would be *insignificant*.

3.13 PUBLIC SERVICES

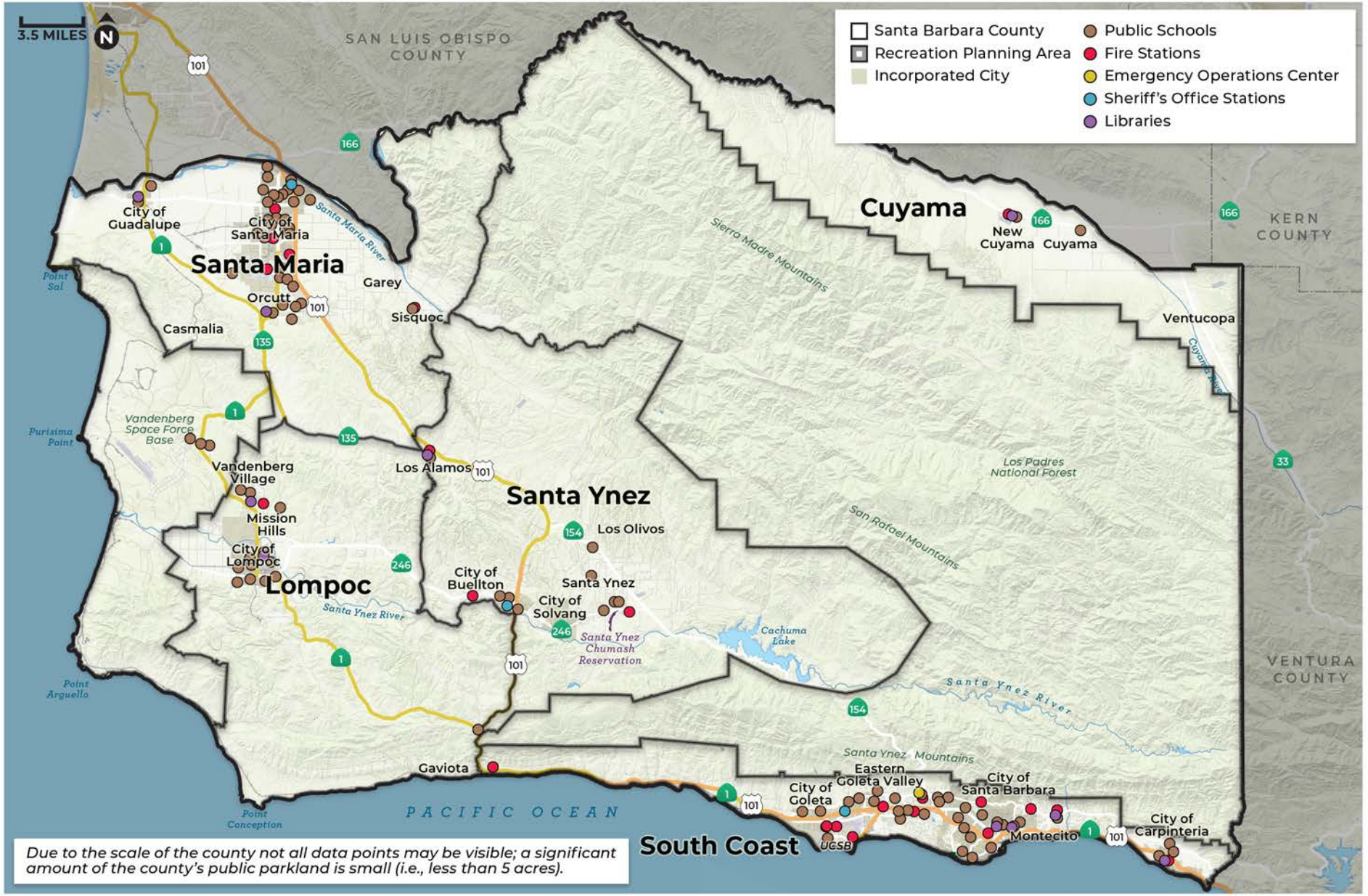
3.13.1 INTRODUCTION

This section describes potential impacts on public services that could occur from the implementation of the Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (Project). This section describes existing public services in the Project area, which include fire protection, law enforcement and police protection, emergency medical services and healthcare, public schools, and libraries. The analysis addresses the physical environmental impacts that could occur as a result of the construction or expansion of new public facilities necessary to serve the Project.

Section 3.14, *Recreation* considers the availability and adequacy of public parks and recreation facilities that serve the unincorporated areas of the county. Section 3.16, *Utilities and Water Supply* provides information regarding public utilities, including water, wastewater, and solid waste management. Section 3.6, *Energy* provides information regarding electricity and natural gas utilities. Section 3.15, *Transportation* provides information regarding public transportation services. For information about wildland fires, response capabilities, and wildfire fighting strategies, see Section 3.17, *Wildfire*. For analysis of potential air quality impacts on sensitive receptors associated with public service facilities (e.g., schools), refer to Section 3.3, *Air Quality*.

3.13.2 ENVIRONMENTAL SETTING

State and local government entities provide a wide range of public services to the residents of the county related to public health and safety, and educational institutions, as summarized in Table 3.13-1 and described in further detail below. Figure 3.13-1 depicts the location of various public facilities within the county that provide services to unincorporated communities.



wsp

Santa Barbara County Public Services

FIGURE 3.13.-1

Table 3.13-1. Summary of Public Service Providers in the Unincorporated County

Public Service	Provider
Fire Protection	• Santa Barbara County Fire Department (SBCFD)
Law Enforcement and Police Protection	• Santa Barbara County Sheriff's Office • California Highway Patrol (CHP)
Public Schools	• Ballard School District • Blochman Union School District • Buellton Union School District • Carpinteria Unified School District • Cold Spring School District • College School District • Cuyama Joint Unified School District • Goleta Union School District • Guadalupe Union School District • Hope School District • Lompoc Unified School District • Los Olivos School District • Montecito Union School District • Orcutt Union School District • Santa Barbara Unified School District • Santa Maria Joint Union High School District • Santa Maria-Bonita School District • Santa Ynez Valley Union High School District • Solvang School District • Vista Del Mar Union School District
Libraries	• Santa Maria Public Library System • Lompoc Public Library System • Carpinteria Community Library • Goleta Valley Library System • Santa Ynez Valley Library System

Fire Protection

Santa Barbara County Fire Department

The Santa Barbara County Fire Department (SBCFD) provides fire prevention, fire suppression, and paramedic services covering an area of 2,480 square miles throughout the county, including unincorporated urban communities such as Eastern Goleta Valley, Orcutt, Santa Ynez, Vandenberg Village, Mission Hills, and New Cuyama, as well as some rural areas. (See Section 3.17, *Wildfire* for additional information about rural and wildland fire protection services.) SBCFD serves approximately 174,268 residents within its service area (SBCFD 2022d). SBCFD is an "all-risk" organization providing services that range from firefighting, fire prevention and inspection, and rescue to emergency medical care, transportation, and hazardous material and oil spill response and containment. SBCFD is also one of six "contract counties" under contract with the



Fire Station No. 13 in Eastern Goleta Valley serves the area from Los Padres National Forest (LPNF) to the Pacific Ocean, including some portions of the City of Santa Barbara, and maintains average response times of about 10 minutes.
Source: SBCFD

California Department of Forestry and Fire Protection (CAL FIRE) with the state. As a contract county, SBCFD assumes responsibility for fire prevention and protection over the 797,382 acres of State Responsibility Area (SRA) in the county. In return for this service, CAL FIRE provides funding for services, including wages of suppression crews, maintenance of firefighting facilities, fire prevention assistance, pre-fire management positions, dispatch, capital improvements, and administrative services. SBCFD's budget also provides for expanded firefighting needs when fires grow beyond the initial attack (SBCFD 2025). The SBCFD and the Santa Barbara County Sheriff's Office have received calls for service in public parks and trails such as medical emergencies, theft, or other disturbances after hours in public facilities in the county. Some County Parks staff are also emergency medical technicians (EMTs) and respond to certain emergencies as needed (Jeffrey Lindgren 2025).

Fire Stations, Staffing, and Equipment

With approximately 245 field personnel divided across 16 fire stations (Table 3.13-2), SBCFD responds to over 15,000 incidents each year, including structure, wildland, vehicle, and other types of fires (SBCFD 2022a). Each fire station is staffed 24 hours per day with a minimum of three firefighters and a Type I (structure) engine. Specialized equipment, such as Type III (wildland) fire engines, water tenders, paramedic rescue ambulances, technical rescue, and water rescue equipment are strategically placed throughout the county and are cross-staffed with existing engine personnel. Details regarding the location, service area, and apparatus and staffing for SBCFD fire stations are provided in Table 3.13-2 and Figure 3.13-1. Consistent with the County Fire Protection Standards, SBCFD targets a firefighter-to-population ratio of one firefighter on duty for every 2,000 persons in the service area. One firefighter per 4,000 persons (including urban and rural area populations) is the maximum ratio that SBCFD has determined that can adequately serve the public (County of Santa Barbara 2023a). Additionally, a ratio of one engine company per 16,000 persons represents the maximum population that SBCFD has determined can be adequately served by a four-person crew. With a service area population of approximately 174,268 persons, and 245 field personnel spread across 16 fire stations (and a total of 18 engine/truck companies), the current firefighter-to-population ratio is one firefighter for approximately every 711 persons, and one engine company for every 9,682 persons.

Table 3.13-2. Santa Barbara County Fire Department Stations

Station No.	Address	Location (City/Community)	Service Area	Apparatus & Staffing[1]
10	7952 Hollister Avenue (Planned)	South Coast City of Goleta	Western portions of the City of Goleta and the unincorporated areas of the county north and west of the City of Goleta.	This new fire station is planned, but not yet built. The facility is planned as an 11,600-square-foot, single-story station with three drive bays for fire trucks and associated apparatus. Three firefighters would be on duty at all times.
11	6901 Frey Way	South Coast City of Goleta	The City of Goleta west of Los Carneros Road and north of El Colegio Road and the unincorporated areas of the county north and west of the City of Goleta.	One Captain, one Engineer, and one Firefighter are assigned to Ladder Truck 11 and one Captain, one Engineer, and one Firefighter / Paramedic are assigned to Engine 11. Since Station 11 is also a Water Rescue Station two of the responding Firefighters may be assigned to the rescue watercraft. Station 11 is also the home to the Urban Search And Rescue (USAR) vehicle and team members. Truck 11 responds to all vehicle accidents, heavy rescues, technical rescues, and structure fire calls in Battalion 1.
12	5330 Calle Real	South Coast City of Goleta	The area bordered by Fairview Avenue, Fowler Road, Cathedral Oaks Road, and San Marcos Pass Road from Calle Real North to Via Los Santos	One Captain, one Engineer, and one Firefighter Advanced Life Support (ALS) capable when paramedic on duty (through the use of extension kits)

Table 3.13-2. Santa Barbara County Fire Department Stations (Continued)

Station No.	Address	Location (City/Community)	Service Area	Apparatus & Staffing[1]
13	4570 Hollister Avenue	South Coast Eastern Goleta Valley	Areas of Goleta and unincorporated areas (Eastern Goleta Valley) west of the City of Santa Barbara; bordered to the north by areas of Los Padres National Forest (LPNF), to the south by the Pacific Ocean, to the east by the County-City borders, and to the west roughly by Maria Ignacio Creek in the south and San Antonio Creek towards the north	One Captain, one Engineer, and one Firefighter Advanced Life Support (ALS) capable when paramedic on-duty (through the use of extension kits) Utility
14	320 North Los Carneros Road	South Coast City of Goleta	The area south of LPNF, north of Hollister Avenue, east of Glen Annie Road, and west of Fairview Avenue..	One Captain, one Engineer, and one Firefighter ALS Paramedic-Staffed Station
15	2491 Foothill Road	South Coast City of Santa Barbara	The unincorporated areas north of the City of Santa Barbara, extending into LPNF in the north, towards the south, and east up to the City/County borders. In the west, it is bordered north of Foothill Road by Antone Road and Debra Drive and south of Foothill Road by Alamar Avenue.	One Captain, one Engineer, and one Firefighter ALS capable when paramedic on-duty (through the use of extension kits)
17	University of California, Santa Barbara (UCSB), Mesa Road Bldg. 547	South Coast UCSB	The UCSB campus and areas of Isla Vista and the City of Goleta; bounded to the north by Hollister Avenue, to the south by the Pacific Ocean, to the east by Goleta Beach Park, and to the west by Camino Del Sur.	One Captain, one Engineer, one Firefighter / Paramedic Water Rescue Team Engine 17 Water Rescue Vehicle, there is one Firefighter / Paramedic and one Firefighter ALS Paramedic-Staffed Station

Table 3.13-2. Santa Barbara County Fire Department Stations (Continued)

Station No.	Address	Location (City/Community)	Service Area	Apparatus & Staffing[1]
38	17200 Calle Mariposa Reina Road	South Coast Gaviota	The area bounded by the Pacific Ocean to both the south and west. The northern boundary is roughly a line running from Jalama Beach, east through the Nojoqui Summit ending at their eastern boundary which is determined by a line running due north from El Capitan State Beach Park.	One Captain, one Engineer, and one Firefighter Support Water Tender Light & Air Unit
21	335 Union Avenue	Santa Maria Orcutt	The Orcutt and Santa Maria Valley areas including the communities of Tanglewood and Casmalia. Also responds north and west to portions of State Routes (SRs) 1 and 135 up to the city limits of Santa Maria and Guadalupe. and southward to SR 1 near San Antonio Road and SR 135 at Harris Grade Road.	One Captain, one Engineer, one Firefighter, and one Firefighter / Paramedic
25	E. Union Valley Parkway (Planned)	Santa Maria Orcutt	The unincorporated community of Orcutt.	This new fire station is planned, but not yet built.
26	1596 Tiffany Park Court	Santa Maria Orcutt	The Orcutt and Santa Maria Valleys. Bounded by the Solomon Grade to the south, Santa Maria Way to the north, Bradley Road to the west, and Dominion Road to the east.	One Captain, one Engineer, one Firefighter, and one Firefighter/Paramedic Tactical Water Tender Utility
23	5003 Depot Street	Santa Maria Sisquoc	The Sisquoc region. Bounded by Tepesquet Canyon to the north, by U.S. Highway 101 and Aliso Canyon Road to the south, by Foxen Canyon and Rancho Sisquoc to the east, and by Dominion Road to the west.	One Captain, one Engineer, and one Firefighter (one of these will also be a Paramedic) ALS Paramedic-Staffed Station

Table 3.13-2. Santa Barbara County Fire Department Stations (Continued)

Station No.	Address	Location (City/Community)	Service Area	Apparatus & Staffing[1]
24	99 Centennial Street	Santa Ynez Los Alamos	The Los Alamos area roughly bordered in the north by the Solomon Grade (on U.S. Highway 101) or the 9000 block of Foxen Canyon Road. In the South, it extends to an area just North of SR 154. In the East, it goes out to Zaca Lake and in the West, it extends to San Antonio Road and SR 135.	One Captain, one Engineer, and one Firefighter/Paramedic Utility Type 1 Reserve Location of Battalion 2 Office/Quarters and SBCFD Construction Section ALS Paramedic-Staffed Station
30	1644 Oak Street	Santa Ynez City of Solvang	The City of Solvang and portions of the unincorporated Santa Ynez Valley, including the town of Ballard.	One Captain, one Engineer, one Firefighter, and one Firefighter/Paramedic Utility Type 1 Reserve ALS Paramedic-Staffed Station
31	168 West Highway 246	Santa Ynez City of Buellton	Northern boundary: approximately 2 miles north of SR 154/ U.S. Highway 101 interchange; the southern boundary is the top of the Nojoqui Grade; extends eastward until Solvang city limit, and westward to the intersection of SR 246 and Campbell Road.	One Captain, one Engineer, one Firefighter, and one Firefighter/Paramedic Hazardous Materials (Haz-Mat) Response Team Haz-Mat Vehicle Home to Battalion 3 Quarters ALS Paramedic-Staffed Station
32	906 Airport Road	Santa Ynez Santa Ynez	The area bounded to the north by the LPNF boundary, to the south by the ridge of the Santa Ynez Mountains, to the east by Paradise Road, and to the west by Alamo Pintado Road along Solvang city limits.	One Captain, one Engineer, and two Firefighters/Paramedics Utility Water Tender Helicopter access ALS Paramedic-Staffed Station

Table 3.13-2. Santa Barbara County Fire Department Stations (Continued)

Station No.	Address	Location (City/Community)	Service Area	Apparatus & Staffing[1]
34	3510 Harris Grade Road	Lompoc Mission Hills	The area bounded to the north by SR 1 at San Antonio Creek, to the south at the Las Cruces Grade on SR 1, to the east by Drum Canyon at SR 246, and to the west by the Pacific Ocean.	One Captain, two Engineers, and two Firefighters / Paramedics Paramedic Engine Company Rescue Ambulance Type 1 Reserve Engine ALS Paramedic-Staffed Station
27	41 Newsome Street	Cuyama New Cuyama	The Cuyama Valley, the town of New Cuyama, and surrounding areas. The northern boundary extends to portions of San Luis Obispo County and the Caliente Mountains, in the South to the Sierra Madre, west on SR 166 to the Rockfront Ranch, and east to SR 33.	One Captain, one Engineer, one Firefighter, and one Firefighter / Paramedic

Notes:
[1] In addition to staff and apparatus listed, all stations include both Type 1 and 3 Engines.
Source: SBCFD 2022c.

In 2020, SBCFD retained Citygate Associates, LLC (Citygate) to conduct an operational enhancement update to the 2012 fire services deployment and departmental performance audit. This study evaluated the organization and deployment of fire suppression and Emergency Medical Services (EMS) operations. Citygate found that SBCFD's response apparatus (i.e., equipment) was appropriate to protect against the hazards likely to impact the fire service areas. Additionally, Citygate found the daily staffing per unit provides Effective Response Forces (ERFs) sufficient for one to three emerging or serious fires while maintaining other single-unit emergency responses. In terms of emergency incident workload per unit, no single fire unit or station area is approaching workload saturation (Citygate Associates, LLC 2020).

According to the County's Multi-Jurisdictional Hazard Mitigation Plan (MJHMP), 10 of the 16 County fire stations are more than 50 years old and three are more than 60 years old. The typical life of a fire station is 40 years. Recent studies conducted by contracted outside agencies have identified the need for SBCFD to replace 10 aging fire stations (County of Santa Barbara 2023). The County is actively seeking funding to repair or replace up to 10 county fire stations to provide adequate fire response services and equipment and equitable access to fire services countywide. In addition, the County is currently in the process of either planning for or acquiring funding for the construction of two new fire stations – Fire Station No. 10 in the City of Goleta to serve the western portions of the city and unincorporated county areas to the north and west,

and Fire Station No. 25 in Orcutt. It is currently uncertain when Fire Station No. 10 will be constructed and become operational. Fire Station No. 25 is in its design phase and is tentatively anticipated to be completed in 2025.

Response Times and Services

The adequacy of fire protection services can be informed by the average response times to incidents. Total response time to emergency incidents includes three separate components: 1) 9-1-1 call processing/dispatch time; 2) crew turnout time[1]; and 3) travel time. According to the National Fire Protection Association (NFPA) Code 1710 (Standard for the Organization and Deployment of Fire Suppression Operations, EMS, and Special Operations to the Public by Career Fire Departments), dispatch time for fire suppression, medical response, and special operations should be less than or equal to 60 seconds 90 percent of the time. Turnout time should be 60 seconds for EMS responses and 80 seconds for fire responses. The NFPA also requires fire stations to establish an objective of 240 seconds (i.e., 4:00 minutes) or less travel time for the first engine company arriving at a fire suppression incident or the first responder with an automatic defibrillator or higher-level capacity at an emergency medical incident. The NFPA standards require that these objectives be met for at least 90 percent of incidents. The most recently released 2020 NFPA standards were also revised in 2022 to include a requirement for fire stations to establish an objective of having an alarm answering time of not more than 15 seconds for at least 95 percent of the alarms received and not more than 40 seconds for at least 99 percent of the alarms received (NFPA 2020b). In particular, SBCFD's response performance goals are based on recommended best practices for first-due and multiple-unit ERF responses, which consist of 1:30 minutes for dispatch time, 2:00 minutes for turnout, and 4:00 minutes (initial units) to 8:00 minutes (multiple-unit ERF) for travel time.

Based on the most recently available 2019 data provided in the Citygate study, SBCFD's fire crew turnout and fire unit travel times are longer than the best practices recommendations. In total, SBCFD's total response time from 9-1-1 being answered is 2:22 minutes longer than best practices (Citygate Associates, LLC 2020). Citygate found that fire unit travel time exceeds the NFPA objective of 4:00 minutes due to: 1) existing road network design/limitations (e.g., poor road layout, narrow and winding roads); and 2) the size of some areas served by the individual stations (i.e., almost all of SBCFD's "first-in" districts include both urban areas and large rural areas). For example, in Orcutt, the existing stations serve the unincorporated Urban Area of Orcutt and adjoining rural unincorporated areas. Citygate found that improving these response times could be difficult and would require the addition of two stations to assist underserved areas. Additionally, Citygate acknowledged that subdivision-level growth is envisioned by the County for future approval. In light of this, Citygate recommended the construction of a station

[1] NFPA Standard 1710 defines turnout time as the time beginning when units acknowledge notification of the emergency to the time point of beginning the response.

in the Orcutt area to increase response capacity (Citygate Associates, LLC 2020). As previously mentioned, SBCFD is planning a new Fire Station No. 25 in Orcutt on East Union Valley Parkway, adjacent to the existing City of Santa Maria Fire Department. The fire station is in its preliminary planning and design phase.

Additional Fire Protection Services

As part of the Santa Barbara Operational Area Mutual Aid Plan, nine fire departments provide auto and mutual aid fire protection services to unincorporated areas of the county. Those fire departments include the Carpinteria-Summerland Fire Protection District, Guadalupe City Fire Protection District, Lompoc City Fire Department, Montecito Fire Protection District, Santa Maria City Fire Protection District, Vandenberg Space Force Base (VSFB), Santa Barbara City Fire Department, United States Forest Service (USFS) – Los Padres National Forest (LPNF), and CAL FIRE.

California Department of Forestry and Fire Protection

CAL FIRE is an emergency response and resource protection department. CAL FIRE serves over 31 million acres of California's privately owned wildlands, providing emergency service under agreement with 115 counties, cities, and districts. CAL FIRE responds to more than 7,300 wildland fires that burn an average of 300,000 acres each year and conducts fire prevention projects (CAL FIRE 2023a). CAL FIRE's Fire Prevention Program consists of multiple activities including wildland pre-fire engineering, vegetation management, fire planning, education, and law enforcement (California Climate Investments 2024). In addition, CAL FIRE personnel answer the call over 500,000 times for other emergencies including structure fires, automobile accidents, medical aids, swift water rescues, civil disturbances, search and rescues, hazardous material spills, train wrecks, floods, and earthquakes (CAL FIRE 2023b).

CAL FIRE covers the state with 21 operational units, 812 fire stations (237 state and 575 local government), 30 conservation (fire) camps, 5 training centers, 14 air attack bases, and 10 helitack bases. CAL FIRE comprises over 9,600 full-time and seasonal firefighting professionals, foresters, and administrative employees, 2,750 local government volunteer firefighters, roughly 1,000 Volunteers In Prevention, and 4,300 inmates and wards. To transport and support these forces, CAL FIRE operates nearly 1,000 fire engines, 184 rescue squads, 63 paramedic units, 27 aerial ladder trucks, 58 bulldozers, six mobile communication centers, and 11 mobile kitchen units. Further, CAL FIRE funds an additional 82 engines and 12 bulldozers via contract with Kern, Los Angeles, Marin, Orange, Santa Barbara, and Ventura counties. Concerning aircraft, CAL FIRE operates 23 1,200-gallon air tankers, 12 helicopters, and 17 air tactical planes (CAL FIRE 2014; 2018; 2022a; 2022b).

CAL FIRE is responsible for fire protection within SRAs. In most cases, CAL FIRE directly protects the SRA; however, six counties (including Santa Barbara County), known as "Contract

Counties," provide SRA fire protection under contract with CAL FIRE. The SRA extends throughout most of Santa Barbara County, excluding most incorporated and federally owned lands. The County has the responsibility as a Contract County to implement the 2024 State Strategic Fire Plan for California in the county (CAL FIRE 2024a). As such, SBCFD functionally operates as a unit of CAL FIRE and is responsible for all Strategic Fire Plan activities within the county. More information about wildland fire response, management, and firefighting strategies is available in Section 3.17, *Wildfire*.

Ocean Rescue Unit

The Santa Barbara County Fire Department's Water Rescue Team has nearly 30 qualified personnel certified as Swift Water Technician I and trained in surf rescue, personal watercraft (river and surf operations), and inflatable rescue boat operations. Certified members are Swift Water and Surf Rescue Specialists under the Tri-County Urban Search and Rescue (USAR) guidelines. The team responds countywide to a wide variety of potential and actual incidents along 118 miles of coastal shoreline and many creeks and rivers throughout the County of Santa Barbara. Water Rescue Team equipment is assigned to Fire Stations 11, 17, and 32 and includes Water Rescue 11, IRB 17, and Helicopter 308. The team responds to back-up engine company resources, countywide, and has responded to a variety of incidents since its inception. The operation of the team is part of a total system that includes the coordinated efforts of surrounding agencies and jurisdictions including operational area fire departments, lifeguards, USCG, Harbor Patrol, and Search and Rescue. Additionally, all Santa Barbara County Fire Department personnel are trained and equipped for shore-based water rescue (SBCFD 2022e).

Air Support Unit

The SBCFD Air Support Unit (ASU) currently has helicopters ready to respond to any emergency, day or night, rain or shine. The ASU is based in the center of the county at the Santa Ynez Airport and is jointly operated by the Fire and Sheriff Departments. ASU is staffed seven days a week with professional pilots chosen for their experience in the fire and rescue disciplines. These pilots are responsible for the safe operation of the aircraft and are teamed up with an experienced Crew Chief. The Crew Chief is responsible for the strategic and tactical planning of the fire, rescue, or medivac mission. To accomplish the rescue or medivac mission, Fire Station 32, also located at the airport, provides rescue paramedics for the helicopter. The rescue medics train for ocean, cliff, or mountain rescue and provide a support role during fire operations such as cutting and staffing landing spots on wildland fires or filling the helicopter's water tank for night fire suppression missions. For example, the ASU supported putting out the Zaca Lake Fire in July 2024 in Santa Ynez Valley and assisted in evacuations (KCLU 2024). The SBCFD's primary fire and rescue helicopter, known as the Firehawk, is a military Blackhawk helicopter that can carry triple the water of a Huey helicopter that the ASU had previously been utilizing. The Firehawk made day and night water drops to extinguish the approximate 38,000-

acre fire (CAL FIRE 2024b). Station 32 also provides staffing for the helicopter fuel truck, which is especially crucial for the fire mission. This allows the helicopter to fuel close to the fire incident, allowing a very quick return to dropping water. The ASU has helicopters capable of performing all fire, rescue, and medivac missions. The ASU helicopters are equipped with water-dropping tanks that carry 320 gallons of water. These helicopters can pump water from a reservoir or other suitable water source or can be filled on the ground with a fire hose. The helicopters have rescue hoists to rescue people in precarious places and carry a full complement of medical equipment to treat the sick or injured either on the ground or in the air. During high fire season, the helicopters can transport fire crews to inaccessible locations (SBCFD 2022b).

Law Enforcement and Police Protection

Santa Barbara County Sheriff's Office

The Santa Barbara County Sheriff's Office (Sheriff's Office) is responsible for law enforcement in the unincorporated areas of the county, the County jail system, superior court security, and coroner functions. The Sheriff's Office is responsible for providing law enforcement services for approximately 443,000 people, which includes residents of the unincorporated county and some incorporated cities for which the Sheriff's Office provides contract law enforcement services. Within Law Enforcement Operations, there are three divisions, including Criminal Investigations, North County Operations, and South County Operations. The Sheriff's Office is also contracted to provide police services to the cities of Buellton, Carpinteria, Goleta, and Solvang (Santa Barbara County Sheriff's Office 2025). The Santa Barbara County Sheriff's Office has received calls for service in public parks and trails such as medical emergencies, theft, or other disturbances after hours in public facilities in the county. Sheriff response in parks is also supported by County Parks rangers (Jeffrey Lindgren 2025).

Sheriff Stations, Staffing, and Level of Service

The Sheriff's Office has approximately 600 full-time employees and 150 volunteers at more than 25 work sites located throughout Santa Barbara County. The County Sheriff's Headquarters is located at the County's Calle Real Campus in the Eastern Goleta Valley west of the City of Santa Barbara, and eight sub-stations are located in Buellton, Carpinteria, Goleta, Isla Vista, Lompoc, New Cuyama, Santa Maria, and Solvang, as well as an office on the Santa Ynez Band of Chumash Indian's Reservation (Table 3.13-3). Although the number varies, the Sheriff's Office currently includes approximately 260 law enforcement deputies and 200 custody deputies. Additionally, the Operations Support Division is comprised of highly trained and specialized units that support daily and administrative operations (Santa Barbara County Sheriff's Office 2025). Based on the number of law enforcement deputies and resident service population, the Sheriff's Office currently has a ratio of one police officer for approximately every 769 persons, or approximately 1.5 officers for every 1,200 persons. While the Sheriff's Office does not employ standard officer-to-population ratios as an operational metric, the County

Comprehensive Plan provides target officer-to-population service ratios in some communities for land use and community planning. The Eastern Goleta Valley Community Plan identifies a target staffing level of at least one officer per 1,200 persons (Policy POL-EGV-1.1). The Orcutt Community Plan similarly identifies a target service ratio of one officer per 1,200 persons.

Table 3.13-3. Sheriff Stations and Sub-Stations in Santa Barbara County

Station Name	Address
South Coast	
Santa Barbara Headquarters	4434 Calle Real, Santa Barbara, CA
Carpinteria Station	5775 Carpinteria Avenue, Carpinteria, CA
Goleta Camino Real Marketplace Satellite Office	7042 Marketplace Drive, Goleta, CA
Isla Vista Foot Patrol Station	6504 Trigo Road, Isla Vista, CA
Santa Ynez Valley	
Santa Ynez Valley/Solvang Station	1745 Mission Drive, Solvang, CA
Buellton Station	140 W Highway 246, Buellton, CA
Santa Ynez Band of Chumash Indians Reservation	100 Via Juana, Santa Ynez, CA
Lompoc Valley	
Lompoc Station	3500 Harris Grade, Lompoc, CA
Santa Maria Valley	
Santa Maria Station	812-A West Foster Road, Santa Maria, CA
Cuyama Valley	
New Cuyama Valley Station	70 Newsome Street, New Cuyama, CA

Source: Santa Barbara County Sheriff's Office 2025.

Emergency Medical and Healthcare Services

The Santa Barbara County Emergency Medical Service Agency (SBCEMSA), a division of the Santa Barbara County Public Health Department (SBCPHD), is the local emergency medical services agency responsible for the planning, implementation, and evaluation of emergency medical services within the county. This system, as defined in Division 2.5 of the California Health and Safety Code, consists of "an organized pattern of readiness and response services based on public and private agreements and operational procedures." Both the fire paramedics (employed by local fire stations) and the American Medical Response (AMR) ambulance service are under the authority of SBCEMSA and dispatched during emergencies. Ambulance services are currently provided by AMR. Patients served by EMS are taken to one of two trauma centers in the county, depending on the location and proximity of the incident. Santa Barbara Cottage Hospital, located in the City of Santa Barbara on the South Coast, is a Level 1 trauma center. Marian Regional Medical Center, located in the City of Santa Maria in the North County, is a Level 2 trauma center. Most of the populated areas of the county are within 40 minutes of either of these two trauma centers. Depending on the type and location of the incident, patients are

transported to the nearest or most appropriate trauma center. The SBCFD and the Santa Barbara County Sheriff's Office have received calls for service in public parks and trails such as medical emergencies, theft, or other disturbances after hours in public facilities in the county. Some County staff are also EMTs and can respond to certain emergencies as needed (Jeffrey Lindgren 2025).

Public Schools

Enrollment and Services

In Santa Barbara County, 20 school districts serve approximately 70,000 students (Santa Barabra County Education Office 2025). Table 3.13-4 includes all 20 school districts within the county, as well as the number of students served and the schools operating within the district. The Santa Barbara County Education Office oversees over 200 programs and services that support high-quality education, as well as student services, professional development for educators, and fiscal services for districts. These programs include the Bilingual Authorization Program, the Countywide Volunteer Program, several Credential Programs, and many programs intended for students, families, and the communities that make up the county (Santa Barbara County Education Office 2022).

The number of school-aged children varies across each of the 20 school districts within the county, ranging from 0.15 students per household at Goleta Union (Elementary) (Schoolworks, Inc. 2022a) to 0.58 students per household at Santa Maria-Bonita (Schoolworks, Inc. 2022b), and averages approximately 0.30 students per household. Based on the countywide total number of school children (i.e., ages 5 to 18), the number of school-aged children per household countywide is 0.48 students per household (U.S. Census Bureau 2024).

The operating budget for each school district varies year-to-year, based on several factors, including student enrollment, student attendance, and state and federal funding. Operating revenue provided to school districts is generated by local property taxes accrued at the state level and then allocated to each school district based on average daily student attendance. Because state funding for capital improvements has historically lagged behind enrollment growth, physical improvements to accommodate new students are funded primarily by public debt (i.e., bond measures), supplemented by fees assessed on development projects.

Table 3.13-4. Santa Barbara County School Districts (2024)

School District	Enrollment	Schools
Carpinteria Unified	1,920	Aliso Elementary; Canalino Elementary; Summerland Elementary; Carpinteria Family School; Carpinteria Middle School; Carpinteria Senior High School; two small alternative high schools
Cuyama Joint Unified	314	California Connections Academy Central Coast; Cuyama Joint Elementary School (K-8), Cuyama Valley High School (9-12)
Lompoc Unified	9,413	Seven Elementary Schools: Buena Vista Elementary, Clarence Ruth Elementary, Crestview Elementary, Leonora Fillmore, Arthur Hapgood Elementary, La Canada Elementary, Miguelito Elementary Two Middle Schools: Lompoc Valley, Vandenberg Four High Schools: Cabrillo, Lompoc, Maple, Bob Forinash Community Day School La Honda STEAM Academy Los Berros Visual and Performing Arts Academy One Adult Education School Mission Valley School, Manzanita Public Charter
Santa Barbara Unified (Elementary and Secondary)	13,573	Twelve Elementary Schools: Adams, Adelante (Charter), Cleveland, Franklin, Harding (University Partnership), McKinley, Monroe, Peabody (Charter), Roosevelt, Santa Barbara (Charter), Santa Barbara Community Academy, Washington Four Junior Highs (Middle Schools): Goleta Valley, La Colina, La Cumbre, Santa Barbara Five High Schools: Alta Vista (Alternative), Dos Pueblos, La Cuesta (Continuation), San Marcos, Santa Barbara
Cold Spring	178	Cold Spring School (TK-6)
Goleta Union (Elementary)	3,408	Brandon; El Camino; Ellwood; Foothill; Hollister; Isla Vista; Kellogg; La Patera; Mountain View
Hope (Elementary)	871	Hope, Monte Vista, and Vieja Valley
Montecito Union (Elementary)	345	Montecito Union Elementary School (K-6)
Santa Maria Joint Union (High School)	8,985	Four High Schools: Delta, Ernest Righetti, Pioneer Valley, Santa Maria Mark Richardson Career Technical Education Center and Agricultural Farm
Blochman Union	1,458	Benjamin Foxen School (K-8); Family Partnership Charter School (K-12); Trivium Charter School (K-12); Trivium Charter School (Adventure)(K-12); Trivium Charter School (Voyage) (K-12)
Guadalupe Union	1,306	Mary Buren Elementary School; Kermit McKenzie Intermediate School
Orcutt Union	4,764	Seven Elementary Schools: Alice Shaw, Joe Nightingale, Olga Reed (K-8), Patterson Road, Pine Grove, Ralph Dunlap, Orcutt Academy (K-8, Charter) Two Middle Schools: Lakeview and Orcutt Junior High Schools Orcutt Academy High School (Charter) Orcutt School for Independent Study

Table 3.12-4. Santa Barbara County School Districts (2024) (Continued)

School District	Enrollment	Schools
Santa Maria-Bonita	17,165	Seventeen Elementary Schools: Adam, Alvin, Arellanes, Battles, Bill Libbon, Bonita, Bruce, Fairlawn, Jiménez, Liberty, Miller, Oakley, Ontiveros, Rice, Sanchez, Taylor, Tunnell Four Junior Highs (Middle Schools): Arellanes, El Camino, Fesler, Tommie Kunst
Santa Ynez Valley Union (High School)	862	Santa Ynez High School (9-12); Refugio High School (10-12)
Ballard	107	Ballard Elementary School (K-6)
Buellton Union	545	Jonata Middle School (6-8); Oak Valley Elementary School (TK-5);
College	358	College Elementary School (PreK-K); Santa Ynez Elementary School (1-8); Santa Ynez Valley Charter School (K-8)
Los Olivos	151	Los Olivos School (K-8); Olive Grove Charter School (K-12)
Solvang (Elementary)	621	Solvang School (K-8)
Vista Del Mar Union	61	Vista de Las Cruces School (K-8)

N/A = School capacity information not available.
Source: Santa Barbara County Education Office 2024.

Libraries

Library services in the county are provided by the county's incorporated cities' main libraries and various branch locations as a means to efficiently use existing facilities and prevent the creation of County-operated duplicate establishments. The library service is grouped into five zones. Zone 1 (Santa Barbara) provides services to the City of Santa Barbara and unincorporated areas located within or near Santa Barbara, Montecito, Summerland, and Mission Canyon. Zone 2 (Lompoc) provides services to the City of Lompoc, as well as the unincorporated areas located within or near the City of Lompoc, Vandenberg Village, VSFB, Mission Hills, and Mesa Oaks. Zone 3 (Santa Maria) provides services to the cities of Santa Maria and Guadalupe, as well as the unincorporated areas located within or near these cities, Cuyama, New Cuyama, Los Alamos, and Orcutt. Zone 4 (Goleta) provides services to the cities of Goleta, Buellton, and Solvang, as well as the unincorporated areas located within or near these cities, Solvang, Eastern Goleta Valley, County Service Area 3 (Goleta Valley), Hope Ranch, Isla Vista, Gaviota, Santa Ynez, and Los Olivos. Zone 5 (Carpinteria) provides services to the City of Carpinteria, as well as the unincorporated areas located within or near the City of Carpinteria and Toro Canyon, although the City of Carpinteria owns and operates the Carpinteria Community Library (County of Santa Barbara 2022a).

The County's contribution to library services for each zone is based on the population of the cities and unincorporated areas within the respective zone, as certified on January 1st of the

prior fiscal year by the California State Library Public Fund (Santa Barbara County Community Services 2023). In addition, the County's Library Advisory Committee makes recommendations to the County to ensure adequate library services to all county residents.

3.13.3 REGULATORY SETTING

Federal, state, and local regulations have been enacted to address public services in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to the Project and its associated impacts.

3.13.3.1 Federal

National Fire Protection Association 1710

NFPA 1710 is the standard for the organization and deployment of fire suppression operations, emergency medical operations, and special operations to the public by career fire departments. NFPA developed NFPA 1710 as an industry standard for the deployment of fire suppression operations to ensure safe and effective fire service operations. The Standard stipulates that the first fire engine should arrive at 90 percent of emergency calls within a range of 6:15 and 6:45 minutes. It is recognized that the NFPA 1710 Standard is the optimal national standard and is not regularly achieved in rural areas or areas otherwise far removed from firefighting service providers.

3.13.3.2 State

California Fire Code

The California Fire Code (CFC) is Part 9 of thirteen parts of the official building regulations to the California Code of Regulations. This code is also referred to as Title 24, or the California Building Standards Code. The CFC establishes the minimum requirements consistent with nationally recognized good practices to safeguard public health, safety, and general welfare from fire and other hazards in new and existing buildings, structures, and premises, and provide safety and assistance to firefighters and emergency responders during emergency operations. The CFC applies to the construction – including the presence of fire service features and fire apparatus access roads – alteration, movement, enlargement, replacement, repair, equipment, use, occupancy, means of egress, evacuation plans, location, maintenance, and demolition and removal of every building or structure or any appurtenances connected or attached to such building structures throughout the state.

California Health and Safety Code

State fire regulations outlined in California Health and Safety Code Sections 13000 et seq., address building standards, fire protection, and notification systems, provision of fire protection

devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training.

California Education Code Section 17620 and Government Code Section 65995

California Education Code Section 17620 authorizes school districts to levy a fee, charge, dedication, or other requirement against any construction of new residential, commercial, and industrial uses within their boundaries to fund the construction of new schools or school facilities. California Code of Regulations Section 65995 limits the maximum fee that school districts can assess.

California Occupational Safety and Health Administration

Per Title 8, California Code of Regulations Section 1270, Fire Prevention, and Section 6773, Fire Protection and Fire Fighting Equipment, the California Occupational Safety and Health Administration (Cal-OSHA) has established minimum standards for fire suppression and EMS. The standards include but are not limited to guidelines on the handling of highly combustible materials, fire hose sizing requirements, restrictions on the use of compressed air, requirements for access roads, and the testing, maintenance, and use of all firefighting and emergency medical equipment.

Senate Bill (SB) 50

Senate Bill (SB) 50, or the Leroy F. Greene School Facilities Act of 1998, amends Education Code Section 17620 and authorizes school districts to levy developer fees to finance the construction or reconstruction of school facilities and restricts the ability of local agencies to deny project approvals on the basis that public school facilities (classrooms, auditoriums, etc.) are inadequate. School impact fees are collected at the time when building permits are issued. Payment of school fees is required by SB 50 for all new residential development projects and is considered full and complete mitigation of any school impacts. School impact fees are payments to offset capital cost impacts associated with new developments, which result primarily from costs of additional school facilities, related furnishings and equipment, and projected capital maintenance requirements. As such, agencies cannot require additional mitigation for any impact on school facilities or due to the inadequacy of school facilities.

School Mitigation Fee (Government Code Section 65996)

Government Code Section 65996 designates Education Code Section 17620 (i.e., the mitigation fees authorized by SB 50) and Government Code Section 65970 to be the exclusive method for considering and mitigating development impacts on school facilities.

Education Code Sections 41376 and 41378

Education Code Sections 41376 and 41378 prescribe the maximum class sizes and penalties for districts with any classes that exceed the limits established in 1964.

- Kindergarten – average class size not to exceed 31 students; no class larger than 33 students
- Grades one through three – average class size not to exceed 30 students; no class larger than 32 students
- Grades four through eight – in the current fiscal year, the average number of students per teacher not to exceed the greater of 29.9 (the statewide average number of students per teacher in 1964) or the district's average number of students per teacher in 1964.

If the above limits are exceeded, the statute requires the Superintendent of Public Instruction to reduce the district's revenue limit apportionment for each student over the limit. In short, this means that the penalty for exceeding the limit is a loss in all revenue limit funding for each student over the limit.

Mello-Roos Community Facilities Act of 1982

In 1982, the Mello-Roos Community Facilities Act of 1982 (Government Code Sections 53311-53368.3) was created to provide an alternate method of financing needed improvements and services. The Act allows any county, city, special district, school district, or joint powers authority to establish a Mello-Roos Community Facilities District (CFD), which allows for the financing of public improvements and services through the collection of additional property taxes. The services and improvements that Mello-Roos CFDs can finance include streets, sewer systems and other basic infrastructure, fire protection, law enforcement and police protection, ambulance services, schools, parks, libraries, museums, and other cultural facilities. By law, the CFD is also entitled to recover expenses needed to form the CFD and administer the annual special taxes and bonded debt (California Tax Data 2023b).

Landscaping and Lighting Act of 1972

The Landscaping and Lighting Act of 1972 allows local governmental agencies to form Landscape and Lighting Maintenance Districts to finance the costs and expenses of landscaping and lighting public areas. This act can be used by any local agency including cities, counties, and special districts such as school districts or water districts. The many approved uses include the installation and maintenance of landscaping, statues, fountains, general lighting, traffic lights, recreational and playground courts and equipment, and public restrooms. Additionally, the Act allows the acquisition of land for parks and open spaces, plus the construction of community centers, municipal auditoriums, or halls to be financed. Notes or bonds can be issued to finance larger improvements under the Act (California Tax Data 2023a).

3.13.3.3 Local

Santa Barbara County Comprehensive Plan

The County Comprehensive Plan is a planning document including research, analyses, and goals to enable the Santa Barbara County Board of Supervisors and Planning Commissions to determine matters of priority more effectively in the allocation of resources and to achieve the physical, social, and economic goals of the unincorporated communities within the county. The following components of the Comprehensive Plan are related to public services.

Open Space Element

The Santa Barbara County Comprehensive Plan Open Space Element discusses designated regions within the county that should remain open space and the reasons why. The reasons for the designation of open space are for public health and safety, for the managed production of resources, for outdoor recreation, and for the preservation of natural resources. Open space for public health and safety includes consideration of wildfire hazard areas.

Seismic Safety and Safety Element

The Seismic Safety and Safety Element (adopted in 1979, republished in May 2009, and amended in August 2010) is intended to guide land use planning by providing pertinent data regarding geologic, soil, seismic, fire, and flood hazards. The Element provides information concerning geology, soils, seismicity, and fire and flood hazards of Santa Barbara County, and provides recommendations and criteria to aid in land use planning to ensure that future development will be compatible with the environment. Its overarching purpose is to reduce potential deaths, injuries, and damage to property caused by earthquakes, fires, geologic hazards, and other natural disasters. The following policies are relevant to the Project.

- **Geologic and Seismic Protection Policy 3**: The County shall ensure compliance with State seismic and building standards in the evaluation, design, and siting of critical facilities, including police and fire stations, school facilities, hospitals, hazardous material manufacture and storage facilities, bridges, large public assembly halls, and other structures subject to special seismic safety design requirements pursuant to the California Code of Regulations, Title 24, Part 2 California Building Code.
- **Fire Policy 3**: Fire Hazard Severity Zone Maps, as maintained by the California Department of Forestry and Fire Protection, shall be used to illustrate the official areas of Very High Fire Hazard Severity Zones (VHFHSZ) in the Local and State Responsibility Areas.
- **Fire Policy 5**: The County shall continue to require defensible space clearance around all structures in unincorporated Local Responsibility Areas pursuant to Public Resource Code Section 4291, and Government Code Sections 51175-51188.

- **Fire Policy 7**: The County should strive to maintain partnerships with tribal governments, state, local, and federal agencies to identify, prioritize, and implement fire prevention and protection measures in the county.

Coastal Land Use Plan

The Coastal Land Use Plan (CLUP) lays out the general patterns of development throughout the coastal areas of the unincorporated county. Its purpose is to protect coastal resources while accommodating land use development within the Coastal Zone. The other elements are applicable within the Coastal Zone; however, when there is a conflict, the CLUP takes precedence. The following policies are relevant to the proposed Project:

30254. New or expanded public works facilities shall be designed and limited to accommodate needs generated by development or uses permitted consistent with the provisions of this Division; provided, however, that it is the intent of the Legislature that State Highway Route 1 in rural areas of the coastal zone remains a scenic two-lane road. Special districts shall not be formed or expanded except where assessment for, and provision of, the service would not induce new development inconsistent with this division. Where existing or planned public works facilities can accommodate only a limited amount of new development, services to coastal-dependent land use, essential public services and basic industries vital to the economic health of the region, state, or nation, public recreation, commercial recreation, and visitor-serving land uses shall not be precluded by other development.

Development Policy 2-6: Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (i.e., water, sewer, roads, etc.) are available to serve the proposed development. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the land use plan.

Community Plans

The County has adopted 10 community or area plans. Each community plan contains goals, policies, and standards guiding the development of the community it serves and supplements the policies and goals of the Comprehensive Plan. Community plans with specific policies related to public services that pertain to the proposed Project are detailed below.

Eastern Goleta Valley Community Plan:

The following policies from the Orcutt Community Plan are relevant to the Project.

- **Policy SF-EGV-1.1:** The County shall ensure that required public services and facilities to meet the needs of development are constructed and operational concurrently with, or in advance of, the construction and operation of development.
- **Policy SF-EGV-1.2:** The County shall encourage developers to use innovative measures to mitigate the public service impacts from their developments in addition to standard in-lieu fees, including, but not limited, to payment of development impact fees; direct public service facility improvements; creation of public service facility benefit assessment districts, etc.
- **Policy SF-EGV-2.1**: In the interest of coordinated regional planning, the County shall continue to monitor and consider the planning, development and operations activities of adjacent entities to ensure that impacts to County public services and facilities are mitigated to the greatest extent feasible.
- **Policy SF-EGV-2.2:** The County should strive to ensure adjacent jurisdictions fully mitigate their public service and facility impacts, including the City of Goleta, City of Santa Barbara, and UCSB.
- **Policy SF-EGV-2.3:** The County shall continue to review regional projects to evaluate public service and facility impacts to Eastern Goleta Valley.

Fire

- **Policy FIRE-EGV-1.1:** The County shall support and pursue collaborative fuel management and wildfire protection programs for the City of Santa Barbara, the City of Goleta, and Eastern Goleta Valley to encourage fire hazard reduction and protection of natural resources.
- **Policy FIRE-EGV-1.2**: Fire hazards shall be minimized in order to reduce the cost of and need for increased fire protection services, while protecting environmental resources.
- **Policy FIRE-EGV-2.2**: All roads which provide access to structures and properties served by the County Fire Department shall be designed and constructed to Fire Department and County engineering standards or approved equivalent.
- **Policy FIRE-EGV-2.3**: Secondary access shall be a consideration in the location and design of development. Two routes of ingress and egress shall be required for discretionary development unless the County Fire Department waives or modifies this requirement. Routes of ingress and egress required by the Fire Department shall be open and unobstructed.
- **Policy FIRE-EGV-2.5:** The Planning and Development Department shall work with the County Fire Department to design, locate, and develop land use strategies for acquiring and constructing emergency access roads in the rural and urban areas to improve accessibility and evacuation in the event of wildfire.

Law Enforcement Services and Facilities

- **Policy POL-EGV-1.1**: The County should maintain a staffing level of law enforcement officers of at least one (1) officer per 1,200 people to meet or exceed the demand for service based on existing and future service populations as determined by the County Sheriff's Department.
- **Policy POL-EGV-1.2**: The County shall consider the publicly owned lands of the Calle Real Administration Campus and the Ben Page Youth Center properties as suitable locations for law enforcement facilities.

Emergency Services and Facilities

- **Policy ES-EGV-1.1:** The County shall continue to facilitate effective emergency response systems in the event of a community-wide emergency in Eastern Goleta Valley.

Orcutt Community Plan

The following policies from the Orcutt Community Plan are relevant to the proposed Project.

Fire Protection

- **Policy FIRE-O-1:** The County shall strive to provide adequate fire protection service for the residents of Orcutt.
- **Dev-STD FIRE 2.2:** Emergency access. The County shall require two routes of ingress and egress for development unless waived by the Fire Department. Emergency access and egress roads are not required to be paved or meet width standards for normal roadways.

Libraries

- **Policy LIB-O-1:** The County shall strive to provide adequate library services for residents within the OPA.

Law Enforcement and Police Protection

- **Policy PP-O-1:** The County shall strive to provide adequate police protection for residents within the OPA.

Santa Ynez Valley Community Plan

The following policies from the Santa Ynez Valley Community Plan are relevant to the Project.

Fire Protection

- **Policy FIRE-SYV-1:** The County shall strive to ensure that an adequate number and type of fire station, equipment and personnel be maintained by periodically evaluating population growth, level of service requirements, response time, and fire hazards throughout the planning area.

Law Enforcement and Police Protection

- **Policy PP-SYV-1:** The County shall strive to provide adequate police protection for residents within the Santa Ynez Valley Community Plan Area (SYVCPA).

Schools

- **Policy S-SYV-1:** The County shall work with the School Districts in the Santa Ynez Valley to ensure that public education needs are met.

Goleta Community Plan

The following policies from the Goleta Community Plan are relevant to the Project.

- **Policy FIRE-GV-4:** Emergency access shall be a consideration in the siting and design of all new development.
- **Policy G-GV-3:** The County shall encourage developers to use innovative measures such as but not limited to payment of development impact fees; direct public service facility improvements; creation of public service facility benefit assessment districts etc., to mitigate the public service impacts from their developments, in addition to standard in-lieu fees.

Los Alamos Community Plan

The following policies from the Los Alamos Community Plan are relevant to the Project.

- **Policy SERV-LA-1.3:** The County shall encourage developers to use innovative measures such as but not limited to payment of development impact fees; direct public service facility improvements; creation of public service facility benefit assessment districts etc., to mitigate and/or address the public service impacts from their developments.

Mission Canyon Community Plan

The following policies from the Mission Canyon Community Plan are relevant to the Project.

- **DevStd FIRE-MC-3.2**: Development proposals shall include an evaluation of the need and location for a fire hydrant, subject to review and approval by the County Fire Department. Fire hydrants may be required on either side of a roadway depending on such factors as: (1) the roadway represents a main route out of the Mission Canyon area; or (2) the Fire Chief, or designated representative, determines the use of fire hydrants on the opposite side of the roadway may prove operationally difficult, or may create unsafe working conditions.
- **DevStd FIRE-MC-3.3**: Development shall comply with the County Fire Department's development standards for fire hydrant spacing and flow rates.
- **DevStd FIRE-MC-3.5:** Development shall comply with current state and County Fire Department's development standards for defensible space (i.e., presently a minimum of 100 feet of fuel modification from buildings and structures).

- **DevStd FIRE-MC-5.1:** Development shall comply with the County Fire Department's development standard for two separate access roads unless the County Fire Department waives/modifies the requirement and documents finding(s) for the waiver/modification based upon substantial evidence that public safety will not be compromised.

Toro Canyon Community Plan

The following policies from the Toro Canyon Community Plan are relevant to the Project.

- **Action PS-TC-2.1**: The County Public Works Department and Sheriff's Department shall work with the California Highway Patrol to address speeding concerns on problem streets, and to encourage the reporting of non-injury accidents so that a better record of traffic hazards may be compiled for improving traffic safety and law enforcement.
- **Policy PS-TC-3:** The County shall work with the Carpinteria Unified School District to ensure that public education needs are met.

Multi-Jurisdictional Hazard Mitigation Plan

The MJHMP was prepared by the Santa Barbara County Office of Emergency Management (SBCOEM) in 2022 to comprehensively identify, evaluate, and mitigate the known hazards that Santa Barbara County faces. The MJHMP is used by local emergency management teams, decision-makers, and agency staff to implement needed mitigation to address known hazards. The MJHMP can also be used as a tool for all stakeholders to increase community awareness of local hazards and risks and provide information about options and resources available to reduce those risks. The MJHMP describes historical hazard events and the future probability of these hazards and their impact on communities. Vulnerability assessments summarize the identified hazards' impact on critical infrastructure, populations, and future development. The MJHMP identifies goals and a wide range of hazard mitigation actions to achieve those goals (County of Santa Barbara 2023b).

Santa Barbara Operational Area Mutual Aid Plan

A cornerstone of the fire protection system in Santa Barbara County is the Santa Barbara Operational Area Mutual Aid Plan, which is updated regularly. In Santa Barbara County, no single local fire agency can muster the resources necessary to mitigate large-scale emergencies on an ongoing basis, such as large wildfires, hazardous materials responses, and urban search and rescue responses. The California Fire Master Mutual Aid Agreement requires each county to have a mutual aid plan. Because several cities and unincorporated areas of the county provide fire protection services, the Santa Barbara Operational Area Mutual Aid Plan becomes an essential mechanism for coordinating fire protection resources.

Mutual Aid takes on several different forms. For initial attack purposes, mutual aid and automatic aid facilitate the day-to-day responses where the closest resources are dispatched regardless of jurisdictional boundaries. Because several of the agencies maintain their separate

dispatch centers, any aid request must be relayed between dispatch centers. Within Santa Barbara County agreements have been made between all agencies concerning dispatch protocols and dispatch procedures (automatic aid and mutual aid). In addition, Santa Barbara County also has agreements with Kern County, San Luis Obispo County, and Ventura County.

If an incident requires reinforcement resources that cannot be met through local mutual aid agreements, the California Fire Service and Rescue Emergency Mutual Aid Plan is followed. All fire service entities in California are signatories to the California Fire Service and Rescue Emergency Mutual Aid System, Mutual Aid Plan.

Community Wildfire Protection Plans

A Community Wildfire Protection Plan (CWPP) is a planning and funding prioritization tool created by the Healthy Forests and Restoration Act of 2003 as an incentive for communities to engage in comprehensive forest and fire hazard planning and help define and prioritize local implementation and funding needs. CWPPs are generally developed by local governments or other entities with assistance from state and federal agencies and in collaboration with other interested partners. This provides communities with a tremendous opportunity to influence where and how federal agencies implement fuel reduction projects on federal land, as well as how additional federal funds may be distributed for projects on non-federal lands. CAL FIRE also provides funding opportunities for projects or activities that may be identified in CWPPs (CAL FIRE 2025).

County Fire Protection Standards

SBCFD employs the following two standards for the provision of fire protection services (County of Santa Barbara Planning and Development Department [P&D] 2011):

1. A firefighter-to-population ratio of one firefighter on duty 24 hours a day for every 2,000 in population is considered "ideal," although a ratio (including rural areas) of one firefighter per 4,000 in population is the maximum population that can be adequately served. Additionally, a ratio of one engine company per 16,000 population, assuming four firefighters per station, represents the absolute maximum population that the SBCFD has determined can be adequately served by a four-person crew.
2. A 5-minute response time in urban areas. This incorporates the following NFPA response-time objectives:
    a. One minute for turnout time
    b. Four minutes or less, for the arrival of the first-arriving engine company

SBCFD strives to obtain a minimum of four firefighters in each engine company. This standard is set by the NFPA guidelines, which state that engine companies shall be staffed with a minimum of four on-duty personnel. The most recently released 2020 NFPA standards were

also revised to include a requirement for fire stations to establish an objective of a second properly staffed four-person unit to arrive within 360 seconds (i.e., 6 minutes) or less (NFPA 2020a). This is especially important in unincorporated and rural areas, due to the longer response times from outlying fire stations. Cal-OSHA requires that a minimum of two firefighters, operating as a team, conduct interior firefighting operations. In addition, a minimum of two firefighters must be positioned outside and remain capable of rapid intervention and rescue if needed. This is also known as the State of California's "Two-In, Two-Out" law (29 Code of Federal Regulations [CFR] §1910.134[g][4]). If there are only three firefighters assigned to a fire engine, the engine company must wait for additional backup to arrive before being able to engage in interior firefighting operations to comply with Cal-OSHA regulations.

County Code of Ordinances

Chapter 10 – County Building Code

Chapter 10 of the County's Code of Ordinances is the Santa Barbara County Building Code (Ord. No. 4822, 1-17-2012). The code addresses geological, topographical, and climatic conditions in the county, including extreme weather conditions, firefighting resources, flammable vegetation, High Hazard Areas, extreme wind conditions, and seismic shaking, and the minimum standards to safeguard and protect life, buildings, and structures within the county. Per the County's Building Code Construction Standards, residential development within designated high-fire hazard areas must abide by specific construction standards. Where appropriate, all of the required structural safeguards must be graphically depicted on building plans submitted before issuance of a building permit. The safeguards must be inspected and approved by SBCFD inspectors before occupancy.

Chapter 15 - Fire Prevention / Fire Code

Chapter 15 of the County's Code of Ordinances (Ord. No. 5170, 12-6-2022) is titled *Fire Prevention* and serves as the County's Fire Code. This ordinance incorporates the CFC by reference and, as a result, implements the minimum requirements consistent with nationally recognized good practices to safeguard public health, safety, and general welfare from fire and other hazards in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations.

This chapter of the County's Code of Ordinances includes development standards developed by SBCFD to provide for and maintain adequate and unobstructed emergency access for fire department apparatus and personnel to buildings, structures, hazardous occupancies, or other premises. The standards apply to newly proposed private roads and driveways that are used to provide access to dwellings and structures for emergency access. They include requirements for minimum roadway width, turnarounds, fire access, vegetation clearing around roadways to

be used for firefighting access purposes and building and construction standards. The standards also provide limitations for the maximum length of dead-end-roads allowable, defensible space requirements, and automatic sprinkler systems, among others. Multifamily development projects may have additional access requirements beyond what is included in this standard.

The County's Code of Ordinances also includes an impact mitigation fee for new development projects within the SBCFD service area. To mitigate impacts caused by new development projects within SBCFD's service area, a fire facility, apparatus, and equipment development impact mitigation fee may be necessary. The fee is needed to finance fire facilities, apparatus, and equipment necessary to serve new development and to ensure new development projects pay their fair share for these facilities. These fees are outlined in the County's Development Impact Mitigation Fee Program and are required to be paid on or before the final building permit inspection.

Santa Barbara County Land Use and Development Code

The County Land Use and Development Code (LUDC) provides standards, regulations, and procedures on land use and development planning throughout the unincorporated county. Select sections are excerpted below to represent key provisions. Similar provisions are contained within the Montecito LUDC and Article II, Coastal Zoning Ordinance.

Section 35.82.060 – Conditional Use Permits and Minor Conditional Use Permits

E. Findings required for approval of Conditional Use Permits other than Conditional Use Permit applications submitted in compliance with Chapter 35.38 (Sign Standards). A Conditional Use Permit application shall be approved or conditionally approved only if the review authority first makes all of the following findings, as applicable.

1. Findings required for all Conditional Use Permits:

- There will be adequate public services, including fire protection, police protection, sewage disposal, and water supply to serve the proposed project.

Section 35.82.080: Development Plans:

E. Findings required for approval.

A Development Plan application shall be approved or conditionally approved only if the review authority first makes all of the following findings, as applicable:

1. Findings for all Preliminary or Final Development Plans.

d. There will be adequate public services, including fire and police protection, sewage disposal, and water supply to serve the proposed project.

3.13.4 ENVIRONMENTAL IMPACT ANALYSIS

This section discusses the public service impacts associated with the proposed Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed or described where they are infeasible and the residual impact after mitigation is determined.

3.13.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the California Environmental Quality Act (CEQA) Guidelines. For the purposes of this Program Environmental Impact Report (EIR), implementation of the proposed Project may have a significant adverse impact relating to public services if it would:

a. Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any of the public services:

   i) Fire protection

   ii) Police protection

   iii) Schools

   iv) Parks

   v) Other public facilities

Non-applicable thresholds:

- Threshold (a[v]) (*Parks*): Potential impacts associated with the development of new parks and recreational facilities are discussed in Section 3.14, *Recreation.* Therefore, this issue is not discussed in this section.

County of Santa Barbara Environmental Thresholds and Guidelines

The County's *Environmental Thresholds and Guidelines Manual* (2021) does not provide any thresholds for significant impacts on fire protection services or law enforcement and police protection services. Instead, the County relies on analysis and consideration of impacts with regard to significance criteria for these resources based on CEQA Guidelines, as well as questions from the County's Initial Study Checklist, as follows.

- Would the project result in a need for new or altered police protection and/or healthcare services?

The County's *Environmental Thresholds and Guidelines Manual* does provide local criteria for determining whether a project may have a significant effect on schools. Accordingly, a project may create a significant environmental impact on schools if it would result in:

- The generation of a sufficient number of students to require an additional classroom. This assumes 29 students per classroom for the elementary/junior high students, and 28 students per classroom for high school students, based on the lowest student per classroom loading standards or the state school building program. This threshold is to be applied in those school districts which are currently approaching, at, or exceeding their current capacity.

Neither the County's *Environmental Thresholds and Guidelines Manual n*or the County's Initial Study Checklist contain thresholds relating to library services.

Methodology

As described in Chapter 2, *Project Description*, the Project plans for parks, trails, and recreational facilities in unincorporated areas within the county. Project-level siting and design details are not known, so the impact analysis provided below does not evaluate impacts on public services at a project- or site-specific level. The programmatic analysis provided by this Program EIR addresses the potential for parks, recreation, trails, and related development under the Project to affect public services and facilities within the county, which include fire protection, law enforcement, emergency medical response, healthcare, schools, libraries, and parks. There are no other public facilities affected by the Project. Wherever possible, illustrative examples are provided to describe particular areas of the county where the implementation of the Project would create impacts related to public services. As described in Section 1.4, *Program-Level EIR Analysis* the impact analysis provided below is broad and qualitative such that the findings apply to any of the proposed uses and related development.

The information and analysis presented in this section are based on available long-range planning documents, EIRs, and related technical studies that apply to the Project area. This section is derived from the existing evaluations and mapping of visual resources by the Santa Barbara County Comprehensive Plan and associated community plans. Additionally, this section integrates relevant information from the 2023-2031 Santa Barbara County Housing Element Update EIR. The impact determinations are based on consistency with the CEQA thresholds, the County's 2021 *Environmental Thresholds and Guidelines Manual*, and the County's existing policies and regulations related to relevant public services.

3.13.4.2 Project Impacts

Table 3.13-5 provides a summary of the Project's impacts related to public services. A detailed discussion of each impact follows.

Table 3.13-5. Summary of Public Service Impacts

Public Service Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact PSR-1. The Project could result in the need for or provision of new or physically altered fire protection, law enforcement, emergency medical response, healthcare, schools, or library facilities, the construction of which could cause significant environmental impacts.	Insignificant	No mitigation measures required.	Insignificant impacts
Cumulative Impacts	Insignificant	No mitigation measures required.	Insignificant impacts

Impact PSR-1. The Project could result in the need for or provision of new or physically altered fire protection, law enforcement, emergency medical response, healthcare, schools, or library facilities, the construction of which could cause significant environmental impacts.

Fire Protection Services

As described in 3.13.2, *Environmental Setting*, Citygate's operational enhancement update to the 2012 fire services deployment and departmental performance audit found SBCFD's existing response apparatus or vehicles to be appropriate to protect against the hazards likely to impact the fire service areas (Citygate Associates, LLC 2020). Additionally, Citygate found the existing daily staffing to be sufficient; no single fire unit or station area is approaching workload saturation (Citygate Associates, LLC 2020). Further, as described in Section 3.13.2, *Existing Setting,* SBCFD's current firefighter-to-population ratio is one firefighter for approximately every 711 persons, and one engine company for every 9,682 persons, which is within the established ideal standard of one firefighter on duty for every 2,000 persons.

The Project would not directly or indirectly result in increases in resident populations in the county that would diminish current SBCFD's firefighter-to-population ratio. The Project would result in new or expanded public parks, recreation facilities, and trails that would not result in permanent increases in resident populations requiring fire services within the county and would not increase demands on fire services. Further, employment associated with recreation facilities such as groundskeepers, rangers, and staff members (e.g., lifeguards, maintenance) would be nominal and sourced from existing and future residents in the county, with a nominal effect on residential population. The demand for fire department response in public parks and trails each year is nominal (SBCFD Headquarters 2025), and additional recreation facilities would not increase the need for fire services within these facilities. Additionally, indirect impacts associated with the proposed regulatory changes would foster the development of parks and trails in the unincorporated area and would not contribute to population increases that would call for additional police services in the county. The additional allowable uses enabled by the

proposed Project RBP Program similarly do not entail uses that would result in permanent increases in resident populations requiring an increase in demand for fire protection services as compared to existing allowable uses within eligible zone districts.

While SBCFD's service ratios would remain within SBCFD's standards, the countywide response time from 9-1-1 being answered is 2:22 minutes longer than County best practices. Citygate found that this is primarily due to: 1) existing road network design/limitations (e.g., poor road layout, narrow and winding roads); and 2) the size of some areas served by the individual stations (i.e., almost all of SBCFD's "first-in" districts include both the Urban Area and large Rural Area). Further, Citygate qualified that some SBCFD stations have existing temporally compacted call volume during peak hours of the day that results in multiple calls at the same time. In those events, the next closest engine takes the second call, which results in a slower response time given an assumed greater distance to travel. To address existing long-standing deficiencies in response times to some areas of the county, SBCFD and the City of Goleta have planned for and are in the process of preparing for the construction of Fire Station No. 10 in the City of Goleta. Additionally, SBCFD and the County are actively implementing Citygate's recommendations and are in the process of designing a new Fire Station No. 25 in Orcutt to reduce response times in that community. Once constructed, these two new fire stations would improve service and response times and would serve future recreation developments enabled under the Project in these areas.

Additionally, expanded capacity of County Parks as a result of the Project would help support adequate fire response services. County Parks staff also serve as first responders who coordinate calls for service for fire, law enforcement, and EMS at County parks, as well serving as first responders for incidents along SR 154 (Jeffrey Lindgren 2025). Parks and recreation facilities can support evacuation zones or staging areas in the event of emergencies, such as earthquakes and wildfires. Further, during countywide emergencies, County Parks joins the County Office of Emergency Management in operating the Emergency Operations Center (EOC) when activated in response to countywide emergencies, such as wildfires (see also, Section 3.17, *Wildfire*). Some trails also provide firefighter access when dually serving as fire roads in the foothills and rural areas of the county. An increase in parks and trails would promote better access for emergency services and increase the number of staging areas for emergency personnel.

The Project would not increase demand for fire responses services and no additional facilities are required to serve the Project. Therefore, direct and indirect impacts of the Project associated with the need for construction or expansion of new protection facilities to maintain ideal service ratios and response times would be *insignificant*.

Law Enforcement Services

Similar to fire protection, development of parks, recreation facilities, and trails and proposed regulatory amendments under the Project would not trigger the need for additional police protection staff, services, or infrastructure. The demand for police response in public parks and trails each year is nominal (SBCFD Headquarters 2025), and additional recreation facilities would not increase the need for police services within these facilities. Additionally, indirect impacts associated with the proposed regulatory changes would foster the development of parks and trails in the unincorporated area and would not contribute to population increases that would call for additional police services in the county. While the Project would potentially enable future non-recreational development through the proposed RBP Program, the additional allowable uses do not entail uses that would result in permanent increases in resident populations requiring an increase in demand for police protection services as compared to existing allowable uses within eligible zone districts. As a result, direct and indirect impacts on police protection services would be *insignificant*.

Emergency Medical Response and Healthcare Facilities

Ambulance service and healthcare facilities are privately governed but are continually monitored by SBCEMSA and SBCPHD to ensure adequate service is being provided to county residents. If ambulance and health services become inadequate as determined by SBCEMSA and SBCPHD such that new or expanded facilities are needed, the construction of such facilities could result in environmental impacts. However, the expansion of existing healthcare facilities or the construction of new facilities are required to serve the Project In the event of a major emergency or event (e.g., earthquake, flood, fire, etc.), County staff can also become emergency personnel to assist SBCFD, SBCEMSA, and SBCPHD through EMT services. Expanding County Parks capabilities under the Project increases resources to assist in the event of an emergency, particularly given that many County Parks staff are skilled/trained in first aid and emergency response.

The Jalama Beach Campground Expansion & Upgrade Project proposed in Lompoc Valley could increase the number of daily visitors through additional parking spaces, low-cost coastal accommodations, or increased coastal access. However, the project would not substantially increase the need for ocean rescue services or additional police protection. Rather, the proposed site layout improvements to increase efficiency and alleviate internal site congestion and additional access to coastal resources would actually promote a safer environment for the public and decrease potential need for emergency services. Additionally, the project plans to construct quarters or facilities for lifeguard training purposes, expanding emergency response services in the county. Future recreational development and regulatory amendments enabled under the Project are not considered to result in a substantial need for new or improved emergency medical and healthcare facilities, such that direct or indirect environmental impacts

would occur. The Project would actually help increase services, programs, and training for EMS and therefore, impacts are considered *insignificant*.

Schools and Libraries

Proposed county parks projects and related development under the Project would occur over several years and would be incrementally distributed throughout unincorporated areas of the county. As the Project involves direct and indirect development of recreation facilities, the proposed uses and related development would not result in population growth or increases in resident school-aged children that would increase demand for schools and libraries to the extent that new facilities would be required. Some proposed developments such as the Mission Hills Community Trails could potentially result in incremental increases in student or family activities by providing biking and hiking connections between neighborhoods, Los Berros Elementary School, and the existing La Purísima Mission trails. However, this potential increase in outdoor activity near the school would not result in population growth or the need for additional school or library facilities. Contrastingly, public parks and recreation facilities in close proximity to schools could also be utilized by the schools (e.g., field trips, outdoor learning activities, etc.), and could have a beneficial impact on school facilities and minimize the need for schools to expand their own recreational facilities. Therefore, potential impacts to schools and libraries associated with the Project are considered *insignificant*.

3.13.4.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis*, the cumulative setting for the Project involves a variety of long-range plans, policies, and initiatives, as well as development of county projects in the unincorporated county and surrounding incorporated cities. Project impacts along with potential impacts from pending and current planning or development projects inform the cumulative impacts analysis. Such cumulative projects include programmatic projects that would substantially increase countywide population, such as the County's 2023-2031 Housing Element Update. However, the Project would have no substantial increase in service population and, therefore, would not contribute to the cumulative impact of future residential growth. Therefore, the Project would not result in substantial adverse cumulative impacts associated with the need for expansion or the construction of new fire protection, law enforcement and police protection, emergency medical response, healthcare, schools, and library facilities, the construction of which could cause significant environmental impacts.

3.13.4.4 Proposed Mitigation

No mitigation measures are required.

3.13.4.5 Secondary Impacts

No mitigation measures are required to reduce impacts associated with the proposed Project. Therefore, no direct secondary impacts would occur.

3.13.4.6 Residual Impacts

Impact PSR-1. The Project would involve parks, recreation facility, and trails development in the unincorporated county and would not result in a population increase that would result in a substantial increase in demand for fire protection, law enforcement, emergency medical response, healthcare, school, and library services. Therefore, impacts would be considered *insignificant*.

3.14 RECREATION

3.14.1 INTRODUCTION

This section describes potential impacts to and from the development of recreational facilities that could occur from the implementation of the Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (Project). This section summarizes the existing recreational facilities within the Project area and reviews applicable federal, state, and local recreation policies and standards. The analysis considers the potential for physical detriment or reduction in access to existing recreational facilities and whether the development of new recreational facilities would significantly affect the environment.

3.14.2 ENVIRONMENTAL SETTING

This section describes the existing public parks and recreation systems serving the unincorporated areas of Santa Barbara County, including neighborhood and regional parks and recreational facilities, including public trails, provided by the County and other public recreation agencies. A range of recreational facilities is provided by the County and two special recreation districts, as well as state and federal agencies. The Program EIR summarizes existing recreation facilities based on categories of public property types, as follows:

- **"Public parkland"** is developed with recreation facilities that are free and openly accessible to the public. Public parkland can provide both active and passive recreation depending on the park type and location, including sports fields and courts, playgrounds, BBQ and picnic areas, restrooms, trails, and other recreational facilities.
- **"Public open spaces"** are largely undeveloped and primarily provide resource protection and land conservation but may support publicly accessible low-intensity outdoor recreation (e.g., hiking or bird watching) in balance with natural resource preservation.

The Program EIR summarizes existing public trails based on categories of use, location, and ownership, as follows:

- **"Recreational trails"** typically consist of natural surface, off-road, hiking and multi-user trails primarily intended for the purpose of providing public access to natural environments for outdoor exploration, play, and exercise. Unless otherwise explicitly stated in the Grant of Easement for a trail, all trails dedicated in Santa Barbara County allow for use by pedestrians, mountain bikers, and equestrians.
- **"Community trails"** are dedicated trails, pathways, or routes serving multiple user groups as community connections for both recreation and active transportation. They can include

pathways located adjacent or parallel to vehicular roadways, such as separate Class I bike and pedestrian facilities that provide some recreational value for bicyclists and walkers, as well as sidewalks and more transportation/commuter-oriented facilities within the road right-of-way such as Class II, Class III, and Class IV bicycle facilities.

- **"State"** trails include recreational and multi-use trails that are owned and managed by State departments and the University of California, Santa Barbara (UCSB). These include the trails systems located within Carpinteria State Beach, UCSB, El Capitan State Beach, Refugio State Beach, Gaviota State Park, La Purisima Mission State Historic Park, and the Burton Mesa Ecological Reserve. State trails include both on- and off-road trails that are generally only open to pedestrians, but some trails may be designated multi-use and allow for equestrians and mountain bikers.
- **"Federal"** trails include systems of recreational and multi-use (primarily on-road) trails owned and managed by federal agencies, such as the U.S. Forest Service (USFS) and Vandenberg Space Force Base (VSFB). They can include on- and off-road trails that primarily provide access to wilderness areas or within federal lands. The majority of federal trails in the county are located within Los Padres National Forest (LPNF) and are under the jurisdiction of USFS.

3.14.2.1 Parks and Recreation Facilities

In Santa Barbara County, recreation facilities and programs are provided by local, state, and federal agencies, as well as private recreation service providers.

County Parks

The County Community Services Department, Parks Division (County Parks) owns and maintains 83 public properties in the unincorporated area of the county.



County Parks provides a range of public parkland and amenities ranging from neighborhood parks, community parks such as Orcutt Community Park (pictured), and regional parks such as Waller Park.
Source: Lompoc Record

Taken together, County Parks' properties comprise approximately 2,192 acres with an estimated 1,139 acres serving the North County and 1,053 acres serving the South Coast. Approximately 715 acres within 53 properties are public parkland providing recreation facilities on land open and accessible to the public. In addition, County Parks operates two campgrounds: 1) the 27-acre Jalama Beach County Park in the Lompoc Valley, which is County-owned and provides fee-based access to a popular coastal campground and day-use facilities; and 2) the campgrounds and recreation facilities within the federally-owned Cachuma Lake Recreation Area, which provides fee-based lakefront camping, a general store, a gas station,

boat rentals, a playground, and a disc golf course on over 9,500 acres surrounding Lake Cachuma in the Santa Ynez Valley. County Parks also maintains 1,999 acres within 53 properties that are public open space, including several properties with open access to public trails and walking paths, such as the Orcutt Hills Trail System in the Santa Maria Valley, which provides approximately 8 miles of multi-use trails, and San Marcos Foothill Preserve in the South Coast, which provides approximately 5-mile-long main trail with several spurs and connectors. The Cachuma Lake Recreation Area also provides six trails in the Santa Ynez Valley comprising approximately 20 miles of trails, including the Live Oak Campground equestrian trail system. Further, several County-owned trails connect to the Los Padres National Forest (LPNF) trail systems in the South Coast, Santa Ynez Valley, and Cuyama Valley. For example, trails in Montecito, such as Manning Park, provide access to on-road and off-road trails that reach the front country foothills of the Santa Ynez Mountains. A complete list of County Parks' properties is provided in Table 3.14-1, including the location, type, and approximate size of each public property.

Table 3.14-1. County Parks' Properties by Location, Type, and Size (Acres)

Park Name	Community /Location	Type of Parkland	Type of Park	Acres
Cuyama Valley				
Richardson County Park	New Cuyama	Public Parkland	Neighborhood	15.7
			Total Cuyama Valley	**15.7**
Lompoc Valley				
Jalama Beach County Park	Unincorporated Lompoc	Public Restricted	Beach	26.6
Ocean Beach Park	Unincorporated Lompoc	Public Parkland	Beach	38.9
Miguelito County Park	Unincorporated Lompoc	Public Parkland	Community	5.4
Santa Rosa Park	Unincorporated Lompoc	Public Parkland	Community	24.3
Falcon Open Space Park	Vandenberg Village	Public Parkland	Neighborhood	0.9
Vandenberg Hills Little League Fields	Vandenberg Village	Public Parkland	Neighborhood	7.5
			Total Lompoc Valley	**103.7**
Santa Maria Valley				
Cobblestone Open Space	Orcutt	Public Parkland	Neighborhood	3.0
Domino Open Space	Orcutt	Public Parkland	Neighborhood	1.2
Lee West Open Space	Orcutt	Public Parkland	Neighborhood	1.7
Orcutt Community Park	Orcutt	Public Parkland	Community	25.6
Orcutt Hills Trails East	Orcutt	Public Open Space	Open Space	51.0
Orcutt Hills Trails West	Orcutt	Public Open Space	Open Space	256.1

Table 3.14-1. County Parks' Properties by Location, Type, and Size (Acres) (Continued)

Park Name	Community /Location	Type of Parkland	Type of Park	Acres
Rice Ranch Open Space	Orcutt	Public Open Space	Open Space	0.8
Stonebrook Open Space	Orcutt	Public Open Space	Open Space	3.1
Waller Park	Orcutt	Public Parkland	Regional	134.2
Point Sal[3]	Unincorporated Santa Maria	Public Open Space	Open Space	44.4
Point Sal Preserve	Unincorporated Santa Maria	Public Open Space	Open Space	759.1
Rancho Guadalupe Dunes County Park	Unincorporated Santa Maria	Public Open Space	Beach	614.9
			Total Santa Maria Valley	**1,894.9**
Santa Ynez Valley				
Los Alamos Park	Los Alamos	Public Parkland	Community	49.9
Santa Ynez Park	Santa Ynez	Public Parkland	Neighborhood	3.2
Nojoqui Falls County Park	Unincorporated Santa Ynez	Public Parkland	Community	83.5
			Total Santa Ynez Valley	**136.6**
South Coast				
Arroyo Burro Beach County Park	City of Santa Barbara	Public Parkland	Beach	6.0
Blueberry Hill Neighborhood Park	Eastern Goleta Valley	Public Parkland	Neighborhood	2.2
Calle Barquero Open Space	Eastern Goleta Valley	Public Parkland	Neighborhood	2.1
Goleta Beach County Park	Eastern Goleta Valley	Public Parkland	Beach	33.1
Kellogg Open Space	Eastern Goleta Valley	Public Parkland	Open Space	8.4
Lassen Open Space	Eastern Goleta Valley	Public Open Space	Neighborhood	2.0
More Mesa Open Space	Eastern Goleta Valley	Public Open Space	Open Space	36.3
Patterson Open Space	Eastern Goleta Valley	Public Open Space	Open Space	3.1
Rhoads Neighborhood Park	Eastern Goleta Valley	Public Parkland	Neighborhood	1.0
Rhoads Open Space	Eastern Goleta Valley	Public Parkland	Neighborhood	0.8
San Marcos Foothills Preserve	Eastern Goleta Valley	Public Open Space	Open Space	200.1
Tabano Hollow Open Space	Eastern Goleta Valley	Public Parkland	Open Space	1.9
Tarragona Open Space	Eastern Goleta Valley	Public Open Space	Open Space	3.0
Teardrop Open Space	Eastern Goleta Valley	Public Open Space	Open Space	0.3
Thunderbird Open Space	Eastern Goleta Valley	Public Open Space	Open Space	0.9
Town & Country Open Space	Eastern Goleta Valley	Public Open Space	Open Space	6.3
Tuckers Grove Park	Eastern Goleta Valley	Public Parkland	Community	111.4
University Circle Open Space	Eastern Goleta Valley	Public Parkland	Open Space	11.7
Pelican Park	Isla Vista	Public Parkland	Neighborhood	1.0

Table 3.14-1. County Parks' Properties by Location, Type, and Size (Acres) (Continued)

Park Name	Community /Location	Type of Parkland	Type of Park	Acres
Sea Lookout Park	Isla Vista	Public Parkland	Neighborhood	1.3
Walter Capps Park	Isla Vista	Public Parkland	Neighborhood	2.1
Rocky Nook Park	Mission Canyon	Public Parkland	Community	17.0
Hammond's Meadow	Montecito	Public Open Space	Open Space	5.4
Manning Park	Montecito	Public Parkland	Neighborhood	11.8
Lookout Park	Summerland	Public Parkland	Neighborhood	6.6
Ocean View Park	Summerland	Public Parkland	Neighborhood	3.2
Summerland Greenwell Preserve	Summerland	Public Open Space	Open Space	1.8
Toro Canyon Park	Toro Canyon	Public Parkland	Community	88.9
Rincon Beach Park	Unincorporated South Coast	Public Parkland	Beach	11.6
			Total South Coast	**589.4**

Summary	Acres	Percentage	Number
Total County Parks	**2,740.3**	**100.0%**	**53**
Total Public Parkland	*717.0*	*26.2%*	*33*
Total Open Space	*1,988.6*	*72.8%*	*17*
Total Campground	*26.6*	*1.0%*	*1*

Notes:
[1] Total acreage is approximate based on County Assessor Parcel boundaries and ownership data and may not reflect the physical acreage maintained accessible for public recreation (Rounded to the nearest tenth).
[2] Cachuma Lake Recreation Area is owned by the federal government and operated by County Parks; therefore, the Cachuma Lake Recreation Area is not included.
[3] The County owns portions of Point Sal and Point Sal Reserve.
Source: Draft Santa Barbara County Recreation Master Plan

Recreation Special Districts

Two recreation special districts have been formed in the county to provide public recreation in specific unincorporated communities. The Cuyama Valley Recreation District (CVRD) owns and maintains 13.1 acres of public parkland as part of Richardson Park in the unincorporated community of New Cuyama in the Cuyama Valley, which increases the total park area to 28.2 acres when combined with the County-owned portion of Richardson Park. The Isla Vista Recreation and Park District (IVRPD) owns and maintains 50.1 acres within 17 parks and open spaces in the unincorporated community of Isla Vista, which comprises 15.1 acres of public parkland and 33.3 acres of public open space (Table 3.14-2). Combined with County-owned parks in Isla Vista, the community is served by 54.5 acres in 20 public parks and open spaces.

Table 3.14-2. Recreation Special Districts' Properties by Location, Type, and Size (Acres)

Park Name	Community /Location	Type of Parkland	Type of Park	Acres
Cuyama Valley Recreation District (CVRD)				
Richardson Park	New Cuyama	Public Parkland	Neighborhood	13.1
Isla Vista Recreation and Park District (IVRPD)				
Camino Corto Open Space	Isla Vista	Public Open Space	Open Space	21.5
Camino Pescadero Park	Isla Vista	Public Parkland	Neighborhood	0.5
Childrens Park	Isla Vista	Public Parkland	Pocket	0.7
Del Sol Vernal Pool Reserve	Isla Vista	Public Open Space	Open Space	11.8
Embarcadero Park	Isla Vista	Public Parkland	Community	4.3
Estero Park & Tipi Village	Isla Vista	Public Parkland	Neighborhood	6.8
Gaffney Park	Isla Vista	Public Parkland	Neighborhood	0.5
Greek Park	Isla Vista	Public Parkland	Neighborhood	0.5
IVPRD	Isla Vista	N/A	N/A	0.3
Kid's Trail Park	Isla Vista	Public Parkland	Neighborhood	0.2
Little Acorn Park	Isla Vista	Public Parkland	Neighborhood	0.6
Pardall Gardens	Isla Vista	Public Parkland	Neighborhood	0.2
Rottapel Park	Isla Vista	Public Parkland	Pocket	0.2
Sueno Orchard	Isla Vista	Public Parkland	Neighborhood	0.9
Sueno Park	Isla Vista	Public Parkland	Neighborhood	0.4
Trigo Pasado Park	Isla Vista	Public Parkland	Neighborhood	0.3
Window to the Sea Park	Isla Vista	Public Parkland	Pocket	0.3
			Total Recreation Special District Properties	**50.1**

Summary	Acres	Percentage	Number
Total Recreation Special Districts	**76.3**	**100.0%**	**18**
Total Public Parkland	*29.9*	*39.2%*	*16*
Total Open Space	*33.3*	*43.6%*	*2*
Total Campground	*0.0*	*0.0%*	*0*

Notes:
[1] Total acreage is approximate based on County Assessor Parcel boundaries and ownership data and may not reflect the physical acreage maintained accessible for public recreation (Rounded to the nearest tenth).
Source: Draft Santa Barbara County Recreation Master Plan

Countywide Public Parkland and Open Space

Across all five recreation planning areas and recreational service providers, including the eight incorporated cities, the unincorporated county area is served by a total of 27,293 acres of existing public parkland and public open space in the unincorporated areas. Public parkland comprises 2,192.5 acres and public open space comprises 25,100.5 acres, the vast majority of which is provided by the LPNF (629,894 acres, or 96.1 percent of all public open space within the county).

Table 3.14-3 summarizes the total public parkland and public open space provided in each recreation planning region. The South Coast has the most public parkland of the five recreation planning regions (1,055 acres; 48.1 percent), over twice the amount of public parkland than the Santa Maria Valley (509.6 acres; 23.2 percent). The Lompoc Valley has 389.0 acres of public parkland (17.7 percent), followed by the Santa Ynez Valley which has 210.2 acres (9.0 percent). The Cuyama Valley provides only 28.8 acres of public parkland (1.3 percent). With respect to public open spaces, the Santa Maria Valley provides the most of the five recreation planning regions (11,630.2 acres; 46.3 percent), followed by the Lompoc Valley (7,126.3 acres; 28.4 percent), South Coast (6,335.6 acres; 25.2 percent), and the Santa Ynez Valley (8.4 acres; less than 0.1 percent). No public open space areas exist within the Cuyama Valley.

Table 3.14-3. Public Parkland and Public Open Space by Region (Excluding LPNF and VSFB)

Region	Total Public Parkland (Acres)	Total Public Open Space (Acres)	Total Public Parkland + Public Open Space (Acres)
Cuyama Valley	28.8 (1.3%)	0.0 (0.0%)	28.8 (0.1%)
Lompoc Valley	389.0 (17.7%)	7,126.3 (28.4%)	7,515.3 (27.5%)
Santa Maria Valley	509.6 (23.2%)	11,630.2 (46.3%)	12,139.8 (44.5%)
Santa Ynez Valley	210.2 (9.7%)	8.4 (0.0%)	218.6 (0.8%)
South Coast	1,054.9 (48.1%)	6,335.6 (25.2%)	7,390.5 (27.1%)
Total Unincorporated County	**2,192.5 (100%)**	**25,100.5 (100%)**	**27,293.0 (100%)**

Source: Draft Santa Barbara County Recreation Master Plan

Existing Recreation Service Levels

One approach to assessing the adequacy of the public parks and recreation system is to consider the ratio of public parkland in acres to the total population served by the system. Achieving this target service ratio ensures that communities are adequately served by public recreation facilities in the unincorporated areas. The County's policy-based standard for parkland-to-population is 4.7 acres of public parkland per 1,000 people as adopted in the Land Use Element of the County's Comprehensive Plan. Based on existing populations estimated by the 2020 U.S. Census for unincorporated areas, the existing public parkland ratio countywide is 5.1, which exceeds the County's adopted population service ratio. This indicates that currently residents are adequately served by more public parkland than the County's adopted parkland standard, except in the Santa Maria Valley.

Table 3.14-4. Existing Public Parkland-to-Population Ratio in Unincorporated County

Region	Total Population (2019)[1]	Total Existing Public Parkland (Acres)	Ratio of Public Parkland (Acres/1,000 people)	Meets County Parkland-to-Population Standard?
Cuyama Valley	596	29	48.2	Meets Standard
Lompoc Valley	54,806	389	7.1	Meets Standard
Santa Maria Valley	146,838	509	3.5	Does not Meet Standard
Santa Ynez Valley	19,157	212	11.1	Meets Standard
South Coast	208,530	1,053	5.0	Meets Standard
Other[2]	20,157	0	0	Does not Meet Standard
Countywide	**450,084**	**2,192**	**4.9**	**Meets Standard**

Notes:

[1] Population is estimated based on 2019 U.S. Census data for recreation planning areas.

[2] Populations within federally-owned lands and/or not within recreation planning areas are included in the total population.

Source: Draft Santa Barbara County Recreation Master Plan

With projected countywide population growth through 2050, the ratio of public parkland to population decreases below the County's current standard of 4.7 acres of parkland per 1,000 residents (Table 3.14-5).

Table 3.14-5. Projected Public Parkland-to-Population Ratio in Unincorporated County by 2050

Region	Projected Future Unincorporated Area Population (2050)[1]	Total Existing Public Parkland (Acres)	Ratio of Public Parkland (Acres/1,000 people)	Meets County Parkland-to-Population Standard?
Cuyama Valley	647	29	44.4	Meets Standard
Lompoc Valley	62,069	389	6.3	Meets Standard
Santa Maria Valley	169,101	509	3.0	Does not Meet Standard
Santa Ynez Valley	21,326	212	9.9	Meets Standard
South Coast	222,659	1,053	4.7	Meets Standard
Other[2]	33,895	0	0	Does not Meet Standard
Countywide	**509,697**	**2,192**	**4.3**	**Does not Meet Standard**

Notes:

[1] Population is estimated based on 2019 U.S. Census data for recreation planning areas extrapolated to 2050 based on the Santa Barbara County Association of Government (SBCAG) 2018 Regional Growth Forecast 2050.

[2] Populations within federally-owned lands and/or not within recreation planning areas are included in the total population.

Source: Draft Santa Barbara County Recreation Master Plan

3.14.2.2 Trails

In Santa Barbara County, approximately 1,190 miles of trails support hikers, mountain bikers, equestrians, and outdoor explorers. An estimated 412 miles of trails are provided within cities and unincorporated communities in the five recreation planning areas (Table 3.14-6). These trails provide neighborhood and community access to hiking and biking within open spaces, such as the Orcutt Hills, and along corridors, such as the Obern Trail along Atascadero Creek in Goleta. An additional 778 miles of trails are provided in the Los Padres National Forest and Vandenberg Space Force Base. These trails provide multi-user access to Santa Barbara County's most rural wilderness areas, as well as backcountry camping and backpacking.

Table 3.14-6. Total Estimated Trail Miles by Recreation Planning Area

Trail Type	Trail Miles by Region					
	Cuyama Valley	Lompoc Valley	Santa Maria Valley	Santa Ynez Valley	South Coast	Total
State	0.0 (0.0%)	66.1 (95.0%)	0.1 (0.2%)	0.2 (0.3%)	49.4 (21.6%)	115.7 (28.1%)
Recreation	3.7 (88.1%)	3.4 (4.9%)	44.5 (99.8%)	38.3 (58.3%)	128.6 (56.4%)	218.4 (53.0%)
Community	0.0 (0.0%)	0.1 (0.1%)	0.0 (0.0%)	27.2 (41.4%)	50.0 (21.9%)	77.4 (18.8%)
Federal	0.5 (11.9%)	0.0 (0.0%)	0.0 (0.0%)	0.0 (0.0%)	0.2 (0.1%)	0.7 (0.2%)
Total	**4.1 (100.0%)**	**69.6 (100.0%)**	**44.6 (100.0%)**	**65.7 (100.0%)**	**228.2 (100.0%)**	**412.2 (100.0%)**

Source: Draft Santa Barbara County Recreation Master Plan

3.14.2.3 State and Federal Parks and Recreation Facilities

In addition to recreation facilities provided by County Parks and recreation special districts, several California State Parks and State Beaches are located within the county, as well as one National Forest (i.e., LPNF). California State Beaches within the county include Point Sal, which is a rural coastal access point, and Refugio, El Capitan, and Carpinteria, which provide coastal access and camping. The county contains four State Parks as well, including Chumash Painted Cave State Historic Park, El Presidio de Santa Barbara State Historic Park, Gaviota State Park, and La Purisima Mission State Historic Park (California Department of Parks and Recreation 2022). A portion of the LPNF also falls within the county and provides campgrounds, day-use areas, and trails which serve as an important source of recreational opportunities for many residents and visitors, particularly in those recreational planning regions which lack local non-federal trails for hiking, biking, and horseback riding (e.g., Cuyama Valley, Santa Ynez Valley).

3.14.3 REGULATORY SETTING

State and local laws and regulations have been enacted to ensure adequate provision of recreational facilities in the county. There are no federal regulations that apply to the Project.

3.14.3.1 State Regulations

Quimby Act (1975) and Assembly Bill (AB) 1359

The Quimby Act within the Subdivision Map Act gives cities and counties the authority, by ordinance, to require the dedication of land or payment of in-lieu fees, or a combination of both, for park and recreation purposes as a condition of approval of tentative or parcel subdivision map. The Quimby Act specifies that parkland dedications may not exceed 3 acres of parkland per 1,000 persons residing within a subdivision, unless the amount of existing neighborhood and community park area exceeds that limit, in which case, the city or county may adopt a higher standard not to exceed 5 acres of parkland per 1,000 residents to serve the needs of residents of the subdivision and the greater public residing in the city or county.

Assembly Bill (AB) 1359 amended the Quimby Act to allow fees paid pursuant to the Quimby Act to also be used to develop or rehabilitate park or recreational facilities in a neighborhood other than the neighborhood in which the subdivision is located if certain requirements are met. In addition, AB 1359 authorizes the use of joint or shared use agreements to facilitate access to park or recreational facilities for residents in specified areas.

Mello-Roos Community Facilities Act of 1982

In 1982, the Mello-Roos Community Facilities Act of 1982 (Government Code Sections 53311-53368.3) was created to provide an alternate method of financing needed improvements and services. The Act allows any county, city, special district, school district, or joint powers authority to establish a Mello-Roos Community Facilities District (CFD), which allows for the financing of public improvements and services through the collection of additional property taxes. The services and improvements that Mello-Roos CFDs can finance include streets, sewer systems and other basic infrastructure, fire protection, law enforcement and police protection, ambulance services, schools, parks, libraries, museums, and other cultural facilities. By law, the CFD is also entitled to recover expenses needed to form the CFD and administer the annual special taxes and bonded debt (California Tax Data 2023b).

Landscaping and Lighting Act of 1972

The Landscaping and Lighting Act of 1972 allows local governmental agencies to form Landscape and Lighting Maintenance Districts to finance the costs and expenses of landscaping and lighting public areas. This act can be used by any local agency including cities, counties, and special districts such as school districts or water districts. The many approved uses include the installation and maintenance of landscaping, statues, fountains, general lighting, traffic lights, recreational and playground courts and equipment, and public restrooms. Additionally, the Act allows the acquisition of land for parks and open spaces, plus the construction of community centers, municipal auditoriums, or halls to be financed. Notes or bonds can be issued to finance larger improvements under the Act (California Tax Data 2023a).

3.14.3.2 Local Regulations

Santa Barbara County Comprehensive Plan

The County Comprehensive Plan is a planning document including research, analyses, and goals to enable the Santa Barbara County Board of Supervisors and Planning Commissions to determine matters of priority more effectively in the allocation of resources and to achieve the physical, social, and economic goals of the unincorporated communities within the county. The following components of the Comprehensive Plan are related to recreation.

Open Space Element

The Santa Barbara County Comprehensive Plan Open Space Element discusses designated regions within the county that should remain open space and the reasons why. The reasons for the designation of open space are for public health and safety, for the managed production of resources, for outdoor recreation, and for the preservation of natural resources. Open space for public health and safety includes consideration of fire hazard areas.

Land Use Element

The Santa Barbara County Comprehensive Plan Land Use Element was adopted in 1980 and comprises a variety of research findings, Advisory Committee goals and policies, and proposals from the other Comprehensive Plan Elements. The purpose of this element is to interrelate all of the different factors that affect population growth, urban development, and open land preservation and to represent the County's policy on land use. This Element also determined that 4.7 acres of parkland are needed for every 1,000 persons. Per the Land Use Element, the number of trail miles for riding and hiking paths have not been quantified, but it is acknowledged that the desire by the public for easy and close access to trails and bikeways requires many additional miles of trails and paths to meet demand from residents and visitors.

Land Use Development Policies

4. Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (e.g., water, sewer, and roads) are available to serve the proposed development. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the land use plan.

Parks, Recreation, and Trails Policies

The Land Use Element includes the following Parks/Recreation Policies that apply to public parks and open space.

3. Future development of parks should emphasize meeting the needs of the local residents.
4. Opportunities for hiking and equestrian trails should be preserved, improved, and expanded wherever compatible with surrounding uses.
5. Schools and other public-owned lands should be utilized for joint-use recreational activities whenever possible.

Proposed Public or Private Park/Recreation Facility Overlay

The 1980 Land Use Element also includes a Proposed Public or Private Park/Recreational Facility Overlay to identify future sites to be designated for recreation. This designation identifies by an overlay those lands suitable for future inclusions within the recreational designation defined above. These lands include the following:

- Lands selected by the County Park Department from those sites designated as having the highest suitability for recreational use;
- Areas designated by advisory committees;
- Shoreline areas designated within the County coastal zone; and
- Additional access along creeks and drainage ways.

There are currently four locations designated with the Proposed Public or Private Park/Recreational Facility Overlay, totaling 134 acres. In the South Coast, there are three sites with this overlay, including the Las Varas Ranch and Dos Pueblos Ranch on the Gaviota Coast, and a 23-acre vacant parcel in the center of the Eastern Goleta Valley that is planned for residential and recreational uses. The fourth site within this overlay lies in New Cuyama and currently supports Richardson Park. These sites have been designated with this overlay for decades, and only one (Richardson Park) has been developed with recreation uses.

Parks, Recreation and Trails Maps (PRT Maps)

The PRT Maps are an aspect of the Land Use Element. The PRT Maps consist of five maps adopted by the Board of Supervisors and which establish the envisioned comprehensive parks, recreation, and trails network for the unincorporated area. Specifically, the PRT Maps delineate existing and proposed parks, open areas, joint use facilities, on-road trails, and off-road trails countywide and in the Montecito-Summerland-Carpinteria area, Goleta-Santa Barbara area, Lompoc area, and Santa Maria area. In addition, in 1997, the Board of Supervisors adopted amendments to the PRT Maps to eliminate the Orcutt Area from the Santa Maria Area PRT Map and adopt by reference the Orcutt Community Plan Parks, Recreation and Trails map of the Orcutt Community Plan. The goal of the PRT Maps is to provide a tool whereby informed land use decisions can be made with advanced knowledge of planned trail locations early in the County's discretionary review process. The lines that represent trails on the PRT Maps do not show exact locations of existing or proposed trails, and instead represent general corridors

where trails exist or are proposed to exist. The PRT Maps also provide guidance on the designation of trails, the acquisition of proposed trails, and trail design standards.

Coastal Land Use Plan

The Coastal Land Use Plan (CLUP) lays out the general patterns of development throughout the coastal areas of the unincorporated county. Its purpose is to protect coastal resources while accommodating land use development within the Coastal Zone. The other elements are applicable within the Coastal Zone; however, when there is a conflict, the CLUP takes precedence.

Community Plans

The County has adopted 10 community or area plans. Each community plan contains goals, policies, and standards guiding the development of the community it serves and supplements the policies and goals of the Comprehensive Plan. Community plans with specific policies related to public services and recreation that pertain to new residential or mixed-use development associated with the proposed Project are detailed below.

Eastern Goleta Valley Community Plan:

The following policies from the Orcutt Community Plan are relevant to the proposed Project.

- **Policy SF-EGV-1.1:** The County shall ensure that required public services and facilities to meet the needs of development are constructed and operational concurrently with, or in advance of, the construction and operation of development.
- **Policy SF-EGV-1.2:** The County shall encourage developers to use innovative measures to mitigate the public service impacts from their developments in addition to standard in-lieu fees, including, but not limited, to payment of development impact fees; direct public service facility improvements; creation of public service facility benefit assessment districts, etc.
- **Policy SF-EGV-2.1**: In the interest of coordinated regional planning, the County shall continue to monitor and consider the planning, development and operations activities of adjacent entities to ensure that impacts to County public services and facilities are mitigated to the greatest extent feasible.
- **Policy SF-EGV-2.2:** The County should strive to ensure adjacent jurisdictions fully mitigate their public service and facility impacts, including the City of Goleta, City of Santa Barbara, and UCSB.
- **Policy SF-EGV-2.3:** The County shall continue to review regional projects to evaluate public service and facility impacts to Eastern Goleta Valley.

- **Policy PRT-EGV-1.1:** Diverse outdoor and indoor recreational opportunities shall be encouraged to enhance Goleta's recreational resources and to ensure that current and future recreational needs of residents are met.
- **Policy PRT-EGV-1.2:** To enhance overall public health and well-being, recreation facilities shall be located, designed and constructed, as needed, to increase opportunities to play and exercise in Eastern Goleta Valley.
- **Policy PRT-EGV-1.3:** New public recreational resources shall be prioritized for underserved locations to increase equitable access to a range of recreation opportunities.
- **Policy PRT-EGV-1.4:** The County shall prioritize locating recreational resources in areas within walking or biking distance of residential and educational land uses.
- **Policy PRT-EGV-3.1**: County recreation resources shall be maintained and enhanced to best serve the users of the facility.
- **Policy PRT-EGV-3.2: (INLAND)** Tucker's Grove Park shall be maintained and enhanced.
- **Policy PRT-EGV-3.2: (COASTAL)** Public access and recreational opportunities at Goleta Beach County Parks shall be maintained and enhanced.
- **Policy PRT-EGV-3.3:** There shall be no motorized off-road recreational vehicle (RV) use on County-owned lands within Eastern Goleta Valley.
- **Policy PRT-EGV-4.1**: Acquisition and development of lands for pocket, neighborhood, and community parks should utilize vacant or underutilized lands near or adjacent to residential neighborhoods and educational facilities whenever possible.
- **Policy PRT-EGV-4.2**: Properties with the potential for maximum public use shall be considered a high priority in park acquisition decisions. Public use is maximized when the park locations:
    - Are highly accessible to many people (e.g., park along bike path or at trailhead or on heavily used transportation corridor).
    - Could be connected into network of multimodal transportation options and/or trails.
    - Provide a mix of recreational resources to serve a wide range of visitor demands (e.g., playgrounds near playing fields, or near a dog park, etc.).
- **Policy PRT-EGV-5.1:** In compliance with applicable requirements, all opportunities for public recreational trails within the general corridors adopted by the Board of Supervisors as part of the Parks, Recreation and Trails (PRT) maps of the County Comprehensive Plan (and this Community Plan) shall be protected, preserved and provided for upon approval of any development, subdivision and/or permit requiring any discretionary review or approval, except as referenced in Agricultural Element Policy IA.
- **Policy PRT-EGV-5.10:** The County shall actively pursue acquisition of public trails through exactions as part of development agreements and permitting, through negotiation with property owners for purchase or other transaction, through exchange for surplus county property as available, through acceptance of gifts and other voluntary dedications of

easements, and/or through the use of incentives as developed through the revised Goleta Trails Implementation Study.

- **Policy PRT-EGV-7.1:** The County shall pursue the acquisition of vacant properties for potential use as public parks or open spaces, where the purchase would serve as buffer zones for residential or commercial development, provide usable recreation space, or preserve wildlife habitats and migration corridors or sensitive biological resources.
- **Policy PRT-EGV-7.2:** The County shall work to acquire and implement additional public coastal access.
- **Policy PRT-EGV-7.3**: Acquisition or designation of property for public open space and passive recreation shall strive to incorporate the following features:
    - Significant natural and ecological resources
    - Environmentally sensitive habitat areas
    - Visual resources
    - Significant physical constraints
    - Opportunities for public coastal access and parking
- **Policy PRT-EGV-7.5:** The County shall work with South Coast agencies, including cities, districts, or other interested organizations, to site, acquire, and implement public open space.

Orcutt Community Plan

The following policies from the Orcutt Community Plan are relevant to the proposed Project.

- **Policy PRT-O-1: Diverse** passive and active recreational activities shall be developed in Orcutt.
- **Policy PRT-O-2: Development** of parks shall be consistent with the community's existing semi-rural character and landscaping.
- **Policy PRT-O-3**: Regional retention basins shall serve a dual flood control/recreational use **where** feasible and appropriate given flood control constraints and appropriate levels of natural resource protection.
- **Policy OS-O-1:** When considering approval of development projects within or adjacent to areas identified for potential public open space, the County shall review the appropriate mix of public and/or private open space, and to the maximum extent feasible require dedication of contiguous areas identified as a priority for public acquisition as public open space based on the following criteria:
    - location within designated open space corridors and proximity of adjacent open space;
    - the criteria and intent of the Planned residential Development (PRD) zone district; and
    - demonstration of rough proportionality between the level of permitted development, its associated impact, and the open space dedication, consistent with applicable laws.

- **Policy OS-O-3**: Private open space within designated open space corridors shall be sited, designed, and managed to protect the natural resources and/or recreation potential of these corridors, consistent with the Open Space, Park, Recreation & Trails, and Biological Resource policies of this Plan.
- **Policy OS-O-4**: Development adjacent to, or within designated open space areas, shall be sited and designed to protect and enhance the natural resources of these areas, and accommodate appropriate recreation opportunities as identified in the Parks, Recreation & Trails section of this Plan.
- **Policy OS-O-6:** The County should acquire the open space lands prioritized for public acquisition through dedication by working with property owners and interested groups, or through purchase. Where dedication is required, the County shall offset fees as required. If dedication is not required, the County may consider purchase, use of the TDC program or permitting the property to remain as private open space, consistent with the standards of this plan for natural resource protection and provision of passive and active recreation opportunities.
- **Policy OS-O-7**: To the maximum extent feasible, the County shall set Quimby and other fees at sufficient levels to permit construction and acquisition of the parks, open space, trails, and landscape improvements identified in the Orcutt Community Plan, in the proposed Public Infrastructure Finance Program and in reports/recommendations from the proposed Citizens Parks/Open Space Committee. Where the costs of these proposed improvements exceed funds generated by the fee(s), the County should pursue grants, work with community organizations, consider assessments agreed to by the residents, or other appropriate mechanisms.
- **Policy OS-O-8:** Property outside of designated Open Space areas shall be available for development consistent with other applicable policies in this Plan.
- **Policy OS-O-9:** The County shall encourage restoration and enhancement of degraded habitats within natural undeveloped open space areas.

Santa Ynez Valley Community Plan

The following policies from the Santa Ynez Valley Community Plan are relevant to the proposed Project.

- **Policy PRT-SYV-1:** The County shall strive to provide new recreation and park facilities and new trails. New trails shall be limited to nonmotorized vehicle use and shall be considered on public and private property including public roads.

County Parks Plans

County Parks has adopted several plans for its park properties throughout the county. Examples include master plans for Jalama Beach County Park, the Point Sal Reserve, Lake Cachuma County Park, and Guadalupe Dunes County Park. These plans address park design and layout,

circulation and access, visitation and user experience, maintenance and capital improvements, and funding/financial considerations. Park plans are developed through individual planning processes involving community input and consideration of County priorities and goals outlined in the Comprehensive Plan and applicable community plans. The planning processes themselves are often grant-funded and are key mechanisms to secure funding to construct and operate planned improvements and ongoing maintenance programs within the parks.

Santa Barbara County Land Use and Development Code

The County Land Use Development Code (LUDC; Chapter 35.20 through 28) carries out the policies of the Comprehensive Plan by classifying and regulating the uses of land within the County. Additionally, the Montecito Land Use Development Code (MLUDC), as well as the Coastal Zoning Ordinance (CZO), carry out the policies of the Comprehensive Plan by classifying and regulating the use of land per the Montecito Community Plan Area and the Coastal Land Use Plan (CLUP), respectively. While land use designations characterize the physical uses and the intensity of that use, zoning designations legally define permitted uses and development guidelines for those uses. In the unincorporated areas, recreational uses and open spaces are designated under the Recreation (REC) zoning designation, which is applied to provide public or private open space areas that are appropriate for various forms of outdoor recreation, consistent with the Land Use Element. Zoning for planned development also provides a regulatory framework for park exactions and acquisitions as part of private property development in the County.

3.14.4 ENVIRONMENTAL IMPACT ANALYSIS

3.14.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

According to Appendix G of the CEQA Guidelines, a project would have a significant impact related to recreational resources if:

a. The project would increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated; or

b. The project would include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?

County of Santa Barbara Environmental Thresholds and Guidelines

The County's *Environmental Thresholds and Guidelines Manual* (2024) does not provide any thresholds for significant impacts on parks, recreation, and trails. Instead, the County relies on analysis and consideration of impacts with regard to significance criteria for these resources

based on CEQA Guidelines, as well as questions from the County's Initial Study Checklist, as follows.

- Would the project conflict with established recreational uses of the area?
- Would the project conflict with biking, equestrian, and hiking trails?
- Would the project result in substantial impacts on the quality or quantity of existing recreational opportunities (e.g., overuse of an area with constraints on number of people, vehicles, animals, etc., which might safely use the area)?

Further, although the County's *Environmental Thresholds and Guidelines Manual* does not contain a threshold for parks, recreation, and trails impacts, the County Board of Supervisors has also established a minimum standard ratio of 4.7 acres of public parkland per 1,000 residents in the 1980 Land Use Element, Recreation Section.

Methodology

As described in Chapter 2, *Project Description*, the Project plans for parks, trails, and recreational facilities in unincorporated areas within the county. The Project includes planned capital improvements and amendments to the County's policies and regulations to support the long-term development of recreation facilities to meet recreation needs within five recreation planning regions. Project-level siting and design details are not known, so the impact analysis provided in this EIR does not evaluate impacts associated with recreational development at a project- or site-specific level. The programmatic analysis provided by this Program EIR addresses the potential for parks, recreation, trails, and related development under the Project to affect existing recreation facilities and the environment. Wherever possible, illustrative examples are provided to describe particular areas of the county where the implementation of the Project would create impacts related to parks, trails, and recreation facilities. As described in Section 1.3, *Program-Level EIR Analysis,* the impact analysis provided below is broad and qualitative, such that the findings apply to any of the proposed uses and related development. To assess whether the Project would result in physical deterioration of existing recreational facilities, this section also analyzes impacts in the context of the County's adopted parkland-to-population ratio.

3.14.4.2 Project Impacts

Table 3.14-7 provides a summary of the proposed Project's impacts related to recreation. A detailed discussion of each impact follows.

Table 3.14-7. Summary of Recreation Impacts

Public Service Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact REC-1. The Project would facilitate the development of parks, recreational facilities, and trails that would reduce the use and physical deterioration of existing recreational facilities.	Beneficial	No mitigation measures required.	Beneficial
Impact REC-2. The Project would facilitate the development of parks, recreational facilities, and trails that could result in adverse physical effects on the environment.	Potentially significant	All MMs identified in Section 3.3, *Air Quality*, Section 3.4, *Biological Resources*, Section 3.5, *Cultural and Tribal Resources*, Section 3.7, *Geology and Soils,* Section 3.9, *Hazards and Hazardous Materials,* Section 3.10, *Hydrology and Water Quality*, and Section 3.12, *Noise*.	Significant but mitigable
Impact REC-3. The Project would facilitate the development of parks, recreational facilities, and trails that could result in conflicts with the established recreational use of an area or conflicts between user groups.	Insignificant	No mitigation measures required.	Insignificant
Cumulative Impacts	Insignificant	No mitigation measures required.	Insignificant impacts

Impact REC-1. The Project would facilitate the development of parks, recreational facilities, and trails that would reduce the use and physical deterioration of existing recreational facilities.

As described in Section 3.14.4.1, *Thresholds of Significance*, the County employs a standard ratio of 4.7 acres of public parkland for every 1,000 residents per the 1980 Land Use Element. As presented in Table 3.14-4 above, countywide, the existing parkland-to-population ratio currently meets this standard, with approximately 4.9 acres of parkland for every 1,000 persons; however, the acreage of parkland within the Santa Maria Valley fails to meet this standard, providing only 3.0 acres of parkland for every 1,000 residents. Further, when accounting for future population growth within the county, the ratio of public parkland per 1,000 residents declines, and it is projected that the ratio of public parkland countywide would fall below the County's adopted standards.

The Project would not directly or indirectly result in increases in resident populations in the county or place additional demand on existing parks and recreational facilities. As described in Chapter 2, *Project Description*, the Project would foster the development of parks, trails, and recreational facilities in many different areas of the county. County Parks' planned park, recreation, and trail projects would entail the physical development of new facilities or the expansion of existing facilities. Some projects are new concepts for existing or future parks developed through the Recreation Master Plan process, and other projects are long-standing concepts in the County's community plans. Parks and trail projects planned on existing public properties would require site design, construction, and operation consistent with the County Comprehensive Plan, Recreation Master Plan, and County Parks' approval. Parks and trail projects identified entirely or partially on privately owned properties would require real estate acquisition for long-term public use, as well as site design, construction, and operation in alignment with the Recreation Master Plan. While each of the proposed County Parks projects are unique and vary in complexity, vision, location, and users served, the Recreation Master Plan aims to provide the framework and tools needed to support the development of park and trail projects to help meet countywide needs and facilitate development of facilities necessary to maintain the County's standard ratio of 4.7 acres of public parkland for every 1,000 residents.

Recreational development enabled by the Project would also improve the availability and accessibility of parks and trails to existing and future residents of the county. Such improvements would help to prevent or alleviate the overuse of existing parks, improve the quality of existing recreational opportunities, and reduce future physical deterioration of any one recreation facility, thereby reducing the indirect need for additional recreational facilities, the construction of which could cause adverse physical environmental impacts. Therefore, the Project is considered to result in a *beneficial* impact.

Impact REC-2. The Project would facilitate the development of parks, recreational facilities, and trails that could result in adverse physical effects on the environment.

The Project entails the direct and indirect development of new or expanded parks, recreational facilities, and trails in many areas of the county, which would result in potential adverse physical effects on the environment through the construction of improvements (e.g., grading, earthwork, and structural development). These impacts are discussed in further detail within each resource analysis presented in Chapter 3, *Environmental Impact Analysis.* For instance, the Project has potential to adversely affect aesthetics and visual resources, agricultural resources, air quality, biological resources, cultural and tribal resources, energy, geology and soils, greenhouse gas emissions (GHGs) and climate change, hazards and hazardous materials, hydrology and water quality, land use and planning, noise, public services, transportation, utilities, and wildfire. Please refer to those relevant sections for a detailed analysis of potential impacts associated with the Project. In addition, a detailed analysis of consistency with existing

policies and regulations governing or guiding recreation and development of recreational facilities and trails within the county is presented in Section 3.11, *Land Use and Planning.*

Where potentially significant impacts are identified as they relate to the construction or expansion of recreational facilities, applicable existing regulations, the proposed Comprehensive Plan policies for parks, recreation, and trails, and development standards included as part of the zoning ordinance amendments, or appropriate mitigation is identified which would reduce associated direct and indirect recreational development enabled by the Project. For instance, the Project proposed or would enable new recreational development in areas of the county that are home to sensitive plant and wildlife species, or sensitive natural communities (e.g., Environmentally Sensitive Habitat Areas). Impacts to these resources would be reduced through existing regulations and mandatory compliance with policies and development standards proposed as part of the Project, which require that new development minimize impacts to sensitive habitats and species to the extent feasible (see Section 3.4, *Biological Resources*). Additionally, as discussed in other sections of this EIR, mitigation would be implemented to reduce impacts. This includes all MMs identified in Section 3.3, *Air Quality,* Section 3.4, *Biological Resources,* Section 3.5, *Cultural and Tribal Resources,* Section 3.7, *Geology and Soils,* Section 3.10, *Hydrology and Water Quality,* and Section 3.12, *Noise.*. With the implementation of the regulations and measures identified in those other sections of this EIR, impacts from the construction or expansion of recreational facilities would be reduced to a *significant but mitigable* level.

Impact REC-3. The Project would facilitate the development of parks, recreational facilities, and trails that could result in conflicts with the established recreational use of an area or conflicts between user groups.

Several of the parks and recreational facilities directly and indirectly enabled by the Project have the potential to result in conflicts in the established recreational use of an area or cause conflicts between user groups, such as hikers, mountain bikers, and equestrian trail users. Conflicts could arise from the development and expansion of existing recreational facilities to provide additional opportunities for existing users of the facilities, as well as new recreational opportunities that did not previously exist.

As an example, the Project proposes the Point Sal Trails & Coastal Access Improvements, which would entail reopening Point Sal Road, constructing new beach access parking, and building a new coastal access stairway to improve public coastal access and beach recreation at Point Sal State Beach and access to hiking trails in the larger Point Sal Reserve. With the implementation of these improvements, the County also intends to broaden the range of user groups to include cyclists on Point Sal Road and equestrians on appropriate trails within the reserve. Improved access to the beach would also increase beach and shoreline recreation (e.g., beach-going, swimming, fishing). Recreational use of this area, however, is currently primarily

limited to hikers and dog walkers. Further, access is very challenging, which reduces the number of visitors to the area, but is a major contributor to the wild and scenic character and quality of the reserve. By increasing access and recreational use at the Point Sal area, implementation of the Project could result in substantial impacts to the quality of the existing recreational opportunities, as well as create conflicts with the established use of the area and between different trail user groups.

The Project also proposes future expansion of recreational opportunities at Lake Cachuma's north shore and Live Oak Campground, including a potential new campground, equestrian facilities, and potentially new trails for hiking, mountain biking, and horseback riding. These improvements could result in conflicts between existing recreational use of the area, which is currently limited to horseback riding, particularly with the addition of trails for mountain biking. In many areas of the county, mountain biking and equestrian use of single-track trails may be viewed as a conflicting use that poses safety concerns to both user groups.

However, as part of the Project, the County would adopt new policies applying to new recreational development trails within the unincorporated area to balance the needs of different user groups. In particular, proposed trail policies would require the public trail network to accommodate pedestrians, equestrians, bicyclists, and other trail user groups wherever feasible, and that separate facilities for unique users be developed to meet unique user needs, enhance trail safety and sustainability, and/or minimize user conflicts. For example, the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan project would involve improved and expanded trails to support equestrians with separate segments and facilities for other non-motorized users. The equestrian trail system would offer scenic routes in varying terrain for riders of various skill levels to encourage the advancement of local equestrians. Non-equestrian trails would support hiking and non-motorized biking. Where trail conflicts could arise with other recreational users, horse-only bypasses would be integrated into the trail design to ensure the safety and comfort of riders and horses. Further, the County requires County parkland and land designated for recreation to be preserved and developed for public recreation, while non-recreational public facilities shall be located on non-recreational land. Compliance with these development standards for the proper siting and design of new recreational facilities and trails would ensure future recreational development enabled under the Project does not result in substantial adverse conflicts with established recreational use of an area or result in conflicts between user groups. Therefore, impacts are considered *insignificant*.

3.14.4.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis*, the cumulative setting for the Project involves a variety of long-range plans, policies, and initiatives, as well as the development of county projects in the unincorporated county and surrounding incorporated cities. Project

impacts, along with potential impacts from pending and current planning or development projects, inform the cumulative impacts analysis. Such cumulative projects would range from programmatic projects, such as the County's 2023-2031 Housing Element Update, to planned parks and trail projects in local cities and special districts, such as the Dwight Murphy Field Renovation project in Santa Barbara. Depending on the type of project, cumulative residential development throughout the county is expected to increase population and demand for recreational facilities and services provided by the County and/or local municipalities and special districts. Regionwide increases in demand for these services as a result of implementation of these cumulative projects would increase the demand for and use of existing recreational facilities throughout the county, accelerating the deterioration of these facilities and further constituting the need for new facilities to meet existing and future recreational needs, resulting in a potential cumulative impact. The Project, however, would directly help to alleviate these impacts by planning for new parks, recreational facilities, and trails to meet the demands of existing residents, as well as future residential growth occurring as a result of other cumulative pending plans and projects. As a result, the Project would not contribute to a cumulatively significant impact on recreational facilities or services, and cumulative impacts as a result of the Project would be considered *beneficial*.

In addition, certain proposed uses and related development could result in site disturbance, grading, or site improvements, which, when combined with the physical development of parks, recreational facilities, and trails under the Project, could result in cumulatively considerable adverse physical impacts to the environment. Detailed discussion of these cumulative impacts, as well as the Project's contribution, is discussed in detail in other resource sections included in Chapter 3, *Environmental Impact Analysis.* Please refer to the cumulative impact discussion provided in these other resource sections for detailed analysis and consideration of the cumulative impact of the development of parks, recreational facilities, and trails. As discussed therein, implementation of required project-specific mitigation measures, independent site-specific analysis, and implementation of existing regulations and County permitting procedures would ensure individual impacts of cumulative pending plans and projects would be appropriately addressed and would not result in a cumulatively considerable impact for which the Project's contribution would be significant. Therefore, the Project would not substantially contribute to a cumulatively significant impact on recreation, and cumulative impacts would be *insignificant*.

3.14.4.4 Proposed Mitigation

As discussed in other sections of this Program EIR, the development of parks, recreational facilities, and trails would cause adverse physical impacts on the environment. Refer to other resource discussions provided in Chapter 3, *Environmental Impact Analysis* for the list of requirement mitigation measures to reduce the impacts of the Project.

3.14.4.5 Secondary Impacts

No mitigation measures are required to reduce the Project impacts on recreational facilities. Mitigation measures are identified in other resource sections included in Chapter 3, *Environmental Impact Analysis,* which could result in adverse secondary impacts to the environment. These secondary impacts are discussed in detail in the relevant resource sections of this Program EIR.

3.14.4.6 Residual Impacts

Impact REC-1. The Project would reduce the use and physical deterioration of existing recreational facilities throughout the county as a result of the Project facilitating the development of new or expanded parks, recreational facilities, and trails to meet existing and future recreational needs of residents and guests of the county. The impacts of the Project would be *beneficial*.

Impact REC-2. As discussed for affected resources in other sections of this Program EIR, construction of individual parks, recreational facilities, and trail projects enabled by the proposed Project would result in potential adverse physical impacts as a result of construction. As discussed in these sections, new parks, recreational facilities, and trail development enabled under the Project would be potentially significant and subject to appropriate mitigation to reduce adverse impacts. This includes all MMs identified in Section 3.3, *Air Quality,* Section 3.4, *Biological Resources,* Section 3.5, *Cultural and Tribal Resources,* Section 3.7, *Geology and Soils,* Section 3.10, *Hydrology and Water Quality,* and Section 3.12, *Noise.* Implementation of identified mitigation measures would reduce physical environmental impacts associated with the new park, recreational facilities, and trail construction to a *significant but mitigable* level.

Impact REC-3. Mandatory compliance with existing regulations and implementation of policies and development standards proposed as part of the Project would avoid conflicts with the established recreational use of an area and conflicts between user groups. Impacts of the Project would be *insignificant*.

3.15 TRANSPORTATION

3.15.1 INTRODUCTION

This section describes potential impacts to transportation that could occur as a result of future development under the Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (Project). The section describes the existing multi-modal transportation system in the unincorporated areas of Santa Barbara County and summaries applicable plans, policies, programs, and standards adopted by applicable agencies, including the County, the Santa Barbara County Association of Governments (SBCAG), and the California Department of Transportation (Caltrans). The analysis provided in this section addresses temporary construction-related impacts and long-term operational impacts that could result from the development of parks, trails, and recreational facilities under the proposed Project.

Many factors affect travel behavior, including density and diversity of land uses, design of the transportation network, access to regional destinations, distance to high-quality transit and active transportation facilities, development scale, demographics, and transportation demand management (TDM). Typically, low-density development at greater distances from other land uses, located in areas with poor access to public transit, generate more vehicle trips as compared to development located in urban areas, where there is higher population density and a mix of land uses (e.g., commercial uses near housing), and public transit options are available. Consistent with the requirements of Senate Bill (SB) 743, the California Environmental Quality Act (CEQA) Guidelines, and the County's *Environmental Thresholds and Guidelines Manual*, the discussion focuses on Vehicle Miles Traveled (VMT), which measures the number of vehicle trips and their distances, rather than Level of Service (LOS), which measures roadway capacity, intersection operations, and traffic congestion. VMT is discussed in terms of total VMT and VMT per capita. Total VMT is a measure of the number of vehicle trips and distances that residents, employees, or visitors drive, determined by multiplying the total number of trips generated by the average length of the trips measured in miles. VMT per capita is calculated as the total annual miles of vehicle travel divided by the total population in the planning area. VMT per capita is an efficiency metric that facilitates comparison with state policy goals to reduce vehicle energy use, particularly that associated with non-renewable fossil fuels, associated greenhouse gas (GHG) emissions, and adverse effects on global climate change. In addition to VMT, this analysis addresses consistency with applicable regional and transportation plans, roadway configurations and safety issues, and emergency access issues.

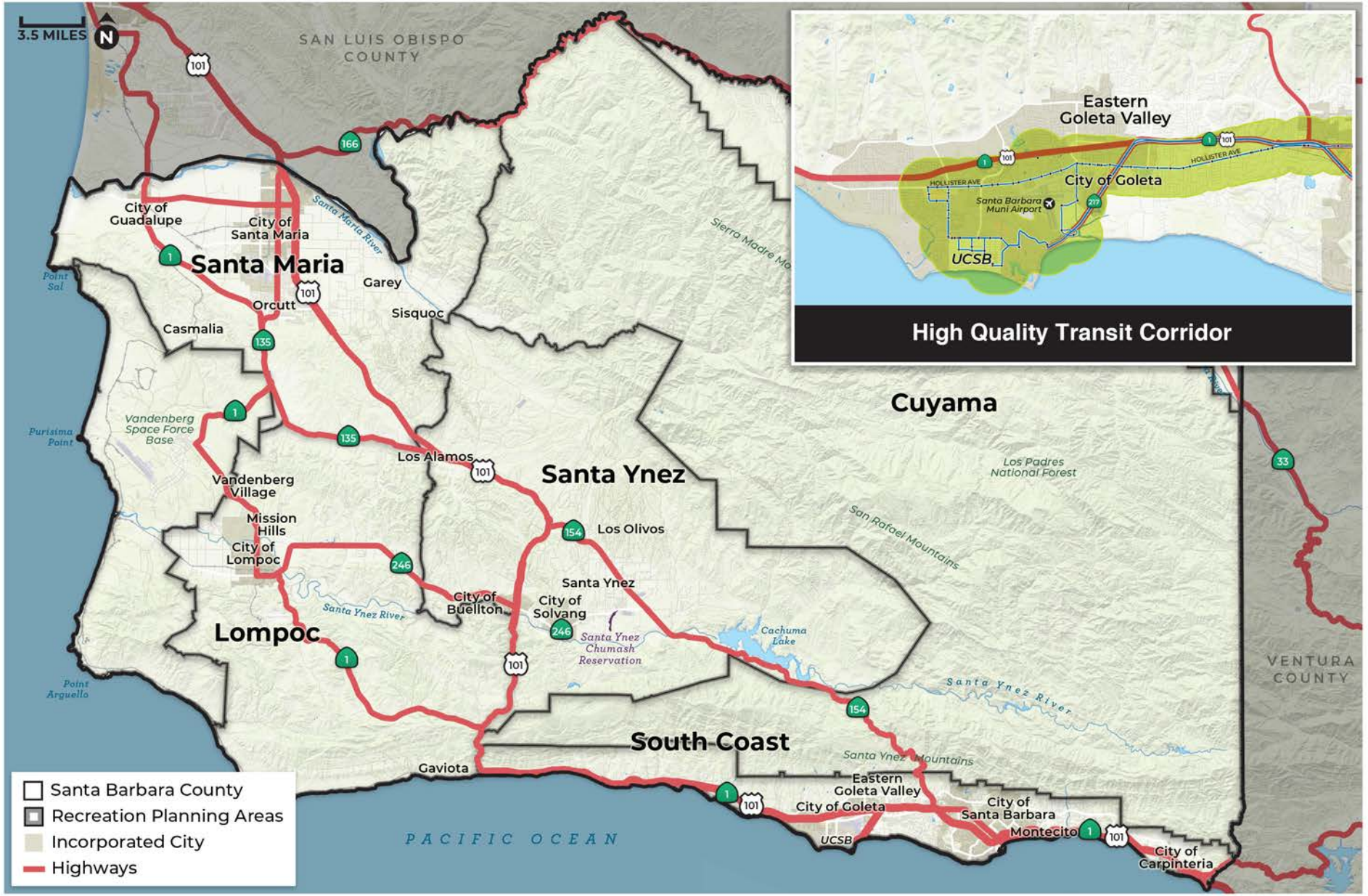
3.15.2 ENVIRONMENTAL SETTING

3.15.2.1 Countywide Transportation Network

Santa Barbara County is served by a multi-modal transportation system that supports a wide range of transportation infrastructure, including infrastructure owned and managed by the state (Caltrans), local agencies such as the County and eight incorporated cities, and private entities. The countywide transportation network consists of approximately 2,054 miles of maintained public roadways, 13 public transit service systems, dozens of private transportation services, and 338 miles of Class I, II, and III bikeways (SBCAG 2021). The County Public Works Department, Transportation Division, maintains approximately 1,650 lane miles of roads in unincorporated areas (i.e., areas not within one of the eight incorporated cities) of Santa Barbara County (County of Santa Barbara 2025). This roadway network is critical to the movement of people, goods, and services throughout the region. County roads, and their associated bicycle and pedestrian facilities, provide access for public transit, people who walk and bike, and vehicles.

U.S. Highway 101 and State Routes

U.S. Highway 101 is a major transportation corridor that extends through California and is an important travel corridor for Santa Barbara County. State Routes (SRs) – including all or parts of SR 1, SR 33, SR 135, SR 144, SR 150, SR 154, SR 166, SR 192, SR 217, SR 225, and SR 246 – facilitate regional access throughout the county. U.S. Highway 101 and the SRs are depicted in Figure 3.15-1 and described in further detail below.



wsp

Santa Barbara County Transportation Network

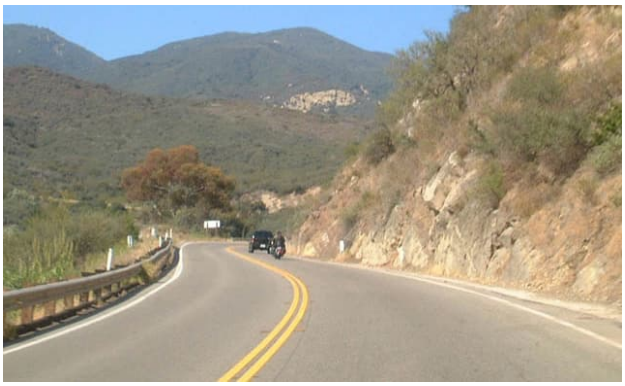
FIGURE 3.15-1



U.S. Highway 101 traverses the county in a north-south direction and carries the highest volumes of any roadway in the unincorporated county with a maximum of 133,000 average annual daily trips (AADT) in Santa Barbara. Source: Santa Barbara Newspress

U.S. Highway 101 serves as the primary transportation link between the urban areas located throughout Santa Barbara County and connects the county with Ventura County to the south, and San Luis Obispo County to the north. U.S. Highway 101 runs for approximately 90 miles within Santa Barbara County as a limited-access freeway, especially within urban areas (SBCAG 2021). However, there are segments along the Gaviota Coast, outside of Buellton and Los Alamos, with side street and driveway access in these rural areas (SBCAG 2021). U.S. Highway 101 forms the foundation of the local transportation network, provides the primary freight artery through much of the Central Coast, and is critical for the movement of people and goods statewide. Most trips along this route are related to business, government, recreation, tourism, and daily living, including work commutes, resulting in congestion along U.S. Highway 101 in Santa Maria and between the South Coast and Ventura County. U.S. Highway 101 carries the highest volume of traffic of any roadway within the unincorporated county. A portion of U.S. Highway 101 along the Gaviota Coast is a designated scenic highway as part of Caltrans' State Scenic Highway System, and the entire length of U.S. Highway 101 in Santa Barbara County is eligible for official designation as a scenic highway. (Refer to Section 3.1, *Aesthetics and Visual Resources* for more information about scenic highways and visual resources.)

SR 1 is a major north-south state highway that runs along most of the Pacific coastline in California. In Santa Barbara County, the route extends approximately 80 miles from its intersection with U.S. Highway 101 just north of Gaviota, through the City of Lompoc and the unincorporated community of Vandenberg Village, over Harris Grade into the San Antonio Creek Valley, joining with SR 135 north to the Santa Maria Valley where it traverses southwest Orcutt, eventually continuing into San Luis Obispo County. Commuter traffic has become the major component of congestion along SR 1 south of the City of Lompoc due to a regional jobs-housing imbalance with more than 15,000 Lompoc residents commuting to employment on the South Coast daily. In addition to linking the Lompoc Valley with the Santa Maria Valley and the South Coast, SR 1 serves as the main street through the historic centers of the cities of Lompoc and Guadalupe and is a designated scenic highway as part of Caltrans' State Scenic Highway System. (Refer to Section 3.1, *Aesthetics and Visual Resources* for more information about scenic highways and visual resources.)



SR 154 connects Eastern Goleta Valley with the inland portion of the county, including Santa Ynez and is the only regional transportation route to Lake Cachuma.
Source: Google Earth

SR 154 is an east-west route that serves regional and interregional travel, spanning a distance of approximately 33 miles through the Los Padres National Forest (LPNF) and the Santa Ynez Valley. Between its interchanges with U.S. At its northern junction with U.S. Highway 101, SR 154 runs through the Santa Ynez Valley, past the community of Los Olivos, and through rural agricultural land to its junction with SR 246, which links this route to the community of Santa Ynez and City of Solvang, as well as U.S. Highway 101 to the west. The route then continues to the ranchlands and lower foothills of the Santa Ynez Mountains to San Marcos Pass, then travels down the coastal side of the mountains to U.S. Highway 101. SR 154 has become a major commuter route for residents of North County with employment on the South Coast and is a designated scenic highway as part of Caltrans' State Scenic Highway System. (Refer to Section 3.1, *Aesthetics and Visual Resources* for more information about scenic highways and visual resources.) The corridor provides an alternative access route through southern Santa Barbara County when segments of U.S. Highway 101 are closed due to harsh weather, incidents, or other emergencies.

SR 246 is the primary east-west route between the City of Lompoc and the Santa Ynez Valley. This route also connects U.S. Highway 101 with SR 154. SR 246 serves as a key roadway for the county's agricultural areas, including wineries. This connection is also critical to connecting North County and the South Coast.

SR 217 connects U.S. Highway 101, the Santa Barbara Airport, and the University of California, Santa Barbara (UCSB). Its interchange with Hollister Avenue and partial interchange with South Patterson Avenue provide important access to the Eastern Goleta Valley.

SR 192 is an east-west route running through the South Coast that provides an alternative east-west travel route to U.S. Highway 101, particularly during the peak hour when U.S. Highway 101 experiences congested conditions.

SR 135 runs through the unincorporated communities of Los Alamos and provides important access to jobs at Vandenberg Space Force Base (VSFB) for residents of Orcutt and Santa Maria and serves as a western bypass of U.S. Highway 101 in northern Santa Barbara County. Its interchange with Clarke Avenue and at-grade intersection with Union Valley Parkway provide important access to the community of Orcutt.

SR 166 travels east-west and is the only route within the county that connects to Cuyama Valley. Thus, it is a crucial transportation route for transporting goods and people, as well as an emergency access route, for the communities of Cuyama and New Cuyama.

Local Roadways

The County maintains 1,650 lane miles of roads in the unincorporated areas of the county (County of Santa Barbara 2025). Regional access and important local roads are described for each of the five Recreation Planning Regions below.

Santa Maria Valley

Access to the Santa Maria Valley is provided by U.S. Highway 101, SR 1, SR 135, and SR 166. Primary access to Orcutt off of U.S. Highway 101 and SR 135 is provided via Clarke Avenue and Union Valley Parkway. Within Orcutt, major east-west access is provided by Clarke Avenue which extends for almost 4 miles from U.S. Highway 101 to SR 1 on the west in the south-central part of the community, while Union Valley Parkway currently serves northern neighborhoods and extends for 2.5 miles from U.S. Highway 101 west to South Blosser Avenue. Clarke Avenue is a four-lane road with signalized intersections over most of its reach but narrows two lanes in Old Town Orcutt and as it passes by major undeveloped land in southwest Orcutt. Union Valley Parkway is four lanes between U.S. Highway 101 and SR 135, narrowing to two lanes east of Foxenwood Drive. Union Valley Parkway is planned to be extended southwest to SR 1 when undeveloped lands in southwest Orcutt are developed. Primary north-south access within Orcutt is provided by Bradley Road, which extends for over 3 miles from Rice Ranch Road in the south to Santa Maria Way in the north and is four lanes over most of its reach.

Within this region, the unincorporated communities of Casmalia, Sisquoc, and Garey are located approximately 5 to 7 miles from regional highways, with access provided by narrow rural roads. Access to Casmalia is provided by Black Road and access to Garey and Sisquoc is provided by Foxen Canyon Road. Access to individual properties is provided by a network of often short dead-end rural roads.

Lompoc Valley

Regional access to the Lompoc Valley is provided via SR 1, which provides north-south connections between VSFB, Vandenberg Village, Mission Hills, Mesa Oaks, and the City of Lompoc. SR 246 also provides primary regional access to the Lompoc Valley and east-west connections between the cities of Lompoc, Buellton, Solvang, and Santa Ynez Valley.

Narrow, rural roads, usually consisting of two lanes also connect these Lompoc Valley region communities. Burton Mesa Boulevard, a winding two-lane road extends approximately 3 miles east to connect Vandenberg Village with the community of Mission Hills. Similarly, Purisima

Road, a two-lane roadway, extends approximately 2 miles along the southern end of Mission Hills between SR 1 and SR 246 to connect the communities of Mission Hills and Mesa Oaks.

Santa Ynez Valley

The Santa Ynez Valley is accessible by U.S. Highway 101, SR 154, and SR 246. Access from these regional highways is provided by narrow two-lane roads including the Avenue of Flags, Santa Rosa Road, Ballard Canyon Road, Chalk Hill Road, Roblar Avenue, Alamo Pintado, Refugio Road, Edison Street, and Baseline Avenue. The Los Olivos, Ballard, and Santa Ynez are served by a local street network that provides access to individual properties.

Cuyama Valley

Access to the unincorporated communities of Cuyama, New Cuyama, and Ventucopa is relatively limited. SR 33 provides regional access from the south before becoming SR 166. Access to these unincorporated communities is provided by narrow rural roads with access to individual properties provided by a network of often short dead-end roads.

South Coast

Regional access to the South Coast is primarily provided by U.S. Highway 101, which runs east to west through the region connecting the region with the Gaviota, the City of Carpinteria, and Ventura County. Both SR 217 and Storke Road diverge south from U.S. Highway 101 to provide access to Isla Vista. SR 192 runs through Montecito and north of Summerland before curving north into SR 154, which provides access to the Santa Ynez Valley.

Within the South Coast, the local roadway system of Eastern Goleta Valley consists of a network of neighborhood streets connecting to primary and arterial roadways which are primarily used to connect residences to destinations such as shopping centers, schools, places of employment, and neighboring cities. This area is served by three main east-west travel corridors: U.S. Highway 101, Cathedral Oaks Road, and Hollister Avenue. These east-west travel corridors are connected by three main north-south corridors: Patterson Avenue, Turnpike Road, and SR 154. These three corridors provide the opportunity to cross U.S. Highway 101 from north to south.

Public Transit and Railway Transportation

As described in the County's Regional Transportation Plan (RTP), Connected 2050: Santa Barbara County Regional Transportation Plan and Sustainable Communities Strategy (RTP/SCS), there are 15 public transit services provided within Santa Barbara County. These services are summarized in further detail below. The South Coast is the only region that currently has a High-Quality Transit Corridor (HQTC), defined as a corridor with fixed-route bus service with service intervals no longer than 15 minutes during peak commute hours. This HQTC is located along the extent of Hollister Avenue in the Eastern Goleta Valley between the City of Santa Barbara and the City of Goleta and is achieved primarily by the operations of Line 11

operated by the Metropolitan Transit District (MTD). Public transportation serving the unincorporated communities of the Santa Maria Valley, Santa Ynez Valley, Lompoc Valley, and Cuyama Valley generally operate with 35- to 45-minute wait times, described in greater detail below.

Amtrak

Three Amtrak train stations are located in Santa Barbara County. The Santa Barbara Amtrak Station is located in the City of Santa Barbara's downtown area. MTD connections are provided at the Santa Barbara Amtrak Station. The City of Carpinteria Amtrak Station is located on Linden Avenue near the City's downtown area and Carpinteria State Beach. The Goleta Amtrak Station is located in the City of Goleta in a light industrial area off La Patera Lane north of Hollister Avenue. The two Amtrak lines serving these stations include the Pacific Surfliner and the Coast Starlight. Santa Barbara County destinations served by the Pacific Surfliner include Lompoc-Surf, Guadalupe, Goleta, Santa Barbara, and Carpinteria. The Pacific Surfliner runs four times daily in each direction. Coast Starlight destinations in Santa Barbara County include the cities of Santa Barbara and Oxnard. Coast Starlight runs once daily in each direction. The Connecting Amtrak Thruway bus service is offered from the train stations to the UCSB campus, Solvang-Santa Ynez Valley, and Santa Maria.



The Santa Barbara Amtrak station is located in the downtown of the City of Santa Barbara and provides regional passenger train services via Amtrak's Pacific Surfliner and Coast Starlight lines.

Greyhound

Amtrak and Greyhound bus services work in partnership so that Amtrak passengers can purchase a Greyhound connection to cities not served by rail or the Connecting Amtrak Thruway bus services alongside their Amtrak purchase. Greyhound destinations in Santa Barbara County include the Santa Barbara Amtrak Station and UCSB campus.

Santa Maria Regional Transit (SMRT)

The City of Santa Maria operates a fixed-route public transit service known as the Santa Maria Regional Transit (SMRT) inter-regional bus service serving the cities of Santa Maria, Lompoc, and Buellton/Solvang and the unincorporated community of Orcutt. SMRT provides service Monday through Friday between the hours of 6:00 A.M. and 8:30 P.M., and Saturday and Sunday between the hours of 8:30 A.M. and 6:30 P.M. Routes 6, 12X, and 5 connect the City of

Santa Maria with the unincorporated community of Orcutt. Routes 6 and 12X make stops along Clark Avenue. Route 6 frequents five stops (Crossroads Shopping Center, S. Bradley, and E. Foster, Oak Knolls Shopping Center, Clark and Pacific, and Foster Road at Youth Center) with each bus arriving approximately 45 minutes apart between 6:45 A.M and 7:30 P.M. Route 12X frequents eight stops (Transit Center, Broadway and Stowell, McCoy and Broadway, Santa Maria Airport [upon request], Orcutt and Foster, Clark and Orcutt, Oak Knolls Shopping Center [upon request], and Foster and Bradley), with each bus arriving roughly one hour apart between 6:45 A.M. and 4:45 P.M. Route 5 frequents four stops (Transit Center, Miller and Daniel, Lakeview and Orcutt, Miller and Betteravia), with each bust arriving approximately 45 minutes apart between the hours of 6:30 A.M. and 7:15 P.M. (SMRT 2025).

SMRT also provides weekday commuter service via two routes. Headways or the frequency of service is relatively low with service to many stops at 45-minute intervals or longer during peak commuting with longer intervals during non-peak periods. SMRT Route 30 (formerly Breeze 100) operates weekdays from 5:45 A.M. to 5:00 P.M. and serves the City of Santa Maria, VSFB, a single stop in Vandenberg Village (Burton Mesa Boulevard and Constellation Road), and the City of Lompoc. SMRT Route 20 (formerly Breeze 200) operates weekdays from 6:00 A.M. to 6:30 P.M. and serves the cities of Santa Maria, Buellton, and Solvang with a single stop in the community of Los Alamos (Ferrini Park). SMRT also offers a shared ride Americans with Disabilities Act of 1990 (ADA) compliant door-to-door paratransit service for those whose disability prevents them from riding the ADA-accessible fixed-route bus (SMRT 2025).

SMRT also provides deviated fixed-route service within the Cuyama Valley and to the Orcutt and Santa Maria region via SMRT Route 50. A single shuttle departs New Cuyama to destinations in Santa Maria twice a week (Tuesday and Thursday) at 9:00 A.M. and returns at 5:00 P.M. As this is not a fixed route, passengers are picked up from New Cuyama and taken to their desired destinations in the Santa Maria-Orcutt area (Transit.Wiki 2023).

Santa Barbara Metropolitan Transit District

MTD is an independent special district empowered under the California Public Utilities Code to provide public transit service on the South Coast. MTD provides fixed-route service in the cities of Santa Barbara, Carpinteria, and Goleta and the unincorporated areas of Isla Vista, Montecito, and Summerland, utilizing a fleet of 106 vehicles, including 74 diesel vehicles, 14 electric vehicles, and 18 hybrid vehicles. MTD provides service Monday through Sunday, beginning as early as 5:30 A.M. and running as late as midnight. MTD provides 42 transit routes through 719 bus stops (SBCAG 2021). In 2018, MTD provided 6,288,980 passenger trips (MTD 2025). Line 12x/24x is a key commuter line, connecting Goleta, UCSB, and Isla Vista with major employment centers in Goleta and downtown Santa Barbara.

Line 11 travels primarily down Hollister Avenue and provides connections between the Eastern Goleta Valley, downtown Santa Barbara, UCSB, and the community of Isla Vista through 10 stops

frequented every 7 minutes between 6:15 A.M. and 12:45 A.M. on weekdays, 6:00 A.M. and 10:30 P.M. on Saturdays, and 6:40 A.M. and 9:30 P.M. on Sundays (MTD 2024b). This line creates the HQTC along Hollister Avenue in the Eastern Goleta Valley.

Line 20 connects the City of Santa Barbara with the communities of Montecito and Summerland and the City of Carpinteria through 7 stops frequented every 30 minutes between 5:30 A.M. and 10:00 P.M. on weekdays, 6:30 A.M. and 10:00 P.M. on Saturdays and 6:45 A.M. and 8:00 P.M. on Sundays. Key stops on Line 20 include Milpas Street and Gutierrez Street, Coast Village Road and Hot Springs Road, Carpinteria Avenue and 7th Street, Carpinteria Avenue and Palm Avenue, and Via Real and Mark Avenue (MTD 2024a).

As a public entity that provides non-commuter, fixed-route transit service, MTD is required by the ADA to provide complementary paratransit service for persons who are unable to use the fixed-route service. MTD contracts with Easy Lift to provide complementary paratransit service (SBCAG 2021).

City of Lompoc Transit (COLT) and Wine Country Express

The City of Lompoc manages the City of Lompoc Transit (COLT) transit system and contracts with a private operator for the operation of the fixed-route service. COLT serves the City of Lompoc and the unincorporated communities of Vandenberg Village and Mission Hills. COLT provides service Monday through Friday between the hours of 6:30 A.M. and 7:00 P.M. and on Saturdays between the hours of 9:00 A.M. and 5:00 P.M. COLT's Route 4, the only route that connects Lompoc with the communities of Vandenberg Village and Mission Hills, frequents eight stops (Mission Plaza, Allan Hancock College in Lompoc, Via Lato and Calle Lindero, Los Berros School in Mission Hills, Via Dona and Via Cortez, Mission Hills Market, Cabrillo High School in Vandenberg Village, Constellation and Jupiter), with each bus arriving roughly one hour apart between 6:45 A.M. and 6:50 P.M. and a second bus on hour intervals for Alan Hancock Village and Mission Plaza (City of Lompoc 2023). The City of Lompoc also provides the Santa Barbara Shuttle and the Wine Country Express. The Santa Barbara Shuttle operates one round trip between Lompoc and Santa Barbara, with stops in Buellton on Tuesdays and Thursdays. The shuttle departs the Mission Plaza center in Lompoc at 8:30 A.M. and the return trip departs the Santa Barbara MTD Transit Center at 3:30 P.M. (City of Lompoc 2023). The Wine County Express connects the cities of Lompoc, Buellton, and Solvang with three round trips per day, Monday through Saturday. Neither the Santa Barbara Shuttle nor the Wine County Express offer stops in unincorporated communities. Buses depart at 7:15 A.M., 1:15 P.M., and 4:45 P.M., arriving at Solvang in about 35 minutes (City of Lompoc 2025).

Santa Ynez Valley Transit (SYVT)

Santa Ynez Valley Transit (SYVT) is a joint powers authority (JPA) funded by the County and the cities of Buellton and Solvang. SYVT provides two fixed-route services – the Express Route

and Los Olivos Loop – and a demand-response service to Cottage Hospital. Fixed-route services are available Monday through Saturday from 6:30 A.M. to 6:10 P.M. The Express Route operates every 30 minutes from 6:30 A.M. to 7:00 P.M. frequenting 20 stops between Buellton, Solvang, and Santa Ynez. Stops in Santa Ynez include Santa Ynez Valley Union Highschool, Tribal Health Clinic, Chumash Casino, Cuesta Street and Pine Street, Edison Street and Sagunto Street, Sagunto Street and Meadowvale Road. The Los Olivos Loop operates approximately every hour between 7:10 A.M. and 5:40 P.M. serving 18 stops between Solvang, Santa Ynez, and Los Olivos. Santa Ynez stops include Alamo Pintado Road and Old Mission Drive, Cottage Hospital, Sunny Fields Park, Alamo Pintado Road and Baseline Avenue, Refugio Road and Baseline Avenue, Samantha Drive and Refugio Road, and Santa Ynez Valley Union High School. Los Olivos stops include Santa Barbara Avenue and Alamo Pintado Avenue, Alamo Pintado Avenue and Grand Avenue, Grand Avenue and Alamo Pintado Road, and Refugio Road and Roblar Avenue. Demand-response services are offered every day to ADA-eligible individuals and the general public on Sundays. The City of Solvang is the service administrator for the JPA and contracts with a private operator for the operation of the service (SYVT 2025).

Clean Air Express

The Clean Air Express is a commuter-oriented peak-hour service that also provides non-peak-hour services. The Clean Air Express provides fixed-route commuter service from Lompoc to Goleta, Lompoc to Santa Barbara, Santa Maria/Buellton to Goleta, and Santa Maria/Buellton to Santa Barbara (Clean Air Express 2025). The Clean Air Express is managed by SBCAG and is funded by Measure A and the County of Santa Barbara.



The Clean Air Express is an important commuter service in the County, providing early morning and late evening trips on weekdays between Lompoc and neighboring cities.
Source: Clean Air Express

Ventura County Transportation Commission (VCTC) Coastal Express



VCTC's Coastal Express provides early morning and afternoon peak hour weekday commuter services between the cities of Camarillo, Oxnard, Ventura, Carpinteria, Santa Barbara, Goleta, as well as to UCSB campus.

The Ventura County Transportation Commission (VCTC) Coastal Express is a service of Ventura County's Vista bus line serving peak hour commuters and non-peak hour users. The Coastal Express provides service between the cities of Camarillo, Oxnard, Ventura, Carpinteria, Santa Barbara, Goleta, and UCSB. The Coastal Express does not provide stops to unincorporated Santa Barbara communities except for the Santa Barbara County Complex located in Eastern Goleta Valley at Honor Farm Road/Camino Del Remedio. This stop is serviced three times between 6:43 A.M. and 7:52 A.M. by a northbound bus and three times by a southbound bus between the hours of 4:10 P.M. and 5:15 P.M. The Coastal Express provides 11 different lines which operate between the hours of 4:10 A.M. to 8:27 P.M. Monday through Friday. The Coastal Express operates Saturday through Sunday between the hours of 7:25 A.M. and 8:03 P.M. (VCTC 2025). The Coastal Express is managed and funded jointly by the VCTC and SBCAG, with VCTC acting as the lead agency.

San Luis Obispo Regional Transit Authority (SLORTA) Route 10

San Luis Obispo Regional Transit Authority (SLORTA) Route 10 provides bidirectional, fixed-route, intercounty service between the cities of San Luis Obispo, Pismo Beach, and Arroyo Grande; the communities of Nipomo and Orcutt; and the City of Santa Maria. Route 10 operates Monday through Friday from 6:33 A.M. to 9:43 P.M., Saturday from 8:33 A.M. to 8:43 P.M., and Sunday from 9:33 A.M. to 6:43 P.M. The southbound route frequents nine stops every hour on weekdays and every three hours on Saturdays, and every four hours on Sundays. The northbound route frequents eight stops every hour on weekdays, three hours on Saturdays, and every four hours on Sundays (SLORTA 2025). In the City of Santa Maria, Route 10 serves the SMRT Transit Center, the Pismo Premium Outlets, Allan Hancock College, and the California Polytechnic State University (Cal Poly) in San Luis Obispo.

Easy Lift Transportation

Easy Lift, a 501(c)(3) non-profit organization, serves as the Consolidated Transportation Service Agency for south Santa Barbara County. Easy Lift provides Dial-A-Ride, Greatest Generation Accessible Transportation, Children's Accessible Transportation, and other services.

Easy Lift also contracts with MTD to provide ADA complementary paratransit service to the South Coast (Easy Lift Transportation 2023).

SMOOTH Transportation

Santa Maria Organization of Transportation Helpers (SMOOTH) offers curb-to-curb pickup for senior residents of Santa Maria and the unincorporated community of Orcutt. SMOOTH is the Consolidated Transportation Services Agency (CTSA) for the Santa Maria Valley and currently comprises three operational divisions – non-emergency medical transportation, CTSA Services, and the Transit & Health Service Division. SMOOTH also operates the Santa Barbara Medical Bus from North County to Santa Barbara for non-emergency medical appointments as part of the SMOOTH Transit & Health Services Division.

Bicycle and Pedestrian Transportation Facilities

In addition to the roadway network and transit systems, the county's transportation network includes bicycle and pedestrian facilities, particularly in the more developed, urban areas of the county. Currently, the county is developed with approximately 350 miles of Class I, II, and III bikeways. The 2006 Caltrans Highway Design Manual defines these classes of bikeways:

- **Class I (Bike Path):** Provides a completely separated right of way for the exclusive use of bicycles and pedestrians with crossflow by motorists minimized.
- **Class II (Bike Lane):** Provides a striped lane for one-way bike travel on a street or highway.
- **Class III (Bike Route):** Provides for shared use with pedestrian or motor vehicle traffic.
- **Class IV Bikeway:** A Class IV bikeway, also known as a cycle track, are exclusive bicycle infrastructure that is separated and protected from motorist traffic. Class IV bikeways can be separated from motor traffic lanes in various ways including grade separation, posts, barriers, or on-street parking.

Currently, the county is developed with approximately 268 miles of all bikeways, including 58.6 miles of Class I bikeways and 198.4 miles of Class II bicycle lanes (County of Santa Barbara 2023a). Table 3.15-1 below provides mileage of bikeways in unincorporated regions. Future bicycle-pedestrian improvements are described under *Planned Bicycle-Pedestrian Facility Improvements*.

The majority of existing bicycle facilities are located on the South Coast, which has or is located near some of the most extensively developed bicycle paths in the county. The existing bikeway system in Eastern Goleta Valley provides some Class I facilities with Class II bikeways contributing the most prevalent connections along major east-west and north-south roads. Class I bikeways running east-west through the south side of Eastern Goleta Valley provide recreational and bicycle commuter facilities along the coastal and agricultural areas of the South Patterson Agricultural Area. The Atascadero Creek Bikeway, or Obern Trail, consists of a designated bike route leading from Goleta Beach to near the intersection of Hollister Avenue

and Modoc Road. A north-south Maria Ygnacio route leads from the intersection of Patterson Avenue and Shoreline Drive, under U.S. Highway 101, to northeastern Goleta, where the route connects to the North Goleta route. While the bicycle system is frequently used by the community the distance from commercial corridors presents a barrier to bicycle commuters with destinations in the cities of Goleta and Santa Barbara (County of Santa Barbara 2015).

Within the Santa Maria Valley, Orcutt has well-developed bicycle facilities, including Class II bikeways located along Bradley Road between Lakeview Road and Rice Ranch Road; along Lakeview Road between SR 135 and Bradley Road; along Clark Avenue between Telephone Road and SR 135; along Rice Ranch Road between Bradley Road and Orcutt Road; and along portions of Orcutt Road between Clark Avenue and Lakeview Road. Class III bikeways are also present along Foster Road between SR 135 and Blosser Road.

Table 3.15-1. Class I, II, and III Bikeways in the Unincorporated Communities (miles)

Location	Class I Off-Street Bike/ Multi-Use Paths	Class II On-Street Bike Lanes	Class III On-Street Bike Routes	Class IV On-Street Cycle tracks
Unincorporated Areas				
Ballard	0.0	0.2	0.0	0.0
Isla Vista	8.4	2.5	0.0	0.4
Los Olivos	0.0	1.8	0.0	0.0
Mission Hills	0.0	3.3	0.0	0.0
Montecito	0.3	3.1	0.0	0.0
Orcutt	0.0	6.4	0.0	0.0
Santa Ynez	0.0	3.0	0.0	0.0
Summerland	0.5	2.8	0.0	0.0
Toro Canyon	0.0	0.3	0.0	0.0
Vandenberg Village	0.0	0.6	0.0	0.0
All Other Incorporated Areas	14.2	21.7	0.0	0.0
Total	**50**	**173**	**6**	**3**

Source: SBCAG 2021

The pedestrian sidewalk and trail system spans developed communities throughout the county. Sidewalks are located on both sides of the roadways in the county's developed areas. Trails include unpaved paths that can accommodate both bicyclists and pedestrians. Trails also include multi-purpose trails, which may be designed in conjunction with paved bicycle facilities, as well as unpaved paths. Some unpaved paths and trails in the county are maintained, such as the Tom Urbanske Levee Trail, a 6.7-mile, partially paved, multi-purpose trail in Santa Maria designed for walking, running, and biking, but many others are not. These may include trails through parks that serve utilitarian access and recreational purposes.

Planned Bicycle-Pedestrian Facility Improvements

SBCAG adopted a Regional Active Transportation Plan (ATP) (2015) to help guide the construction of new bicycle and pedestrian-related infrastructure. The purpose of the ATP is to create a regional vision for improving the bicycle and pedestrian network in the county by integrating the bicycle and pedestrian planning of the region's nine-member governments. The plan is also intended to establish a base level of eligibility for funding through ATP grants for projects in the plan area. Per the ATP, new bicycle-related infrastructure planned projects include 25 projects in the unincorporated areas of the Santa Maria Valley adding approximately 40 miles of new bicycle paths; 13 projects in the unincorporated areas of the Lompoc Valley adding 18 miles of new bicycle paths; six projects in the unincorporated areas of the Santa Ynez Valley adding 12 new miles of bicycle paths; 27 projects in the unincorporated communities of the South Coast, 12 of which would occur in Eastern Goleta Valley, adding 7 miles of new bicycle paths. Planned bicycle lane improvements in the Santa Maria Valley would occur along primary and secondary roadways in Orcutt, such as Clark Avenue, Rice Ranch Road, Union Valley Parkway, Orcutt Creek, Solomon Road, Orcutt Road, and Blosser Road, among others. Planned improvements in the Lompoc Valley would occur along major roadways such as SR 246 and Purisima Road, among others. Planned pedestrian and bike improvements in the Santa Ynez Valley would occur along SR 154, Edison Street, Pine Street, Baseline Road, and the Santa Ynez River. Planned Improvements in Eastern Goleta Valley would occur along major primary and secondary roadways such as Patterson Avenue, San Simeon Drive, and El Sueno Road, among others.

The County adopted an ATP (2023) to help guide the construction of new bicycle and pedestrian-related infrastructure within the public right-of-way in the unincorporated communities of Santa Barbara County. Projects are divided into the same five areas as the Recreation Planning Regions. The purpose of the ATP is to create a regional vision for improving the bicycle and pedestrian network in the county by integrating the bicycle and pedestrian planning of the region's nine-member governments. The plan is also intended to establish a base level of eligibility for funding through ATP grants for projects in the plan area and identify over $50 million in future improvements throughout the region.

The active transportation projects proposed in both plans will improve the ability of residents to visit parks and recreational facilities, helping to reduce VMT. For example, the County ATP proposes a new paved walking path connecting the Cuyama Family Resource Center to Richardson Park.

Other Transportation Services

SBCAG offers a variety of commuter services through its Multimodal Program division. SBCAG encourages commuters to choose commuting options other than driving to work alone through

marketing and public outreach, incentive programs, and by acting as an information resource (SBCAG 2025).

Carpool and Vanpool

SBCAG maintains smartride.org to link passengers with other interested carpoolers. Commuters can also find or advertise a vanpool seat.

Freeway Service Patrol

The Freeway Service Patrol program is a free service provided by SBCAG, the California Highway Patrol, and Caltrans. The program is composed of a fleet of tow and service trucks that patrol designated routes of U.S. Highway 101 on the south coast corridor. The service is provided Monday through Friday during peak commute hours.

Call Box Program

SBCAG serves as the Service Authority for Freeway Emergencies (SAFE) for Santa Barbara County and is responsible for the installation, operation, and administration of 47 highway call boxes. These Call Boxes have instant access to a 24-7 call center that can assist with common roadside emergencies, such as calling a tow truck, the California Highway Patrol, or a family member or friend for assistance.

Emergency Access

The County has several emergency access routes, including U.S. Highway 101, SR 1, SR 33, SR 135, SR 166, and SR 246, as well as various streets and single-access residential development roads. For additional information, see Section 3.16.2.6, *Evacuation and Emergency Response,* and Section 3.9, *Hazards and Hazardous Materials*. As described further in Section 3.16.4.1, *Thresholds of Significance* issues related to emergency vehicle access are discussed in Section 3.16, *Wildfire*.

Countywide Mobility Patterns and Trends

VMT is a measure of the number of vehicle trips and distances that residents, employees, or visitors drive, determined by multiplying the total number of trips generated by the average length of the trips measured in miles. VMT per capita is calculated as the total annual miles of vehicle travel divided by the total population in the planning area. The County estimates VMT using the following metrics:

- **Total VMT:** VMT generated by all land uses in a defined geographic area. Total VMT reflects all vehicle trips (passenger and commercial vehicles) assigned on the roadway network.
- **Total VMT per Service Population:** VMT generated by all land uses in a defined geographic area divided by the total number of residents and the total number of employees in the

geographic area. VMT per service population reflects all vehicle trips (passenger and commercial vehicles) assigned on the roadway network.

- **Home-based VMT per Resident:** VMT generated from travel between residents' homes and other destinations, such as work, school, or household errands, in a defined geographic area divided by the total number of residents in the geographic area. This metric excludes trips between two non-residential locations, such as from the store to the coffee shop. Home-based VMT per resident reflects all passenger vehicles (cars and light-duty trucks) assigned on the roadway network.
- **Home-based Work VMT per Employee:** VMT generated from travel between employees' homes and work in a defined geographic area divided by the number of employees in the geographic area. Home-based work VMT per employee reflects all passenger vehicles (cars and light-duty trucks) assigned on the roadway network.

Countywide VMT

Caltrans estimated a total of 9.3 million daily VMT in 2023 in Santa Barbara County, which results in an annual VMT of 3.4 billion (Caltrans 2024). The U.S. Census Bureau estimates the county had a population of 444,500 in 2024 (U.S. Census 2024). As such, countywide annual VMT per capita in 2020 was 7,666 annual VMT per capita (approximately 21.0 daily VMT per capita). Table 3.15-2 provides existing data on daily County VMT.

Table 3.15-2. Santa Barbara County Daily VMT

Jurisdiction	Daily Vehicle Miles of Travel (VMT) [1,000]		
	Rural	Urban	Total
Other			
County	2,296.83	3,935.64	6,232.47
Other State Agency	355.90	715.86	1,071.76
State Highways	2.50	0.29	2.80
State Park Service	4.40	--	4.40
Bureau of Indian Affairs	--	0.57	0.57
U.S. Forest Service	70.82	0.24	71.07
County Total (including cities)	**2,736.73**	**6,599.42**	**9,336.16**

Source: Caltrans 2024.

The SBCAG Regional Transportation Demand Model (RTDM) estimates VMT for 2015 and 2050 conditions for the Connected 2050 RTP/SCS. SBCAG also has an interim year model that reflects forecasted 2035 conditions in the region. With a service population of 194,854, unincorporated Santa Barbara County has a 39.5 VMT per capita (Table 3.15-3). Average daily vehicle trips exceed 793,000.

Table 3.15-3. Santa Barbara County Daily VMT

Metric	Countywide	Planning Region				
		South Coast	Lompoc Valley	Santa Ynez Valley	Santa Maria Valley	Cuyama Valley
Residents	144,087	123,450	19,353	14,272	68,693	6,607
Employees	50,767	25,876	8,929	8,880	15,930	1,244
Service Population	194,854	149,327	28,282	23,152	84,624	7,851
Total Daily VMT	7,705,069	4,134,326	1,461,161	1,056,751	2,109,612	280,342
Total VMT per Service Population	**39.5**	**27.7**	**51.8**	**45.6**	**24.9**	**35.7**

Source: County of Santa Barbara 2023b.

When considered by planning region, total VMT ranges from 280,342 in Cuyama Valley to 4,134,326 in the South Coast. However, given the distribution of residents and employees throughout the county, the VMT per service population is smallest in Santa Maria Valley and South Coast (24.9 and 27.7, respectively) and highest in Santa Ynez Valley and Lompoc Valley (45.6 and 51.8, respectively). This total VMT per service population ratio indicates that the South Coast and Santa Maria Valley are job centers and provide transportation services that support fewer, shorter vehicle trips.

Countywide Recreational Mobility

The county is served by a wide range of multi-modal transportation options to access recreational facilities, and some recreational features serve as connection routes as well. For example, the Obern Trail in Goleta links multiple coastal recreation access points and is used by cyclists and pedestrians. Some small parks are accessible by walking or biking, but many parks in the county are only accessible by car or longer-distance cyclists. Many public parks in unincorporated areas are located in rural areas remote from existing residential neighborhoods or urban communities. Parks in rural areas provide regional recreational opportunities but do not provide residents with accessible playgrounds, sports fields and courts, trails, and open spaces within walking or biking distance. For example, Nojoqui Falls County Park in the Santa Ynez Valley is a community park located approximately 6 miles from the nearest urban community (i.e., the City of Solvang) and is only accessible via narrow rural roadways. Similarly, Miguelito County Park is a community park located approximately 5 miles south of the City of Lompoc and is surrounded by rural and agricultural areas.

In contrast, most public parks are located proximate to existing urban communities and neighborhoods in the Lompoc Valley. In the Santa Maria Valley, Orcutt Community Park provides active recreation facilities in the southern neighborhoods of Orcutt and is accessible via local roads and transit. On the South Coast, most public parkland lies within existing

neighborhoods and is generally accessible via local roadways and trails. For example, Goleta Beach Park is located near the City of Goleta and Eastern Goleta Valley and is directly accessed from regional multi-use trails. Even within communities that are served by more public parkland than others, some neighborhoods are underserved. For example, as identified in the Eastern Goleta Valley Community Plan, neighborhoods located south of U.S. Highway 101 have no public community parks and are served only by Rhoads Park, a single 1-acre neighborhood park. Other than Rhoads Park, residents in this area must travel at least 1 to 2 miles to reach Tuckers Grove or Goleta Beach for public parkland in the unincorporated area. Similarly, in Orcutt, existing public parkland lies primarily on the edges of the communities, such as Orcutt Community Park to the south and Waller Park to the north. Neighborhoods along Union Valley Parkway, Clark Avenue, and Old Town Orcutt are located at least 1 to 2 miles from these public parks.

According to the inventory of parks prepared for the Recreation Master Plan, out of 253 public parks and open spaces throughout the county, 150 are accessible by active transportation modes, 64 have bike path connections, and 170 have sidewalk connections.

3.15.2.2 Future Transportation Network Improvements

SBCAG has adopted the Connected 2050 RTP/SCS, updating the previous 2040 RTP/SCS, which was originally adopted in 2013. The Connected 2050 RTP/SCS covers the entire area of Santa Barbara County and includes the cities of Santa Barbara, Carpinteria, Goleta, Lompoc, Buellton, Santa Maria, Solvang, and Guadalupe, as well as the unincorporated communities. Capital improvement projects identified in the Connected 2050 RTP/SCS are located on state highways, county roads, and locally owned streets, as well as on transit district property and public utility lands. Some of the improvement projects are intended as maintenance and rehabilitation projects aimed at improving the existing infrastructure and transportation networks (e.g., bicycle, pedestrian, and bus lines).

The Connected 2050 RTP/SCS plans how regional transportation needs will be for the 30 years from 2021 to 2050, considering existing and projected future land use patterns, as well as forecast population and job growth. The Connected 2050 RTP/SCS plans for and programs approximately $11.3 billion in revenues expected to be available to the region from all transportation funding sources throughout the planning period. It identifies and prioritizes expenditures of this anticipated funding for transportation projects of all transportation modes: highways, streets and roads, transit, rail, bicycle, and pedestrian, as well as transportation demand management measures and intelligent transportation systems. Major regional projects identified in the Connected 2050 RTP/SCS include the U.S. Highway 101 widening project, SR 166 safety improvements, several bridge replacements, construction of the Goleta Train Depot, and construction of multi-use paths and trails, among others.

Other future transportation improvements are identified in the Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan, the County's Capital Improvement Program (CIP), including the Eastern Goleta Valley and Orcutt Transportation Improvement Plans (TIPs), the County's ATP, and the County's Road Maintenance Annual Plan (RdMAP). Current improvements that are being prioritized include widening segments of U.S. Highway 101 as well as widening of Union Valley Parkway and improvements to the Hollister-State Street Corridor. Capital improvement projects identified in the Connected 2050 RTP/SCS include utilizing Measure A funds and supplementing other funding to improve traffic operations throughout the County including the maintenance of signs, striping, guardrails, and intersection and bikeway signals and lighting, providing maintenance, repair, construction of bike and pedestrian facilities. Other projects would supplement funding to provide roadway maintenance and repair; pavement preservation; and bridge and large culvert projects throughout the County, although details of these improvements and specific locations are not yet known.

3.15.3 REGULATORY SETTING

Federal, state, and local regulations have been enacted to address transportation in Santa Barbara County. The following section summarizes applicable policies and regulations that may relate directly to future recreational development under the Project and its associated impacts.

3.15.3.1 Federal

Americans with Disabilities Act of 1990

Titles I, II, III, and V of the ADA have been codified in Title 42 of the U.S. Code (USC), beginning at Section 12101. Title III prohibits discrimination based on disability in places of public accommodation (i.e., businesses and non-profit agencies that serve the public) and commercial facilities (i.e., other businesses). This regulation includes Appendix A to Part 36, Standards for Accessible Design, which establishes minimum standards for ensuring accessibility when designing and constructing a new facility or altering an existing facility.

Examples of key guidelines include detectable warnings for pedestrians entering traffic where there is no curb, a clear zone of 48 inches for the pedestrian travelway, and a vibration-free zone for pedestrians.

Infrastructure Investment and Jobs Act

Among other areas of infrastructure investment, the bill will provide funding for America's public transit infrastructure. In total, the new investments and reauthorization in the Bipartisan Infrastructure Law (2021) provide $89.9 billion in guaranteed funding for public transit over the next 5 years. The legislation will expand public transit options across every state in the country,

replace thousands of deficient transit vehicles, including buses, with clean, zero-emission vehicles, and improve accessibility for the elderly and people with disabilities.

3.15.3.2 State

Senate Bill (SB) 743, VMT Analysis (Public Resources Code Section 21099)

To further the State's commitment to the goals of SB 375, Assembly Bill (AB) 32, and AB 1358, Governor Brown signed SB 743 on September 27, 2013. SB 743 adds Chapter 2.7, Modernization of Transportation Analysis for Transit-Oriented Infill Projects, to Division 13 (Section 21099) of the Public Resources Code. Key provisions of SB 743 include eliminating the measurement of vehicle delay, or LOS, as a metric that can be used for measuring traffic impacts. Under SB 743, the focus of transportation analysis shifts from LOS to VMT and the reduction of GHG emissions through the creation of multimodal transportation networks and the promotion of a mix of land uses to reduce VMT. SB 743 required the Governor's Office of Planning and Research (OPR) (recently renamed as the Governor's Office of Land Use and Climate [LCI]) to amend the CEQA Guidelines to provide an alternative to LOS for evaluating transportation impacts. Particularly for areas served by transit (i.e., transit priority areas), those alternative criteria must "promote the reduction of GHG emissions, the development of multimodal transportation networks, and a diversity of land uses" (Public Resources Code Section 21099[b][1]). Measurements of transportation impacts may include "vehicle miles traveled, vehicle miles traveled per capita, automobile trip generation rates or automobile trips generated." LCI also has the discretion to develop alternative criteria for areas that are not served by transit, if appropriate.

Pursuant to the mandate in SB 743, LCI adopted the revised CEQA Guidelines in December 2018, recommending the use of VMT for analyzing transportation impacts under CEQA. In turn, Section 15064.3 was added to CEQA Guidelines, which states "generally, vehicle miles traveled is the most appropriate measure of transportation impacts." The revised guidelines require that lead agencies remove automobile delay, as described solely by LOS or similar measures of vehicular capacity or traffic congestion, as a criterion for determining a significant impact on the environment pursuant to CEQA, except in locations specifically identified in the revised guidelines, if any. In accordance with this requirement, CEQA Guidelines Section 15064.3(a), adopted in December 2018, states "a project's effect on automobile delay does not constitute a significant environmental impact."

As noted below, in 2020, the County adopted VMT as part of its *Environmental Thresholds and Guidelines Manual*, shifting away from LOS-based metrics. Specifically, Chapter 18, *Thresholds of Significance for Transportation Impac*ts, now contains standardized VMT metrics, VMT screening criteria, VMT thresholds of significance, and VMT mitigation measures tailored to the unincorporated areas of the county. The screening criteria and thresholds of significance are

now in effect for projects that are subject to CEQA and located within the unincorporated areas of the county.

SB 131, Public Resources, Chapter 24, Statutes of 2025

Senate Bill 131 added Public Resources Code Section 21080.57, which provides that CEQA does not apply to activities or approvals necessary for or incidental to the planning, design, site acquisition, construction, operation, or maintenance of public park facilities or nonmotorized recreational trail facilities that are funded in whole or in part by Proposition 4. This exemption may apply during implementation of the Recreation Master Plan where a future County park or nonmotorized trail project receives Proposition 4 funding and otherwise falls within the scope of the statutory exemption. Because Proposition 4 funding has not yet been secured for specific Recreation Master Plan projects, and because the proposed Project includes broader programmatic actions, including the Recreation Master Plan, Comprehensive Plan amendments, and zoning ordinance amendments, this Program EIR evaluates transportation and VMT impacts of the proposed Project at a programmatic level. Future implementation projects may rely on Public Resources Code Section 21080.57 where applicable, based on the funding source, project type, and approval context at the time of implementation.

Assembly Bill (AB) 32, the Global Warming Solutions Act of 2006

Transportation is the largest single sector of the economy that generates GHGs, and changes in transportation are a focus of several statewide regulations to reduce VMT and increase access to non-vehicular modes of travel. The Global Warming Solutions Act (AB 32) commits the State of California to reduce statewide GHG emissions to 1990 levels by 2020. AB 32 acknowledges that such emissions cause significant adverse impacts to human health and the environment, and therefore must be identified and mitigated where appropriate. Achieving these goals requires a reduction of approximately 30 percent from projected state emission levels and 15 percent from 2006 state levels, with even more substantial reductions required in the future. Pursuant to AB 32, the California Air Resources Board (CARB) must adopt regulations to achieve the maximum technologically feasible and cost-effective GHG emission reductions.

Senate Bill (SB) 375, California's Sustainable Communities and Climate Protection Act

The adoption of SB 375 on September 30, 2008, recognizes the connection between land use planning and reliance on vehicles as the primary mode of transportation, with the result being that emissions from vehicles account for 30 percent of GHG emissions in California. SB 375 aligns the goals of regional transportation planning efforts, regional GHG reduction targets, and land use and housing allocations, and requires Metropolitan Planning Organizations, such as SBCAG, to adopt an SCS or Alternative Planning Strategy within their RTP to demonstrate achievement of GHG reduction targets. As discussed below, in compliance with SB 375, SBCAG has adopted the Connected 2050 RTP/SCS, which guides land use and transportation planning for the region to reduce transportation related GHG emissions.

Assembly Bill (AB) 1358, the California Complete Streets Act of 2008

Governor Schwarzenegger signed AB 1358 into law on September 30, 2008. AB 1358 requires cities and counties to modify the circulation element to plan for a balanced, multimodal transportation network that meets the needs of all users, including bicyclists, pedestrians, transit riders, children, older people, and disabled people, as well as motorists.

Executive Order B-30-15 and SB 32

Executive Order B-30-15 established a new statewide policy goal to reduce GHG emissions 40 percent below their 1990 levels by 2030. This Executive Order acts as an intermediate goal to achieve 80 percent reductions by 2050 as outlined in Executive Order S-3-05. Additionally, this Executive Order aligns California's GHG reduction targets with those of leading international governments, including the 28 nations comprising the European Union. California's new emission reduction target of 40 percent below 1990 levels by 2030 will make it possible to reach the ultimate goal established by Executive Order S-3-05 of reducing emissions to 80 percent under 1990 levels by 2050. (Refer to Section 3.8, *Greenhouse Gas Emissions* for further discussion regarding GHG emissions.)

Statewide Transportation Improvement Program

The California Transportation Commission (CTC) administers transportation improvement programming. Transportation programming is the public decision-making process, that sets priorities and funds projects envisioned in long-range transportation plans. It commits expected revenues over a multi-year period to transportation projects. The State Transportation Improvement Program (STIP) is a multi-year CIP for transportation projects on and off the State Highway System, funded with revenues from the State Highway Account and other funding sources. Caltrans manages the operation of state highways, including highways passing through the county.

The Mitigation Fee Act

Government Code Sections 66000-66025 (Mitigation Fee Act) authorizes local government agencies to impose mitigation fees alongside new development projects to meet the cost of new or additional public facilities that will be needed to serve those developments.

California's 2022 Scoping Plan Update

CARB is responsible for the coordination and administration of both federal and state air pollution control programs within California. In December of 2022, CARB published and approved the 2022 Scoping Plan for Achieving Carbon Neutrality (Scoping Plan), which assesses progress toward the statutory 2030 target, while laying out a path to achieving carbon neutrality no later than 2045. In the transportation sector, GHG emissions-reducing measures include transitioning to zero-emission technology, supplying zero-carbon alternative fuel, and

strategies to promote sustainable communities and improved transportation choices that result in curbing the growth in VMT.

Relative to transportation, the Scoping Plan includes measures to reduce VMT and vehicle generated GHGs. Strategies to achieve this include:

- Achieve a per capita VMT reduction of at least 22 percent below 2019 levels by 2045.
- Implement equitable roadway pricing strategies based on local context and need, reallocating revenues to improve transit, bicycling, and other sustainable transportation choices.
- Reimagine new roadway projects that increase VMT in a way that meets community needs and reduces the need to drive.
- Invest in making public transit a viable alternative to driving by increasing affordability, reliability, coverage, service frequency, and consumer experience.
- Expand and complete planned networks of high-quality active transportation infrastructure.
- Channel the deployment of autonomous vehicles, ride-hailing services, and other new mobility options toward high passenger occupancy and low VMT-impact service models that complement transit and ensure equitable access for priority populations.
- Streamline access to public transportation, through programs such as the California Integrated Travel Project. Ensure alignment of land use, housing, transportation, and conservation planning in adopted regional plans, such as RTPs, SCSs, Regional Housing Needs Allocations, and local plans (e.g., general plans, zoning, and local transportation plans), and develop tools to support the implementation of these plans.

3.15.3.3 Local

Connected 2050 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS)

SBCAG's Connected 2050 RTP/SCS is a long-range transportation plan that sets forth how the region will meet its transportation needs over the next 30-year period through 2050. The RTP/SCS assesses various alternative future scenarios and continues the vision laid out in the prior versions of the RTP/SCS adopted in 2013 and 2017. Existing and future land use patterns and forecasted population and job growth were used to identify and prioritize transportation projects of all transportation modes: highways, streets and roads, transit, rail, bicycle, and pedestrian, as well as transportation demand management measures and intelligent transportation systems. The following list summarizes the most applicable goals and policies that would relate directly to the Project and associated physical environmental impacts.

> **Goal 1, Environment**: Foster patterns of growth, development and transportation that protect natural resources and lead to a healthy environment.

Policy 1.1 Land Use: The planning, construction, and operation of transportation facilities shall be coordinated with local land use planning and should encourage local agencies to:

- Make land use decisions that adequately address regional transportation issues and are consistent with the RTP/SCS.
- Plan for transit-oriented development consistent with the RTP/SCS by:
  - concentrating residences and commercial centers in urban areas near rail stations, transit centers and along transit development corridors.
  - designing and building "complete streets" serving all transportation modes that connect high-usage origins and destinations.
- Preserve open space, agricultural land and sensitive biological areas.

Goal 2, Mobility and System Reliability: Optimize the transportation system to improve accessibility to jobs, schools, and services, allow the unimpeded movement of people and goods, and ensure the reliability of travel by all modes.

Policy 2.1 Access, Circulation and Congestion: The planning, construction, and operation of transportation facilities shall strive to:

- Enhance access, circulation, and mobility throughout the Santa Barbara region and between neighboring regions.
- Reduce congestion, especially on highways and arterials and in neighborhoods surrounding schools in cooperation with schools and school districts.

Policy 2.3 Alternative Transportation Modes: Transportation planning and projects shall:

- Encourage alternatives to single-occupancy vehicle trips and the use alternative transportation modes to reduce vehicle miles traveled and increase bike, walk and transit mode share.
- Provide for a variety of transportation modes and ensure connectivity within and between transportation modes both within and outside the Santa Barbara region. Alternative mode planning and projects shall be compatible with neighboring regions' transportation systems.
- Plan and provide for ancillary support facilities for alternative transportation, such as bicycle parking.

Policy 2.6 Consistency with Other Plans: The planning, construction, and operation of transportation facilities and of the system as a whole shall be consistent with (1) the California Transportation Plan, (2) SBCAG's Transportation Connections: The

Public Transit Human Services Transportation Plan for Santa Barbara County, (3) adopted local General Plans, and (4) other regional policies.

Goal 3, Equity: Ensure that the transportation and housing needs of all socio-economic groups are adequately served.

Policy 3.1 Access: The planning, construction, and operation of transportation facilities and of the system as a whole shall:

- Encourage safe and convenient travel for all transportation system users, including the disabled, pedestrians, bicyclists, transit riders, and other vehicles.
- Ensure that the transportation needs of all groups, in particular disadvantaged, low-income, and minority groups, are adequately served and that all groups have equal access to transportation facilities and services.
- Give special attention to the needs of elderly and disabled individuals for improved transportation accessibility and removal of physical barriers, including provisions required under the 1990 Americans with Disabilities Act.

Goal 4, Health and Safety: Improve public health and ensure the safety of the regional transportation system.

Policy 4.2 Public Health: The RTP/SCS shall promote integrated transportation and land use planning that encourages:

- Active transportation to promote alternative modes of transportation and physical activity (transit, biking and walking).
- Development of "complete streets" which safely and conveniently accommodate all transportation modes, including active transportation.

Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan

In 2006, in recognition that congestion has diminished the quality of life and economic vitality of the county's South Coast, SBCAG developed the "101 in Motion" program, which consisted of short- and long-term solutions to reduce congestion along U.S. Highway 101 in the South Coast. One of the primary strategies to address congestion was to add a High Occupancy Vehicle (HOV) lane on U.S. Highway 101, and in 2018, SBCAG and Caltrans were awarded funds through Cycle 2 and Cycle 3 of SB 1's Solutions for Congested Corridors Program by that the CTC is currently being used to construct HOV improvements along U.S. Highway 101 from Carpinteria to Santa Barbara.

Consistent with the guidelines adopted by the CTC for projects funded through Cycle 2 and Cycle 3 of SB 1, SBCAG prepared the Hybrid Multimodal Corridor Plan in 2019. The objective of the Hybrid Multimodal Corridor Plan was to demonstrate that various plans, including U.S. Highway 101 in Motion program, the Connected 2050 RTP/SCS, and the Congestion

Management Plan, as well as public input, were considered in the process of developing and implementing congestion relief projects.

In 2022, SBCAG prepared and adopted the Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan as an update to the 2019 Hybrid Multimodal Plan. As summarized in the plan, the Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan directly aligns with the Connected 2050 RTP/SCS as it uses the goals and objectives from the RTP/SCS as guiding principles. Further, the congestion relief projects were included in the RTP/SCS as fiscally constrained projects, were included in the environmental evaluation of the RTP, and are part of the region's SCS.

Regional Active Transportation Plan (ATP)

SBCAG adopted the Regional ATP in 2015 to integrate the bicycle and pedestrian planning of the region's nine-member governments and improve the active transportation network in the County. The Regional ATP was initially conceived as a Regional Bikeway Plan; however, in response to evolving state guidelines, the scope of the plan was broadened to include the pedestrian mode. The plan was prepared to meet the requirements of the CTC's 2014 ATP Guidelines. The purpose of the plan is to create a regional vision for improving the bicycle and pedestrian network by integrating the bicycle and pedestrian planning of the region's nine-member governments. The plan is also intended to establish eligibility criteria for funding through Active Transportation Program grants for projects. The major goals of the plan are to:

1. **Enhance Mobility**: Promote increased bicycling and walking to reduce vehicle trips, vehicle miles traveled, auto congestion, and vehicle emissions regionwide.
2. **Increase Connectivity**: Promote increased bicycling and walking to reduce vehicle trips, vehicle miles traveled, auto congestion, and vehicle emissions regionwide.
3. **Promote Equity for All Users in All Communities**: Increase bicycle and pedestrian network coverage within RTP/SCS communities of concern.
4. **Improve Safety and Public Health**: Encourage well-designed bicycle and pedestrian infrastructure to improve multi-modal safety and promote improvements in public health.

County Active Transportation Plan (ATP)

In May 2023, the County adopted its ATP, which serves as a roadmap for implementing active transportation improvements within the public right-of-way in the unincorporated communities of Santa Barbara County. The ATP aims to promote safety, mobility, and access while reducing carbon emissions and supporting public health. While the ATP is a standalone plan rather than an amendment to the County's Circulation Element and community plans, it reflects and builds upon data collection, input, projects, and policies put forth in previous plans, including the

Eastern Goleta Valley, Orcutt, and Santa Ynez Valley Community Plans. Key goals in the ATP include the following:

Goal 1. Enhance the multi-modal transportation network for all unincorporated areas in Santa Barbara County, with an emphasis on increasing safety around schools and key destinations for people walking, biking, or rolling.

Goal 2. Hear directly from the community to understand local travel patterns and challenges, and how travel options can be improved for people of all ages and abilities.

Goal 3. Identify and prioritize active transportation investments, including infrastructure and programs, that improve access, equity, and mobility while reducing collisions and emissions.

Goal 4. Promote and encourage people to choose walking, bicycling, or rolling through the creation of a comfortable, connected, and accessible active transportation network that connects both rural and urban areas throughout the region and encourages alternatives to single occupancy vehicle trips.

Santa Ynez Valley Bicycle Master Plan

In 2019, SBCAG adopted the Santa Ynez Valley Bicycle Master Plan to fill a gap in subregional bicycle planning within the unincorporated Santa Ynez Valley, as well as in the incorporated cities of Buellton and Solvang. The major goals of the plan are to:

1. Establish a safe and secure bicycle network that addresses key areas of concern including highways, intersections, and routes to school.
2. Provide infrastructure throughout the region to encourage bicycling.
3. Develop a well-planned and coordinated network between origins and destinations such as schools and residential areas, community centers, transit stops, park & rides, and neighboring jurisdictions.
4. Provide equitable access to bicycling for all.
5. Recognize the economic importance of bicycling in the region as it relates to tourism and stimulates the local economy.

County of Santa Barbara One Climate & Climate Action Plan

The County of Santa Barbara's One Climate Initiative is a framework that coordinates the County's major climate-related plans, programs, outreach, and progress reporting. The initiative is intended to align related County efforts addressing greenhouse gas reduction, energy resilience, transportation, climate adaptation, and community resilience. The 2030 Climate Action Plan is a core component of One Climate and establishes the County's greenhouse gas reduction strategy for the unincorporated county area. The CAP also provides

a framework for implementation measures and future CEQA streamlining through project consistency with the County's adopted GHG reduction strategy.

As described further in Section 3.8, *Greenhouse Gas Emissions*, the County adopted its 2030 Climate Action Plan in 2024. The plan has an emission reduction goal of 50 percent below 2018 levels by 2030 and achieving carbon neutrality by 2045 or sooner, which are in line with the State's GHG emission reduction goals. The CAP's six focus areas are: 1) Housing and Transportation; 2) Clean Energy; 3) Waste, Water, and Wastewater; 4) Nature-Based Solutions; 5) Low-Carbon Economy; and 6) Municipal Operations. The 2030 CAP is a qualified greenhouse gas emissions reduction plan pursuant to CEQA Guidelines Section 15183.5, which allows discretionary non-industrial proposed projects to tier their GHG emissions analysis off the 2030 CAP Programmatic Environmental Impact Report (EIR) if the proposed project is found consistent with the 2030 CAP. To aid in determining a proposed project's consistency with the 2030 CAP, the County has developed the Climate Action Plan Consistency Checklist. A proposed project will have an insignificant environmental impact in regard to GHG emissions if it is found to be consistent with the 2030 CAP, which tiers GHG emissions analysis off the 2030 CAP Programmatic EIR.

Santa Barbara County Comprehensive Plan – Circulation Element

State law requires that any development in the county must be consistent with the Santa Barbara County Comprehensive Plan. The Circulation Element applies to all roadways and intersections within the unincorporated area of the county, except for those roadways and intersections located within an area included in an adopted community or area plan. The Circulation Element of the Comprehensive Plan provides specific policies related to traffic and transportation implications of the proposed development and establishes guidelines to determine the project-related traffic impacts on County roadways. The following policies are provided in the Circulation Element of the Comprehensive Plan.

A. The roadway classifications, intersection levels of service, and capacity levels adopted in this Element shall apply to all roadways and intersections within the unincorporated area of the county, with the exception of those roadways and intersections located within an area included in an adopted community area plan. Roadway classifications, intersection levels of service, and capacity levels adopted as part of any community or area plan subsequent to the adoption of this Element shall supersede any standards included as part of this Element.

    1) For the communities of Summerland, Montecito, Goleta, Los Alamos, Mission Canyon, Orcutt and the area of Toro Canyon, and the Santa Ynez Valley area please see the Circulation chapters of the Summerland, Montecito, Goleta, Los Alamos, Mission Canyon, and Orcutt Community Plans and the Toro Canyon Plan and Santa Ynez Valley Community Plan sections of the Coastal Land Use Plan and the Land Use

Element of the Comprehensive Plan for the specific Policies and Actions which implement this policy.

2) For the community of Los Alamos, please see the Circulation chapter of the Los Alamos Community Plan section of the Comprehensive Plan's Land Use Element for specific policies and actions that implement this policy.

B. Individual community and area plans adopted subsequent to this Element shall strive to achieve a balance between designated land uses and roadway and intersection capacity. These community and area plans shall identify areas where increased traffic may create noise levels that could potentially exceed the policies and standards of the Noise Element of the Comprehensive Plan and to the extent feasible, include policies, land use changes, and other mitigations to reduce these impacts to insignificance.

C. The County shall continue to develop programs that encourage the use of alternative modes of transportation including, but not limited to, an updated bicycle route plan, park and ride facilities, and transportation demand management ordinances.

D. The County shall maintain a 7-year Capital Improvement Plan. The Plan shall be updated by the Public Works Department and presented to the Planning Commission and the Board of Supervisors for review at a public hearing before each body on an annual basis. The Plan shall contain a list of transportation projects to be undertaken ranked in relative priority order and include estimated cost, and if known, estimated delivery year for each project.

E. A determination of project consistency with the standards and policies of this Element shall constitute a determination of project consistency with the Land Use Element's Land Use Development Policy #4 with regards to roadway and intersection capacity.

1) For reference from the County's Land Use Element, Land Use Development Policy # 4 states that the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources, including roads and transportation, are available to serve the proposed development prior to issuance of a development permit and that the applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the land use plan.

In addition, the Circulation Element applies standards to projects within the unincorporated area that create impacts to over-capacity intersections within incorporated cities. The Circulation Element defines intersection standards in terms of LOS and provides a methodology for determining project consistency with these standards. Within the County, roadway LOS is determined based on the roadway classifications and corresponding design capacities established by the County Comprehensive Plan Circulation Element and local Community Plan

Circulation Elements. These Circulation Elements describe a variety of different types of capacities for applicable County roadways including the policy capacity, design capacity, and acceptable capacity.

Community Plans

Santa Barbara County has 10 community or area plans. Each community plan contains goals, objectives, policies, action/programs, and development standards guiding the development of the community it serves and supplements the policies and goals of the Comprehensive Plan. A policy is a specific statement that guides decision-making. Development standards are measures that will be applied to development projects consistent with relevant policies of the community plan. Development standards typically specify how and where development is designed and constructed. Several community plans – including the Eastern Goleta Valley Community Plan, the Orcutt Community Plan, and the Santa Ynez Valley Community Plan, include policies related to VMT, multi-modal transportation planning, and active transportation modes.

Eastern Goleta Valley Community Plan

The Eastern Goleta Valley Community Plan updates the Santa Barbara County Comprehensive Plan for the unincorporated area of Eastern Goleta Valley and sets goals, policies, programs, actions, and development standards for all future development in Eastern Goleta Valley. The transportation and circulation element identifies transportation goals, objectives, policies, programs, and standards to address the community's vision for sustainable land use and transportation related to cyclists, pedestrians, and public transit riders, and streetscape design and parking. Transportation recommendations include complete street improvements and improved connectivity.

Policy EGV-4.2: Development shall be sited and designed to provide maximum access to non-motor vehicle forms of transportation, including well-designed walkways, sidewalks, and paths and trails between residential development and adjacent and nearby commercial uses and employment centers wherever safe and feasible.

Policy EGV-7.2: The County shall work with the Cities of Goleta and Santa Barbara to plan and develop interconnected regional transportation facilities to serve commuters and enhance access to multimodal transportation options.

Policy TC-EGV-1.4: Improved access to retail, commercial, recreational, and educational facilities via public transit, bikeways and pedestrian facilities shall be considered in public and private transportation and circulation planning for Eastern Goleta Valley.

Policy TC-EGV-1.5: Complete Streets: Multimodal Complete Streets shall be developed and maintained to maximize safety, accessibility, and connectivity of all modes of transportation to each other and to the places people need to go. Complete Streets are designed to optimize

the utility, safety, and attractiveness of the transportation network to all users of the facilities. Transportation planning should strive to create attractive and accessible streets for all users, including drivers, bicyclists, public transportation vehicles and riders, and pedestrians of all ages and abilities.

Policy TC-EGV-1.9: All feasible measures to fully mitigate the transportation impacts associated with development projects, including new and innovative measures as may become available, shall be considered and encouraged.

Policy TC-EGV-1.8: In its long range land use planning efforts, the County shall seek to provide access to retail, commercial, recreational, and educational facilities via transit lines, bikeways and pedestrian trails.

Goleta Community Plan

The Goleta Community Plan sets goals, policies, programs, actions, and development standards for all future development in the unincorporated Goleta community planning area, which currently comprises the unincorporated community of Isla Vista plus rural areas north of the City of Goleta. Transportation recommendations include active transportation improvements and improved connectivity.

Policy CIRC-GV-2: The County shall develop and maintain a Transportation Improvement Plan which includes roadway, intersection, transit and alternative transportation mode (e.g., bike ways and pedestrian paths) improvements, with priority given to improvements that will ease congestion on the most constrained roadways and intersections in the planning area. The priority assigned to these improvements shall account for priorities identified in Community Plan, shall be based upon the most recent available traffic data and shall take into account maintenance requirements of existing improvements. The Transportation Improvement Plan shall be an integrated Plan for maintenance and capital improvements of roads and intersections as well as alternative transportation facilities. The Transportation Improvement Plan shall be updated by the Public Works Department and presented to the Planning Commission and the Board of Supervisors for review on an annual basis. The Plan shall contain a list of transportation projects to be undertaken, ranked in relative priority order, and include estimated cost, and if known, delivery year for each project including both funded and unfunded improvements.

Policy CIRC-GV-4: New development shall be sited and designed to provide maximum access to non-motor vehicle forms of transportation, including well designed walkways, paths and trails between new residential development and adjacent and nearby commercial uses and employment centers.

Policy CIRC-GV-5: The County shall facilitate the use of the bicycle as an alternate mode of transportation and shall provide adequate, safe bike-routes in the Goleta Area to meet the transportation and recreation needs of Goleta cyclists.

Policy CIRC-GV-6: In its long range land use planning efforts, the County shall seek to provide access to retail, commercial, recreational, and educational facilities via transit lines, bikeways and pedestrian trails.

Orcutt Community Plan

The Orcutt Community Plan updates the Santa Barbara County Comprehensive Plan for the unincorporated area of Orcutt and sets goals, policies, programs, actions, and development standards for all future development in Orcutt. The Transportation Section of the Orcutt Community Plan provides Orcutt street classifications. The Plan also outlines transportation policies and development standards and standards for the determination of project consistency. Transportation planning issues identified in the Orcutt Community Plan include a low jobs-to-housing ratio, high commuter trips for Orcutt residents, and a need for an extended bikeway system.

Policy CIRC-O-6: The County shall encourage development of all feasible forms of alternative transportation in the Orcutt/Santa Maria area.

Policy CIRC-O-9: Development shall be sited and designed to provide maximum access to non-motor vehicle forms of transportation, including well-designed walkways, paths, and trails between residential development and adjacent and nearby commercial uses and employment centers, where feasible.

Santa Ynez Valley Community Plan

The circulation section of the Santa Ynez Valley Community Plan updates the Santa Barbara County Comprehensive Plan for the unincorporated area of Santa Ynez Valley and sets goals, policies, programs, actions, and development standards for all future development in Santa Ynez Valley. The plan also identifies increasing congestion and safety concerns on SR 154 and SR 246 as the top transportation issues facing Santa Ynez Valley residents. These challenges are expected to be exacerbated by local and regional growth including job growth and residential development in the Santa Ynez Valley, as well as limited housing development and rising housing costs on the South Coast, and a limited job base in the Santa Ynez, Lompoc, and Santa Maria Valleys.

Policy CIRC-SYV-4: The County shall encourage development of all feasible forms of alternative transportation in the Santa Ynez Valley Community Plan Area.

Action CIRC-SYV-5.1: When updating the Bike Master Plan, the County shall work with Caltrans and Public Works to improve safety on the areas highways and roadways for recreational as well as commuter bicyclists.

Action CIRC-SYV-5.2: The County shall focus attention on improving bikeways within the townships near schools and recreation areas, and consider the safety and feasibility of extending a Class II bike lane on Highway 246 east of the Santa Ynez Valley High School.

Old Town Orcutt Traffic, Circulation, and Parking Study

This traffic study, which encompasses the Old Town Orcutt Pedestrian Area, outlines the existing traffic and circulation conditions within the study area, quantifies the existing parking supply and parking demand within Old Town Orcutt, evaluates future roadway and intersection operations, and discusses potential operational improvements.

Old Town Orcutt Streetscape Concept Plan

This concept plan focuses on transforming the setting of Clark Avenue from a high-speed automobile thruway to a pedestrian-oriented, aesthetically pleasing boulevard that reflects the historic character of the community. The plan focuses on maximizing on-street parking opportunities, streetscape beautification, improving the safety and comfort of pedestrians, and maintaining quality of life in the adjacent residential neighborhoods.

Fiscal Year 2021-2026 Capital Improvement Program (CIP)

The County's CIP is a multi-year planning tool to identify and implement short-term and long-term capital needs (County of Santa Barbara 2021). Capital projects in the CIP include repairs, rehabilitation, and replacement of critical facilities countywide. The plan also addresses improvements and non-routine maintenance to County-owned facilities, roads, bridges, and flood control facilities owned and managed by the Santa Barbara County Flood Control and Water Conservation District. The recommended Fiscal Year 2021-2026 CIP includes a total of $74.9 million in projects in fiscal year 2021-2022 for General Services, the County Fire Department, the Department of Public Works, and the Community Services Department (park improvements). Public Works projects include road improvements (e.g., pavement, hardscapes, bridge repair), general maintenance on bridges and low water crossings, traffic and circulation improvements, drainage systems, and flood controls. Specific projects included in the Orcutt and Goleta TIPs are implemented through the CIP, including roadway, intersection, transit, and sidewalk improvements.

County Code – Santa Barbara, California Chapter 23C Transportation Impact Mitigation Fee

County Code Chapter 23C is intended to ensure that new development or subdivisions pay their fair share of the costs for the impacts they have on certain capital improvements, including transportation and transit facilities. Fees are determined based on the proposed land use of the property to be developed or subdivided and the planning region the site is located. Fees for

residential land uses are calculated per parcel, for final approval of a subdivision map, or by dwelling unit. These fees are levied on all new residential projects with the amount of the fee varying from community to community countywide. Discounted fees are provided for eligible affordable housing projects. The communities of Goleta and Orcutt have fee structures that reflect the cost of improvements needed within each community based on development anticipated under the Eastern Goleta Valley Community Plan and the Orcutt Community Plan. These fees were validated through detailed nexus studies prepared under AB 1600 and refined again with subsequent multimodal capital improvement plans. Transportation impact fees are determined by the projected cost of transportation system improvements identified in the Orcutt TIP or Goleta TIP. The County is currently undertaking a comprehensive update to Transportation Impact Mitigation Fees to reflect updated growth projections related to the proposed Project.

County Code – Santa Barbara, California Chapter 23A Transportation Demand Management (TDM) Program

The purpose of the County's TDM Ordinance is to reduce traffic congestion, air pollution, and parking demand and improve the quality of life by regulating the percentage of commuters in the region who drive alone to or from work during peak periods. This is accomplished by facilitating the adoption and implementation of employer sponsored TDM programs that encourage the use of commute alternatives and alternative work hours. Per the County's TDM Ordinance, each employer is required to conduct a commuter survey and obtain a completed commuter survey from each of its employees in the region that accurately represents employee travel and work characteristics. Within 90 days following the return of the tabulated baseline commuter surveys, each affected employer must develop and prepare a TDM plan to be implemented at all affected worksites. The TDM must state any practicable combination of employer programs sufficient to achieve and/or maintain the Employer Participation Rate and employer average vehicle occupancy (AVO) objectives, and any reasonable combination of information dissemination and marketing measures designed to promote the use by the employer's employees of commute alternatives and alternative work hours. Affected employers are required to achieve and thereafter maintain an employer participation rate of at least 65 percent by the completion of the employer's third annual commuter survey. If the regional AVO objective is not achieved by the completion of the fifth annual commuter survey, then affected employers must achieve a 10 percent increase over baseline AVO within 2 years and maintain the AVO thereafter.

3.15.4 ENVIRONMENTAL IMPACT ANALYSIS

This section discusses the potential transportation and circulation impacts associated with the proposed Project. Where there are potentially significant or significant and unavoidable

impacts, mitigation measures are proposed, and the residual impact after mitigation is determined.

3.15.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For the purpose of this Program EIR, implementation of the proposed Project may have a significant adverse impact on transportation and circulation if it would:

a. Conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities;

b. Conflict or be inconsistent with CEQA Guidelines §15064.3, subdivision (b); and/or

c. Substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment).

Appendix G of the CEQA Guidelines also includes the following threshold of significance for impacts relating to emergency access.

d. Result in inadequate emergency access.

As discussed in Section 3.18, *Wildfire,* due to the relationship of threshold "d" to countywide wildfire hazards, this impact is discussed in Section 3.18, *Wildfire,* and will not be addressed further in this section.

County Environmental Thresholds and Guidelines Manual – Transportation Impacts

In response to updates to the CEQA Guidelines and SB 743 to revise criteria for determining what constitutes a significant transportation-related environmental impact and shift from LOS-based metrics (i.e., vehicle delay) to VMT, the County approved an amendment to the County's *Environmental Thresholds and Guidelines Manual* in September 2020. This amendment describes how to interpret and apply the four transportation threshold questions contained in Appendix G of the CEQA Guidelines and the County's Initial Study Template.

Threshold "a" – Potential Conflict with a Program, Plan, Ordinance, or Policy

The Connected 2050 RTP/SCS and the County's Comprehensive Plan, zoning ordinances, capital improvement programs, and other planning documents contain transportation and circulation programs, plans, ordinances, and policies. Threshold "a" considers a project relative to those programs, plans, ordinances, and policies that specifically address multimodal transportation, complete streets, TDM, and other VMT-related topics. The County and CEQA Guidelines Section 15064.3(a) no longer consider automobile delay or congestion an environmental impact. Therefore, threshold question "a" does not apply to provisions that address LOS or similar

measures of vehicular capacity or traffic congestion. A transportation impact occurs if a project conflicts with the overall purpose of an applicable transportation and circulation program, plan, ordinance, or policy, including impacts to existing transit systems and bicycle and pedestrian networks pursuant to Public Resources Code Section 21099(b)(1). In such cases, applicants must identify project modifications or mitigation measures that eliminate or reduce inconsistencies with applicable programs, plans, ordinances, and policies. For example, some community plans include provisions that encourage complete streets and multi-modal improvements as part of new development. As a result, an applicant for a multifamily apartment complex may need to reduce excess parking spaces, fund a transit stop, and/or add bike storage facilities to comply with a community plan's goals and policies.

Threshold "b" – Potential Impact to VMT

Threshold "b" establishes VMT as the metric to determine transportation impacts. The County's *Environmental Thresholds and Guidelines Manual* includes project-level impact screening thresholds and VMT thresholds of significance specific to land use projects and land use plans.

The County presumes that projects meeting any of the screening criteria, absent substantial evidence to the contrary, would have less than significant VMT impacts and would not require further analysis. Projects that do not meet any of the screening criteria require an analysis of VMT and the preparation of a VMT transportation study. Screening criteria for land use projects are:

- **Small Projects:** A project that generates 110 or fewer average daily trips;
- **Locally Serving Retail:** A project that has locally serving retail uses that are 50,000 square feet (sf) or less;
- **Projects Located in a VMT Efficient Area:** A residential or office project that is located in an area that is already 15 percent below the county VMT (i.e., "VMT efficient area"). The County's Project-Level VMT Calculator determines whether a proposed residential or office project is located within a VMT-efficient area.
- **Project Near Major Transit Stop:** A project that is located within 0.5 miles of a major transit stop or 0.5 miles of a bus stop on an HQTC. In addition, the project must have a floor area ratio of 0.75 or greater, be consistent with the applicable SBCAG SCS (as determined by the County), provide more parking than required by the County's Comprehensive Plan and zoning ordinances; and not replace affordable housing units (units set aside for very low-income and low-income households) with a smaller number of moderate- or above moderate-income housing units.
- **Affordable Housing:** A residential project that provides 100 percent affordable housing units (units set aside for very low-income and low-income households); if part of a larger development, only those units that meet the definition of affordable housing satisfy the screening criteria.

The County generally uses thresholds of significance to determine the significance of transportation impacts for projects and plans that do not meet any of these screening criteria. The County expresses thresholds of significance relative to existing, or baseline, county VMT. Specifically, the County compares the existing, or baseline, county VMT (i.e., pre-construction) to a project's VMT. Projects with VMT below the applicable threshold would normally result in a less than significant VMT impact and, therefore, would not require further analyses or studies. Nonetheless, CEQA Guidelines Section 15064(b)(2) states, "[c]ompliance with the threshold does not relieve a lead agency of the obligation to consider substantial evidence indicating that the project's environmental effects may still be significant." Projects with a VMT above the applicable threshold would normally result in a significant VMT impact and, therefore, would require further analyses and studies, and, if necessary, project modifications or mitigation measures. The VMT thresholds of significance are for general use and should apply to most projects subject to environmental review. However, the thresholds may not be appropriate for unique projects. In such cases, CEQA Guidelines Section 15064.7(c) allows the County to use other thresholds "...on a case-by-case basis as provided in Section 15064(b)(2)." When using thresholds on a case-by-case basis, the County requires substantial evidence to justify why different thresholds are appropriate.

The County's *Environmental Thresholds and Guidelines Manual* presents separate VMT thresholds for land use projects, land use plans, and transportation projects. The thresholds break land use projects into residential, employment, mixed-use, and "other" land use types. The stated threshold for other land use types is as follows: "[f]or project types not listed above (e.g., school, sports or entertainment facility, park), the County will apply an absolute VMT threshold (e.g., total VMT or total roadway VMT) or efficiency based VMT threshold (e.g., home-based VMT per resident, homebased work VMT per employee, or total VMT per service population). The applicable threshold will depend on the project's characteristics, including whether the project is locally or regionally serving. For projects that generally produce job-related travel (i.e., employment), the analysis can compare the project's VMT (i.e., home-based work VMT per employee) to existing county VMT. For projects that serve the region, the analysis can compare the project's total VMT to existing VMT, or compare the project's net increase in total VMT to the study area VMT."

The proposed Project is a land use plan that would lead to the development of parks, trails, and recreational facilities. The threshold for land use plans, such as Comprehensive Plans, Community Plans, and Specific Plans, is that "[t]he plan's generated total VMT per service population exceeds a level of 15 percent below existing total VMT per service population for the geographic area." This threshold focuses on trips generated by residential and commercial/industrial purposes and trips that bring people like commuters to their jobs or new residents to an area. It would be impossible to accurately calculate the "service population" for recreational projects, as the thresholds of significance are not designed to address

recreational trip characteristics and are largely inapplicable to the proposed Project. As such, the most applicable VMT significance threshold for the proposed Project would be the land use project threshold described above. Therefore, for the purposes of this EIR, the proposed Project would be considered to result in a potentially significant VMT impact if the proposed Project would result in a net increase in countywide total VMT.

Additionally, a plan's VMT impact would be cumulatively considerable if the plan results in a net increase in total VMT compared to existing conditions. As described in the County's *Environmental Thresholds and Guidelines Manual,* a land use plan could change travel patterns in the region and an efficiency-based threshold may not fully capture such changes. Therefore, the analysis of a land use plan's cumulative impacts should consider the net increase in Total VMT, which would provide a more detailed analysis of all travel in the plan area and region.

Threshold "c" – Design Features and Hazards

Threshold "c" considers whether a project would increase roadway hazards. An increase could result from existing or proposed uses or geometric design features. In part, the analysis should review these and other relevant factors and identify results that conflict with the County's Engineering Design Standards or other applicable roadway standards. For example, the analysis may consider the following criteria:

- The project requires a driveway that would not meet site distance requirements, including vehicle queueing and visibility of pedestrians and bicyclists.
- The project adds a new traffic signal or results in a major revision to an existing intersection that would not meet the County's Engineering Design Standards.
- The project adds substantial traffic to a roadway with poor design features (e.g., narrow width, roadside ditches, sharp curves, poor sight distance, inadequate pavement structure).
- The project introduces a new use and substantial traffic that would create potential safety problems on an existing road network (e.g., rural roads with use by farm equipment, livestock, horseback riding, or residential roads with heavy pedestrian or recreational use). If a project would result in potential roadway hazards, the applicant would need to modify the project or identify mitigation measures that would eliminate or reduce the potential hazards. For example, an applicant for a retail shopping center may need to shift the location of a new driveway or add sidewalks or pedestrian crossings to reduce potential conflicts between customers and pedestrians.

Threshold "d" – Emergency Access

Threshold "d" considers any changes to emergency access resulting from a project. To identify potential impacts, the analysis must review any proposed roadway design changes and determine if they would potentially impede emergency access vehicles. A project that would result in inadequate emergency vehicle access would have a significant transportation impact

and, as a result, would require project modifications or mitigation measures. For example, a project that modifies a street and, as a result, impairs fire truck access, would require modifications or re-design to comply with County and fire department road development standards.

Again, as discussed in Section 3.18, *Wildfire,* due to the relationship of this threshold of significance to wildfire hazards, this impact is discussed in Section 3.18, *Wildfire,* and will not be analyzed further in this section.

Methodology

Programs, Plans, Ordinance, and Plan Consistency

The plan, ordinance, and policy consistency analysis assesses whether the proposed Project would conflict with an adopted plan, ordinance, and policy addressing the circulation system (including transit, roadways, bicycle, and pedestrian facilities as required under CEQA) that is adopted to protect the environment. In general, transportation policies or standards adopted to protect the environment are those that support multi-modal transportation options and a reduction in VMT. Many of these projects must be implemented by the County over time and a broad area, and this threshold test intends to ensure that proposed development projects and plans do not preclude the County from implementing adopted programs, plans, and policies.

This analysis considers whether the proposed Project would be consistent with applicable plans, policies, and regulations addressing the circulation system. This is a challenge given the dispersed suburban and rural nature of recreational projects that would be facilitated by the proposed Project, which are not clearly addressed or accounted for in CEQA, LCI Technical Guidance, or County thresholds. The proposed Project does not fit neatly into the regional transportation policy planning framework, which is focused on urban areas, particularly on reducing employee, residential, and commercial based trips below existing levels with general targets of at least 15 percent below existing VMT per capita. Sources utilized in the development of this section include SBCAG's Connected 2050 RTP/SCS, the Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan, the Regional ATP, the Santa Ynez Valley Bicycle Master Plan, the Circulation Element of the County's Comprehensive Plan, adopted community and area plans, and the County Code. Plan and policy consistency is based on whether the Project would result in environmental impacts to transportation as outlined in the applicable plan.

VMT Methodology and Project Assumptions

The analysis of VMT for the proposed Project is based on the County's VMT thresholds of significance and analysis methodology outlined in the County's *Environmental Thresholds and Guidelines Manual* which are informed by the *Transportation Analysis Updates in Santa Barbara County* (2020) technical report and based on OPR's *Technical Advisory on Evaluating*

Transportation Impacts in CEQA (2018). Guidance is provided for project-level analysis addressing several broad land use types that account for a majority of development projects in the county, as well as land use plans and programs. The potential Project VMT increases are addressed in the context of CEQA Guidelines Section 15064.3 and Appendix G of the CEQA Guidelines, as well as this technical guidance.

As discussed elsewhere in this EIR, the uses and associated development that would be enabled under the proposed Project involves a variety of recreational facilities distributed throughout the urban, suburban, and rural areas of the county. Each of these projects and potential future development would each individually result in a varying degree of impacts with respect to VMT and would be highly dependent on the type and location of the recreational improvements proposed. For example, new pocket and neighborhood parks would have a negligible effect on changes to travel patterns, daily vehicle trips, and VMT, particularly on a regional or local level. However, other uses such as a new campground (Guadalupe Community Park & Campground) and a new aquatics facility (South Coast Aquatic Center) would result in more substantial changes to travel patterns, daily vehicle trips, and VMT. To characterize and assess VMT impacts associated with the proposed Project, the analysis partially informed by the following assumptions:

- It is challenging to define the existing environmental baseline as it relates to the proposed Project. Based on conversations with County staff, industry representatives, prospective applicants/owners, and personal experiences, activities similar to those proposed under the proposed Project are currently known to occur throughout the county on a frequent basis. For instance, 50 percent of the participants who took the Recreation Master Plan survey stated that they visit parks and recreational facilities several times a week, and 35 percent stated they visit them every day. County residents and visitors are already accessing recreational spaces on a regular basis and contributing to the regional VMT baseline.
- Because of the inability to accurately identify or quantify the full extent of existing activities which contribute to the existing environmental baseline as it relates to VMT, to provide a reasonable worst-case analysis, this EIR assumes that all new trips and VMT would be generated by the proposed Project without consideration of the existing environmental baseline. It is important to note that this approach likely overstates changes in travel patterns or increases in VMT, from the existing physical baseline, but is used to conservatively estimate impacts and permit the County flexibility in program adoption.
- Key uses that appear likely to generate new Average Daily Trips (ADT) and changes to travel patterns and VMT include new projects, such as those planned park, recreation, and trail projects described in Section 2.5.1 in Chapter 2, *Project Description*.
- For some projects, future project-level siting and design details are not yet known, and it is generally not possible to accurately predict where future development projects enabled under the proposed Project would occur because such projects have not been determined

yet. This is particularly true to future development projects indirectly enabled as a result of the proposed zoning ordinance amendments and Recreation Benefit Project (RBP) Program.

Design Features and Hazards

As described in Chapter 2, *Project Description*, the proposed Project would include the development of parks, trails, and recreational facilities across the county. Future project-level siting and design details are not known. As a result, the impact analysis provided below does not evaluate individual potential geometric design features or incompatible use hazards at a project- or site-specific level. Rather, the analysis provided by this Program EIR programmatically addresses the potential for the proposed Project to result in temporary construction-related roadway hazards such as conflicts between vehicles, bicycles, and pedestrians. Additionally, this analysis programmatically evaluates whether there would be long-term operational hazards related to design features such as curved streets with inadequate sight distances, unsafe separation of vehicle, bicycle, and pedestrian traffic, or inadequate pedestrian facilities (e.g., incomplete sidewalks, lack of striped pedestrian crossings).

3.15.4.2 Project Impacts

Table 3.15-4 provides a summary of the proposed Project's impacts related to transportation. A detailed discussion of each impact follows.

Table 3.15-4. Summary of Transportation Impacts

Transportation Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact T-1. The proposed Project could result in potential conflicts with regional transportation plans, or County transportation plans, policies, or regulations.	Insignificant	No mitigation measures required.	Insignificant
Impact T-2. The proposed Project could result in potentially significant increases in total VMT within the county.	Potentially significant	No mitigation is feasible.	Significant and unavoidable impacts
Impact T-3. The proposed Project could result in adverse changes to the transportation safety environment.	Insignificant	No mitigation measures required.	Insignificant
Cumulative Impacts	Potentially significant	No mitigation is feasible.	Significant and unavoidable impacts

Impact T-1. The proposed Project could result in potential conflicts with regional transportation plans, or County transportation plans, policies, or regulations.

The proposed Project plans for the development of new parks, trails, and recreational facilities dispersed throughout the unincorporated area, which is served by existing transportation networks and services, and governed and planned according to a wide range of transportation plans, policies, regulations, and programs. Specifically, SBCAG and the County have adopted programs, plans, ordinances, and policies that establish the planning framework to achieve a safe, accessible, and sustainable transportation system for all users, with a current focus on active transportation modes to encourage car-free travel and a reduction of VMT countywide. The CEQA Guidelines state that a project (including a land use project such as the proposed Project) would have a potentially significant impact if the project would conflict with a program, plan, ordinance, or policy addressing the circulation system, including transit, roadway, bicycle, and pedestrian facilities. Analysis of the consistency of a project with state, regional, and local plans is required under CEQA. As described below, the proposed Project would not impede the implementation of several plans and programs, the proposed Project would be consistent with the overall purpose of some adopted plans and programs, would not conflict with specific improvements to the transportation system planned for under these plans, and would not conflict with specific policies addressing the circulation system.

Santa Barbara County Association of Governments (SBCAG) Regional Plans

Connected 2050 Regional Transportation Plan / Sustainable Communities Strategy (RTP/SCS)

The Connected 2050 RTP/SCS established objectives that are oriented towards achieving the plan's five overarching goals of promoting and protecting: 1) Environment; 2) Mobility & System Reliability; 3) Equity; 4) Health and Safety; and 5) A Prosperous Economy. The objectives aim to foster growth and transportation improvements in a manner that protects natural resources, encourages mixed use development, focuses future growth within existing urbanized areas, reduces or limits new trip generation and VMT, provides equitable access to transit and alternative transportation, and reduces traffic congestion.

As described further below in Impact T-2, the proposed Project would result in a significant and unavoidable impact with regard to VMT. However, this impact is a result of the County's stringent no net increase in VMT threshold that has been utilized for this analysis. Implementation of proposed Project would foster the development of recreational facilities designed to meet the identified recreational needs of the county's residents. Many of these facilities would not result in a substantial increase in trip generation, or they would potentially reduce trips lengths by providing recreational opportunities close to communities that currently lack such services. None of the proposed recreational improvements or additional allowable uses would introduce substantial additional permanent residential populations, nor would they

result in measurable changes in growth patterns, development patterns, or transportation patterns that would conflict with the overarching goals or policies of Connected 2050 as it relates to regional population and employment growth. Further, the proposed Project would add to the existing inventory of sidewalks, bike paths, and other active transportation routes that allow people to visit parks and connect to other population centers. In addition, the proposed Project would not restrict SBCAG's ability to implement any planned transportation improvements under the RTP/SCS. .

Overall, implementation of the Project would not result in a substantial conflict with the Connected 2050 RTP/SCS, and impacts associated with the proposed Project would be *insignificant*.

Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan

The Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan was prepared pursuant to CTC's adopted guidelines for projects funded through SB 1's Solutions for Congested Corridors Program. The purpose and design of the proposed U.S. Highway 101 widening project, as outlined in the Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan, is to alleviate existing and future congestion along the U.S. Highway 101 corridor on the South Coast caused by regional growth. As previously discussed in Section 3.15.3.3, *Regional Regulations,* the Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan (2022 Update) directly aligns with the Connected 2050 RTP/SCS, and all projects of the plan are included in the RTP/SCS as fiscally constrained projects. A project's consistency with the Santa Barbara U.S. Highway 101 Comprehensive Multimodal Corridor Plan can be directly determined based on a project's consistency with the Connected 2050 RTP/SCS. Therefore, as the proposed Project would not result in a substantial conflict with the RTP/SCS because it would not induce residential populations, it is also consistent with the 2022 Update, and impacts would be *insignificant*.

Regional Active Transportation Plan

The SBCAG Regional ATP aims to promote active transportation and improve corridor connectivity (i.e., walking and bicycling) to reduce regional VMT, vehicle congestion, and vehicle emissions. The proposed Project consists of a land use planning program and does not include any features or specific projects that would directly affect the performance or safety of transit, bicycle, or pedestrian facilities. The proposed Project would add to the existing inventory of sidewalks, bike paths, and other active transportation routes that allow people to visit parks and connect to other population centers. In addition, the proposed Project would not restrict SBCAG's ability to implement any planned transportation improvements under the Regional ATP. Further, as discussed below, future development would be subject to compliance with existing County zoning regulations and development standards, which include standards

for the provision of pedestrian and bicycle facilities. Therefore, the proposed Project would not result in potential inconsistencies with the goals and policies of the Regional ATP, and impacts would be *insignificant*.

Santa Ynez Valley Bicycle Master Plan

The Santa Ynez Valley Bicycle Master Plan identifies community priorities to guide and coordinate the implementation of improvements to the bicycle network within the Santa Ynez Valley to improve connectivity, safety, and equitable access. Under the Santa Ynez Valley Bicycle Master Plan, the member agencies have planned for several improvements to the region's bicycle network to achieve these goals. Some of the highest priority projects identified in the Santa Ynez Valley Bicycle Master Plan include the Santa Ynez River Trail and the Los Olivos to Los Alamos Multimodal Trail. The Project would not restrict the member agencies' ability to implement any planned transportation improvements under the Santa Ynez Valley Bicycle Master Plan. The proposed Project would promote the goals and objectives of the Santa Ynez Valley Bicycle Master Plan by developing recreational facilities in proximity to existing and planned bicycle facilities. Further, as discussed below, future development would be subject to compliance with existing County zoning regulations and development standards, which include standards for the provision of pedestrian and bicycle facilities. Therefore, the proposed Project would not conflict with transportation improvements under the Santa Ynez Valley Bicycle Master Plan, and impacts would be *insignificant*.

Santa Barbara County Comprehensive Plan

Circulation Element

The Circulation Element of the Comprehensive Plan identifies key roadway links throughout the unincorporated areas of the County and, along with the other elements of the Comprehensive Plan, guides decisions regarding new development. The objective of this Element is to provide clear traffic capacity guidelines that are intended to maintain acceptable levels of service on the County's roadways and intersections while allowing reasonable growth within the communities of the unincorporated area, including the community planning areas. This Element provides specific policies related to traffic and transportation implications of development projects and establishes guidelines to determine the project-related traffic impacts on County roadways; these goals and policies are also reflected in the County's ATP. Specifically, development projects would be inconsistent with the Circulation Element if roads and transportation services, including pedestrians, bicycles, and other active transportation modes, are inadequate to serve the proposed development before issuance of a development permit.

To address future development project consistency with the Circulation Element, the County's existing planning process requires applicants to improve roadways and intersections directly serving the project. These improvements commonly take the form of sidewalk and bicycle lane

improvements, additional travel and turning lanes, intersection signalization and timing changes, pedestrian crossing, street lighting, and signage. The County can ensure that projects occurring as implementation of the Project are each consistent with the Circulation Element's policies to be adequately served by multi-modal transportation facilities on a site-by-site basis. Please also see Impact T-3 for a more detailed analysis of transportation geometric/design and safety issues.

The proposed Project would also help fulfill the goals and policies of the County's Circulation Element, which encourages community and area plans adopted subsequent to this Element to achieve a balance between designated land uses and roadway and intersection capacity and encourage the use of alternative modes of transportation. The proposed Project would bring many new recreational development to communities currently served by active transportation infrastructure, including sidewalks, bike lanes, and transit services, to support more sustainable, active pedestrian-friendly development that decreases reliance on the automobile and increases transit use, bicycling, and walking. As such, the proposed Project would promote more sustainable land use patterns countywide and create opportunities for alternative transportation consistent with the Circulation Element's goals and policies. Therefore, the proposed Project would not result in potential inconsistencies with the goals and policies of the Circulation Element, and impacts would be *insignificant*.

Community Plans

The County's 10 community plans provide goals, policies, and roadway classifications specifically for each applicable unincorporated community; these goals and policies are also reflected in the County's ATP. The community plans prioritize multi-modal transportation and the development of active transportation facilities, including sidewalks, trails, bike lanes, and transit facilities while ensuring the circulation system maintains the quality of life for residential neighborhoods. Depending on the proposed recreational development project, the proposed Project includes improvements to the circulation system in the community plan areas and supports sustainable community planning. The proposed Project would bring new recreational development to communities currently served by active transportation infrastructure, including sidewalks, bike lanes, and transit services, to support more sustainable, active pedestrian-friendly development that decreases reliance on the automobile and increases transit use, bicycling, and walking. As such, the proposed Project would promote more sustainable land use patterns countywide and create opportunities for alternative transportation consistent with applicable community plan goals and policies.

Similar to the Circulation Element, the County's existing planning process requires applicants to improve roadways and intersections directly serving the project, consistent with the classifications and policies of the applicable community plan. These improvements commonly take the form of sidewalk and bicycle lane improvements, additional travel and turning lanes,

intersection signalization and timing changes, pedestrian crossing, street lighting, and signage. The County can ensure that future development enabled by implementation of the proposed Project (e.g., RBPs) is consistent with the community plan's policies to be adequately served by multi-modal transportation facilities on a site-by-site basis. Therefore, the proposed Project would not result in potential inconsistencies with the goals and policies of the Community Plans, and impacts would be *insignificant*.

Summary of Transportation Plan Consistency Analysis

Applicable transportation plans, policies, and programs in the unincorporated county comprise goals for sustainable community land use patterns and multi-modal/active transportation modes, consistent with SB 375 and SB 743. Relative to these policies, the proposed Project is generally consistent. The Project would provide recreational opportunities in closer proximity to residential population centers. As identified through the Recreation Master Plan process, many residents of the unincorporated area, and even in some incorporated cities, meet their recreational needs by traveling outside their communities. For example, families in the City of Guadalupe have youth on sports teams that do not have adequate local facilities and often drive to Santa Maria to access sports fields. Providing adequate local parkland in currently underserved communities will reduce the need for regional travel and reduce travel distances, thereby reducing vehicle miles traveled, consistent with state and local goals and policies. Further, additional trails and non-motorized connections within communities, such as the Vandenberg Village Community Trail project, will increase opportunities for non-motorized travel, thereby reducing travel demand and related vehicle miles traveled, consistent with state and county goals and policies. As a result, the proposed Project is substantially consistent with state and regional policies for transportation, circulation, and mobility, including the county's circulation element and one climate initiative, goals, policies, and programs, such as the Climate Action Plan.

Impact T-2. The proposed Project could result in potentially significant increases in total VMT within the county.

The proposed Project constitutes a recreation planning framework that would enable the development of a diverse range of recreational facilities dispersed throughout the urban, suburban, and rural unincorporated communities in the county. These would range from rural recreational uses to small neighborhood-serving parks and larger recreational visitor-oriented campgrounds and regional parks.

As described in Section 3.13.4.1, *Thresholds of Significance,* the appropriate County threshold for determining impacts of the proposed Project is a net zero increase in total roadway VMT or regional VMT. As discussed under *Methodology*, regional plans and County thresholds for VMT are strongly focused on urban areas and not tailored for the dispersed trip characteristics of the visitor-oriented recreational uses and rural lands, where residential communities, frequent

transit, sidewalks, or bike paths are available and promote more efficient VMT. Given the nature of recreational visitor-oriented uses of the proposed Project, primarily larger community and regional parks and campgrounds, which typically attract visitors from a wide area, including from outside of the county, any VMT generated by the proposed Project would result in an exceedance of the County's strict VMT thresholds.

The following analysis discusses potential impacts of the proposed Project based on the type of recreational improvements proposed under the Project, as not all recreational improvements are similar in their nature, location, and VMT characteristics. It is possible that some projects would not result in any increase in VMT, and may in fact help contribute to a reduction in existing VMT within a community or region, while others by their nature will generate an increase in trips with longer trip lengths and VMT. However, given the nature the land use plan nature of the Project and the applicable County threshold described above, the impacts are assessed based on overall potential for the Project to result in any net increase in VMT.

Community and Recreational Trails

Community and recreational trails include hiking, mountain biking, and equestrian use trails located in urban, suburban, and rural areas of the county that represent a highly popular form of recreation. Trails proposed under the Project range from more local-serving community trails such as the Orcutt Creek Trail and Mission Hills Community Trails located in or adjacent to existing communities, to more distant destination-based recreational trails such as the Point Sal Trails & Coastal Access Improvements and the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan. Regardless of the type of trail, these facilities are predominantly visitor-oriented, offering new unique recreational opportunities serving local residents, as well as visitors from outside of the immediate vicinity. As such, trail development projects in the county are considered to generate new vehicle trips and VMT.

Pocket and Neighborhood Parks

Pocket and neighborhood parks are typically small parks serving a variety of age groups that are located in existing residential neighborhoods and serving populations located within a ¼-mile to ½-mile radius, respectively. Given their location within existing developed residential neighborhoods or more urban environments, these parks are often also connected to existing communities by multi-modal facilities such as sidewalks and bike routes. By their nature, pocket and neighborhood parks do not generate a high degree of vehicle trips, or attract park visitors from outside the immediate vicinity, or generate substantial VMT. Pocket and neighborhood parks also do not generate substantial trips or VMT from non-visitors (e.g., employees or park maintenance staff), as these park types do not individually generate new employment opportunities, and maintenance of these facilities is often minimal and infrequent. Implementation of the Project and development of new pocket and neighborhood parks, such as the Oak Knoll Neighborhood Park and the Ben Page Neighborhood Park, are therefore not

anticipated to contribute to an increase in VMT. Instead, by providing much-needed community-serving recreational facilities within existing neighborhoods connected by or in close proximity to multi-modal transportation systems (e.g., sidewalks, bike lanes), it is possible that these recreational improvements could reduce VMT compared to existing conditions.

Community Parks

Community parks are larger parks typically developed with outdoor and indoor facilities for competitive sports, as well as playgrounds, trails, and group event areas. They are generally located in areas that serve several neighborhoods within a one- to five-mile radius. The proposed Project proposes to develop three community parks or community park expansion projects, including: the Guadalupe Community Park & Campground (Project No. 23); the South Coast Aquatic Center (Project No. 19); and the Goleta Community Sports Park (Project No. 14). Each of these projects would create new recreational facilities that would attract users from the immediate vicinity, as well as more distant surrounding communities. Some community park projects, such as the Guadalupe Community Park or Richardson Park Expansion, are located in small rural communities where similar recreational facilities do not exist, and it is anticipated that these projects would predominately serve the residents located in the immediate vicinity. Implementation of these projects is not anticipated to generate substantial new VMT; in fact, it is likely that by providing much-needed recreational facilities in much closer proximity to these communities, implementation of these projects would reduce overall VMT within the community or region. However, this is likely not to be the case for other larger community parks, which are anticipated to generate a net increase in VMT as a result of park users traveling from across a greater geographic area. This is particularly true for those community park projects that would entail the development of existing vacant or agricultural sites, resulting in an increase in VMT as compared to the existing use of the site. Therefore, implementation of proposed community park projects are anticipated to contribute to a net increase in VMT.

Regional Parks

Regional parks are larger, multi-use parks that serve several communities within a region, typically within an hour's drive. They offer a diverse range of recreational opportunities, including supporting indoor and outdoor competitive sports facilities for league play. The Project proposes only one regional park project – the Waller Park Regional Sports Fields. The project would develop four new regulation-sized soccer fields designed for youth and adult play, regional tournaments, and other sports programs. The new fields would be accompanied by a new soccer plaza featuring redeveloped picnic areas, an inclusive playground, and a gazebo. While several of the proposed park elements would be support recreational use by residents of the surrounding Santa Maria and Orcutt communities, the facilities supporting

regional tournament play and sports programs represent a potential generator of new trips and VMT, similar to that described for community parks that would serve a broader geographic area. Therefore, implementation of proposed regional park projects are anticipated to contribute to a net increase in VMT.

Campgrounds

Campgrounds, by their nature, are often tourist- or visitor-serving travel destinations that attract visitors from a much greater geographic area. Within the unincorporated county, existing campgrounds are often located within remote rural areas, far from urban centers, and as such inherently result in longer vehicle trips for visitors, employees, and deliveries. For instance, the County's existing Jalama Beach and Lake Cachuma county parks are located in a remote area of the county, approximately 20 roadway miles and 12 roadway miles from the nearest urban centers, respectively. Further, based on recent County reservation data, approximately 70 percent of all campground reservations for Jalama Beach County Park are made by out-of-county residents, making this rural campground a significant generator of VMT. Many of the proposed campground improvements are located in areas that lack sufficient multi-modal transportation facilities that would promote non-passenger vehicle trips to and from Lompoc, California from the sites. As such, it is anticipated that proposed campground improvements, whether they involve improvement and expansion of existing campgrounds that would increase campground capacity or the development of entirely new campground facilities, would generate substantial new VMT.

As an example, the proposed Jalama Beach Campground Expansion & Upgrade Project would increase the number of campsites/cabins from the existing 124 to a total of 140, representing an approximately 13 percent increase in the number of available campsites. Jalama Beach County Park is located approximately 67 miles and 90 miles from the nearest metropolitan areas of San Luis Obispo County and Ventura County, respectively. Conservatively assuming a 13 percent increase in annual vehicle counts, which were measured at 73,000 in 2021, the project Jalama Beach Campground Expansion & Upgrade Project could generate an additional 9,940 annual trips. When assuming roughly 30 percent of all trips are made by in-county residents, where trip length is conservatively measured as the distance from Jalama Beach County Park to Lompoc (19 miles), and 70 percent are made by out of county residents, where trip length is conservatively measured as the average distance from San Luis Obispo and Ventura counties (78 miles), the project could generate an estimated 599,000 VMT annually.

As a further example, the Guadalupe Campground project would result in construction of up to 90 tent and RV camping spaces, as well as cabins and yurts. Conservatively assuming a similar level of occupancy as Jalama Beach County Park, the campground could generate an estimated 53,042 annual vehicle trips (approximately 72.5 percent of annual Jalama Beach County Park trips). Similarly assuming roughly 30 percent of all trips are made by in-county residents, where

trip length is conservatively measured as the distance from the proposed Guadalupe Campground to Santa Maria (9 miles), and 70 percent are made by out of county residents, where trip length is conservatively measured as the average distance from San Luis Obispo and Ventura counties (57 miles), the project could generate an estimated 2,260,000 VMT annually.

Recreation Benefit Projects

The proposed RBP Program would foster public-private partnerships to help fulfill the recreation needs of the local community or region identified in the Recreation Master Plan. Under the RBP Program, the County would encourage private development to contribute directly to the County's public recreation system by providing incentives to applicants who voluntarily provide needed public park, recreation, or trail projects as a part of proposed private development projects. The proposed Project does not propose any specific RBPs, nor would approval of the proposed Project authorize, permit, or entitle any specific RBPs. Further, future RBPs enabled under the proposed Project could be proposed in a broad range of zone districts and take the form of a wide variety of allowed uses. As such, it is difficult to anticipate or analyze the potential impacts to VMT that might result from future allowed RBPs as part of this EIR. However, based on the proposed development standards for RBPs, the Project could enable the following concepts:

a. A maximum 160-site campground/RV park on a minimum 20-acre site

b. A maximum 120-room country inn on a minimum 5-acre site

c. A maximum 2,000-seat outdoor amphitheater

While not all future RBPs enabled by the Project would entail such development, uses such as these would constitute new employee- and recreational/visitor-serving uses that would have the potential to generate new VMT compared to the existing allowable uses within eligible zones, particularly when proposed on undeveloped AG-I and AG-II zones. As such, implementation of the Project and the development and operation of RBPs enabled under the proposed zoning ordinance amendments is anticipated to contribute to a net increase in VMT.

Overall Project VMT Impacts

As described above, the proposed Project would result in the construction and operation of a range of recreational facilities, as well as commercial or visitor-serving uses as part of the RBP Program, within the urban, suburban, and rural areas of the county. While some of the proposed recreational improvements would not constitute uses that would generate new VMT, others, by their nature, would. Regardless of the type of recreational improvements and additional allowed uses proposed or enabled by the Project, future development would be subject to compliance with existing County zoning regulations and development standards applicable to each development project, which include standards for the provision of pedestrian and bicycle facilities. Implementation of these regulations and development standards, as well as the siting

of recreational improvements where there is an identified need, would help to reduce potential generation of new vehicle trips and increases in VMT. Further, as discussed above, the proposed Project would bring new recreational development to communities currently served by active transportation infrastructure, including sidewalks, bike lanes, and transit services, to support more sustainable, active pedestrian-friendly development that decreases reliance on the automobile and increases transit use, bicycling, and walking. As such, the proposed Project would promote more sustainable land use patterns countywide and create opportunities for alternative transportation consistent with applicable community plan goals and policies. Nevertheless, given the County's stringent threshold of significance for the Project being a no net increase in VMT and the difficulties in determining VMT impacts at a project-specific level, impacts are considered *potentially significant*.

The *Transportation Analysis Updates in Santa Barbara County* (2020), prepared to help the County develop methods and thresholds for VMT impacts, identifies various strategies for mitigating VMT impacts of projects in the county. The primary method for reducing VMT is through the implementation of various TDM strategies that reduce single-occupant vehicle travel. However, as noted in the *Transportation Analysis Updates in Santa Barbara County,* the predominantly suburban and rural land use context of the county presents a challenge to the effectiveness of many common TDM strategies. This is particularly true when trying to reduce VMT associated with regional-serving community and regional parks, beach parks, and campgrounds in the rural and suburban areas of the county. Many of the TDM strategies recommended by the County involve increasing the diversity of land uses by including mixed uses within projects, providing pedestrian network improvements, providing traffic calming measures and low-stress bicycle network improvements, implementing car and ride-sharing programs, encouraging telecommuting, and increasing transit service frequency. Most of these strategies are tailored towards individual residential or commercial (employee-based) development projects or plans within or near urban areas with access to multi-modal transportation methods. Many traditional TDM strategies are not appropriate for countywide recreational visitor-oriented uses in rural areas.

The *Transportation Analysis Updates in Santa Barbara County* also identify potentially feasible VMT mitigation strategies in the form of mitigation fee programs. However, the collection of mitigation fees through programs such as the County's Transportation Improvement Program is applicable primarily to private development projects, not recreational improvement projects or programs funded or sponsored directly by the County. The collection of VMT mitigation fees could be applied to future Recreation Benefit Projects or private development of parks and trail projects, but the likelihood of producing meaningful VMT reductions for such projects remains a challenge when projects are proposed in rural and suburban areas of the county. This is because the fiscal cost of constructing new multi-modal improvements to serve projects located in these areas, where no multi-modal facilities currently exist, and the projects are

located far from urban centers, often far exceeds what can reasonably be achieved through the collection of fees, making it unlikely that a mitigation fee program could feasibly reduce impacts.

For these reasons, no viable mitigation strategies exist to reduce Project impacts. Further, even if TDM strategies or fee programs could be applied to the types of projects and improvements proposed or facilitated under the Project, it is extremely unlikely that any form of mitigation could reduce Project VMT impacts to below the County's net-zero VMT threshold. Therefore, based on the County's established net-zero VMT threshold, which is the most applicable to the Project, and the inability to effectively reduce VMT from visitor-oriented recreational uses, the projected increase in VMT associated with the proposed Project would be *significant and unavoidable*.

Impact T-3. The proposed Project could result in adverse changes to the transportation safety environment.

Construction-Related Impacts

Impacts to the traffic safety environment from construction of individual projects typically occur as a result of construction-related traffic such as haul trucks, cement trucks, equipment delivery trucks, construction worker vehicles, and other large construction equipment traveling on freeways and County-maintained roads to and from individual project sites and causing disruptions in traffic flows, reduced lane capacity, slowing traffic movement, or otherwise interfering with traffic, transit, bicycle, and pedestrian circulation. Depending on the recreational improvement project or RBP, construction at an individual site would not require large amounts of construction equipment or construction workers due to the nature of the activities and the limited size of associated development. For smaller recreational improvement projects, such as new recreational trails, neighborhood and pocket parks, and even some RBPs, site-specific construction activities are also anticipated to require only limited amounts of work and would not result in prolonged durations of construction activities. However, other larger development projects, such as the construction of new community and regional parks, campgrounds, or outdoor amphitheater could result in longer construction schedules, a greater degree of construction equipment and construction activities, and potential need for temporary road closures. Regardless of the type of recreational development enabled under the proposed Project, standard construction approval would require the development of construction management plans, signage, flagging, etc. If additional ingress and egress routes are necessary, such as for the Guadalupe Community Park & Campground or the Goleta Community Sports Park, the development would need to be consistent with County policy and permitting requirements that would prevent construction-related impacts. Therefore, it is not anticipated that construction activities occuring on individual sites throughout the county as a result of implementation of the proposed Project would result in significant or prolonged disruptions to

the traffic safety environment. As such, construction-related impacts to the traffic safety environment from implementation of the propsoed Project are considered *insignificant.*

Operational Geometric Hazards

The proposed Project does not include or facilitate any improvements to the local transportation network within the county; instead, the proposed Project would plan for new park, trail, and recreational facility development, which would generally occur within existing parks and recreational spaces or existing disturbed agricultural sites. While the details for future recreational development projects (e.g., site plans, driveway locations, landscaping, utilities) are unknown, all individual projects would be subject to the County's review process and would be subject to compliance with adopted standards and regulations. This includes compliance with the County's standard road improvement details, standards for driveway/access roads from public rights-of-way, and standard bikeway details, which address adequate driveway line of sight, turning movements, and other geometric design considerations. Newly enabled projects could also include circulation improvements to site access and parking, which would be subject to, and designed in accordance with, existing County or, in some cases, State standards and specifications, as applicable, as well as development standards proposed as part of the zoning ordinance amendments. Larger individual projects that would not qualify for an exemption or low-level permit would be subject to the County's review process and would be subject to compliance with adopted standards and regulations. This includes compliance with the County's standard road improvement details, standards for driveway/access roads from public rights-of-way, and standard bikeway details, which address adequate driveway line of sight, turning movements, etc. Mandatory compliance with these existing policies and standards would ensure that individual projects would not create hazards to the traffic environment through the design and implementation of improvements to a specific site. Associated impacts are considered *insignificant.*

Operational Traffic Safety and Roadway Compatibility Impacts

Neither the County nor Caltrans publishes roadway-specific accident data in a readily accessible format. Based on recent accident data from the *California Statewide Integrated Traffic Records System*, which contains data for the unincorporated county for the years 2010-2019, a total of 855 accidents occurred on the 1,650 miles of unincorporated roadways in 2019. Less than 0.5 percent of these accidents involved pedestrians and approximately 5 percent involved bicyclists. As discussed above, the proposed Project does not propose any improvements that would substantially alter the roadway network, and therefore would not create physical hazards to the roadway traffic environment. Rather, the proposed Project has the potential to result in increased traffic along roadways and at intersections throughout the county from increased vehicle traffic generated by individual recreational projects, or by enabling future development of new pedestrian and bicycle facilities, potentially contributing

to increases in the frequency of traffic accidents or accidents involving pedestrians and bicyclists. However, given the programmatic nature of the proposed Project and uncertainty regarding the size and location of where projects might occur, potential effects on site or roadway-specific accident rates cannot feasibly be determined.

Uses enabled by the proposed Project have the potential to add traffic to the roadway network that may increase hazards due to incompatible uses. Some roadways within the county, particularly in the more rural areas, may only be lightly maintained, be subject to erosion or washout from storms, may have limited line-of-sight, have substandard road width or geometrics for turning movements, be of a poor condition, or potentially have on-street parking or other design features that may present safety hazards. Traffic generated by newly enabled uses within agricultural areas would encounter large trucks and farm equipment that often travel along narrow rural roads, which could result in potential conflicts and unsafe driving conditions as travelers, potentially unfamiliar with rural roads, attempt to pass such vehicles. Development of new campgrounds could introduce additional recreational vehicles (RVs) to roads, and increases in opportunities for horseback riding also have the potential to introduce additional vehicles towing horse trailers to the transportation network. While these types of traffic can create potential roadway hazards or conflicts with other traffic, the typically low traffic volumes on these rural roads, where farm equipment and trailers are a common occurrence and are generally considered compatible with the existing roadway network. The projects enabled by the proposed Project are also intended to be complementary to existing land uses and already generate associated traffic on local roadways. For instance, implementation of the Jalama Beach Campground Expansion & Upgrade Project would increase capacity for RV camping, resulting in a potential increase in the number and frequency of RVs traveling on Jalama Road, which already accommodates RV traffic. Implementation of the proposed Project is not anticipated to substantially increase or alter these conditions as roadway volumes are anticipated to remain low. In addition, more intensive uses enabled under the proposed Project, which have higher potential to alter existing conditions, such as larger sports facility development projects, would be subject to the County's existing review and permit approval process and may be subject to site-specific study of traffic safety impacts on a case-by-case basis. As such, the proposed Project is not anticipated to substantially increase frequency of incompatible traffic on local roadways, and associated impacts would be *insignificant*.

3.15.4.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis*, the cumulative setting for the proposed Project involves a variety of long-range plans, policies, and initiatives, as well as development projects in the county and surrounding communities. Project impacts, along with potential impacts from pending and current planning or development projects, inform the

cumulative impacts analysis. Included in the cumulative setting for the proposed Project are housing development, recreational facility development in the incorporated areas, and cannabis cultivation projects.

Per the County's *Environmental Thresholds and Guidelines Manual*, the County recommends evaluating cumulative impacts from land use plans and programs in terms of net changes in total roadway VMT. Concurrent development under the proposed Project, combined with pending or approved planning projects, and residential, commercial and agricultural development within or adjacent to the Project area would increase countywide VMT and could exacerbate hazardous traffic conditions. In particular, the County 2023-2031 Housing Element Update, along with Housing Element Updates for the incorporated cities, has the potential to generate substantial new VMT throughout the county.

Programs, Plans, Ordinance, and Plan Consistency

The proposed Project would result in cumulatively considerable impacts if, in combination with other cumulative pending plans and projects, it would result in substantial adverse impacts associated with inconsistencies with applicable transportation plans and policies. As the project is consistent with all relevant plans, there would be no cumulative impact, and impacts would be *insignificant.*

Cumulative Impacts to VMT

The projects listed above, in conjunction with the proposed Project, have the potential to result in cumulative transportation impacts related to travel on rural roads and highways as well as on total roadway VMT in the county. While it is impossible to determine the cumulative increases in VMT from the proposed Project and other pending or approved planning projects, given the County's current adopted thresholds for cumulative VMT analysis and the likelihood that total roadway VMT would increase under cumulative conditions, the contribution of the proposed Project to these cumulative impacts would be deemed cumulatively considerable. There are no feasible mitigation measures to reduce or eliminate all VMT generated by recreation projects enabled by the proposed Project, and these VMT contribute to substantial increases in residential VMT generated under the County Housing Element Update and various Housing Element Updates of the incorporated cities. Therefore, cumulative impacts on VMT are considered *significant and unavoidable.*

Design Features and Hazards

The proposed Project would result in cumulatively considerable impacts if it, in combination with other cumulative pending plans and projects, would result in substantial adverse impacts associated with geometric design features or traffic safety hazards. As described in Impact T-3, the proposed Project does not include or facilitate any direct improvements to the local roadway system within the county. While the details for future recreational development

projects (e.g., site plans, driveway locations, landscaping, utilities) are unknown, all individual projects would be subject to the County's review process and would be subject to compliance with adopted standards and regulations. This includes compliance with the County's standard road improvement details, standards for driveway/access roads from public rights-of-way, and standard bikeway details, which address adequate driveway line of sight, turning movements, and other geometric design considerations.

Further, the County's existing planning process requires applicants of future development projects enabled under the Project to improve roadways and intersections directly serving the project, if necessary. These improvements commonly take the form of additional travel and turning lanes, intersection signalization and timing changes, bicycle lanes, sidewalks, pedestrian crossings, street lighting, and signage. Compliance with these adopted standards and regulations would ensure that the proposed Project would not substantially contribute to cumulatively significant impacts, and cumulative impacts would be *insignificant.*

3.15.4.4 Proposed Mitigation

No mitigation measures are feasible to reduce impacts.

3.15.4.5 Secondary Impacts

No mitigation measures are proposed. Therefore, no direct secondary impacts would occur.

3.15.4.6 Residual Impacts

Impact T-1. Implementation of the proposed Project would not result in or represent a potential conflict with plans, policies, or regulations addressing the local and regional transportation network. The Project would facilitate the development of recreational facilities in proximity to local residents who need them, reducing the length that people travel to access recreational amenities and, in some cases, resulting in an overall reduction in VMT in some communities, depending on the recreational development project. Further, all development must be consistent with County policy to receive ministerial permits. Projects that do not qualify for ministerial permits would be subject to independent discretionary permit review, which would be required to include project-specific transportation studies and VMT-reducing measures. Overall, the Project does not conflict with local plans and policies because it is consistent with the planning goals and provides a service in close proximity to where those facilities are needed. Therefore, the proposed Project would be consistent with County plans, and impacts would be *insignificant.*

Impact T-2. While some individual recreation development projects would create the potential to generate new VMT, other larger recreational development projects would. Overall, the proposed Project has the potential to generate VMT which would represent an increase in the

existing total VMT exceeding the County's strict VMT thresholds. As there are no viable mitigation strategies that could provide a meaningful reduction in VMT impacts, residual impacts would be *significant and unavoidable.*

Impacts T-3. The proposed Project does not directly propose or facilitate any improvements to the County's roadway network, nor does it include any site-specific plans or circulation schemes that can be evaluated for transportation hazards. Instead, the Project would plan for new park, trail, and recreational facility development, which would generally occur within existing parks and recreational spaces or existing disturbed agricultural sites. While the details for future recreational development projects (e.g., site plans, driveway locations, landscaping, utilities) are unknown, all individual projects would be subject to the County's review process and would be subject to compliance with adopted standards and regulations. This includes compliance with the County's standard road improvement details, standards for driveway/access roads from public rights-of-way, and standard bikeway details, which address adequate driveway line of sight, turning movements, etc. Mandatory compliance with these existing policies and standards would ensure individual projects would not create hazards to the traffic environment through the design and implementation of improvements to a specific site. Associated impacts are considered *insignificant*.

3.16 UTILITIES AND WATER SUPPLY

3.16.1 INTRODUCTION

This section describes the potential impacts on utilities, utility infrastructure, and water supply that could result from the implementation of the Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (Project). Issues discussed in this section include municipal water supply and demand, wastewater generation and treatment capacity, and solid waste generation and disposal capacity (e.g., landfills). This analysis describes the physical setting for municipal utilities serving unincorporated areas of Santa Barbara County and regulations that apply to the supply, treatment, and disposal of water, wastewater, and solid waste. This section provides a water supply analysis per the requirements of Section 15155 of the California Environmental Quality Act (CEQA) and Section 10910 of the California Water Code.

Issues related to water quality, hydrologic resources, stormwater runoff, and groundwater, and surface water resources are discussed in more detail in Section 3.10, *Hydrology and Water Quality*. The analysis of public services, including fire protection, law enforcement, schools, and parks/recreation, is provided in Section 3.13, *Public Services and Recreation*. The analysis of energy services, including electricity and natural gas, is addressed in Section 3.6, *Energy*.

3.16.2 ENVIRONMENTAL SETTING

3.16.2.1 Water

Water Infrastructure and Improvements

Municipal water supplies are stored, treated, and conveyed to customers through an extensive network of water infrastructure serving urban communities throughout the county, including three surface reservoirs (i.e., Lake Cachuma, Jameson Lake, and Gibraltar Reservoir), water distribution systems, desalination, and water treatment facilities. Communities in Santa Barbara County rely on a range of water supplies; as a result, a wide variety of treatment processes are in use. Some communities receive surface water that is treated under the Surface Water Treatment Rule (SWTR). Others rely on groundwater that is treated under federal and state drinking water regulations. Most communities receive both treated surface water and groundwater in their systems, as further described below, and some communities, such as those near the City of Santa Barbara, receive desalinated ocean water (County of Santa Barbara 2019).

Much of the County's water infrastructure is more than 40 years old and several key parts need to be evaluated to comply with increasingly stringent regulatory requirements, including

drinking water quality standards for disinfection byproducts that require expensive new treatment components (County of Santa Barbara 2019). For example, increasing the reliability of wells in the Santa Ynez River alluvium requires the development of a regional water treatment plant to comply with the SWTR (Section 3.16.3.1, *Federal*). Another example is that portions of the South Coast Conduit, built in the 1950s, need to be expanded or replaced to meet increasing demand and to provide adequate reliability. Further, Jameson and Gibraltar Reservoirs, and to a lesser extent Lake Cachuma, are being filled with sediment, reducing their storage capacity and making it increasingly important to enhance local water supply reliability through conservation and other methods, as further explained below (County of Santa Barbara 2019). Information about existing water infrastructure issues is summarized below in *Municipal Water Supply Reservoirs and Groundwater Sources* and is discussed in greater detail in Section 3.10, *Hydrology and Water Quality*.



As the largest surface water source in the county, Lake Cachuma has a capacity of approximately 192,978 AF as of 2023 and serves water demands of the South Coast. Source: Cachuma Operation and Maintenance Board

Additionally, urban delivery infrastructure must be modified on an ongoing basis to meet the needs of a growing population; upgrades are needed to reduce water loss, prevent increased inflow and infiltration during storms, and improve performance for existing and future development. Through the existing planning processes and authorization from water agencies, water lines are typically installed or upgraded as a part of new development, if necessary, to increase capacity to serve the individual sites. Water lines must be sized sufficiently to accommodate both day-to-day customer needs and fire flow needs, which are significantly higher than domestic water needs. Upgrades to water lines are generally triggered by the age of each affected line or as a part of new development where additional capacity is needed (County of Santa Barbara 2019).

Water Pressure

Water pressure is also an important factor in the design and operation of a municipal water supply system. Adequate water pressure is necessary to ensure that water can be properly distributed throughout a service area from pumps, reservoirs, or storage facilities. It is also important that adequate water pressure exists to allow the proper functioning of multiple water fixtures and appliances (e.g., sinks, showers, dishwashers). Various state and local regulations exist that require owners of public water systems to maintain systems and deliver water under specific pressure ranges (California Fire Code 2019; California Plumbing Code 2022). Further,

the County Code and California Fire Code (CFC) mandate the installation of automatic fire sprinklers or suppression systems in certain types of new development projects or projects located in areas subject to heightened fire risk, as well as to ensure adequate flow from fire hydrants. Adequate water pressure in areas serving new development is necessary to ensure compliance with these standards, which include minimum flow requirements.

To ensure adequate water pressure within their service areas, municipal water service providers serving the unincorporated areas of the county maintain their systems and manage water pressure through a system of gravity flow, water pumps, and pressure-reducing valves. For instance, on the South Coast, many of the water service districts (e.g., Goleta Water District, Carpinteria Water District, City of Santa Barbara, Montecito Water District) have water tanks and reservoirs located at higher elevations in the foothills of the Santa Ynez Mountains that allow for gravity flow to create high-pressure zones in the foothills and lowland areas. Within these high-pressure zones, pressure-reducing valves or regulators may be required to reduce pressure. As water is conveyed through the system to the flatter, lower-lying areas, water pressure may decrease, resulting in lower pressure zones and requiring the use of water pumps to raise water pressure. Generally, pressure can be more easily maintained in higher pressure zones and for more typical domestic customers like lower-density residential and commercial uses. However, adequate water pressure may be more difficult to provide for higher-density development with more onsite demands or taller structures, which could require higher pressures to provide adequate water flow for individual functions, such as automatic fire sprinkler systems, as well as firefighting.

State Water Project and Central Coast Water Authority

The Central Coast Water Authority (CCWA) was formed in 1991 to finance, construct, manage, and operate Santa Barbara County's State Water Project (SWP) facilities. Construction of the facilities to import SWP water to the County began in 1994, including a 42-mile extension of the SWP water pipeline, pumping plants, and a regional treatment plant to treat the water for San Luis Obispo and Santa Barbara Counties. The Coastal Branch portion of the SWP brings water 117 miles from the California Aqueduct in Kern County, through San Luis Obispo County and the Santa Maria Valley, and continuing to the northerly portion of Vandenberg Space Force Base (VSFB). At VSFB, the Coastal Branch connects to the 42-mile pipeline comprising the Mission Hills and Santa Ynez Extensions. The Santa Ynez section ends at Lake Cachuma. Water is then delivered through existing facilities to the South Coast of Santa Barbara County. In addition, under a joint powers agreement with the California Department of Water Resources (DWR), CCWA operates all of the Coastal Branch facilities downstream of the treatment plant (County of Santa Barbara 2019).

Existing Water Supply and Demand

The unincorporated areas of the county are served by 12 water agencies that provide municipal water supply services, excluding small mutual water companies serving limited customers and water providers serving areas outside of the County's jurisdiction (e.g., City of Buellton). Combined, these purveyors have the capacity to provide approximately 71,486 acre-feet per year (AFY) countywide. Existing water customers consume approximately 47,015 AFY, which leaves approximately 24,470 AFY in available water supplies countywide. However, the availability of water between purveyors and regions of the county varies. For example, while the Santa Ynez River Water Conservation District Improvement District #1 has approximately 5,118 AFY of remaining capacity available, which could accommodate modest growth in urban land uses in existing communities, the Casmalia Community Services District (CSD) water supplies are potentially more limited and without a comprehensive review of existing supply and storage facilities may only serve minor infill development in the community. Further, water agencies serving urban communities generally have large supplies but also larger customer bases to support (Table 3.16-1).

Water supplies for the county as a whole primarily come from groundwater. In 2024, groundwater supplied 37.2 percent of the water supply (and has historically supplied approximately 75 percent), and surface water accounted for 37.8 percent of the total supply, followed by 20.3 percent from the State Water Project and other purchased water supplies, 2.8 percent from desalinated water, and 2.0 percent from recycled water (County of Santa Barbara 2025a).[1] The Goleta Water District, serving the Eastern Goleta Valley on the South Coast, is the only water purveyor to rely on significant sources of recycled water supplies (County of Santa Barbara 2022).

Municipal Surface Water Supply Reservoirs and Groundwater Sources

Three of the county's four major reservoirs are managed for municipal water supply, as well as groundwater recharge, flood control, recreation, and ecological benefits.[2] Lake Cachuma, Gibraltar Reservoir, and Jameson Lake are all located in the Santa Ynez River Watershed. The three reservoirs on the Santa Ynez River supply the majority of the water used in the South Coast area of Santa Barbara County and for Santa Ynez downstream users, as further described below (County of Santa Barbara 2019):

[1] The percentages provided are for the county as a whole, including incorporated cities and Vandenberg Space Force Base.

[2] Twitchell Reservoir, the fourth reservoir in the county, provides flood protection and groundwater recharge but does not store water for direct municipal use.

Table 3.16-1. Existing Municipal Water Suppliers and Demands Serving Unincorporated Areas of Santa Barbara County

Major Water Suppliers[1]	Housing Market Area Served	Source of Water Supply (% of total supply)[2]	Current Service Capacity (AFY)	Current Service Use (AFY)	Remaining Available Water Supply (AFY)
Cuyama CSD	Cuyama	Groundwater (100%)	171.09	127	44.09
Los Alamos CSD	Lompoc	Groundwater (100%)	605	230	375
Mission Hills CSD	Lompoc	Groundwater (100%)	1,200	500	700
Vandenberg Village CSD	Lompoc	--	2,465	1,400	1,065
Casmalia CSD	Santa Maria	Purchased Water (100%)	9.28[4]	9-10	0 – 0.28
Golden State Water District – Orcutt	Santa Maria	Groundwater (98.2%) Purchased Water (1.8%)	6,481	6,481	0
Santa Ynez River Water Conservation District Improvement District #1	Santa Ynez	Groundwater (39.7%) Purchased Water (60.3%)	8,933[3]	3,815[3]	5,118
Carpinteria Valley Water District (CVWD)	South Coast	Groundwater (19.0%) Surface Water (81.0%)	5,200	4,000	1,200
City of Santa Barbara[1]	South Coast	--	20,760	13,890	6,870
Goleta Water District[1]	South Coast	Groundwater (7.1%) Surface Water (81.3 %) Purchased Water (5.2%) Recycled Water (6.3%)	16,172	11,029	5,143
La Cumbre Mutual Water Company	South Coast	Groundwater (53.6%) Purchased Water (SWP) (46.4%)	1,343	1,234	109

Table 3.16-1. Existing Municipal Water Suppliers and Demands Serving Unincorporated Areas of Santa Barbara County (Continued)

Major Water Suppliers[1]	Housing Market Area Served	Source of Water Supply (% of total supply)[2]	Current Service Capacity (AFY)	Current Service Use (AFY)	Remaining Available Water Supply (AFY)
Montecito Water District	South Coast	Groundwater (0.5%) Surface Water (43.3%) Imported Water (56.2%)	8,147	4,300	3,847
Total (Approx.)		**--**	**71,486**	**47,015**	**24,470**

Notes:

[1] Table only includes water agencies that serve unincorporated areas of Santa Barbara County and does not include water purveyors that do not provide potable water services to lands within the County's jurisdiction (e.g., VSFB). Some water agencies serve both unincorporated and incorporated areas such as the Goleta Water District and the City of Santa Barbara.

[2] Water supply sources and percentages are compiled from relevant Urban Water Management Plans (UWMPs) and the 2019 Santa Barbara Integrated Regional Water Management Plan (IRWMP)

[3] No direct response was received, data are from LAFCO 2022

[4] No service capacity was provided by Casmalia CSD, data are from the 2019 Santa Barbara IRWMP and represent purchases at that time. Service use range was provided by Casmalia CSD.

Sources: City of Buellton Public Works Department 2022; Carpinteria Valley Water District and Woodard and Curran 2021; Goleta Water District and Woodard and Curran 2021; City of Lompoc and Water Systems Consulting, Inc. (WSC) 2021; City of Santa Barbara Water Resources Division and WSC 2021; Provost and Pritchard Consulting Group 2021; Golden State Water Company, Tully and Young, and Zanjero 2021; Montecito Water District and Tully and Young 2021.

- **Lake Cachuma** is owned and operated by the federal government. Lake Cachuma was completed in 1956 with a design storage capacity of approximately 205,000 acre-feet (AF) at 750 feet in elevation. The reservoir capacity has been reduced to approximately 192,978 AF as of 2025 due to the accumulation of silt in the reservoir. Flashboards were installed at Bradbury Dam in 2004 raising the maximum reservoir elevation by 3 feet, which increased the capacity. The principal features of the Cachuma Project are Bradbury Dam, Lake Cachuma, Tecolote Tunnel, and the South Coast Conduit distribution systems. Included in the main conduit system are four regulating reservoirs (Glen Anne, Lauro, Ortega, and Carpinteria) and the Sheffield Tunnel. The Cachuma Project was designed as a gravity flow system. To make efficient deliveries to the South Coast, the intake tower for the Tecolote Tunnel was placed in a bay in the mid-shoreline section of the lake. Water flows via gravity through the Tecolote Tunnel into the South Coast Conduit to Carpinteria Reservoir. Sedimentation has reduced the gravity operational capacity of Lake Cachuma by blocking the lowest intake gate. If the reservoir elevation recedes below the operational gates at the intake tower, water has to be pumped from the lake into the intake tower. The supply disruptions recently have been due to drought, sedimentation, and the inability to gravity flow through the system.
- **Jameson Lake** is owned and operated by the Montecito Water District. Jameson Lake was dedicated in 1930 with a design storage capacity of 7,500 AF. Water is transported to the

South Coast through the Doulton Tunnel. As of 2025, Jameson Lake stores 4,848 AF. The unincorporated community of Montecito receives 45 percent of its water supply from Jameson Lake and Fox and Alder Creeks via the Doulton Tunnel, so the ongoing loss of storage capacity is an issue of concern.

- **Gibraltar Reservoir** is owned and operated by the City of Santa Barbara. Gibraltar Reservoir was completed in 1920 with a design storage capacity of 14,000 AF. Although the dam was raised 23 feet in 1948, the current storage capacity of the reservoir in 2025 has been reduced to 4,693 AF. Water from the reservoir is transported through the Mission Tunnel to the South Coast. The reservoir is the source of approximately one-third of the City of Santa Barbara's water supply. The long-term loss of storage capacity is mitigated by the pass-through provision of the Upper Santa Ynez River Operations Agreement, which allows the City of Santa Barbara to pass through Gibraltar's yield and deliver it through Cachuma Reservoir.

Table 3.16-2 provides a summary of the existing maximum capacity/available storage and current water in storage for each of the three reservoirs, along with the total estimated usable water in storage in each groundwater aquifer and the existing annual groundwater pumping. As of August 2023, the county's reservoirs have a combined current capacity of 202,519 AF with current storage of 193,998 AF, approximately 95.8 percent of the maximum capacity. Further, the approximately 261,750 AFY of groundwater supplies are drawn from local groundwater basins, representing approximately 5.4 percent of the estimated usable water in storage.

State Water Project (Imported Water)

The SWP is a multi-purpose water storage and delivery system that is planned, built, operated, and maintained by DWR. In 1963, the Santa Barbara County Flood Control and Water Conservation District (SBCFCWCD) contracted with DWR to deliver SWP water to Santa Barbara County. Beginning in 1997, the CCWA began to deliver SWP water to Lake Cachuma, where it is mixed with Cachuma Project water and delivered through the Tecolote Tunnel to contractors on the South Coast (Santa Barbara County Public Works Department, Water Resources Division 2025).

Table 3.16-2. Local Sources of Existing Municipal Water Supply

Surface Water Supply Source	Maximum Capacity/Storage (2025)	Current Storage (% of Capacity)
Cachuma Reservoir	192,978 AF	164,186 AF (85.1%)
Gibraltar Reservoir	4,693 AF	3,850 AF (82.0%)
Jameson Reservoir	4,848 AF	4,687 AF (96.7%)
Total	**202,519 AF**	**172.723 AF(85.3%)**
Groundwater Supply Source	**Estimated Usable Water in Storage (2024)**	**Annual Draw (2025)**
Carpinteria	19,000 AF	8,623 AFY
Montecito	14,400 AF	3,084 AFY
Santa Barbara	10,000 AF	530 AFY
Foothill	5,000 AF	284 AFY
Goleta	60,000 AF	4,404 AFY
Santa Ynez River Valley	1,224,000 AF	54,979 AFY
San Antonio Creek Valley	800,000 AF	23,750 AFY
Santa Maria Valley	2,300,000 AF	97,982 AFY
Cuyama Valley	400,000 AF	41,059 AFY
Total	**4,832,400 AF**	**234,695 AFY**

Notes:
For further details regarding groundwater basin supply, allocation, and yield, see Section 3.10, *Hydrology and Water Quality*.
Statistics provided in this table are current as of August 21, 2023 (for reservoir data), and 2014/2020 (for groundwater data), but storage capacity fluctuates annually and throughout the year.
All values are reported in AF.
Source: Santa Barbara County Public Works Department, Water Resources Division 2024; Santa Barbara County Flood Control District 2025; DWR 2025.

Each year, DWR announces SWP Table A allocations which inform water contractors' SWP deliveries. Table A allocations represent "a portion or all of the annual Table A amount requested by SWP water contractors and approved for delivery by DWR" (DWR 2019). The Table A allocation differs each year and also may change over the course of the year to reflect the actual and forecast water supply. Table 3.16-3 shows the amount of water to which each Santa Barbara County participant in the SWP has a contractual right (Table A amounts). Actual deliveries may be less than shown due to supply limitations and request reductions. Historically, deliveries have ranged from 30 percent to 100 percent since the region began importing SWP water. Each project participant is also entitled to a drought buffer amount which totals 6,408 AFY for all participants (this includes a special drought buffer of 2,500 AFY for Goleta Water District), which increases the reliability of their Table A amount (County of Santa Barbara 2019). This can be stored for future use and/or requested in dry years when cutbacks are expected to SWP allocations. Lastly, "Article 21" deliveries allow water contractors to take deliveries above approved and scheduled Table A amounts (DWR 2019). Article 21 is sometimes called interruptible, unscheduled, or surplus water, and is offered predominantly in wet years (California Water Blog 2020).

Table 3.16-3. Santa Barbara County SWP Participant Table A Amounts

CCWA SWP Participant	Table A Amount (AFY)		
	Original Table A	Drought Buffer	Total Table A
City of Buellton	578	58	636
Carpinteria Valley Water District	2,000	200	2,200
Goleta Water District[1]	4,500	2,950	7,450
City of Guadalupe	550	55	605
La Cumbre Mutual Water Company	1,000	100	1,100
Montecito Water District	3,000	300	3,300
Morehart Land Company	200	20	220
City of Santa Barbara	3,000	300	3,300
Raytheon Company	50	5	55
City of Santa Maria	16,200	1,620	17,820
Santa Ynez River Water Conservation District, Improvement District #1	2,000	200	2,200
Golden State Water Company – Orcutt	500	50	550
Vandenberg SFB	5,500	550	6,050
Total[2]	**39,078**	**6,408**	**45,486**

Notes:
[1] The drought buffer includes 3,908 AFY for CCWA supply and conveyance capacity. Goleta Water District also has a 2,500 AFY drought buffer for supply only with no associated conveyance capacity.
[2] Total provided is for the county as a whole, including SWP participants who serve only incorporated areas of the county.
Source: CCWA and Provost and Pritchard Consulting Group 2020.

Recycled Water

Recycled water must meet rigorous water quality standards before it can be reused. Various treatment technologies are approved for the treatment of recycled water under Title 22 of the California Code of Regulations but generally, they are all referred to as tertiary treatment. Currently, three agencies in the county treat all of their effluent to full tertiary levels. These agencies are the Laguna County Sanitation District, the City of Lompoc, and the Summerland Sanitary District. The City of Lompoc generate up to 5 mgd of recycled water for irrigation and dust control and sells approximately 69 AFY, and the Summerland Sanitary District can generate up to 0.3 mgd or 168 AFY, which is discharged to the Pacific Ocean. The Laguna County Sanitation District produces 2,242 AFY and up to 3.7 mgd, which is used for agricultural, landscaping, and industrial purposes, with recycling as its only discharge mechanism (County of Santa Barbara 2019). In 2022, Laguna County Sanitation District's Recycled Water Distribution Project began delivering recycled water over a 3.5-mile pipeline from the Wastewater Reclamation Facility to a 1 million gallon tank at Waller Park outside Santa Maria. Waller Park is owned and operated by the County and has 65 acres of irrigated turf that uses

84 million gallons of water each year. Connecting recycled water to the park substantially reduces the need to pump groundwater for irrigation in the Santa Maria Valley..

Two other agencies treat some of their flow to tertiary levels for reuse as landscape irrigation: the City of Santa Barbara and the Goleta Sanitary District. The City of Santa Barbara's recycled water system has a distribution capacity to deliver 1,400 AFY and can generate up to 4.3 mgd. However, due to process and infrastructure issues, the city currently provides only 800 AFY of recycled water to users. The Goleta recycled water system is operated jointly by the Goleta Sanitary District and the Goleta Water District, which acts as the purveyor/retailer of the recycled water to its customers. The system currently serves approximately 785 AFY and is permitted to generate up to 3.0 mgd of recycled water for parks, schools, golf courses, landscape, irrigation, and toilet flushing (County of Santa Barbara 2019). The 2019 Integrated Regional Water Management Plan (IRWMP) included a target of 7,035 AFY recycled water use by 2035.

Desalinated Water

Within the county, the City of Santa Barbara is the only entity that provides desalinated water as a municipal water source. The City of Santa Barbara constructed the Charles E. Meyer desalination facility, a reverse osmosis seawater desalination facility, as a drought and emergency supply, although it is permitted under various operating scenarios. In February 2021, the Santa Barbara City Council adopted a policy recommendation to operate ocean desalination as part of the City's water supply portfolio to support drought preparedness, response, and recovery. Under this policy, the desalination plant will operate within its current capacity (3,125 AFY) to protect and optimize the city's other water supplies and to enhance the city's ability to prepare for and respond to future drought conditions. Other studies carried out by the City of Santa Barbara have identified the expansion of the desalination plant to 5,000 AFY as a potential form of new water supply (City of Santa Barbara Water Resources Division and Water Systems Consulting, Inc. [WSC] 2021).

Water Conservation

Water conservation addresses the "demand side" of water management, and thereby constitutes an important part of stretching the county's water supplies. Through water conservation programs implemented at the regional and water purveyor level, additional water supplies become available for use within the county, reducing pressure on other water resources. Water conservation activities occur countywide through its Regional Water Efficiency Program (County of Santa Barbara 2019). Water purveyors in the program, such as CVWD and Goleta Water District, among others, work cooperatively to implement conservation through residential, commercial, agricultural, and landscape programs. Additionally, regional education and public information programs help change behavior to decrease water use. Regional

programs have been in place since 1990 and are staffed and funded by a multiagency team of conservation staff from the Santa Barbara County Water Agency (SBCWA) and local water purveyors. Water purveyors also implement individual programs of particular interest within their service areas. Water savings through conservation programs are calculated on an annual basis by those agencies that are members of the California Urban Water Conservation Council.

Future Water Supply and Demand

Projected future water supply and demand under normal conditions for some water districts are displayed in Table 3.16-4. Water purveyors subject to the California Urban Water Management Planning Act (UWMPA), which includes water service providers serving 3,000 or more service connections or providing more than 3,000 AFY of water supply, analyze existing and future water supplies in their Urban Water Management Plans (UWMPs), which are updated every five years. Several water agencies in the county do not meet the thresholds established by the UWMPA and therefore do not produce UWMPs, including La Cumbre Mutual Water Company, Santa Ynez River Water Conservation District Improvement District #1, Los Alamos CSD, Cuyama CSD, Casmalia CSD, Mission Hills CSD, or Vandenberg Village CSD. As shown based on available UWMPs, the larger water agencies generally project nominal increases in supply but fairly substantial demand through 2040, which would reduce the surplus supplies currently available in these agencies. In some areas, including the Goleta Water District and the Montecito Water District, projected demand is expected to exceed supplies by 2040. The one exception to these supply and demand trends is the Golden State Water District - Orcutt, which actively balances water supply through the use of imported supplies to match demand. Taken together, by 2040, the growth rate in demand is expected to exceed the growth rate in water supplies by approximately 7.9 percent.

Drought and Multiple Dry-Year Conditions

A drought occurs when climactic and weather conditions are drier than normal for a long period, resulting in less water available for people, agricultural uses, and ecosystems. Drought and water shortages are a gradual phenomenon and generally are not signified by one or two dry years. California's and the county's extensive system of water supply infrastructure (e.g., reservoirs, groundwater basins, and interregional conveyance facilities) generally mitigates the effects of short-term dry periods for most water users. However, drought conditions are present when a region receives below-average precipitation over an extended multiple-year period (e.g., three to four or more years), resulting in prolonged shortages in water supply (County of Santa Barbara 2025b).

Table 3.16-4. Projected Future Normal Year Conditions for Municipal Water Suppliers and Demands Serving Unincorporated Areas of Santa Barbara County

Water Supply Agency[1]	Supply and Demand	2025 Projected	2030 Projected	2035 Projected	2040 Projected	Percent Increase (2025-2040)
CVWD	Supply	4,586	5,586	5,586	5,586	21.8%
	Demand	4,111	4,170	4,381	4,452	8.3%
	Difference	*475*	*1,416*	*1,205*	*1,134*	*138.7%*
City of Santa Barbara	Supply	20,760	22,580	22,530	22,480	8.3%
	Demand	13,890	14,600	14,580	14,720	6.0%
	Difference	*6,870*	*7,980*	*7,950*	*7,760*	*13.0%*
Goleta Water District	Supply	16,240	16,244	16,244	16,244	0.02%
	Demand	10,866	11,325	11,561	11,737	8.0%
	Difference	*5,374*	*4,919*	*4,683*	*4,507*	*-16.2%*
Golden State Water District – Orcutt	Supply	6,105	6,266	6,432	6,603	8.2%
	Demand	6,105	6,266	6,432	6,603	8.2%
	Difference	*0*	*0*	*0*	*0*	*0.0%*
Montecito Water District	Supply	8,147	8,630	8,613	8,595	5.5%
	Demand	4,635	4,764	4,869	4,999	7.9%
	Difference	*3,512*	*3,866*	*3,744*	*3,596*	*2.4%*
Total	**Supply**	**102,765**	**106,078**	**106,024**	**105,972**	**3.12%**
	Demand	**60,990**	**64,783**	**66,153**	**67,513**	**10.7%**
	Difference	***41,775***	***41,295***	***39,871***	***38,459***	***-7.9%***

Notes:
All values are reported in AFY.
[1] Smaller water districts that provide less than 3,000 AFY and serve fewer than 3,000 connections are not required to prepare a UWMP as part of Water Conservation Bill SBX7-7 (2009) and are subsequently not required to report and plan for future water supplies or demand.
Sources: CVWD and Woodard and Curran 2021; Goleta Water District and Woodard and Curran 2021; City of Lompoc and WSC 2021; City of Santa Barbara Water Resources Division and WSC 2021; Provost and Pritchard Consulting Group 2021; Golden State Water Company, Tully and Young, and Zanjero 2021; Montecito Water District and Tully and Young 2021.

Longer-term droughts and multiple dry years can impact surface water reservoir storage levels in major reservoirs, such as Lake Cachuma, which provides about 85 percent of the water for over 200,000 residents of the South Coast of Santa Barbara County (Goleta Water District 2021). Longer-term droughts can also impact water levels in major groundwater basins that are key to both urban and agricultural water supply. Drought impacts increase with the length of a drought, as carry-over supplies in reservoirs are depleted and water levels in groundwater basins decline (County of Santa Barbara 2025b).

Water supply sources vary considerably across the county, with some water providers relying more heavily on reservoirs to supply water to their customers, and others more on groundwater or the SWP. Water sources also vary year to year, depending on rainfall levels, SWP supply, and conditions in each purveyor's district. Individual water purveyors use their own metrics to determine whether they are in a water shortage and thus whether watering restrictions are necessary. Water shortage categories are defined in each purveyor's Water Shortage Contingency Plan and are based on how well the purveyor's water supplies are projected to

meet demand, rather than on dry climatological conditions. Depending on the water supply status, each purveyor may instate local rules for water use and conservation. Examples include limitations on irrigation, washing, and runoff, leak detection and repair, automatic shutoffs, and incentives for water-efficient fixtures and recycled water use. These requirements are commonly scalable in response to the severity of multi-year drought conditions, such as the drought that impacted California from 2012-2017, and triggered in response to local and statewide drought declarations (County of Santa Barbara 2025b).

3.16.2.2 Wastewater

Wastewater Treatment Facilities and Capacity



Wastewater generated in the unincorporated areas of the county is treated at one of 14 WWTPs, including the Goleta Sanitary District, which processes approximately 8 million gallons per day. Source: Goleta Sanitary District.

Per the California Water Code and the State Water Resources Control Board (SWRCB), the Central Coast Regional Water Quality Control Board (RWQCB) regulates discharge permits for municipalities and special districts that operate wastewater treatment plants (WWTPs), consistent with the National Pollutant Discharge Elimination System (NPDES) program. NPDES regulates point sources that discharge pollutants into waters of the U.S. Currently, 16 wastewater service providers/districts manage wastewater services within unincorporated urban communities in Santa Barbara County, including service to at least a portion of unincorporated county lands or treatment of wastewater collected and conveyed by neighboring districts (Table 3.16-5). These include Cuyama CSD, Laguna County Sanitation District, Los Alamos CSD, Mission Hills CSD, Montecito CSD, and Summerland Sanitary District, as well as sanitation departments of some incorporated cities.

Table 3.16-5. Existing Wastewater Service Providers Serving Unincorporated Areas of Santa Barbara County

Wastewater Service Provider	Unincorporated County Area Served	Region Served
Cuyama CSD	Unincorporated community of New Cuyama	Cuyama Valley
City of Lompoc	VSFB, Vandenberg Village CSD	Lompoc Valley
Mission Hills CSD	Unincorporated community of Mission Hills	Lompoc Valley
Vandenberg Village CSD[1]	Unincorporated community of Vandenberg Village (effluent treated by the City of Lompoc)	Lompoc Valley
City of Santa Maria[2]	A small portion of the unincorporated community of Orcutt	Santa Maria Valley
Laguna County Sanitation District[2]	Unincorporated community of Orcutt and a small area of the southern part of the City of Santa Maria	Santa Maria Valley
Los Alamos CSD	Unincorporated community of Los Alamos	Santa Ynez Valley
Los Olivos CSD[3]	Unincorporated community of Los Olivos	Santa Ynez Valley
Santa Ynez CSD[1]	Portions of Santa Ynez (collection and conveyance to Solvang WWTP); also manages, operates, and maintains the Chumash WWTP	Santa Ynez Valley
Carpinteria Sanitary District	Unincorporated areas in the Carpinteria Valley	South Coast
City of Santa Barbara	Unincorporated areas adjacent to City boundaries and County-owned properties within City boundaries	South Coast
County Service Area (CSA) 121	Mission Canyon area	South Coast
Goleta Sanitary District	Eastern Goleta Valley and District boundaries: unincorporated urban areas of Goleta Valley immediately west of and adjacent to the City of Santa Barbara Larger Service Area: the Goleta West Sanitary District, University of California at Santa Barbara, Santa Barbara Municipal Airport, and certain Santa Barbara County facilities	South Coast
Goleta West Sanitary District[1]	Western portion of Goleta Valley, Isla Vista, and Embarcadero Municipal Improvement District	South Coast
Montecito CSD	Unincorporated community of Montecito	South Coast
Summerland Sanitary District	Unincorporated community of Summerland	South Coast

Notes:

[1] Provides only wastewater collection services.

[2] The Laguna County Sanitation District and the City of Santa Maria have a long-standing agreement, renewed in 2017, to provide treatment services to small areas of each other's territories. The service territories are adjacent to each other and because of pipe sizing and proximity to treatment facilities, this arrangement is cost-effective for both parties. This agreement does not include expanding service to new developments.

[3] The Los Olivos CSD was formed in 2018 and is in the process of studying and developing a community-wide wastewater treatment system for sewage, wastewater, recycled water, and stormwater. Currently, no municipal wastewater treatment services are provided in this community and all wastewater is managed by onsite wastewater treatment systems (OWTS). In 2025, the Los Olivos CSD was granted a 2-year extension from the Local Agency Formation Commission to conduct its Proposition 218 assessment toward creating a community wastewater collection and treatment solution.

Source: County of Santa Barbara 2019.

In addition to the wastewater collection and conveyance systems, there are 14 WWTPs throughout the county that collect and treat municipal wastewater. These WWTPs are operated by wastewater management agencies and sanitation districts (Table 3.16-6). Of the treatment plants that serve the unincorporated areas of the county, each is operating well within its permitted capacity, and the system currently operates at an average of 56.7 percent of the permitted treatment capacity (in million gallons per day [MGD]) of all facilities.

Table 3.16-6. Wastewater Treatment/Reclamation Facilities Servicing Unincorporated Areas of Santa Barbara County

Treatment/ Reclamation Facility	Serviced Sanitation Districts	Permitted Capacity (MGD)	Average Daily Throughput (MGD)	Remaining Capacity (MGD)
Carpinteria Sanitary District WWTP	Carpinteria Sanitary District	2.5	1.1	1.4
Cuyama CSD WWTP	Cuyama CSD	0.15	0.03	0.12
City of Santa Barbara WWTP	City of Santa Barbara CSA 12	11.0	6.0	5.0
Goleta Sanitary District WWTP	Goleta Sanitary District Goleta West Sanitation District	7.64	5.18	2.46
Laguna County Sanitary District WWTP[1]	Laguna County Sanitation District	2.7	1.7	1.0
Lompoc Regional Wastewater Reclamation Plant	City of Lompoc Vandenberg Village CSD	0.89	0.45	0.44
Los Alamos WWTP	Los Alamos CSD	0.20	0.125	0.075
Mission Hills CSD (La Purisima WWTP)	Mission Hills CSD	0.40	0.20	0.20
Montecito Sanitary District WWTP	Montecito CSD	1.5	0.64	0.86
Solvang WWTP	Santa Ynez CSD City of Solvang	0.3	0.14	0.16
Summerland Sanitary District WWTP	Summerland Sanitary District	0.3	0.072	0.228
Total	**--**	**27.58**	**15.64**	**11.94**

Notes:

[1] Laguna County Sanitary District's only method of discharge is through recycled water distribution for agricultural, landscaping, and industrial purposes. The treatment capacity is 3.7 MGD, but the discharge capacity is currently only 2.7 MGD. Therefore, the actual permitted treatment capacity for the WWTP is 2.7 MGD. To increase overall capacity, additional discharge connections are needed.

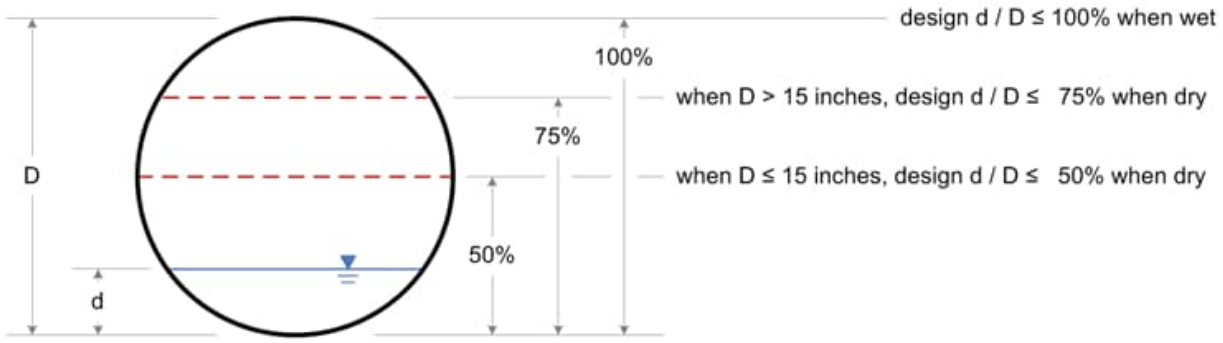
Sources: Carpinteria Sanitary District 2022; City of Santa Maria Utilities Department, n.d.; Provost and Pritchard Consulting Group 2021; City of Santa Barbara Water Resources Division and WSC 2021; Goleta West Sanitary District 2019; City of Guadalupe 2022; City of Lompoc and WSC 2021; Los Alamos Community Services District 2022; Montecito Water District and Tully and Young 2021.

Wastewater Conveyance

Wastewater collection systems in the county comprise underground pipelines that collect wastewater from homes and businesses and transport it typically via gravity flow to the WWTP servicing the community. Each existing home and business, apart from those served by onsite wastewater treatment systems (OWTS), has a connecting sewer pipe called a lateral. Lateral sewers connect with larger sewers called trunk or main sewers. Pipes within the collection system range in size from 4 inches to 36 inches or more in diameter and can be buried to depths of approximately 25 feet. Where gravity is insufficient to convey wastewater effectively or where conveyance must traverse slopes, pumps or lifts are used to move wastewater through the system.

Sewers in the county are often designed to flow under gravity flow conditions with some reserve capacity. Flow depth is a key performance indicator. The flow depth-to-diameter ratio is a metric for sewer design and is defined as follows: Flow Depth-to-Diameter Ratio = d/D, where d = flow depth (inches) and D = sewer diameter (inches) (Figure 3.16-1).

Figure 3.16-1. d/D Ratio as Related to Sewer Design and Sizing



Source: ADS Environmental Services 2016.

This ratio indicates the capacity of a sewer line to convey wastewater adequately and avoid problems (i.e., backups or overflows) during dry and wet weather. For example, the American Society of Civil Engineers (ASCE) and the Water Environment Federation (WEF) recommend that sewers with diameters up to 15 inches be designed to flow with dry weather d/D ratios no more than 50 percent (i.e., 0.5 d/D), and larger diameter sewers be designed to flow with dry weather d/D ratios no more than 75 percent (i.e., 0.75 d/D). Sewers are not generally designed to operate under surcharge conditions (i.e., maximum capacity). Therefore, it is recommended that wet weather d/D ratios should not exceed 100 percent (ADS Environmental Services 2016).

Wastewater Treatment

Wastewater treatment facilities in the county are permitted under NPDES; therefore, the purification techniques and technologies used by WWTPs are designed to achieve mandated levels of cleanliness before release to the natural environment. In the county, WWTP outfalls

are typically water bodies, including the Pacific Ocean and other waterways, such as the Goleta Slough in the South Coast and the Santa Ynez River in North County. Exceptions include Laguna County Sanitation District and Los Alamos CSD, which dispose of effluent through irrigation. While each WWTP is designed and operated differently, the stages of treatment typically include the following:

- **Preliminary Treatment** removes larger inorganic objects, including plastics, wood, and metal, and allows small heavy materials such as coffee grounds, eggshells, and rocks to drop out and be removed and transported to a landfill.
- **Primary Treatment** uses gravity to remove a majority of organic solids from the wastewater, where solid "sludge" that settles to the bottom or "scum" that floats to the top is collected and removed from the water.
- **Secondary and Tertiary Treatment** uses filters to remove organic material using microorganisms to break down and filter out contaminants. This secondary and/or tertiary treated water also is disinfected (typically with chlorine) before disposal.

Onsite Wastewater Treatment Systems

In unincorporated rural lands that are not served by municipalities or special districts, wastewater is typically treated through private OWTSs (e.g., septic leach fields, and dry wells). Based on a survey undertaken by the County in 2000, there are an estimated 8,749 properties in unincorporated areas served by septic systems (Questa Engineering Corporation 2003). These systems are designed and managed under a variety of regulatory requirements. In June 2012, the SWRCB adopted the Water Quality Control Policy for Siting, Design, Operation and Maintenance of OWTSs. The Policy went into effect in May 2013 and established a statewide, risk-based tiered approach for the regulation and management of OWTSs. In compliance with these regulations, the County developed the 2014 Local Agency Management Program (LAMP), which sets standards and regulatory requirements for wastewater management.

3.16.2.3 Solid Waste

The RRWMD is responsible for the operation and administration of solid waste diversion and disposal in the unincorporated areas of the county. Solid waste generally refers to garbage, refuse, sludge, and other discarded solid materials that come from residential, industrial, and commercial activities. Construction, demolition, and inert wastes are also classified as solid waste. The general waste classifications used for California waste management units, facilities, and disposal sites are Nonhazardous Wastes, Hazardous Wastes, Liquid Wastes, Asbestos Containing Waste, Designated Wastes, and Special Wastes (California Department of Resource Recycling and Recovery [CalRecycle] 2025b). Residential and commercial waste collection services are provided to the unincorporated county areas by Waste Management (North County) and MarBorg Industries (South Coast).

The Tajiguas Landfill is the only active landfill that the County owns and operates. The Tajiguas Landfill is a Class III non-hazardous solid waste disposal facility located approximately 13 miles west of the City of Goleta. Solid waste is hauled to the landfill by authorized franchise waste haulers and private companies directly contracted with the County. The landfill receives solid waste from the South Coast, Santa Ynez Valley, and Cuyama Valley regions (RRWMD 2023). It has a maximum permitted capacity of 29.4 million cubic yards (cy) and a permitted maximum throughput of 9,000 tons per day (tpd). As of 2025, this landfill had an estimated remaining capacity of 7,345,787 cy (25.0 percent), and the estimated landfill closure year identified in the landfill's solid waste facility permit is 2038 (Table 3.16-7) (CalRecycle 2025a).

The Santa Maria Regional Landfill is owned and operated by the City of Santa Maria and is a Class III non-hazardous solid waste disposal facility located approximately 2.8 miles east of the City of Santa Maria. It has a maximum permitted capacity of 15.3 million cy and a permitted maximum throughput of 8,820 tpd. As of 2025, the landfill had an estimated remaining capacity of 2,845,000 cy (18.6 percent), and the estimated landfill closure year identified in the landfill's solid waste facility permit is 2034 (Table 3.16-7) (CalRecycle 2025a). Solid waste is hauled to the landfill by authorized franchise waste haulers and private companies directly contracted with the City of Santa Maria. The landfill is open to the public. The landfill receives solid waste collected from urban and rural communities in the Santa Maria Valley region (RRWMD 2023).

To help address the capacity issues of the Santa Maria Regional Landfill, in 2010 the City of Santa Maria approved the construction of the new Los Flores Integrated Waste Management Facility, a new 255-acre Class III non-hazardous solid waste facility to be located on a 1,774-acre site approximately 2.8 miles southeast of the community of Orcutt and 7 miles south of the Santa Maria Regional Landfill. The new Los Flores Integrated Waste Management Facility is to be designed with a 90-year capacity. However, The construction of the IWMF has been delayed as the City reconciles its design to avoid construction of waste management units over any closed oil wells within the permitted disposal footprint, as well as to reduce overall environmental impact of the project and perform subsequent California Environmental Quality Act (CEQA) requirements (Santa Barbara County Public Health Department 2025).

The Lompoc Sanitary Landfill is owned and operated by the City of Lompoc and is a Class III non-hazardous solid waste disposal facility located southwest of the City of Lompoc. It has a maximum permitted capacity of 7.97 million cy and a permitted maximum throughput of 400 tpd. The landfill's estimated remaining capacity is 1,139,600 cy (14.3 percent) and a closure year of 2045 (Table 3.16-7) (CalRecycle 2025a). Solid waste is hauled to the landfill by authorized franchise waste haulers and private companies directly contracted with the City of Lompoc. The landfill is open to the public. The landfill receives solid waste collected from urban and rural communities in the Lompoc Valley region (RRWMD 2023).

Within the other unincorporated regions of the county, municipal waste is hauled to the South Coast Recycling & Transfer Station (SCRTS), Santa Ynez Valley Recycling & Transfer Station (SYVRTS), New Cuyama Transfer Station (NCTS), or Ventucopa Transfer Station (VTS), which are owned by the County and managed by the RRWMD for processing, sorting, and diversion before being disposed at regional landfills (Table 3.16-7).

The County also manages a household hazardous waste collection program (ABOP Program) operated out of the SYVRTS and jointly manages the Community Hazardous Waste Collection Center with the University of California, Santa Barbara (UCSB) (RRWMD 2023).

Table 3.16-7. Solid Waste Facilities Serving Santa Barbara County

Waste Facility	Permitted Capacity	Permitted Throughput	Remaining Capacity (% of capacity)	Remaining Life (years)	2022-23 Average Daily Processing/ Disposal (tpd)
South Coast Recycling & Transfer Station (SCRTS)	595 tpd	550 tpd	295.4 tpd (53.71%)	--	254.6
Santa Ynez Valley Recycling & Transfer Station (SYVRTS)	320 tpd	212 tpd	125.7 tpd (59.3%)	--	86.3
New Cuyama Transfer Station (NCTS)	302 cy	8 tpd	4.6 tpd (57.5%)	--	3.4
Ventucopa Transfer Station (VTS)	89 cy	5 tpd		--	
Tajiguas Landfill	29,400,000 cy	9,000 tpd	7,345,787 cy (25.0%)	13 (closure in 2038)	529.7
Lompoc Landfill	7,970,000 cy	400 tpd	1,139,600 cy (14.3%)	20 (closure in 2045)	115
Santa Maria Regional Landfill	15,278,400 cy	8,820 tpd	2,845,000 cy (18.6%)	9 (closure in 2034)	418
Los Flores Integrated Regional Waste Management Facility (Planned)	130,850,000 cy	1,600 tpd	130,850,000 cy (100.0%)	--	N/A

Notes:
Sources: CalRecycle 2025a; Santa Barbara County RRWMD 2023;

Waste Reduction Programs

The RRWMD also runs several waste reduction programs throughout the county, ranging from residential and special recycling programs (e.g., Electronics Recycling Program, Christmas Tree Recycling Program) to Household Hazardous Waste Disposal and various composting and green waste programs (RRWMD 2023). These programs have had significant success in diverting various types of waste from landfills; the County's overall diversion rate is

approximately 69 percent. Examples of this success include the Tajiguas Landfill and the Resource Center, which received 39,383 tons of green waste and 11,257 tons of recyclables, respectively, from 2021-2022 (RRWMD 2023). Diversion from landfills is accomplished by a variety of different entities; Waste Management and MarBorg Industries maintain programs that streamline the collection of sharps, household batteries, and bulky items. In addition to the efforts of these private haulers, other diversion activities include landscapers diverting green waste, private facilities processing construction and demolition material, and several programs, including those operated by the County, which recover electronics, appliances, and hazardous waste.

In addition to these programs and diversion efforts, the County complies with California's Green Building Code (CalGreen), which requires a minimum of 65 percent of all construction waste to be recycled. To comply with these requirements, all development projects in the county must include a Solid Waste Management Plan (SWMP). In addition, companies that haul construction waste material are required to have a permit to operate in the county's unincorporated areas and as a condition of this permit, must recycle the majority of any material that they collect (including construction waste) when feasible (RRWMD 2023).

3.16.3 REGULATORY SETTING

3.16.3.1 Federal

Federal Water Pollution Control Act of 1948 / Clean Water Act

The Federal Water Pollution Control Act, which was expanded in 1972 and is now commonly known as the Clean Water Act (CWA), is a comprehensive statute aimed at restoring and maintaining the chemical, physical, and biological integrity of the nation's waters, including discharge waters of wastewater treatment processes. The CWA, in combination with other federal environmental laws, regulates the location, type, planning, and funding of wastewater treatment facilities.

National Pollutant Discharge Elimination System

As authorized by the CWA, NPDES regulates point sources that discharge pollutants into waters of the U.S. Point sources are discrete conveyances such as pipes or man-made ditches. Individual homes that are connected to a municipal system, use a septic system, or do not have a surface discharge do not need an NPDES permit; however, industrial, municipal, and other facilities must obtain permits if their discharges go directly to surface waters. The NPDES permit system is authorized and implemented by states and local water boards.

Surface Water Treatment Rules

The purpose of the SWTRs is to reduce illnesses caused by pathogens in drinking water. The disease-causing pathogens include *Legionella*, *Giardia lamblia, and Cryptosporidium*. The SWTRs require water systems to filter and disinfect surface water sources. Some water systems are allowed to use disinfection only for surface water sources that meet criteria for water quality and watershed protection.

The SWTRs apply to all public water systems using surface water sources or groundwater sources under the direct influence of surface water, require most water systems to filter and disinfect water, establish maximum contaminant level goals for a range of contaminants, and include treatment technique requirements for filtered and unfiltered systems to protect against adverse health effects of exposure to pathogens.

Drinking Water Rules and the Safe Drinking Water Act

The U.S. Environmental Protection Agency (USEPA) sets legal limits on over 90 contaminants in drinking water. The legal limit for a contaminant reflects the level that protects human health and that water systems can achieve using the best available technology. USEPA rules also set water-testing schedules and methods that water systems must follow. The Safe Drinking Water Act (SDWA) allows individual states to set and enforce their own drinking water standards if the standards are at a minimum as stringent as the USEPA's national standards.

3.16.3.2 State

State Water Resources Control Board Order No. 2006-0003

The SWRCB General Waste Discharge Requirement for Sanitary Sewer Systems (SWRCB Order No. 2006-0003) requires wastewater agencies to evaluate and rehabilitate sewer systems, with a target of zero sewer overflows.

California Fire Code

The 2019 CFC is one of 12 parts of an official compilation referred to as the California Building Standards Code. The purpose of the CFC is to establish the minimum requirements consistent with nationally recognized good practices to safeguard the public health, safety, and general welfare from the hazards of fire, explosion, or dangerous conditions in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. The CFC includes standards for water supply and pressure to adequately support firefighting capabilities, including appendix standards for automatic fire sprinkler systems that reduce water demands to a building for firefighting by up to 75 percent with a minimum required fire flow of 1,500 gallons per minute (GPM). The latest CFC is based on the 2018 International Fire Code and was published by the California Building Standards Commission in 2019.

California Plumbing Code

The California Plumbing Code is Part 5 of 13 parts of the official compilation and publication of the adoption, amendment, and repeal of plumbing regulations to the California Code of Regulations, Title 24, also referred to as the California Building Standards Code. This code incorporates by adoption of the 2021 Uniform Plumbing Code of the International Association of Plumbing and Mechanical Officials with necessary California amendments. The purpose of the code is to establish the minimum requirements to safeguard public health, safety, and general welfare through structural strength, means of egress facilities, stability, access to persons with disabilities, sanitation, adequate lighting and ventilation, and energy conservation; safety to life and property from fire and other hazards attributed to the built environment; and to provide safety to firefighters and emergency responders during emergency operations.

California Water Plan Update 2018

The California Water Plan (California Water Code Section 10005[a]) provides a collaborative framework for water managers, legislators, and the public to consider options and make decisions regarding the state's water future. The plan is updated every five years and outlines actions that bring reliability, restoration, and resilience to California's water resources. The plan reinforces the value of integrated water management and examines policies that allow water managers to combine flood management, environmental stewardship, and surface water and groundwater supply. The California Water Plan Update 2018 was released for public review on December 21, 2018, and the final plan was released in June 2019. As of August 2023, DWR is in the process of preparing the California Water Plan Update 2023 and anticipates the release of the final plan in late 2023.

Sustainable Groundwater Management Act of 2014

California enacted landmark legislation in 2014 known as the Sustainable Groundwater Management Act (SGMA), which is composed of Assembly Bill (AB) 1739, Senate Bill (SB) 1168, and SB 1319. The legislation provides a framework for sustainable management of groundwater supplies by local authorities, with a limited role for state intervention only if necessary to protect the resource. SGMA requires governments and water agencies of high- and medium-priority basins to halt overdrafts and bring groundwater basins into balanced levels of pumping and recharge. Basins must reach sustainability within 20 years of implementing the sustainability plans. SGMA requires the formation of local groundwater sustainability agencies that must assess conditions in their local water basins and adopt locally based management plans. Additional information regarding SGMA, the status of local groundwater basins, and locally adopted Groundwater Sustainability Plans is provided in Section 3.10, *Hydrology and Water Quality*.

California Urban Water Management Planning Act (UWMPA)

The UWMPA (California Water Code Division 6, Part 2.6, Sections 10610 et seq.) was developed to address concerns over potential water supply shortages throughout California. The UWMPA requires the collection and reporting of information on water supply reliability and water use efficiency measures. As part of the UWMPA, municipal water suppliers that serve over 3,000 customers or provide more than 3,000 AFY are required to develop and implement UWMPs to describe water supply, service area demand, population trends, and efforts to promote efficient use and management of water resources. A UWMP is intended to serve as a water supply and demand planning document that is updated every five years to reflect changes in the water supplier's service area, including water supply trends as well as conservation and water use efficiency policies.

Senate Bill 610 and SB 221

SB 610 and SB 221 became effective January 1, 2002. SB 610, codified in California Water Code Division 6, Part 2.6, Sections 10910 et seq., describes requirements for water supply assessments (WSAs) and UWMPs applicable to the CEQA process. SB 610 requires that water suppliers must prepare a WSA for projects that are subject to CEQA and exceed a specified minimum size to determine whether the projected water demand associated with the project is included as part of the most recently adopted UWMP. The size requirement is specified according to development type but generally includes developments with water consumption that would be equivalent to or greater than the amount of water required by a 500-dwelling unit project. SB 610 requirements may be satisfied by a water supply analysis provided in an EIR.

Water Conservation Act (2009)

The Water Conservation Act mandates new water conservation goals for UWMPs, requiring urban water suppliers to achieve a 20 percent per capita water consumption reduction statewide by 2020, as described in the 20 x 2020 State Water Conservation Plan. UWMP updates must incorporate a description of how the water supplier will achieve this reduction, in addition to SB 610 requirements.

Urban water retailers can achieve the Act's water reduction goals using one of four specified methods:

- Option 1: 80 percent of baseline use (reduction of 20 percent)
- Option 2: Sum of specified performance standards
- Option 3: 95 percent of the DWR Hydrologic Region target from the draft 20 x 2020 State Water Conservation Plan
- Option 4: A flexible alternative designed to adjust to local circumstances

Urban retail water suppliers must monitor and report compliance on an individual or regional basis. Individual urban retail water suppliers are not required to achieve a reduction in urban per capita water use greater than 20 percent. Compliance with the water reduction target is required for continued state water grants and loan eligibility. After 2021, the failure of urban retail water suppliers to meet their targets establishes a violation of law for administrative or judicial proceedings.

State Assembly Bill 939, California Integrated Waste Management Act of 1989

The California Integrated Waste Management Act of 1989 (AB 939; Public Resources Code Section 40000 et seq.) established an integrated waste management hierarchy to guide the California Integrated Waste Management Board (Board) and local agencies in implementation, in order of priority: 1) source reduction; 2) recycling and composting; and 3) environmentally-safe transformation and land disposal. The Act required each county to establish a task force to coordinate the development of city source reduction and recycling elements and a countywide siting element. The Act also required each county to prepare, adopt, and submit to the Board an Integrated Waste Management Plan.

Additionally, waste diversion mandates were set in AB 939. The law required each city or county plan to include an implementation schedule that shows the diversion of 25 percent of all solid waste from landfill or transformation facilities by January 1, 1995, through source reduction, recycling, and composting activities; and the diversion of 50 percent of all solid waste by January 1, 2000, through source reduction, recycling, and composting activities. A city or county may be deemed exempt from these goals or reduce the requirements if the city or county demonstrates that attainment of the goals is not feasible due to the small geographic size of the area and the small quantity of waste generated. After January 1, 1995, the Act authorized the Board to establish an alternative goal to the 50 percent requirement, if the Board finds that the local agency is effectively implementing all source reduction, recycling, and composting measures to the maximum extent feasible.

Senate Bill 1016

SB 1016 builds on AB 939 compliance requirements by implementing a simplified measure of jurisdictions' performance. SB 1016 accomplishes this by changing the measurement of waste reduction from a diversion rate to a disposal-based indicator – the per capita disposal rate. The purpose of the per capita disposal measurement system is to make the process of goal measurement as established by AB 939 simpler, timelier, and more accurate. Beginning with the reporting year 2007 jurisdiction annual reports, diversion rates will no longer be measured. With the passage of SB 1016, only per capita disposal rates are measured. For 2007 and subsequent years, CalRecycle compares reported disposal tons to population to calculate per capita disposal expressed in pounds/person/day.

Short-Lived Climate Pollutants Bill of 2016 (Senate Bill 1383)

SB 1383 requires the California Air Resources Board (CARB) to approve and begin implementing a comprehensive strategy no later than January 1, 2018, to reduce emissions of short-lived climate pollutants to achieve a reduction in methane by 40 percent, hydrofluorocarbon gases by 40 percent, and anthropogenic black carbon by 50 percent below 2013 levels by 2030. It also establishes targets to achieve a 50 percent reduction in the level of the statewide disposal of organic waste from the 2014 level by 2020 and a 75 percent reduction by 2025. The law grants CalRecycle the regulatory authority required to achieve the organic waste disposal reduction targets and establishes an additional target that not less than 20 percent of currently disposed edible food is recovered for human consumption by 2025. CalRecycle, in consultation with CARB, is responsible for the implementation of regulations to achieve these targets. SB 1383 authorizes local jurisdictions to charge and collect fees to recover the local jurisdiction's costs incurred in complying with the regulations. It also requires CalRecycle, in consultation with CARB, to analyze the progress that the waste sector, state government, and local governments have made in achieving the specified targets for reducing organic waste in landfills no later than July 1, 2020. Depending on the outcome of that analysis, CalRecycle is authorized to amend the regulations to include incentives or additional requirements.

State Assembly Bill (AB) 341

AB 341 established a state policy goal that no less than 75 percent of solid waste generated be source-reduced, recycled, or composted by 2020. Additionally, this law required CalRecycle to provide a report to the California Legislature that recommends strategies to achieve the policy goal by January 1, 2014. AB 341 builds on the existing AB 939 requirement that every jurisdiction divert at least 50 percent of its waste. The bill also mandates local jurisdictions to implement commercial recycling by July 1, 2012. AB 341 requires any business (including schools and government facilities) that generates four cubic yards or more of waste per week, and multifamily buildings with five or more units, to arrange for recycling services. Additionally, the bill requires education and outreach programs to be implemented to inform generators covered by the bill of their obligation to meet the terms of the regulation. To measure efforts made to comply with this policy, CalRecycle requires an annual report that details the commercial recycling program, including education, outreach, and monitoring.

California Green Building Standards Code

The California Green Building Standards Code – Part 11, Title 24, California Code of Regulations—known as CalGreen, is the first-in-the-nation mandatory green building standards code. In 2007, the California Building Standards Commission developed green building standards to meet the goals of California's landmark initiative AB 32, which established a comprehensive program of cost-effective reductions of greenhouse gases to 1990 levels by 2020. CBSC has the authority to propose CALGreen standards for residential and

nonresidential structures that include new buildings or portions of new buildings, additions, alterations, and all occupancies where no other state agency has the authority to adopt green building standards applicable to those occupancies. Section 4.408.1, *Construction Waste Management*, requires that a minimum of 65 percent of the nonhazardous construction and demolition waste be recycled and/or salvaged, in accordance with either Section 4.408.2 (Construction Waste Management Plan), 4.408.3 (Waste Management Company), or 4.408.4 (Waste Stream Reduction Alternative), or meet a more stringent local construction and demolition waste management ordinance.

Public Resources Code Division 30, Part 2, Chapter 4, Section 41701

The Division and Chapter of the Public Resources Code requires all jurisdictions in the state to plan and manage disposal capacity for waste that cannot be reduced, recycled, or composted.

Local Agency Management Programs

The California Water Quality Control Policy for Siting, Design, Operation, and Maintenance of On-Site Wastewater Treatment Systems went into effect in May 2013, requiring counties to adopt their own LAMP by 2016 or to default to the policy's restrictions. The Central Coast RWQCB approved Santa Barbara County's LAMP, developed by Environmental Health Services with local stakeholders, on November 20, 2015, and it became fully effective on January 1, 2016. The LAMP outlines a customized management program to regulate septic systems within the County's jurisdiction and requires the County to develop management plans for water bodies degraded by the use of OWTS. The goal of the LAMP is to protect surface water bodies and groundwater from negative impacts caused by the operation of OWTS.

3.16.3.3 Local

Santa Barbara County Comprehensive Plan

Land Use Element

The Land Use Element lays out the general patterns of development throughout the county, including the distribution of real estate, open space and agricultural land, mineral resources, recreational facilities, schools, utilities, and waste facilities. The following policies relate to the proposed Project:

- **Land Use Development Policy 4**: Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (i.e., water, sewer, roads, etc.) are available to serve the proposed development. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private services

or resources shall be grounds for denial of the project or reduction in the density otherwise indicated in the land use plan.

- **Land Use Development Policy 5**: Within designated urban areas, new development other than that for agricultural purposes shall be serviced by the appropriate public sewer and water district or an existing mutual water company if such service is available.

Conservation Element

The Conservation Element of the County's Comprehensive Plan includes a Water Resources Section, which provides direction for the conservation, development, and utilization of water resources in Santa Barbara County. As part of this effort, the County is directed to consider water resources during the permitting process. The Conservation Element provides the following recommendations:

- The County and the cities should support the Regional Water Quality Control Board in its establishment of discharge requirements for point source waste discharges, to protect surface and groundwater supplies.
- The use of streams from which groundwater recharge takes place should be regulated to ensure that the recharge capability of the channels is not impaired.
- Land use and development upstream from surface reservoirs should be regulated and monitored by the County Department of Public Works and the County Planning & Development Department (P&D) Department to minimize the production of water-polluting wastes.
- The County should initiate a study of land development in areas relying on septic tanks to assess the impact of alternate densities on water quality.
- Based on the adopted Water Quality Control Plan for the Central Coastal Region, the County and the cities should review their policies for the protection of local water resources to determine what changes may be necessary.

Energy Element

The Energy Element of the County's Comprehensive Plan contains long-range planning guidelines and strategies to encourage energy efficiency and alternative energy sources in Santa Barbara County. Of particular relevance to the Project is Goal 4, which aims to increase the efficiency of water and resource use to reduce energy consumption associated with various phases of using resources (pumping, distribution, treatment, heating, etc.). The following policies in support of Goal 4 relate to the Project.

- **Policy 4.1: Construction.** Encourage recycling and reuse of construction waste to reduce energy consumption associated with extracting and manufacturing virgin materials.

- **Policy 4.2: Recycled Materials.** The County shall require adequate areas for collecting and loading recyclable materials in development projects, and shall further address recycling logistics in its zoning ordinance.
- **Policy 4.3: Reuse of Asphalt.** Promote reuse of asphalt removed from roads and paved structures within the county and use of recycled materials in roadway and paved surface construction.
- **Policy 4.4: Procurement of Recycled Products.** The County shall procure products made from recycled materials to the maximum extent feasible, and as budget constraints allow.
- **Policy 4.5: Waste Collection and Recycling Programs.** The County shall continue to support the programs associated with efficient waste collection and recycling, public school education, and composting.
- **Policy 4.6: Water/Energy-Efficient Irrigation – Agriculture.** The County shall continue to support the programs of the Soil Conservation Service, Resource Conservation District, U.C. Cooperative Extension/Farm Advisor, utility companies, and others that address efficient irrigation because of their associated energy benefits.
- **Policy 4.7: Interior Water-Efficient Plumbing Fixtures.** The County shall encourage water purveyors and water customers to continue their efforts to install more efficient options to increase energy benefits associated with reduced pumping, distribution, heating and treatment of water and wastewater.
- **Policy 4.8: Water Efficient Landscaping.** The County shall require (per Government Code, Section 65590, Article 10.8) water-efficient landscape design and irrigation systems in new and renovated developments and at public parks and facilities. [Energy-savings are accrued through reduced water pumping and treatment, and reduced disposal and maintenance.]

Coastal Land Use Plan

The Santa Barbara County Comprehensive Plan, Coastal Land Use Plan (CLUP) establishes goals, policies, and objectives adopted by the County to ensure the adequate protection and provision of public facilities and resources. The goals and policies applicable to this Project are listed below:

- **Policy 2-6:** Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (e.g., water, sewer, roads) are available to serve the proposed development.

Community Plans

Community-specific goals and policies for utilities and water supply resources are provided in several adopted community plans as part of the Comprehensive Plan. Any future housing and

associated development within the following community plan areas would be subject to the public utilities, infrastructure, and water supply and conservation goals and policies of that plan.

- Eastern Goleta Valley Community Plan
- Gaviota Coast Plan
- Goleta Community Plan
- Los Alamos Community Plan
- Mission Canyon Plan
- Montecito Community Plan
- Orcutt Community Plan
- Santa Ynez Community Plan
- Summerland Community Plan
- Toro Canyon Plan

Santa Barbara County Land Use Development Code (LUDC)

35.30.100 – Infrastructure, Services, Utilities and Related Facilities

A. Adequacy of infrastructure required. Issuance of a Land Use Permit (Section 35.82.110) or Zoning Clearance (Section 35.82.210) shall require that the review authority first find, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (e.g., water, sewer, roads) are available to serve a proposed development.

B. Applicant responsibilities. The applicant shall assume full responsibility for costs incurred in service extensions or improvements that are required as a result of the proposed project. Lack of available public or private services or resources shall be grounds for denial of a project or reduction in the density otherwise indicated in the Comprehensive Plan or zoning maps.

C. General requirement for water and sewer services. Within Urban areas designated on the Comprehensive Plan maps, new development other than that for agricultural purposes shall be served by the appropriate public sewer and water district or an existing mutual water company, if such service is available.

35.30.170 – Solid Waste and Recycling Storage Facilities

A. Purpose. This Section provides standards which recognize County support for and compliance with the California Solid Waste Reuse and Recycling Access Act (Public Resources Code Section 42900 through 42911).

B. Applicability. These requirements apply to the following projects:

2. Residential building. Any new residential building having five or more dwelling units or any changes to such an existing residential building which requires a building permit.

3. Residential development. Any new residential project where solid waste is collected and loaded in a location serving five or more dwelling units, or any changes to an existing residential project which requires a building permit.

4. One-family subdivision. Any subdivision of one-family detached dwellings if, within such subdivisions there is an area where solid waste is collected and loaded in a location which serves five or more dwelling units. In such instances, recycling areas as specified in this Section are only required to serve the needs of the dwelling units which utilize the solid waste collection and loading area.

C. Standards for storage areas. All projects identified in Subsection B (Applicability) above shall be required to provide solid waste areas specifically identified for the storage of both trash and recycling containers in compliance with the following.

1. Functional use. Solid waste enclosures shall be properly located, exterior of living space, for functional use by occupants and by the disposal and hauling companies providing collection services.

2. Size and location. The exact size and location of the solid waste and recycling facilities storage areas shall be determined by the review authority on a case-by-case basis taking into account types and quantities of recyclable materials to be generated by the proposed land use and by the mode of collection.

3. Screening requirements. Solid waste enclosures shall be constructed to be as inconspicuous as possible and, in accordance with Santa Barbara County Code Chapter 17, the contents of enclosures shall be screened from public view.

D. Solid Waste Management Plan. A Solid Waste Management Plan shall be developed by the permittee as directed by the County Solid Waste Management Plan Guidelines and may require review and approval by the County Public Works Department prior to the issuance of building permits by the Department.

Article II Coastal Zoning Ordinance

Pursuant to PRC Section 30500 of the California Coastal Act of 1976, the County has prepared a Local Coastal Program (LCP) for the unincorporated area of the county within the Coastal Zone. The County's LCP includes the Land Use Plan, zoning district maps applying to the Coastal Zone, and a zoning ordinance (which is the Article II CZO itself). The purposes of the Article II CZO are to protect, maintain, and, where feasible, enhance and restore the overall quality of the Coastal Zone; assure orderly and balanced utilization of Coastal Zone resources; maximize public access to and along the coast, as well as public recreational opportunities; assure priority for coastal-dependent and coastal-related development over other development on the coast;

and protect the character and stability (social and economic) of agricultural, residential, commercial, and industrial areas.

Santa Barbara County Integrated Regional Water Management Plan

The County of Santa Barbara's IRWMP was developed in response to the State of California's Integrated Regional Water Management (IRWM) program, and it shares the state's visions of IRWM as a collaborative effort to manage all aspects of water resources in a region. The County's IRWMP intends to promote and practice integrated regional water management strategies to ensure sustainable water uses, reliable water supplies, better water quality, environmental stewardship, efficient urban development, and protection of agricultural and watershed awareness. Although the IRWMP is not a regulatory document, nor does it provide specific policies to which development must adhere to, it identifies various programs, objectives, priorities, and implementation strategies that are recommended to encourage water conservation and is updated to respond to the changing needs and conditions in the region.

Santa Barbara County Water Agency Programs

The SBCWA was established by the state legislature in 1945 to contract with the U.S. for the Cachuma and Santa Maria Project. The SBCWA is a dependent special district that manages several regional programs throughout Santa Barbara County. The SBCWA jurisdictional boundaries are the same as the County's political boundaries. The SBCWA manages the following programs: implementation and partial funding of operational programs such as the cloud seeding program; implementation and administration of the Regional Water Efficiency Program; and collection of countywide hydrologic data and development of hydrologic models. Included in these programs are technical reports and studies such as periodic reports on groundwater conditions, sediment management studies, reservoir capacity studies, technical support to other public agencies, and public information. Major water projects involving the SBCWA include the SWP (Coastal Branch Extension), the Cachuma Project, and the Twitchell Project. SBCWA administers the development of the IRWMP, supported by several local governments.

Santa Barbara County Fire Code, Chapter 15 – Fire Prevention / Fire Code

Chapter 15 of the County's Code of Ordinances (Ord. No. 5170, 12-6-2022) is titled *Fire Prevention* and serves as the County's Fire Code. This ordinance incorporates the CFC by reference and, as a result, implements the minimum requirements consistent with nationally recognized good practices to safeguard public health, safety, and general welfare from fire and other hazards in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations.

This chapter of the County's Code of Ordinances includes development standards developed by the Santa Barbara County Fire Department (SBCFD) to provide for and maintain adequate and unobstructed emergency access for fire department apparatus and personnel to buildings, structures, hazardous occupancies, or other premises. The standards apply to newly proposed private roads and driveways that are used to provide access to dwellings and structures for emergency access. They include requirements for minimum roadway width, turnarounds, fire access, vegetation clearing around roadways to be used for firefighting access purposes and building and construction standards. The standards also provide limitations for the maximum length of dead-end-roads allowable, defensible space requirements, and automatic sprinkler systems, among others. Multifamily development projects may have additional access requirements beyond what is included in this standard.

The County's Code of Ordinances also includes an impact mitigation fee for new development projects within the SBCFD service area. To mitigate impacts caused by new development projects within SBCFD's service area, a fire facility, apparatus, and equipment development impact mitigation fee may be necessary. The fee is needed to finance fire facilities, apparatus, and equipment necessary to serve new development and to assure new development projects pay their fair share for these facilities. These fees are outlined in the County's Development Impact Mitigation Fee Program and are required to be paid on or before the final building permit inspection.

Santa Barbara County Code, Chapter 17 – Solid Waste Systems

Chapter 17 of the County Code of Ordinances addresses solid waste systems. Section 17-23, *Construction and Demolition Waste*, states that the County specifically requires construction and demolition waste to be recycled to the minimum required by CalGreen Standards to assist the County in maintaining compliance with AB 939, the Integrated Waste Management Act, and to conform with adopted CalGreen Standards.

3.16.4 ENVIRONMENTAL IMPACT ANALYSIS

This section discusses the potential utility and water supply impacts associated with the proposed Project. Where there are potentially significant or significant and unavoidable impacts, mitigation measures are proposed and the residual impact after mitigation is determined.

3.16.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For purposes of this Program EIR, implementation of the proposed Project may have a significant adverse impact relating to utilities and water supply if it would:

a. Require or result in the relocation or construction of or expanded water, wastewater treatment or stormwater drainage, electrical power, natural gas, or telecommunications facilities, the construction of which could cause significant environmental effects;

b. Not have sufficient water supplies available to serve the project and reasonably foreseeable future development during normal, dry, and multiple dry years;

c. Result in a determination by the wastewater treatment provider which serves or may serve the project that it does not have adequate capacity to serve the project's projected demand in addition to the provider's existing commitments;

d. Generate solid waste in excess of state or local standards, or in excess of the capacity of local infrastructure, or otherwise impair the attainment of solid waste reduction goals; or

e. Not comply with federal, state, and local statutes and regulations related to solid waste.

Impacts relating to electrical power and natural gas services and facilities are discussed in Section 3.6, *Energy*. Water quality standards and requirements--including discharge regulations--as well as stormwater drainage and facilities are addressed in Section 3.10, *Hydrology and Water Quality*. The proposed Project does not involve any uses that would result in the relocation or construction of or expanded telecommunications facilities. Therefore, impacts associated with telecommunication facilities are not discussed.

County of Santa Barbara Environmental Thresholds and Guidelines Manual

Water

The County's *Environmental Thresholds and Guidelines Manual* (2024) does not identify applicable thresholds related to municipal water supplies and infrastructure; therefore, the Program EIR relies upon the County's Initial Study Checklist. Under the Water Resources/Flooding section of the County's Initial Study Checklist, the County considers a project's impact on municipal water supplies and infrastructure potentially significant if it would result in:

- Substantial reduction in the amount of water otherwise available for public water supplies.

Wastewater

The County's *Environmental Thresholds and Guidelines Manual* (2024) does not identify applicable local thresholds related to wastewater services and infrastructure; therefore, for this analysis, the Program EIR relies upon the County's Initial Study Checklist. Under the Public Facilities section of the County's Initial Study Checklist, the County considers a project's impact on wastewater treatment facilities potentially significant if it would result in:

- The relocation or construction of new or expanded wastewater treatment facilities (sewer lines, lift stations, etc.) the construction or relocation of which could cause significant environmental effects.

Solid Waste

The County's *Environmental Thresholds and Guidelines Manual* (2024) includes the following thresholds for determining the significance of impacts from solid waste:

1. Construction and demolition. Construction and demolition waste accounts for 31 percent of all waste generated by residents of Santa Barbara County. In order to comply with AB 939 requiring a minimum of 50 percent of all waste to be diverted from landfills, the particular source of waste has been targeted.

   Any construction, demolition, or remodeling project of a commercial, industrial, or residential development that is projected to create more than 350 tons of construction and demolition debris is considered to have a significant impact on public services.

   Although amounts of waste generated vary project-to-project, the County has the following estimates of projects that will reach the threshold of significance:

   a. Remodeling projects over 7,000 square feet for residential projects and 17,500 square feet for commercial/industrial projects.

   b. Demolition projects over 11,600 square feet for residential buildings and 7,000 square feet for commercial/industrial buildings.

   c. New construction projects over 47,000 square feet for residential buildings and 28,000 square feet for commercial/industrial buildings.

   These estimates are based on the USEPA's 1998 construction and demolition study (Document: EPA530-R-98-010; June 1998) and data gathered by the San Luis Obispo Integrated Waste Management Authority in 2005 and 2006.

2. Operations/Occupancy. A project is considered to result in a significant impact to landfill capacity if it would generate five percent or more of the expected annual increase in waste generation thereby using a significant portion of the remaining landfill capacity. The numerical value associated with the five percent increase is 196 tons per year (tpy). Source reduction, recycling and composting can reduce a project's waste stream

(generated during operations) by as much as 50 percent. If a proposed project generates 196 or more tpy after reduction and recycling efforts, impacts would be considered significant and unavoidable.

Methodology

As described in Chapter 2, *Project Description*, The Project includes the proposed Recreation Master Plan, a strategic long-range plan to fund and construct new public parks and trails to meet current and future recreation needs countywide. The Recreation Master Plan identifies recreation needs within five recreation planning regions and proposes capital improvements, programs, funding, and implementation strategies to guide the development of a range of public parks and trail projects over 10 to 20 years. However, future project-level siting and design details, as well as the timing of future development, are not known. As a result, the impact analysis provided below does not evaluate utilities or water supply issues at a project- or site-specific level. This programmatic analysis reviews potential impacts anticipated to be enabled by the Recreation Master Plan and considers whether these changes would affect utilities and water supply within the county.

To support a reasonable worst-case analysis of potential impacts, this Program EIR evaluates the proposed Project as a whole and considers the maximum potential buildout capacity scenario for the Recreation Master Plan based on the existing or potential zoning of each site. In addition, wherever possible, illustrative examples are provided to describe particular areas of the county where the implementation of the Recreation Master Plan could exacerbate existing water supply or utility infrastructure issues.

This section evaluates the availability and level of existing water, wastewater, and solid waste facilities and water supply serving unincorporated areas of the county; reviews any planned improvements or changes to these facilities and supply; and analyzes the potential increases in demand for services (including conveyance, collection, disposal, and treatment) for water supplies, wastewater, and solid waste as a result of land use changes and projected new development enabled under the Recreation Master Plan. It then assesses the adequacy of existing and planned facilities and supplies to meet future demand to determine whether development enabled under the Recreation Master Plan would increase the demand for utilities such that there would be a need for new or physically altered facilities or whether new or expansion of facilities would be needed. This impact analysis also assesses whether development enabled under the Project would result in the generation of solid waste that would impair the attainment of solid waste reduction goals, or not comply with regulations and statutes related to solid waste (e.g., by creating more than 350 tons of construction and demolition debris).

This section utilizes data information from CalRecycle, data provided by and communications with various service providers and agencies responsible for the operation of existing facilities,

recent UWMPs, and the County's IRWMP, among other resources. Based on these resources, this analysis provides a planning-level assessment of the adequacy of existing infrastructures and water supplies to serve projected increases in demand associated with future land use and development enabled by the Project. Additional discussion regarding the methodology and assumptions for assessing impacts on utilities and water supply is provided below.

3.16.4.2 Project Impacts

Table 3.16-8 provides a summary of the proposed Project's impacts related to utilities and water supply. A detailed discussion of each impact follows.

Table 3.16-8. Summary of Utility Service and Water Supply Impacts

Utilities and Water Supply Impacts	Impact Classification	Mitigation Measure	Residual Significance
Impact UWS-1. The Project could result in the construction, expansion, or replacement of utilities, including water and wastewater facilities.	Potentially significant	All MMs identified in Section 3.3, *Air Quality,* Section 3.4, *Biological Resources,* Section 3.5, *Cultural and Tribal Resources,* Section 3.7, *Geology and Soils,* Section 3.10, *Hydrology and Water Quality,* and Section 3.12, *Noise*	Significant but mitigatable
Impact UWS-2. The Project would result in increased water demand that could exceed the capacity of water purveyors to serve future development during normal, dry, and multiple dry years.	Insignificant	No mitigation measures required.	Insignificant
Impact UWS-3. The Project would result in increased wastewater generation, which may exceed the capacity of wastewater treatment providers in the county.	Insignificant	No mitigation measures required.	Insignificant
Impact UWS-4. The Project would not result in the generation of solid waste that could exceed relevant standards and/or the capacity of existing waste disposal facilities serving the county, as well as impair the attainment of solid waste reduction goals.	Insignificant	No mitigation measures required.	Insignificant
Cumulative Impacts	Insignificant	No mitigation measures required.	Insignificant

Impact UWS-1. The Project could result in the construction, expansion, or replacement of utilities, including water and wastewater facilities.

The additional demand for services and supplies generated by the Project could necessitate the construction or expansion of utilities, such as water and wastewater facilities, to serve restrooms, irrigation, drinking fountains, pools, and aquatic features with parks and recreation facilities. The primary water and wastewater infrastructure related to the Project would come from parks and recreation facilities, as trails do not typically require municipal water supplies or wastewater facilities. Instead, restrooms or water fountains at trailheads typically lie within public parks served by permitted water and wastewater infrastructure and these facilities are associated with the park, not the trail.

The unincorporated county is served by a total of 12 different water service districts and 16 wastewater service providers/districts that provide domestic and municipal water and wastewater services to a wide range of unincorporated communities, ranging from larger urban areas, such as those in the South Coast, to smaller communities, such as Cuyama or Casmalia. Municipal water supply agencies providing services to the unincorporated areas of the county manage their municipal water distribution systems in compliance with existing regulations to maintain adequate water flow and pressures serving existing and future development. Water flow rates and pressure may be required to provide adequate service to irrigate larger community parks and meet pressure requirements for structures such as restrooms and pools. Such development is not typical or does not currently exist in many of the service areas of local municipal water agencies; therefore, existing municipal water infrastructure may not currently be designed to provide necessary water pressure for development contemplated as part of the proposed Project, particularly for identified greenfield development sites located in lower-lying areas that could fall within a lower pressure zone. Potential examples of this could include Jalama and Guadalupe Campgrounds. Similar issues may also exist for sites located within relatively level areas where gravity flow cannot be relied upon and other infrastructure (e.g., pumps) is used to provide adequate water pressure.

The CFC and California Plumbing Code require that developers demonstrate that there is adequate water flow and pressure for both domestic supply and fire protection to serve new construction. According to these existing regulations, if the pressure on the property is low, individual project developers would need to provide pumps on the property of the new development or pay for the public water service provider to install a loop line to ensure adequate pressure. Further, as discussed in Impact UWS-2 and Impact UWS-3, the Project would require parks, recreation, and trail projects to demonstrate that adequate water and wastewater services, including system pressure, would be available to serve the project.

It is foreseeable that parks, recreation, and trail projects enabled by the Project could require the construction, expansion, and/or upgrade of existing water and wastewater infrastructure

to adequately serve the project, which could potentially result in significant adverse environmental impacts. For example, the Jalama Beach Campground Expansion & Upgrade Project could include the development of a new OWTS to improve water quality and provide a new source of water for irrigation and non-potable uses to offset demands on the existing potable water system drawing from groundwater and an offsite water tank. Ground disturbance during construction could potentially disturb or destroy existing sensitive biological resources or uncover previously unknown buried cultural or paleontological resources, as discussed in Section 3.4, *Biological Resources,* Section 3.5, *Cultural and Tribal Resources,* and Section 3.6, *Geology and Soils*. Construction of onsite utilities would contribute to additional criteria pollutants and greenhouse gas emissions from the operation of construction equipment, as discussed in Section 3.3, *Air Quality,* and Section 3.8, *Greenhouse Gas Emissions*, respectively. As described in Section 3.10, *Hydrology and Water Quality,* ground disturbance may also contribute to an increased potential for erosion, sedimentation, or runoff on- and offsite, which could adversely affect the quality of receiving waters. Further, construction could also introduce temporary new sources of noise associated with the operation of construction equipment, which are addressed in Section 3.12, *Noise*. As discussed in these sections, mitigation would be implemented to reduce impacts. This includes all MMs identified in Section 3.3, *Air Quality,* Section 3.4, *Biological Resources,* Section 3.5, *Cultural and Tribal Resources,* Section 3.7, *Geology and Soils,* Section 3.10, *Hydrology and Water Quality,* and Section 3.12, *Noise.* Mitigation would reduce impacts on these resources resulting from the construction or expansion of utilities such as water and wastewater facilities to a *significant but mitigable* level.

Impact UWS-2. The Project would result in increased water demand that could exceed the capacity of water purveyors to serve future development during normal, dry, and multiple dry years.

Increased demand for water could occur from irrigation for landscaping and fields, pools and other aquatic facilities (e.g., splash pads), and potable water in restrooms and other recreation facilities. Development enabled by the Project would include parks of various sizes, ranging from small pocket parks to larger community parks. Water consumption would be greater for parks with higher irrigation requirements because of natural turf, sports fields, or landscaping. Water demand and the ability of water purveyors to supply adequate water would vary by region of the county. Future parks, recreation, and trail development enabled under the Project would be located primarily within the service area existing water service providers, though trail projects also would extend into rural areas outside these service districts. The primary water demands related to the Project would come from parks and recreation facilities, as trails do not typically require municipal water supplies. Instead, restrooms or water fountains at trailheads typically lie within public parks served by permitted water and wastewater infrastructure and these facilities are associated with the park, not the trail.

As the Project is a plan to help meet recreation needs in Santa Barbara County, the Project includes planned public parks, recreation, and trail projects that would develop new facilities or expand existing facilities in unincorporated areas in the county. Accordingly, it is speculative to estimate the total water demand of the Project over 20 to 30 years. However, as described in Chapter 2, *Project Description*, the Project plans for two community parks that would represent a reasonable worst-case scenario for increased water demand within any particular water agency or district. Conservative estimates of water demand for each of these planned parks inform this analysis of potential water demands relative to available supplies.

Based on local data collected for recreation land uses in the City of Ventura from 2013 to 2018 (during a multi-year drought), typical neighborhood parks and community parks demand an average of 1,217 GPD/acre and 1,096 GPD/acre, respectively, and pools/aquatic facilities demand an average of 0.12 GPD/KSF (City of Ventura 2020). The planned Goleta Community Sports Park represents the most water-intensive improvement that could occur under the Project, with up to 50 acres developed as a community park and served by the Goleta Water District. Water demands for a large community park are estimated at 62.2 AFY (61.4 AFY for 50 acres of parkland and 0.8 AFY for a large aquatic facility), which would represent 1.2 percent of the Goleta Water District's 5,143 AFY in available capacity. Similarly, the planned Guadalupe Community Park & Campground would develop up to 15 acres as a community park and up to an 88-space campground adjacent to the City of Guadalupe. Water demands for this project are estimated at 21.1 AFY (18.4 AFY for 15 acres of parkland and 2.7 AFY for a large aquatic facility).[3] These demands are a nominal portion of the available supplies in the South Coast and in the Santa Maria Valley. This water demand estimate is a conservative estimate that does not account for the County's required water-conserving features such as low-flow fixtures, drought-tolerant landscaping, or irrigation reduction during drought conditions, or use of recycled/reclaimed water. Even so, these reasonable worst-case scenarios demonstrate that the water demands for a large community park and aquatic center, and/or campground could be adequately served within existing supplies. Further, irrigation needs for large community parks enabled by the Project would replace past or existing agricultural irrigation used for in-ground crops for the planned Goleta Community Sports Park and Guadalupe Community Park & Campground.

Other planned neighborhood parks and trails within the service areas of the county's water purveyors would have either no new water demands or negligible water demands, such as a potential Sunise Open Space and Obern Trail Play & Skate Park projects, which would demand up to less than 2 AFY. Further, the Project would implement **MM HWR-1 (Recycled Water in Parks)**, ensuring the use of recycled water, either from onsite or municipal sources, whenever

[3] At this time, it is unknown whether water supplies for the planned Guadalupe Community Park and Campground would be provided by onsite water or by municipal water sources available in the City of Guadalupe.

possible, for new parks. For example, parks within the Goleta Water District could potentially utilize recycled water produced by the Goleta Sanitation District's wastewater treatment facility to further offset demands for potable water sources. Onsite collection and treatment would also provide non-potable water sources for irrigation and restrooms, similar to the proposed OWTS as part of the Jalama Beach Campground Expansion & Upgrade Project . All projects would also comply with the County water conservation standards for required facilities. As a result, recreation projects enabled by the Project have estimated water demands that would not exceed the capacity of the county's water purveyors.

The Project would also amend the County's zoning ordinances to establish land use regulations for parks, trails, and Recreation Benefit Projects (RBP) and all related developments in unincorporated areas. Uses enabled by the Project only for eligible RBPs could include overnight accommodation with small-scale campgrounds or inns, small cafes, special events, and other agricultural recreation uses. Under the Project, these proposed uses and related development would be required to be served by adequate water resources to serve the estimated interior and exterior needs as follows: 1) a letter of service from the appropriate district or mutual water company shall document that adequate water service is available to the site and that the service complies with the company's Domestic Water Supply Permit, or 2) a Public Health Department or State approved and permitted water system. An applicant must provide documentation from the appropriate public water districts or agencies demonstrating that adequate water services are available to serve the project; this includes water supply, system pressure, and service infrastructure. The documentation shall also identify any required service extensions or improvements that are required to adequately serve the project, such as water mains designed and sized to provide adequate flows and pressure to serve the project's general water demands and fire flows (i.e., pumps), such as restrooms and pool facilities.

Through the Projects' site design and requirements for public parks, trails, recreation facilities, and RBPs to be served by public water districts or agencies, if such service is available, consistent with the County's zoning ordinances as well as the CFC and California Plumbing Code, or provide onsite water infrastructure and services to meet needs of users and site operations, Project impacts would be *insignificant*.

Impact UWS-3. The Project would result in increased wastewater generation, which may exceed the capacity of wastewater treatment providers in the county and could require new wastewater facilities or the expansion of existing facilities, the construction of which could potentially result in significant environmental effects.

Potential future parks, recreation, and trail development enabled under the Project would generally be located in urban communities or adjacent to urban areas and would connect to the existing networks of wastewater collection lines through new laterals to existing municipal wastewater treatment facilities. The unincorporated county is served by 16 wastewater service

providers/districts that serve at least a portion of unincorporated county lands within each district or treat wastewater collected by neighboring districts. The statuses of these districts vary, and some require infrastructure and facility upgrades given the current ages or conditions of their collection, conveyance, and treatment systems. However, as described herein, the Project would not generate substantial wastewater that would exceed the capacity of onsite or offsite wastewater treatment facilities.

As the Project is a plan to help meet recreation needs in Santa Barbara County, the Project includes planned public parks, recreation, and trail projects that would develop new facilities or expand existing facilities in unincorporated areas in the county. Accordingly, it is speculative to estimate the total water demand of the Project over 20 to 30 years. However, as described in Chapter 2, *Project Description*, the Project plans for two community parks that would represent a reasonable worst-case scenario for increased water demand within any particular water agency or district. Conservative estimates of water demand for each of these planned parks inform this analysis of potential water demands relative to available supplies.

As described in Impact UWS-1 above, typical neighborhood parks and community parks demand an average of 1,217 GPD/acre and 1,096 GPD/acre, respectively, and pools/aquatic facilities demand an average of 0.12 GPD/KSF (City of Ventura 2020). For the analysis of wastewater impacts of the Project, it is presumed that the same amount of water demanded would be generated as wastewater that requires treatment. This is a highly conservative estimate because most water used for parks is for irrigation, which does not require municipal treatment. Only water from restrooms and other recreation facilities would increase demands for water treatment facilities. Nevertheless, this analysis considers the reasonable worst-case scenario for wastewater generation associated with a large, planned community park and aquatic facility.

The planned Goleta Community Sports Park represents the most water-intensive improvement that could occur under the Project, with up to 50 acres developed as a community park and served by the Goleta Sanitary District. Water demands and equivalent wastewater generation for a large community park are estimated at 55,514 GPD/0.05 MGD (54,800 GPD for 50 acres of parkland and 714 GPD for a large aquatic facility), which would represent 1.9 percent of the Goleta Sanitary District's 2.46 MGD in available capacity. These demands are a nominal portion of the available treatment capacity. This reasonable worst-case scenario demonstrates that the wastewater generation for a large community park could be adequately served within the existing capacity of water treatment facilities. This wastewater generation estimate does not account for the County's required water-conserving features such as low-flow fixtures, drought-tolerant landscaping, or irrigation reduction during drought conditions, or use of recycled/reclaimed water. For example, a new package wastewater treatment system and associated facilities to serve existing and future demand at Jalama Beach County Park would improve the reliability and dependability of potable water services by providing a source of

recycled water supplies for use for landscaping and irrigation, toilet flushing, facility cleaning, habitat restoration, and other acceptable uses, thereby improving the capacity of the site to process and treat wastewater.

Other planned neighborhood parks and trails within the service areas of the county's wastewater treatment facilities would have either no new wastewater treatment demands or negligible demands, such as a potential Ben Page Neighborhood Park and Barno Ranch Trails projects, which would generate up to less than 0.0015 MGD each. Further, the Project would implement **MM HWR-1 (Recycled Water in Parks)**, ensuring the use of recycled water, either from onsite or municipal sources, whenever possible, for new parks. For example, parks within the Goleta Water District could potentially utilize recycled water produced by the Goleta Sanitation District's wastewater treatment facility to further offset demands for potable water sources. Onsite collection and treatment would also provide non-potable water sources for irrigation and restrooms, similar to the proposed OWTS as part of the Jalama Beach Campground Expansion & Upgrade Project. All projects would also comply with the County water conservation standards for required facilities. As a result, recreation projects enabled by the Project have estimated wastewater generation rates that would not exceed the capacity of the county's municipal wastewater treatment facilities.

The Project would also amend the County's zoning ordinances to establish land use regulations for parks, trails, RBPs, and all related developments in unincorporated areas. Uses enabled by the Project only for eligible RBPs could include overnight accommodation with small-scale campgrounds or inns, small cafes, special events, and other agricultural recreation uses. Under the Project, any project enabled by the Project would either be served by a public sewer system, and a letter of available service can be obtained from the appropriate district, or if the development is to be served by an onsite wastewater treatment system, the system shall meet all applicable County requirements for permitting and installation, as determined by the Public Health Department. An applicant must provide documentation from the appropriate wastewater districts or agencies demonstrating that adequate wastewater services are available to serve the project; this includes wastewater conveyance and treatment capacity. The documentation shall also identify any required service extensions or improvements that are required to adequately serve the project, such as sewer laterals and main connections adequately sized to convey project wastewater flows, such as restrooms and pool facilities.

Through the Projects' site design and requirements for public parks, trails, recreation facilities, and RBPs to be served by wastewater (sewer) districts or agencies, if such service is available, consistent with the County's zoning ordinances as well as the CFC and California Plumbing Code, or provide onsite wastewater infrastructure and services to meet needs of users and site operations, Project impacts would be *insignificant*.

Impact UWS-4. The Project would not result in the generation of solid waste that could exceed relevant standards and/or the capacity of existing waste disposal facilities serving the county, as well as impair the attainment of solid waste reduction goals.

Parks, trails, recreation facilities, and RBPs enabled by the Project would nominally increase solid waste generation in the county, resulting in increased demand for waste disposal and landfill services. Depending on the region, solid waste would be disposed of at different facilities, each of which has varying remaining capacities, but all are currently sufficient to serve planned growth in the county. Based on the County's thresholds for solid waste generation, if a project would generate 196 tpy, or 1,074 lbs/day of additional solid waste, after reduction and diversion efforts, impacts relating to solid waste generation could be substantial. The Project would not be expected to exceed this threshold. The Project would result in no substantial population growth or any residential development. Rather, public parks and trailheads provide onsite trash management facilities, including trash cans, dumpsters, and recycling facilities, to serve the needs of residents using the public recreation facilities. Similar to other uses and operations in the county, solid waste is collected by contracted waste haulers and transported to the appropriate transfer station and/or landfill.

Existing regional landfills serving the unincorporated areas have adequate long-term capacity to serve planned population growth in the county. Further, existing standards or regulations that mandate reductions in solid waste generation or increased requirements for waste diversion would reduce long-term demand for landfills and solid waste management facilities. In addition, development under the Project would need to comply with CalGreen, which requires a minimum of 65 percent of all construction waste to be recycled. Although there could be demolition of some existing structures, most construction relating to the Project would be the construction of new structures as features of public parks and trails, which generally creates less waste than demolition or remodeling. Further, all development projects in the county must include a SWMP to comply with this recycling requirement (RRWMD 2022). The Project would be compliant with these codes and policies, as well as all other policies relating to solid waste generation, reduction, and diversion, as discussed in Section 3.11, *Land Use and Planning*. Compliance with these regulations, plans, and programs would reduce the amount of solid waste generated by projects enabled by the Project that would be buried at a landfill, reducing impacts associated with the capacity of landfills. Therefore, impacts are considered *insignificant*.

3.16.4.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis*, the cumulative setting for the Project involves a range of recreation projects proposed in cities and State Parks, housing development enabled under recently adopted housing elements, and a variety of long-range plans for land

use and transportation countywide. Project impacts, along with potential impacts from pending and current planning or development projects, inform the cumulative impacts analysis.

Certain proposed uses and related development could result in nominal increases to water demand, wastewater generation, and solid waste generation. As analyzed above, these increases would be nominal compared to the service capacity of public utilities serving potential parks, trails, recreation facilities, and RBPs enabled by the Project. These activities, as well as the construction and operation of other cumulative development projects in the county, could result in a substantial increase in demand for water, wastewater, and solid waste, but that demand is largely generated from planned housing growth. The Project's contribution to long-term demands would be nominal. Further, as stated above, all recreational development is subject to all applicable regulations and development standards to ensure adequate water, wastewater, and solid waste utilities at each potential project site. Therefore, the Project would not substantially contribute to a cumulatively significant impact on utilities and service systems, and cumulative impacts would be *insignificant*.

3.16.4.4 Proposed Mitigation

As discussed in other sections of this Program EIR, the development of parks, recreational facilities, and trails and associated utility improvements would cause adverse physical impacts on the environment. Refer to other resource discussions provided in Chapter 3, *Environmental Impact Analysis* for the list of requirement mitigation measures to reduce the impacts of the Project.

3.16.4.5 Secondary Impacts

No mitigation measures are required to reduce the Project impacts utilities and water supply. Mitigation measures are identified in other resource sections included in Chapter 3, *Environmental Impact Analysis,* which could result in adverse secondary impacts to the environment. These secondary impacts are discussed in detail in the relevant resource sections of this Program EIR.

3.16.4.6 Residual Impacts

Impact UWS-1. Some parks, recreation, and trail projects, as well as RBPs, under the Project could require the construction, expansion, and/or upgrade of existing water and wastewater infrastructure to adequately serve the project, which could potentially result in significant adverse environmental impacts. As discussed in these sections, mitigation would be implemented to reduce impacts. This includes all MMs identified in Section 3.3, *Air Quality,* Section 3.4, *Biological Resources,* Section 3.5, *Cultural and Tribal Resources,* Section 3.7, *Geology and Soils,* Section 3.10, *Hydrology and Water Quality,* and Section 3.12, *Noise.* Mitigation would

reduce impacts on these resources resulting from the construction or expansion of utilities such as water and wastewater facilities to a *significant but mitigable* level.

Impact UWS-2. Project implementation would have the potential to result in additional demand for municipal water supplies from local water purveyors. However, reasonable worst-case scenarios demonstrate that the water demands for the largest planned projects could be adequately served within existing supplies. Further, through the Projects' site design and requirements for public parks, trails, recreation facilities, and RBPs to be served by public water districts or agencies, if such service is available, consistent with the County's zoning ordinances as well as the CFC and California Plumbing Code, or provide onsite water infrastructure and services to meet needs of users and site operations, Project impacts would be *insignificant*. Additionally, **MM HWR-1 (Recycled Water in Parks)** would ensure the use of recycled water whenever possible, which would further reduce water demand.

Impact UWS-3. Through the Projects' site design and requirements for public parks, trails, recreation facilities, and RBPs to be served by wastewater (sewer) districts or agencies, if such service is available, consistent with the County's zoning ordinances as well as the CFC and California Plumbing Code, or provide onsite wastewater infrastructure and services to meet needs of users and site operations, Project impacts would be *insignificant*.

Impact UWS-4. Based on the County's thresholds for solid waste generation, if a project would result in 196 tpy of additional waste generated, after reduction and diversion efforts, impacts relating to solid waste generation would be substantial. The Project would result in no substantial population growth or any residential development. Rather, public parks and trailheads provide onsite trash management facilities, including trash cans, dumpsters, and recycling facilities, to serve the needs of residents using the public recreation facilities. Future development would also be subject to existing laws, regulations, plans, and policies to reduce the amount of solid waste generated and disposed of in regional landfills. Therefore, impacts are considered *insignificant*.

This page intentionally left blank.

3.17 WILDFIRE

3.17.1 INTRODUCTION

This section describes potential wildfire hazards and vulnerabilities that could be exacerbated by implementation of the Santa Barbara County Recreation Master Plan Project (Project) as proposed by the County of Santa Barbara (County). A wildfire is an unplanned fire that is fueled by natural areas or wildlands, such as the Los Padres National Forest (LPNF), or undeveloped ranchland, particularly in the Santa Ynez Mountains or San Rafael Mountains. Of critical concern within Santa Barbara County is the wildland-urban interface (WUI), where wildfire can burn buildings and infrastructure on the edge of developed neighborhoods and communities. This analysis describes the physical setting for wildfire, wildfire risk, and the regulations that apply to wildfire management, emergency response and access, and development standards in areas that are vulnerable to wildfire. The impact analysis assesses the risk of exposure to wildfire or post-wildfire hazards, specifically in vulnerable areas in the WUI, including the increased potential for ignition.

3.17.2 ENVIRONMENTAL SETTING

3.17.2.1 Existing Fire Hazards and Contributing Factors

Santa Barbara County experiences annual cycles of elevated fire danger due to its highly flammable vegetation, mountainous terrain, low annual precipitation, and high velocity "sundowner" and Santa Ana winds. The Santa Ynez Mountains and other wildland areas are subject to dry conditions during fire season, seasonal 40- to 50-mile-per-hour winds, and high temperatures of over 90 degrees that contribute to a much higher threat of wildfire year-round. As such, much of the county is subject to high fire hazards. Between 1935 and 2023, the county was subject to 42 major wildfires, resulting in a 48 percent chance of occurrence in any given year (Santa Barbara County Office of Emergency Management (SBCOEM 2023)).

The California Department of Forestry and Fire Prevention (CAL FIRE) provides a Fire Season Outlook for active incidents as well as incidents in previous years. The outlook is a summary of all incidents (10+ acre wildfires), including those managed by CAL FIRE and other partner agencies. In 2024, CAL FIRE reported 8,024 fire incidents, an estimated 1,050,012 acres burned, damage to 2,148 structures, and 1 confirmed fatality (CAL FIRE 2025a). As of May 2025, CAL FIRE has reported 1,525 wildfire incidents, an estimated 66,618 acres burned, destruction of 16,253 structures, and 30 fatalities (CAL FIRE 2025d). Recent trends indicate fire season in California is starting earlier and ending later, with the length of fire season increasing by 75 days across the Sierra Nevada, resulting in a fire season that begins earlier and ends later than

in prior years. A primary driver of the expanded fire season is climate change. Warmer temperatures, increased periods of drought, reduced snowpack, and earlier spring snowmelt create longer and more intense dry seasons that make vegetated areas more susceptible to severe wildfires (CAL FIRE 2022). Other factors exacerbating wildfire risk in California include a widespread tree mortality epidemic due to insect infestations and structural development expanding into WUI areas.

As described further below, several factors combine to contribute to high wildfire risk in the county, including vegetation and fuel, topography, and climatic conditions.

Fuel and Vegetation

Vegetation within the county includes chaparral, coastal sage scrub, riparian, and oak woodlands, all of which are classified as highly combustible and have high biomass density levels. These vegetation types are particularly susceptible to ignition during dry summer conditions and droughts. Since 2012, Santa Barbara County has experienced drought and dry periods with only limited wet years, with a statewide drought emergency that persisted from 2012 through 2017. According to the National Integrated Drought Information System (NIDIS) by the National Oceanic and Atmospheric Administration (NOAA), 24.61 percent of the county is currently identified as an area of D0 – Abnormally Dry, 35.78 percent is identified as an area of D1 – Moderate Drought, and 39.61 percent is identified as an area of D2 – Severe Drought. This means that over 75 percent of the county is currently identified as being in a drought (NOAA 2025). This drought condition dries out vegetation and exacerbates wildfire risk in the county. Additionally, seasonal drying of vegetation produces conditions that can result in fuel-driven wildfires and fire-associated climatic changes. This condition is referred to as a plume-dominated wildfire. Plume-dominated wildfires are fires where the energy produced by the fire, in conjunction with atmospheric instability, creates significant convective forces and increased wind speeds. These vegetation characteristics combine to create extreme, unpredictable, and rapidly spreading wildfires. These vegetation areas are commonly referred to as “fuel beds” and within the county often have steep topography and a lack of roads or natural barriers (Santa Barbara County Fire Department [SBCFD] and CAL FIRE 2021).

Topography

Santa Barbara County is characterized by several ranges of steeply sloping foothills, narrow canyons, and low-lying coastal plains, as well as several mountain ranges, with urban development often located in more level valleys bordered by steep areas. The county has a mountainous interior, primarily made up of three mountain ranges: the Santa Ynez Mountains, the San Rafael Mountains, and the Sierra Madre Mountains. The majority of the mountainous region is within the LPNF. These areas of steeper slopes can result in a faster-moving fire with longer flame lengths (County of Santa Barbara Planning and Development [P&D] and SBCFD 2019). This makes the south-facing slopes of the Santa Ynez Mountains located upslope of the

urbanized South Coast particularly hazardous. Additionally, the narrow drainage and sub-drainage topographic features of the Santa Ynez Mountains can funnel winds, increase wind speeds, erratically alter wind direction, and facilitate rapid fire spread (SBCOEM 2023). The topography in the rural interiors of the county also limits access with few rural roads and challenging terrain for wildland firefighters to navigate during a wildfire.

Climate

The local climate is typically warm and dry in summer and cooler and wetter in winter. Most of the county's rivers, creeks, and streams remain dry during the summer months. High winds, like the "sundowner" and Santa Ana winds throughout the region, can cause a wildfire to rapidly advance through already dry vegetation, posing a major challenge to firefighting.[1] Further, drought conditions can extend the duration of warm, dry summers. The recent 2012-2017 drought conditions exceeded historic norms and caused significant stress to native and introduced/cultivated vegetation (SBCFD and CAL FIRE 2021).

Based on research performed by the State of California Governor's Office of Planning and Research (OPR), climate change is now playing a significant role in increasing the frequency and severity of wildfires. Increasing temperatures and changing fire behavior associated with climate change coupled with population growth and development are expected to continue exposing California forest lands, natural resources, and residential neighborhoods to wildfire hazards, particularly in WUI areas. Climate change-driven wildfire behavior, the frequency of human-caused ignitions, past vegetation and wildfire management practices and policies, and more extensive and drier fuel loads all create increased wildfire hazards. Increasing temperatures may intensify wildfire threat and susceptibility to more frequent wildfires in the county. The County's Climate Change Vulnerability Assessment (CCVA) estimates that the annual average acres burned is expected to increase to 23,040 acres per year (30 percent increase) by 2030, 25,782 acres per year (46 percent increase) by 2060, and 24,050 acres per year (36 percent increase) by 2100 due to higher annual average temperatures and the increased frequency and intensity of droughts (County of Santa Barbara 2021).

[1] Sundowner winds are hot, gusty winds from the Santa Ynez Mountains, that can raise the temperature in the region by 20 degrees Fahrenheit (County of Santa Barbara 2021).

3.17.2.2 Historic Wildfires in Santa Barbara County

In recent history, Santa Barbara County has experienced over 30 major wildfires impacting unincorporated areas. Recent fires have been burning faster and bigger due to drier vegetation related to recent drought conditions, potentially exacerbated by climate change (NOAA 2021). These conditions allow for intense fires that can spread quickly and threaten urban areas. Several of these fires (Thomas, Gap, Tea, Jesusita, Sherpa, and Whittier) directly threatened the heavily populated South Coast and cities/unincorporated communities in North County (Canyon, Rucker, Alamo). Eleven of these fires (Thomas, Sherpa, Tea, Jesusita, Alamo, and Whittier, Ballard, Alisal, Dog, Plant, and Lake) destroyed structures. The Thomas Fire was responsible for the destruction of over 1,000 structures, approximately 80 of which were in Santa Barbara County (the majority of structures burned were in Ventura County). The Thomas Fire also played a large role in the debris flows that occurred in Santa Barbara and Montecito in January 2018, which caused the loss of 23 lives and extensive structure and infrastructure-related damage and loss. (See Section 3.17.2.8, *Post-Wildfire Hazards* for more information.)



The 2017 Thomas Fire burned approximately 281,893 acres in Ventura and Santa Barbara counties, making it the then largest California wildfire in modern history. The fire was started by power lines coming in contact during high winds and remained active for 40 days. At one point, 8,500 emergency personnel from all across the western U.S. were working to contain the fire. The fire resulted in the destruction of 1,063 structures and one civilian and one firefighter fatality.
Source: SBCOEM 2022.

Table 3.17-1 lists the major wildfires affecting unincorporated areas in the county from 1955 to 2025. In recent years, the Paint (1990), Tea (2008), Jesusita (2009), Thomas (2017), and Cave (2019) fires have threatened urban communities on the South Coast, including the Eastern Goleta Valley and Carpinteria Valley. In the North County, the 2016 Canyon Fire threatened the City of Lompoc, and the unincorporated community of Mission Hills was threatened by the 2017 Rucker Fire. In the rural community of Tepusquet, numerous homes were burned by the 2017 Alamo Fire.

Table 3.17-1. Major Wildfires in Santa Barbara County

Year	Fire Name	Acres Burned
1955	Refugio	79,428
1964	Coyote	65,338
1971	Romero	14,538
1977	Sycamore	806
1977	Honda	10,000
1985	Wheeler	119,361
1990	Paint	4,270
1993	Marre	43,822
2004	Gaviota	7,440
2006	Perkins	14,988
2007	Zaca	240,207
2008	Gap	9,443
2008	Tea	1,940
2009	Jesusita	8,733
2009	La Brea	91,622
2013	White	1,984
2016	Canyon	12,518
2016	Rey	33,606
2016	Sherpa	7,474
2017	Alamo Fire	28,687
2017	Whittier Fire	18,430
2017	Thomas Fire	281,893
2018	Holiday	113
2019	Cave Fire	3,126
2021	Alisal	16,953
2023	Plant	5,465
2022	Hollister	124
2023	Sun	211
2024	Santa Lucia	124
2024	Hill	1,383
2024	Lake	38,664

Notes: A number of these fires, such as the Thomas Fire, burned in other counties as well (e.g., Ventura County), so acreages burned in Santa Barbara County are not representative of the true size of the fire. To provide a clearer picture of the extent of damage caused by these fires, the *total* acreages burned (including other counties) are used in this table.
Source: (SBCFD 2025)

3.17.2.3 Fire Hazard Severity Zones

CAL FIRE has mapped areas of significant fire hazards in the state through its Fire and Resources Assessment Program (FRAP). These maps classify Fire Hazard Severity Zones (FHSZ) in State Responsibility Areas (SRAs) based on a hazard scoring system. SRAs are lands where CAL FIRE is typically responsible for wildland fire protection; however, in Santa Barbara County SRA fire protection is provided by SBCFD under contract with CAL FIRE. As a contract county, SBCFD protects 670,677 acres of SRA. In return for this service, CAL FIRE provides funding for services such as wages of suppression crews, maintenance of firefighting facilities, fire prevention assistants, pre-fire management positions, dispatch, capital improvements, and administrative services. SBCFD's budget also provides for expanded firefighting needs when fires grow beyond the initial attack. The majority of the county is located within an SRA.

The hazard scoring system considers criteria for fuels, fire history, terrain influences, housing density, and occurrence of severe fire weather where an urban conflagration could result in catastrophic losses. The "Very High" FHSZ represents the greatest threat of wildfire hazards and occurs largely in rural areas along the Santa Ynez Mountains and LPNF and extends into or

near urban communities along the South Coast, including Eastern Goleta Valley and Carpinteria Valley, and in the northern areas of Lompoc, including Mission Hills and Vandenberg Village. The "High" FHSZ occurs throughout much of the non-mountainous rural areas of the Lompoc Valley, Santa Ynez Valley, and southern Santa Maria Valley. The High FHSZ within the SRA borders or overlaps many unincorporated communities, including Orcutt, Garey, Sisquoc, Los Alamos, Santa Ynez, Los Olivos, Vandenberg Village, Mission Hills, and Casmalia (Figure 3.17-1).

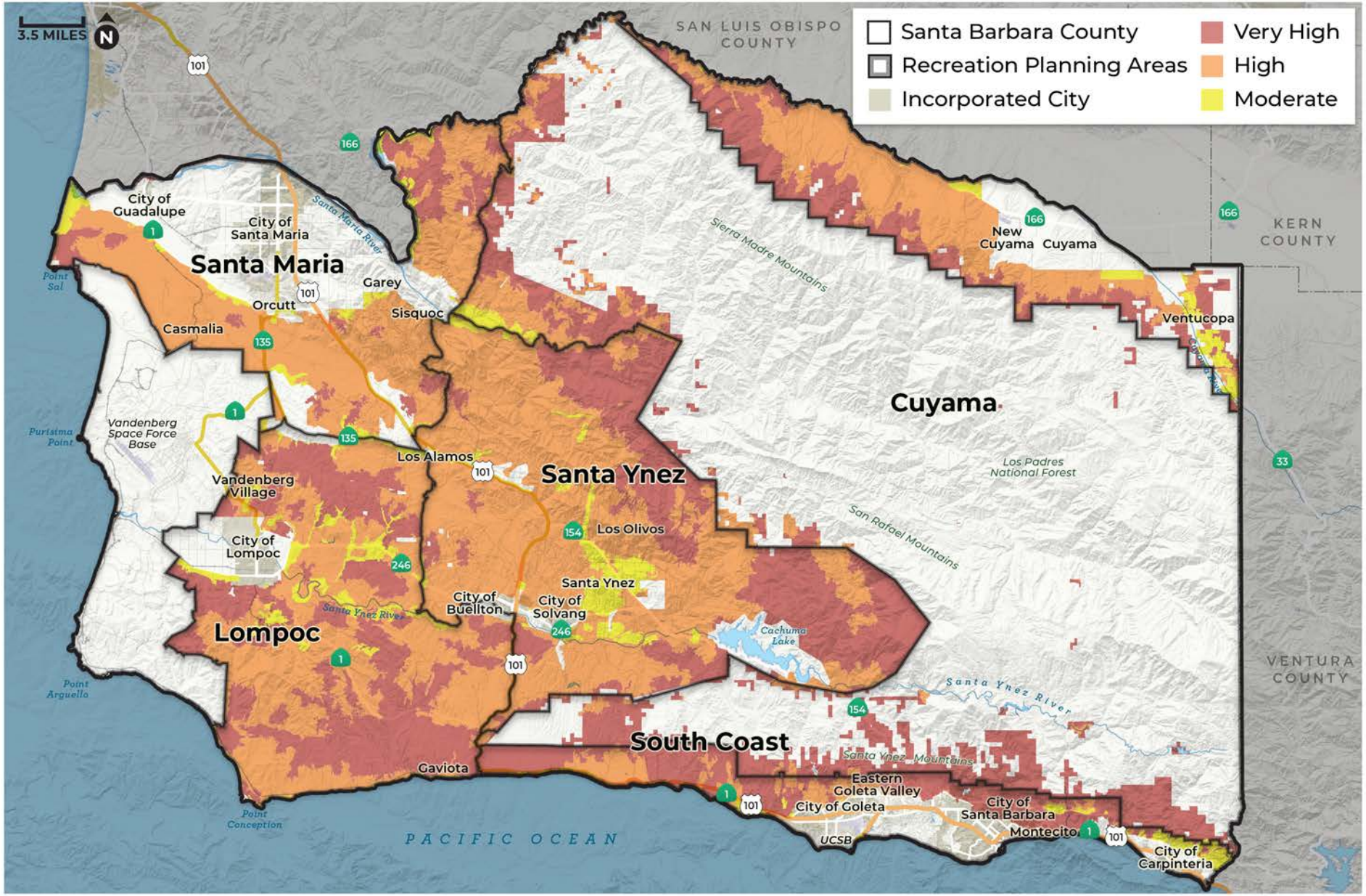
Some areas within the county, including lands within incorporated city boundaries or under federal ownership, are not designated as SRAs. These include several incorporated cities as well as the unincorporated communities of Orcutt, Garey, Sisquoc, Los Alamos, Cuyama, New Cuyama, Carpinteria, Summerland, Montecito, Isla Vista, and Eastern Goleta Valley. These areas are designated as Local Responsibility Areas (LRAs), where local governments have financial responsibility for wildland fire protection. In these areas, SBCFD and other local fire departments serve as the primary responders for fire protection. Within Santa Barbara County, Very High FHSZs within LRAs are designated by the LRA consistent with Government Code Section 51179 for parts of Mission Hills, Sisquoc, Cuyama, New Cuyama, and areas near Los Alamos, Lompoc, Solvang, and Buellton in the North County, and Mission Canyon, Goleta, Eastern Goleta Valley, Santa Barbara, Montecito, Summerland, Toro Canyon, and Carpinteria in the South Coast (Figure 3.17-1) (CAL FIRE 2025c).

3.17.2.4 Wildland-Urban Interface and Communities at Risk

The county supports large areas that are exposed to high wildland fire hazards in the WUI between wildland vegetation and adjacent urban development (Figure 3.17-2). According to the National Fire Plan issued by the U.S. Department of Agriculture (USDA) Forest Service and the Department of the Interior, the WUI is defined as "...the line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels." In WUI fires, the fire is fueled primarily by naturally occurring vegetation in the wildland and urban areas, as well as by the urban structural elements themselves. WUIs can be identified by the Influence Zone, where vegetation is susceptible to wildfire, and the Interface Zone, where dense housing adjacent to vegetation can burn in a wildfire.



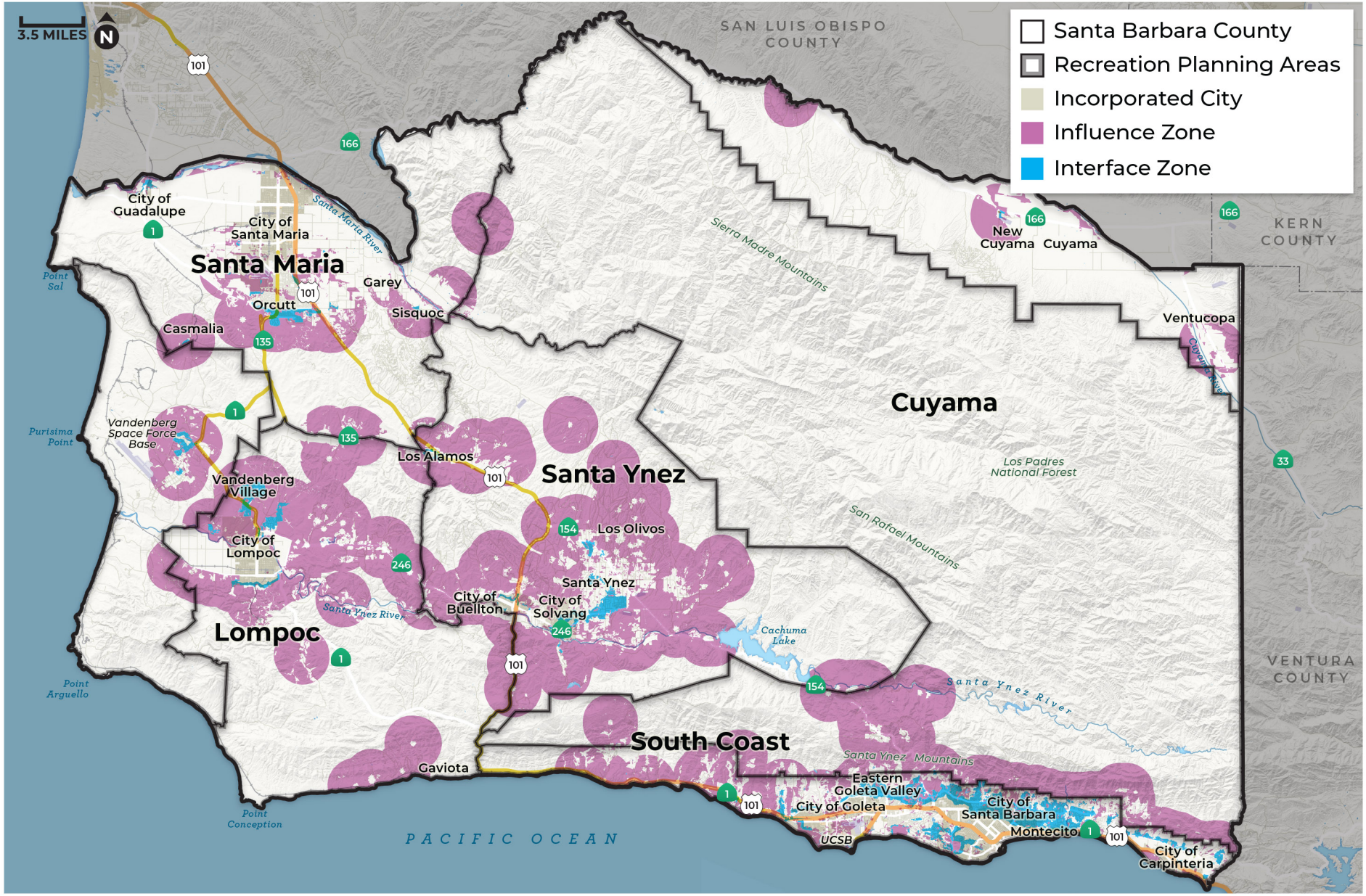
As demonstrated by the 1990 Paint Fire, a combination of vegetation, topography, and climatic conditions, such as high winds and extreme heat can create wildfire risks for life and structures in the WUI.
Source: Edhat.com



wsp

Santa Barbara County Fire Hazard Severity Zones

FIGURE 3.17-1



Santa Barbara County Wildland-Urban Interface

FIGURE 3.17-2

The CAL FIRE FRAP has developed WUI mapping that displays the relative risk from wildfire to areas of significant population density. The WUI data is created by intersecting residential housing unit density with proximate fire threat to give a relative measure of potential loss of structures and threats to public safety from wildfire. Within the county, these areas are often concentrated, developed single-family neighborhoods and some multifamily developments within or immediately adjacent to the foothills of the Santa Ynez Mountains in the unincorporated communities of Eastern Goleta Valley, Mission Canyon, Montecito, Summerland, and Toro Canyon in the South Coast, and Vandenberg Village, Mission Hills, Los Olivos, Santa Ynez, Los Alamos, and the southern portion of Orcutt in the Solomon Hills in North County (Figure 3.17-2) (SBCOEM 2023). In the unincorporated communities on the South Coast, WUIs have experienced repeated wildfires, which sometimes burn deep into the urban areas and destroy hundreds of homes. This occurred during several recent wildfires in Santa Barbara County, such as the Paint (1990) and Jesusita (2009) fires. (Refer to Section 3.17.2.2, *Historic Wildfires in Santa Barbara County*.)

The FRAP has also developed a Communities at Risk from Wildfire Map, which generally identifies communities that are identified as having some lands at high risk of house/structure damage from wildfire. These high-risk communities are within the WUI and include areas where homes are within 0.5 to 1.5 miles of areas of High or Very High FHSZ. There are 25 communities on the Communities at Risk List in Santa Barbara County (Office of the State Fire Marshal 2019). SBCFD also identifies an additional 16 neighborhoods or small communities at risk of wildfire (SBCOEM 2023). Together, these lists represent nearly every unincorporated and incorporated community in the county. Notably, New Cuyama is not on CAL FIRE's Communities at Risk list.

3.17.2.5 Recreation and Wildfire

Section 3.14, *Recreation*, provides an inventory of all recreational resources in the county. Some of these resources are located within high fire hazard areas (e.g., WUI, High/Very High FHSZs). In the South Coast, for example, the San Marcos Foothills Preserve is owned and managed by the County as open space, and is located in a Very High FHSZ. In the Santa Ynez Valley, the County manages land near Lake Cachuma as a camping park and hiking trails; the areas around and adjacent to Lake Cachuma pose high fire hazard (CAL FIRE 2025b; USBR 2010). In the Lompoc Valley, Jalama Beach Park offers campgrounds, coastal access, and other recreational resources in High and Very High FHSZs. In the Santa Maria Valley, the Point Sal Trail is managed in High and Very High FHSZs. It should also be noted that some of the recreational land in the county is located within Federal Responsibility Area (FRA). Portions of the area around Lake Cachuma, for example, are owned by the U.S. Bureau of Reclamation (USBR). In addition, while a majority of land on the Point Sal Trail is owned by the County, access to the area is provided via roads (Brown Road and Point Sal Road) that are on U.S. Air Force Property. In FRA, the U.S.

Department of the Interior (DOI) and U.S. Department of Agriculture (and agencies under both Departments) share responsibility for managing wildfires (DOI 2024).

Parks, recreational facilities, and trails have both positive and negative connections to wildfire. Several activities relating to recreation, such as cooking and campfires, shooting sports, riding off-highway vehicles, trail maintenance, and smoking, have been known to start wildfires in the past (National Interagency Fire Center 2020; USFS 2021). In addition, trails located in high fire hazard areas create the potential for users to become trapped and isolated in the event of wildfire. For example, during the 2024 Royal Fire in the Tahoe National Forest (within Placer County), a group of 13 backpackers were cut off from the Palisades Creek Trail. A search and rescue crew with the Placer County Sheriff's Office found and safely evacuated all hikers after an overnight search (CBS News 2024). In cases like this, emergency responders serve an essential role in avoiding loss of life. (Refer to Section 3.13, *Public Services*, and see Section 3.17.2.7, *Evacuation and Emergency Response*.)

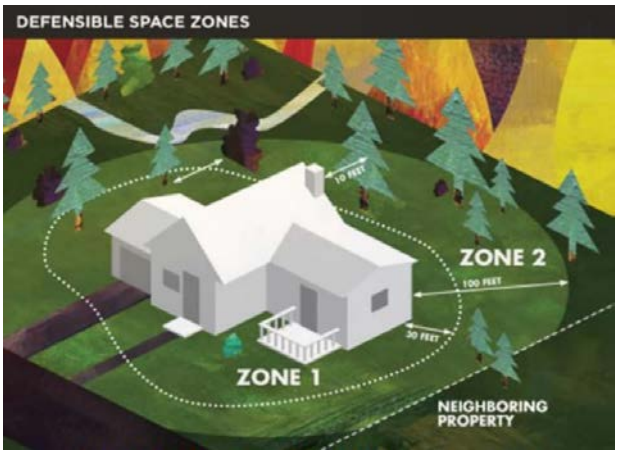
3.17.2.6 Wildfire Management and Firefighting Strategies

When a wildfire occurs, an important factor for life, property, and the environment comes from passive protection measures, such as defensible space (i.e., vegetation clearance around structures), fire-resistant landscaping, and fire-resistant construction. The sum effect of passive protection measures substantially increases the effectiveness of fire suppression activities. Inadequate water supply, ingress and egress access, structural safeguards, and vegetation management are key factors that lead to major structural-related fire losses in areas adjacent to wildlands (Cohen 1999). In addition, the inability of residents to shelter in place can also create evacuation and fire department access problems in these areas (U.S. Forest Service [USFS] 2000).

Typical strategies for managing wildland fire hazards involve three parts: ongoing fuel management, fuel reduction near structures, and suppression of active fires. Fuel management includes the ongoing removal of dried vegetation, the creation of fuel breaks where vegetation is managed to slow or control a fire, and conducting prescribed burns, mainly in open spaces (County of Santa Barbara 2015). Fuel modification reduces a wildfire's intensity, which results in reduced radiant and convective heat generated by wildfire and provides valuable defensible space for firefighters to take an effective stand against an approaching wildfire front and firebrands (i.e., ember showers).

The SBCFD maintains a Defensible Space Program that includes the creation of defensible space, defined as "...the area surrounding a structure or building where basic wildfire protection practices are implemented, providing the key point of defense from an approaching wildfire, or

escaping structure fire. The area is characterized by the establishment and maintenance of fuel modification measures." In fire hazard zones, clearance from all structures shall not be less than 100 feet using surface measurements. Within the 100-foot perimeter, all brush, flammable vegetation, or combustible growth shall be modified so that a wildfire burning under average weather conditions would be unlikely to ignite the structure. The Defensible Space Program implements four Defensible Space Zones concentrically around vulnerable structures. Zone 0 requires the removal of all combustible materials within five feet of a structure. Zones 1 and 2 incorporate requirements for vegetation management (e.g., thinning of shrubs and chaparral, selective removal, and limbing) between 5 to 30 feet from a structure, and between 30 and 100 feet from a structure, respectively. Zone 3 addresses access zones and defensible space within 10 feet of roads and driveways. These minimum standards are established to provide reasonable measures for controlling both fire and erosion hazards and to protect lives and property. SBCFD may require greater protection levels in high-danger areas. In special cases where difficult terrain, the danger of erosion, or environmentally sensitive habitat areas make compliance difficult, the requirements can be adjusted to accomplish all goals (SBCOEM 2023; SBCFD 2022). To facilitate the reduction in fuel loads on residences, the Santa Barbara County Fire Safe Council provides free curbside chipping services for residents throughout the South Coast to reduce fire risk and encourage the development of defensible space (Santa Barbara County Fire Safe Council 2023a).



SBCFD implements a Defensible Space Program consistent with CAL FIRE requirements. Defensible Space refers to an area around the perimeter of structures or developments in the wildlands where the flammable vegetation has been modified to reduce the potential for the structure and/or structures to ignite in the event of a wildfire. Clearance from all structures shall not be less than 100 feet using surface measurements. Within the 100-foot perimeter, all brush, flammable vegetation, or combustible growth shall be modified so that a wildfire burning under average weather conditions would be unlikely to ignite the structure.
Source: SBCFD 2023

Several Santa Barbara County communities that live in the WUI and/or high fire zones are working to or have completed Firewise USA certification from the National Fire Protection Association (NFPA). Firewise USA is a free program run by the NFPA that provides a collaborative framework for communities to get organized, identify their wildfire risks, and work together to create a plan to mitigate those risks. The Firewise program has some minimum requirements (e.g., community size of between 8 and 2,500 dwelling units), but primarily provides the framework and allows communities to determine how to meet its requirements.

Communities participate in this program and certification voluntarily. Within Santa Barbara County, there are 41 Firewise certified communities (NFPA 2025).

Firefighting Resources

Santa Barbara County Fire Department and Mutual Aid Departments

The SBCFD serves a population of approximately 172,000 residents encompassing 2,480 square miles and operates out of 16 stations (County of Santa Barbara 2025). The SBCFD is an "all-risk" organization, providing services that range from firefighting, fire prevention and inspection, and rescue to emergency medical care, transportation, and hazardous material and oil spill response and containment. The SBCFD is additionally responsible for enforcing the Defensible Space Program described above. In addition to the 16 stations operated by the SBCFD, nine other fire departments and fire protection agencies within Santa Barbara County provide automatic and mutual aid fire protection services as a result of the Operational Area Mutual Aid Plan (SBCFD 2021). SBCFD strives to attain a 4-minute (plus one minute for turnout) response time or less in urban areas. Response time refers to the time needed for a unit to arrive at the scene and set up the initial equipment. No response time targets have been established for rural areas. In such areas, onsite fire protection systems, such as sprinklers, water storage facilities, and fire hydrants are considered as important as first response to a fire (County of Santa Barbara P&D and CH2MHILL 2007). (Refer to Section 3.13, *Public Services*, for additional information about SBCFD's capabilities and services.)

California Department of Forestry and Fire Protection (CAL FIRE)

The County is one of six "contract counties" (i.e., Santa Barbara, Ventura, Los Angeles, Orange, Kern, and Marin) that have executed a contract with the State of California to provide wildland fire protection in the SRA.[2] The County has the responsibility as a contract county to implement the 2018 State Strategic Fire Plan for California in the county. As such, the SBCFD functionally operates as a unit of CAL FIRE and is responsible for all Strategic Fire Plan activities within the county (SBCOEM 2023).

Los Padres National Forest (LPNF) / U.S. Forest Service (USFS)

There is a considerable risk of wildfire in the LPNF resulting from a combination of weather, vegetation, terrain, and human use. Intense wildfires, fed by the accumulation of dead and dry vegetation, cause substantial resource damage and are difficult and expensive to suppress. Wildfires have burned more than 2.3 million acres in the LPNF since 1912, for a historic average

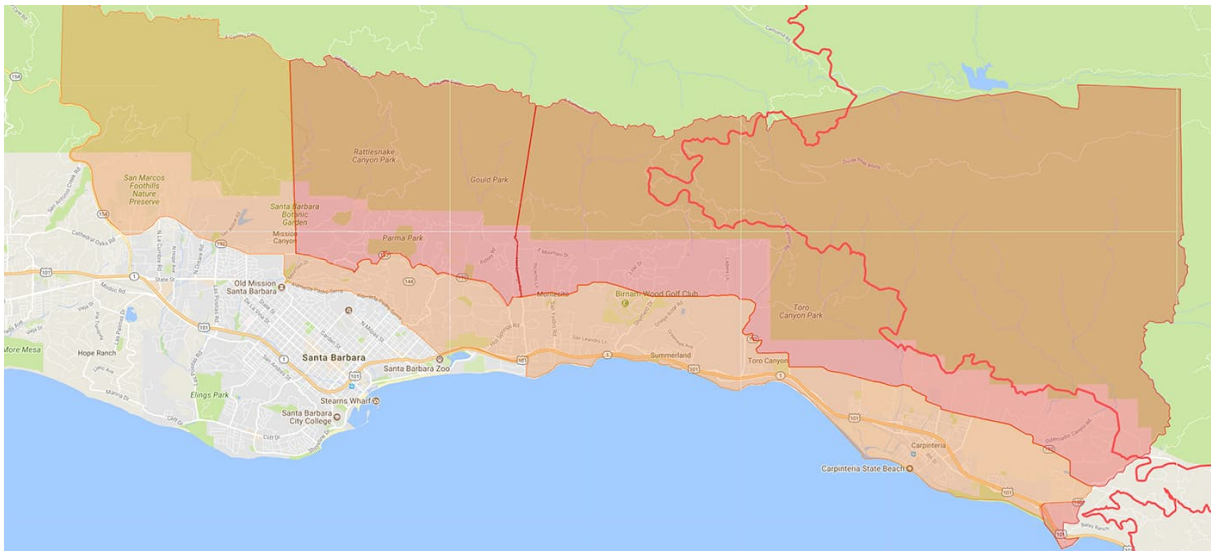
[2] The SRA is the area in the state where the State of California has the primary financial responsibility for the prevention and suppression of wildland fires. The SRA forms one large area over 31 million acres to which CAL FIRE (and contract counties, such as Santa Barbara County and SBCFD) provides a basic level of wildland fire prevention and protection services. Public Resource Code (PRC) Section 4126 classifies lands that are state and privately-owned forest, watershed, and rangeland as SRA. Lands within city boundaries or in federal ownership are not in the SRA.

of 25,000 acres per year (USFS 2025). The LPNF is divided into five ranger districts. The Santa Barbara Ranger District has six engines, one hotshot crew, three fire prevention patrols, one helicopter, one water tender, and two dozers. The other four ranger districts – including the Santa Lucia Ranger District located in Santa Maria – have a similar mix of assets and coordinate with each other for wildfire response and resource sharing, as needed (USFS 2023).

3.17.2.7 Evacuation and Emergency Response

The County does not prescribe fixed emergency evacuation routes for wildfire events due to the variability and transformative nature of wildfires (County of Santa Barbara 2015). The SBCFD maintains Standard Operating Procedures (SOPs) that outline the protocols for fire-induced evacuations based on individual emergency scenarios. During wildfire emergencies in LRAs and SRAs, as a contract county, SBCFD is responsible for assessing hazard areas to identify evacuation requirements and coordinating with other Santa Barbara County agencies and departments to ensure that residents are evacuated, as necessary. Evacuations may either be mandatory or voluntary. Past wildfires demonstrate that evacuations may be required for the South Coast region in the WUI during wildfires in the Santa Ynez Mountains. Large-scale evacuations are less foreseeable in parts of the North County due to the smaller and more dispersed nature of communities and associated populations. At a countywide level, law enforcement agencies, including the County Sheriff's Office, the California Highway Patrol, and local police departments, are responsible for implementing emergency evacuations.

In the event of a large-scale wildfire, SBCOEM may implement the Santa Barbara County Operational Area Multi-Hazard Functional Plan (MHFP), which outlines protocols for emergency planning, management, and response for the county operational area. Additionally, SBCOEM may activate the Santa Barbara County Emergency Operations Center (EOC) to coordinate multi-agency emergency response efforts for a wildfire event in compliance with the State Standardized Emergency Management System (SEMS) protocols. The EOC provides the centralized emergency management that is needed during an emergency or disaster. When activated, representatives from local governmental departments report to the EOC to coordinate local decision-making, simultaneously coordinate department activities, and liaison with different levels of government as well as with private entities. The EOC provides a centralized focus of authority and information and allows for face-to-face coordination among personnel who must set priorities for the use of resources and evaluate the need to request mutual aid. The use of these plans and protocols is critical in administering numerous aspects of emergency response, including evacuations across the county (SBCOEM 2023).



Mandatory and voluntary evacuation orders are issued in response to each specific wildfire in Santa Barbara County. As demonstrated by past fires, such as the 2017 Thomas Fire (pictured), evacuation orders can extend throughout the WUI in the South Coast, including northern neighborhoods along Foothill Road/SR 192 and into coastal communities in Carpinteria Valley, Santa Barbara, and Eastern Goleta Valley. Source: Santa Barbara Independent

SBCOEM manages an alert system (Ready Santa Barbara County [ReadySBC]) to notify county residents in the event of a disaster, including wildfires. Although ReadySBC is the primary source of information and notifications, County jurisdictions have established various communication pathways to inform the public of emergencies and recommended protective actions, such as evacuations and sheltering in place. Emergency notifications can be disseminated through phone calls, text messages, email, TeleTYpe/Telecommunications Device for the Deaf (TTY/TTD) (for the deaf and hearing-impaired), Wireless Emergency Alerts (WEAs), and Emergency Alert System (EAS) messages. Notifications may be delivered directly to residents via door knocks and/or evacuation sirens on law enforcement vehicles. Incident information can also be posted on the County's emergency preparedness website: www.ReadySBC.org, shared on social media platforms (e.g., Twitter and Facebook), through print, radio, and TV media, and accessed through 2-1-1 and Call Center hotlines.

Egress options are limited for populated areas of the South Coast. For most of the South Coast, including the communities of Goleta, Eastern Goleta Valley, Santa Barbara, Montecito, Summerland, Mission Canyon, Toro Canyon, and Carpinteria, the primary evacuation egress route is north or south on U.S. Highway 101. State Route (SR) 154 may also provide an evacuation route out of Santa Barbara. Communities in the North County also utilize U.S. Highway 101 to evacuate north, towards San Luis Obispo County, or south towards the South Coast. SR 1 can also serve as an evacuation route, as it extends north from Gaviota through the City of Lompoc, and eventually into San Luis Obispo County. SR 246, which extends between Lompoc and the Santa Ynez Valley, is critical to connecting communities within the Lompoc

Valley and Santa Ynez Valley and with U.S. Highway 101, SR 1, and SR 154. For example, during the Alisal Fire in 2021, which closed U.S. Highway 101 along the Gaviota Coast, drivers detoured from U.S. Highway 101 in the North County and used SR 246 to reach SR 154, which circumvented the fire to connect to the South Coast (Caltrans 2019). In general, emergency access and evacuation can be constrained in hillside neighborhoods and rural communities where limited ingress and egress can slow and prevent the efficient movement of people and vehicles. This is particularly true in denser communities with larger populations served by narrow local roads, such as the City of Santa Barbara, the Goleta foothills, and areas of the Santa Ynez Valley and Orcutt (SBCOEM 2023). Further, in most cases, the same roads used for civilian evacuation to leave an area are also used by emergency responders to access the incident area, causing significant congestion and delays for both emergency responders and evacuees.

3.17.2.8 Post-Wildfire Hazards

Mudflow and Debris Flow

Mudflows are flows or rivers of liquid mud down a hillside on the surface of normally dry land. They occur when water saturates the ground, usually following long and heavy rainfalls or rapid snowmelt. To be considered a mudflow, more than half of the particles must be sand-sized or smaller and able to flow very rapidly. A mudflow is the sandy, more water-saturated analog of a debris flow (Colorado Geological Survey 2021).



Mud and debris deposited outside the Montecito Inn along Olive Mill Road in Montecito, California after a major storm hit the Thomas Fire burn area on January 9, 2018, resulting in a debris flow.
Source: LA Times via Getty Images

Debris flows are similar to mudflows but are classified as a separate hazard. A debris flow is a soil flow where the majority of the materials are coarse-grained (fine sand to boulder-sized particles) and non-cohesive (SBCOEM 2023). Debris flows consist of a fast-moving slurry of water, rock, soil, vegetation, and even boulders and trees. The rainy season increases the possibility of flash floods and debris flows, especially on slopes burned by recent wildfires where severely burned soils become water-repellent, as well as at drainage corridors (SBCOEM 2023). Debris flows are triggered by short, intense periods of rainfall following a period of less intense precipitation and can cause property damage and loss of life, damage ecosystems, clog drainage conduits, and close transportation corridors (California Department of Conservation 2019). Given the county's topography, areas susceptible to mudflows and debris flow hazards are present throughout the

county at the base of hillsides and drainages, and the extent of susceptible areas varies widely. Lowland areas of the county are prone to impacts from mudflows and debris flows as sediment, water, and debris slide down slopes towards these areas (SBCOEM 2023).

The county has a high risk level and a history of significant debris flow events. Most notably, in January 2018, a debris flow in the area of Montecito burned by the Thomas fire caused 23 fatalities, damaged or destroyed more than 500 structures and 7 bridges, and shut down U.S. Highway 101 for two weeks. California Geological Survey scientists estimate the Montecito debris flows were up to 30 feet deep, traveled at speeds of 10 to 15 miles per hour, and were capable of carrying boulders as large as a tow truck (California Department of Conservation 2019).

Post-wildfire debris flows remain a significant risk to communities in Santa Barbara County where recent wildfires have occurred. Working in collaboration with the SBCFD, County Public Works Department staff identifies areas of flood and landslide vulnerability related to post-wildfire conditions and develops and implements projects designed to mitigate flood and landslide hazards. However, it is important to note that although mapped hazard areas depict known extents and locations of mudflows and debris flows, they may occur countywide where heavy rain occurs on steep, exposed slopes, particularly following wildfires; therefore, the full extent of debris flow risk cannot be accurately depicted. Flood and debris flow mitigation projects include, but are not limited to, drainage crossing debris maintenance, control of storm runoff in burn areas, and revegetation of burn areas.

3.17.3 REGULATORY SETTING

State and local regulations have been enacted to address wildfire risks and hazards in the wildfire-prone areas of Santa Barbara County. There are no federal regulations that pertain to wildfire hazards or response. Federal regulations that apply to fire protection services are provided in Section 3.13, *Public Services*.

3.17.3.1 State

California Department of Forestry and Fire Protection (CAL FIRE)

CAL FIRE serves and safeguards the people and protects the property and resources of over 31 million acres of California's privately owned wildlands within the SRA. CAL FIRE's mission emphasizes the management and protection of California's natural resources— a goal that is accomplished through ongoing assessment and study of the state's natural resources and FRAP. CAL FIRE foresters and fire personnel work closely with other agencies to encourage and implement fuel management projects to reduce the threat of uncontrolled wildfires. CAL FIRE provides varied emergency services to 36 counties via contracts with local governments. CAL FIRE's Fire Prevention Program consists of multiple activities, including wildland pre-fire

engineering, vegetation management, fire planning, education, and law enforcement. Typical CAL FIRE prevention projects include brush clearance, prescribed fires, defensible space inspections, emergency evacuation planning, fire prevention education, fire hazard severity mapping, and fire-related law enforcement activities.

California Fire Code (CFC)

The California Fire Code (CFC) is Part 9 of thirteen parts of the official building regulations to the California Code of Regulations. This code is also referred to as Title 24, or the California Building Standards Code. The CFC establishes the minimum requirements consistent with nationally recognized good practices to safeguard public health, safety, and general welfare from fire and other hazards in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations. The CFC applies to the construction – including the presence of fire service features and fire apparatus access roads – alteration, movement, enlargement, replacement, repair, equipment, use, occupancy, means of egress, evacuation plans, location, maintenance, and demolition and removal of any building or structure or any appurtenances connected or attached to such building structures throughout the state. Chapter 49 of the CFC establishes minimum standards for the protection of life and property by increasing the ability of a building located in any FHSZ within SRAs or any WUI Fire Area to resist the intrusion of flames or burning embers projected by a vegetation fire and contributes to a systematic reduction in conflagration losses. The CFC is administered by the Santa Barbara County Building and Safety Division.

2018 Strategic Fire Plan for California

The 2018 Strategic Fire Plan for California is a cooperative effort between the State Board of Forestry and Fire Protection and CAL FIRE. The plan serves as the state's road map for reducing the risk of wildfire by emphasizing preventive action before a fire starts. The Fire Plan reduces firefighting costs and property losses, increases firefighter safety, and contributes to ecosystem health (State Board of Forestry and Fire Protection and CAL FIRE 2018). Eight goals outlined by the Fire Plan include:

1. Identify and evaluate wildland fire hazards and facilitate the collaborative development and sharing of such analyses and data collection.
2. Promote and support local land use planning processes as they relate to protection from wildfire and landowner responsibility.
3. Support and participate in the collaborative development and implementation of local, county, and regional plans that address fire protection and landowner objectives.
4. Increase fire prevention awareness, knowledge, and actions implemented by individuals and communities to reduce human loss, property damage, and impacts on natural resources from wildland fires.

5. Integrate fire and fuels management practices with landowner/land manager priorities across jurisdictions.
6. Determine the level of resources necessary to effectively identify, plan, and implement fire prevention using adaptive management strategies.
7. Determine the level of fire suppression resources necessary to protect the values and assets at risk identified during planning processes.
8. Implement post-fire assessments and programs for the protection of life, property, and natural resource recovery.

2022 California Building Code (CBC)

Building standards for high-fire hazard areas are identified in the California Building Code (CBC) (Title 24 Part 2), which is administered by the Santa Barbara County Building and Safety Division, in addition to the CFC. Chapters 6-9 of the CBC establish standard building fire prevention systems, fire and smoke protection features, interior finishes, and fire protection and life safety systems.

California Health and Safety Code Section 13000 et seq.

State fire regulations are set forth in Section 13000 et seq. of the California Health and Safety Code, which include regulations concerning building standards (as also set forth in the CBC), fire protection and notification systems, fire protection devices such as extinguishers and smoke alarms, high-rise building and childcare facility standards, and fire suppression training. The State Fire Marshal enforces these regulations and building standards in all state-owned buildings, state-occupied buildings, and state institutions throughout California.

California State Multi-Hazard Mitigation Plan (SHMP)

The 2023 SHMP, developed by the Governor's Office of Emergency Services (Cal OES), reflects an integrated, multi-level, multi-sector, collaborative approach to risk reduction that builds community resilience and promotes equitable outcomes. The 2023 SHMP identifies hazards informed by science-based projections and the history of disasters in California and lists the State's goals, objectives, strategies, and actions for reducing future risk. Implementing planned, feasible, and cost-effective mitigation measures reduces loss of lives, property, and the environment and streamlines the disaster recovery process (Cal OES 2023).

Office of Planning and Research (OPR) Fire Hazard Planning Technical Advisory

The OPR's technical advisory provides context relating to wildfire risk and environmental and regulatory settings, as well as general planning guidance. Guidance topics include outreach and engagement, fire hazard and risk assessment, policy development, and example policies (OPR 2022). The goal of the technical advisory is to provide a robust planning framework for addressing fire hazards, reducing risk, and increasing resilience across California's diverse

communities and landscapes. To accomplish this goal, local agencies (i.e., cities and counties) must develop and incorporate effective policies and implementation programs in their general plans and integrate their general plans with other relevant hazard and risk reduction policies, plans, and programs. This technical advisory guides those policies and programs and is also intended to assist city and county planners in discussions with professionals from fire hazard prevention and mitigation, disaster preparedness, and emergency response and recovery agencies.

Government Code Sections 51175 – 51189

Government Code Sections 51175-51189 designate responsibility to local agencies to identify areas in the state as Very High FHSZ falling under local protection with the LRA. Classification of Very High FHSZ must be consistent with statewide criteria. Designation of Very High FHSZ is based on fuel loading, slope, weather, and other relevant factors, including winds identified as causing wildfire spread. Once identified, information on Very High FHSZ is mapped and made available to the public. The CAL FIRE director periodically reviews the LRA, and as necessary, makes recommendations relative to the designated Very High FHSZ. These sections also outline brush clearance and defensible space maintenance for buildings in the Very High FHSZ, as well as the necessary permit process for building construction and reconstruction. CAL FIRE guides fuel management and defensible space requirements.

Public Resource Code

PRC Section 4119 authorizes USFS, the U.S. Department of the Interior, Bureau of Land Management, and CAL FIRE to inspect properties to determine whether they comply with state forest and fire laws, regulations, or use permits.

PRC Sections 4201-4204 direct CAL FIRE to map areas of significant fire hazards within SRAs. Classification is based on fuels, terrain, weather, and other relevant factors, and falls under either Moderate, High, or Very High. The director of CAL FIRE is required to designate, review, and revise, as necessary, FHSZs and assign to each zone a rating reflecting the degree of fire hazard severity expected to prevail in the zone.

PRC Section 4290 requires the adoption of minimum fire safety standards related to defensible space that apply to SRA lands under the authority of CAL FIRE and to lands classified and designated as Very High FHSZ. These regulations apply to the perimeters and access to all residential, commercial, and industrial building construction within SRAs approved after January 1, 1991, and within lands classified and designated as Very High FHSZ after July 1, 2021. The regulations include all of the following:

1. Road standards for fire equipment access.
2. Standards for signs identifying streets, roads, and buildings.
3. Minimum private water supply reserves for emergency fire use.

4. Fuel breaks and greenbelts.

PRC Section 4291 requires a person who owns, leases, controls, operates, or maintains a building or structure in, upon, or adjoining a mountainous area, forest-covered lands, brush-covered lands, grass-covered lands, or land that is covered with flammable material to maintain defensible space of 100 feet (or up to the property line, whichever is less) from each side and the front and rear of the structure. Fuels shall be maintained in a condition so that a wildfire burning under average weather conditions would be unlikely to ignite the structure. Here, "fuel" means any combustible material, including petroleum-based products and wildland fuels. The intensity of fuel management may vary within the 100-foot perimeter of the structure, the most intense being within the first 30 feet around the structure. A greater distance may be required by state law or local ordinances, program standards, rules, or regulations. Clearance beyond the property line may only be required if the state law or local ordinances, program standards, rules, or regulations include findings that the clearing is necessary to significantly reduce the risk of transmission of flame or heat sufficient to ignite the structure, and there is no other feasible mitigation measure possible to reduce the risk of ignition or spread of wildfire to the structure. Clearance on the adjacent property shall only be conducted following written consent by the adjacent landowner. This section does not apply to single specimens of trees or other vegetation that are well-pruned and maintained to effectively manage fuels and not form a means of rapidly transmitting fire from other nearby vegetation to a structure or from a structure to other nearby vegetation.

PRC Section 4427 limits the use of any motor, engine, boiler, stationary equipment, welding equipment, cutting torches, tar pots, or grinding devices from which a spark, fire, or flame may originate when the equipment is located on or near land covered by forest, brush, or grass. Before such equipment may be used, all flammable material, including snags, must be cleared away from the area around such operation for a distance of 10 feet. A serviceable round point shovel with an overall length of not less than 46 inches and a backpack pump water-type fire extinguisher, fully equipped and ready for use, must be maintained in the immediate area during the operation.

Under PRC Section 4741, per policies established by the State Board of Forestry and Fire Protection, CAL FIRE shall assist local governments in preventing future wildland fire and vegetation management problems by making its wildland fire prevention and vegetation management expertise available to local governments to the extent possible within the department's budgetary limitations. CAL FIRE recommendations shall be advisory in nature and local governments shall not be required to follow such recommendations.

3.17.3.2 Local

County Code of Ordinances

Chapter 10 – County Building Code

Chapter 10 of the County's Code of Ordinances is the Santa Barbara County Building Code (Ord. No. 4822, 1-17-2012; Ord. No. 5171, 12-6-2022). The code addresses geological, topographical, and climatic conditions in the county, including extreme weather conditions, firefighting resources, flammable vegetation, High Hazard Areas, extreme wind conditions, and seismic shaking, and the minimum standards to safeguard and protect life, buildings, and structures within the county.

Chapter 15 – Fire Prevention / Fire Code

Chapter 15 of the County's Code of Ordinances (Ord. No. 5170, 12-6-2022) is titled *Fire Prevention* and serves as the County's Fire Code. This ordinance incorporates the CFC by reference and, as a result, implements the minimum requirements consistent with nationally recognized good practices to safeguard public health, safety, and general welfare from fire and other hazards in new and existing buildings, structures, and premises, and to provide safety and assistance to firefighters and emergency responders during emergency operations.

This chapter of the County's Code of Ordinances includes development standards developed by the SBCFD Fire Protection District to provide for and maintain adequate and unobstructed emergency access for fire department apparatus and personnel to buildings, structures, hazardous occupancies, or other premises. The standards apply to newly proposed private roads and driveways that are used to provide access to dwellings and structures for emergency access. They include requirements for minimum roadway width, turnarounds, fire access, vegetation clearing around roadways to be used for firefighting access purposes, and building and construction standards. The standards also provide limitations for the maximum length of dead-end-roads allowable, defensible space requirements, and automatic sprinkler systems, among others. Multifamily development projects may have additional access requirements beyond what is included in this standard.

The County's Code of Ordinances also includes an impact mitigation fee for new development projects within the SBCFD service area. To mitigate impacts caused by new development projects within SBCFD's service area, a fire facility, apparatus, and equipment development impact mitigation fee may be necessary. The fee is needed to finance fire facilities, apparatus, and equipment necessary to serve new development and to ensure that new development projects pay their fair share for these facilities. These fees are outlined in the County's Development Impact Mitigation Fee Program and are required to be paid on or before the final building permit inspection.

Chapter 26 – Parks and Recreation

Section 26-27 of Chapter 26 of the County's Code of Ordinances restricts campfire and open fire use. Specifically, it states that "no person shall build, use or maintain any open fire within any recreation area that is deemed to be unsafe by [public officers]. This includes any fire within any county recreation area during a period of time declared to be a time of high fire hazard by park division personnel, except as specifically permitted by the director of community services, or deputy director. Public notices of high fire hazard shall be posted within the recreation area when applicable. Bonfires, open flames, and BBQs are prohibited on county beaches, unless approved by the director of community services or designee or it is a camping park designated fire pit."

Santa Barbara County Comprehensive Plan

The Santa Barbara County Comprehensive Plan (inclusive of mandatory and optional Elements) addresses the safety, conservation, development, and use of natural resources, including the risks associated with wildfire and its potential effects. Consistency with these policies is discussed in Section 3.11, *Land Use and Planning*.

Seismic Safety and Safety Element

The Seismic Safety and Safety Element (adopted in 1979, republished in May 2009, and amended in July 2023) is intended to guide land use planning by providing pertinent data regarding natural and manmade hazards (e.g. seismic, geologic, flood, wildfire, and toxic materials). The following policies from the Seismic Safety and Safety Element (2023) are applicable:

- **Policy FIRE-1.0:** Continue to pursue and promote County fire prevention programs and control measures.
- **Policy FIRE-1.2**: The County will consider risks from hazards when reviewing plans for development and occupancies in High or Very High Fire Hazard Severity Zones and take action to minimize risks to occupants to the greatest extent feasible.
- **Policy FIRE-1.3**: The County shall manage County-owned urban open space facilities to reduce wildfire hazards and associated risks consistent with State and County wildfire regulations and standards.
- **Policy FIRE-1.4**: The County should work with property owners of existing developments that do not conform to contemporary fire safe standards to improve or mitigate access, water supply and fire flow, signing, and vegetation clearance to meet current State and/or locally adopted fire safety standards.
- **Policy FIRE-2.0**: The County shall use California Department of Forestry and Fire Protection-Fire Hazard Severity Zones to determine areas that will require appropriate construction materials for new buildings in State Responsibility Areas and Local Responsibility Areas,

local agency Very-High Fire Hazard Severity Zones, and designated Wildland-Urban Interface areas pursuant to the California Code of Regulations Title 24, Part 2, California Building Code.

- **Policy FIRE-2.1**: The County should continue to collaborate with the California Department of Forestry and Fire Protection in the revision of Fire Hazard Severity Zone Maps and shall adopt the official areas of Very High Fire Hazard Severity Zones in the Local and State Responsibility Areas.
- **Policy FIRE-3.0**: The County shall continue to require consistency with County Fire Department Development Standards that ensure adequate defensible space clearance around all structures in compliance with the California Fire Code, Public Resource Code Section 4291, and Government Code Sections 51175-51188.
- **Policy FIRE-3.1**: New development shall meet or exceed the State Fire Safe Regulations through application of the Fire Code and wildfire development standards pertaining to fuel modification and defensible space.
- **Policy FIRE-3.2**: A Wildfire Protection Plan is required for all new large developments in the Very High Fire Hazard Severity Zone (VHFHSZ), including subdivisions, mixed use development, commercial cannabis activities, multi-family housing, businesses open to the public, and large assembly uses and/or events. Such uses may require a Wildfire Protection Plan in the High FHSZ, at the discretion of the Fire Marshal.
- **Policy FIRE-3.3**: When a Wildfire Protection Plan is required, it shall include measures for modifying fuel loading, a maintenance plan to ensure measures are maintained, and a site plan with locations of any roads or existing structures that may act as a fuel barrier in a configuration that will maximize their benefit as a fuel barrier/fire break to the proposed development.
- **Policy FIRE-3.4**: Santa Barbara County Fire Department shall continue to implement the Vegetation Management Program through implementation of its Unit Strategic Fire Plan and maintained in CalMapper, providing long-term maintenance of fire hazard reduction projects to mitigate risks to existing development and communities.
- **Policy FIRE-3.5**: Communities within Santa Barbara County are encouraged to prepare Community Wildfire Protection Plans to identify and prioritize areas for hazardous fuel reduction treatments, describe methods to reduce structure ignitability, and methods of fuel treatment that protect essential infrastructure.
- **Policy FIRE-3.6**: To reduce the potential for fire damage, the County shall continue to require consistency with County Fire Department Development Standards pursuant to the California Fire Code, Public Resource Code Section 4291, and Government Code Sections 51175-51188, as may be amended.

- **Policy FIRE-4.0**: The County shall strive to maintain partnerships with tribal governments, state, local, and federal agencies to identify, prioritize, and implement fire prevention and protection measures in the County.
- **Policy FIRE-4.1**: The County Office of Emergency Management (OEM) shall continue coordinating emergency planning for the Santa Barbara Operational Area pursuant to the California Emergency Services Act of 1970.
- **Policy FIRE-4.2**: The County's Safety Element should continue to reference the Santa Barbara County Multi-Jurisdiction Hazard Mitigation Plan in order to consider measures to reduce potential harm from fire-related activity to property and lives.
- **Policy FIRE-4.3**: The County's fire districts will update and implement the Santa Barbara County Mutual Aid Plan each year to establish a plan for interagency preparedness, coordination, automatic aid, and mutual aid.
- **Policy FIRE-5.0**: New development in the State Responsibility Areas and Very High Fire Hazard Severity Zone shall meet or exceed State Fire Safe Regulations, as may be amended, relating to roads, water, signing and fuel modification; and Fire Hazard Reduction Around Buildings and Structures Regulations relating to fuel modification (Title 14, California Code of Regulations 1299.01-1299.05), as may be amended.
- **Policy FIRE-5.1**: New development within the State Responsibility Area, Very High Fire Hazard Severity Zones, and County High Fire Hazard Area will meet or exceed State standards set forth in the County Fire Code and County Building Code, Chapter 7A Materials and Construction Methods for Exterior Wildfire Exposure, as may be amended.
- **Policy FIRE-5.2**: The County will continue to evaluate non-conforming development and apply contemporary road standards consistent with the State Fire Safe Regulations through the development review process.
- **Policy FIRE-5.3**: All new development shall meet requirements identified in the State Fire Safe Regulations, National Fire Protection Association Standard 1142 on water supplies for suburban and rural firefighting, State Fire Code, and local Fire District Development Standards for hydrant spacing, water flow rates for fire suppression, and stored water for water and fire protection systems.
- **Policy FIRE-5.4**: New development in the State Responsibility Area and Very High Fire Hazard Severity Zone will meet or exceed the requirements in the State Fire Code and Fire Safe Regulations, which include visible home and street addressing and signage, evacuation and emergency vehicle access, and vegetation clearance maintenance on public and private roads that ensure adequate evacuation and emergency vehicle access.
- **Policy FIRE-6.1**: The County's fire districts shall continue to review and update Standard of Coverage studies provided for existing and planned new development to ensure there are adequate fire protection services, such as fire stations, equipment, and coverage during emergencies.

- **Policy FIRE-6.2**: The County's fire districts shall periodically prepare or update a Standard of Cover Study to assess future emergency service needs and identify additional resources and services necessary to provide satisfactory emergency response services to meet future needs.
- **Policy FIRE-6.3**: The County's fire districts will continue to train and certify their staff using the California Incident Command Certification System or by the requirements and guidelines set by the State Fire Marshal for training emergency service staff.
- **Policy FIRE-7.0**: The County shall ensure completeness and availability of identified emergency supplies and resources to all segments of the population, focusing especially on vulnerable and disadvantaged communities, including but not limited to temporary shelter or housing, and items such as medical supplies and services, water main repair parts, generators, pumps, sandbags, road clearing, and communication facilities.
- **Policy FIRE-7.1**: The County shall maintain and improve disaster response and recovery capabilities and shall meet the emergency needs of all members of the community, especially the most vulnerable and disadvantaged.
- **Policy FIRE-7.2**: Post-wildfire reconstruction shall conform to the latest applicable Fire and Building Code standards.
- **Policy FIRE-7.3**: The County shall continue to promote outreach programs that educate at-risk populations and the wider community on defensible space, evacuation routes, and other information aimed at mitigating wildfire hazards.
- **Policy FIRE-8.1**: All new development in the Very High Fire Hazard Severity Zone VHFHSZ will comply with ingress/egress requirements found in applicable wildfire Development Standards, Fire Code, and the State Fire Safe Regulations.
- **Policy FIRE-9.0**: All new development shall maintain adequate water infrastructure that ensures water supply and flow rates are adequate for fire suppression.
- **Policy FIRE-9.1**: New development, including that which is not supplied by a water purveyor, shall have adequate infrastructure flow rate, and storage onsite that supports long-term water supply.
- **Policy FIRE-9.2**: The County will coordinate with water purveyors to encourage water supply infrastructure upgrades to maintain an adequate, long-term water supply for fire suppression needs for the community.

Community Plans

Community-specific goals and policies for wildfire hazards are provided in several adopted community plans as part of the Comprehensive Plan. Any park, recreation, or trail projects and related development proposed or enabled under the Project within the following community plan areas would be subject to the public safety and wildfire hazard protection and planning

goals and policies of that plan (and/or to more stringent goals and policies in other adopted regulatory plans).

- Eastern Goleta Valley Community Plan
- Gaviota Coast Plan
- Goleta Community Plan
- Los Alamos Community Plan
- Mission Canyon Plan
- Montecito Community Plan
- Orcutt Community Plan
- Santa Ynez Community Plan
- Summerland Community Plan
- Toro Canyon Plan

Other Non-Regulatory Plans Addressing Wildfire Hazards

In addition to the County regulations discussed above, various agencies have prepared documents that provide background or guidance on wildfire risks, vulnerabilities, and mitigations. The following plans and programs are not regulatory documents but help to inform policy and management of wildfire hazards and response.

Multi-Jurisdictional Hazard Mitigation Plan (MJHMP)

The Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) was most recently updated by the SBCOEM in 2022 to comprehensively identify, evaluate, and mitigate the known hazards that Santa Barbara County faces. The MJHMP is used by local emergency management teams, decision-makers, and agency staff to implement needed mitigation to address known hazards. The MJHMP can also be used as a tool for all stakeholders to increase community awareness of local hazards and risks and provide information about options and resources available to reduce those risks. The MJHMP describes historical hazard events and the future probability of these hazards and their impact on communities within the county. Vulnerability assessments summarize wildfire hazard impacts on critical infrastructure, populations, and future development. The MJHMP identifies five goals and a Mitigation Plan, including measures to ensure that future development is resilient to known hazards, including wildfire.

Standardized Emergency Management System Emergency Management Plan

The SBCOEM developed the Santa Barbara County Operational Area Emergency Management Plan (EMP) in June 2003, and updated it in 2013, to ensure the safety, security, and protection of life and property and to assure the overall well-being of the population during a disaster. The EMP was developed as part of the Standardized Emergency Management System (SEMS).

The EMP addresses emergency responses associated with natural disasters, technological incidents, and national-security emergencies, including both peacetime and wartime nuclear defense operations. The EMP assigns tasks and specifies policies and SOPs for the coordination of emergency staff, resources, and service elements, states that hazard mitigation is a year-round effort, and encourages all communities to prepare hazard mitigation plans. The following activities were identified by the EMP as potential mitigation activities: improving structures and facilities at risk; identifying hazard-prone areas and developing standards for prohibited or restricted use, recovery, and relief from loss (i.e., insurance); and providing hazard warning and protecting the population. The EMP is currently undergoing routine revision and will have the title "Santa Barbara County and Operational Area Emergency Operations Plan (EOP)."

The EOP contains step-by-step procedures and planned courses of action to help emergency officials and responders carry out complex and routine operations by providing officials with strategic direction, an operational framework, and a basis for decision making. In the event of a major incident, the Emergency Operations Center is activated, and County staff from various departments are pulled into emergency response roles.

Santa Barbara Operational Area "All Risk" Mutual Aid Plan

The Mutual Aid Plan exists to provide, in an expedient manner, fire, rescue, emergency medical services, hazardous materials, urban search and rescue, or other expertise – in the form of resources and qualified personnel – as would be necessary to manage a major incident or disaster that would exceed the capabilities of a single agency. Santa Barbara County is located in California Mutual Aid Region I, which includes San Luis Obispo, Ventura, Los Angeles, Orange, and Santa Barbara counties. Each county is required to have a Mutual Aid Plan that outlines procedures, policies, resources, and personnel information. This Plan assists local, state, and federal fire agencies in preparing for a major emergency (SBCFD 2005).

Community Wildfire Protection Plans

A Community Wildfire Protection Plan (CWPP) is a planning and funding prioritization tool created by the Healthy Forests and Restoration Act of 2003 as an incentive for communities to engage in comprehensive forest and fire hazard planning and help define and prioritize local implementation and funding needs (OPR 2025). CWPPs are generally developed by local governments or other entities with assistance from state and federal agencies and in collaboration with other interested partners. This provides communities with an opportunity to influence where and how federal agencies implement fuel reduction projects on federal lands, as well as how additional federal funds may be distributed for projects on non-federal lands. CAL FIRE also provides funding opportunities for projects or activities that may be identified in CWPPs (OPR 2022). Within the unincorporated county, CWPPs have been prepared for Carpinteria-Summerland, San Marcos Pass-Eastern Goleta Valley, Mission Canyon, Montecito,

and the Gaviota Coast. These documents offer background and guidance on wildfire risks, prevention, and preparedness, as well as mitigation measures.

Regional Wildfire Mitigation Program

The Regional Wildfire Mitigation Program (RWMP) is a collaboration between many local, regional, and national groups, and aims to foster wildfire resilience across landscapes and communities on the South Coast of Santa Barbara County. This multi-year program is designed to assess vulnerable areas and equitably improve fire safety for residents and properties, decrease the risk of damaging fires to infrastructure, and promote wildfire-resilient green space, working lands, and habitats (Santa Barbara County Fire Safe Council 2023b).

2023 Santa Barbara County Unit Strategic Fire Plan

The 2023 Santa Barbara County Unit Strategic Fire Plan is developed with the SBCFD's Mission Statement in mind and intended to serve as a collaborative local planning document. The Santa Barbara County Unit Strategic Fire Plan tiers under the 2018 Strategic Fire Plan for California and the 2022 CAL FIRE Strategic Plan to identify goals and objectives to minimize wildland fire risk to county watersheds, communities, firefighters, the public, and various other local assets. In combination, these three plans recognize wildland fires occur and work to figure out how to live with the risk of wildfire. The Santa Barbara County Unit Strategic Fire Plan utilizes eight specific goals related to wildfire and hazard mitigation.

2021 Climate Change Vulnerability Assessment (CCVA)

The County published its CCVA in November 2021. The CCVA serves as the first step to improving regional resiliency by analyzing how climate change may harm the community. The assessment looks at how severe the effects of climate change hazards are likely to be for the county's people and assets and identifies which groups of people and assets face the greatest potential for harm. The County used these results to assist in preparing the 2030 Climate Action Plan (CAP) and to initiate updates to the Seismic Safety and Safety Element to increase resiliency throughout the unincorporated county.

2030 Climate Action Plan

The 2030 CAP replaced and updated the County's 2015 Energy & Climate Action Plan, which was sunset in 2020. (Refer to Section 3.8, *Greenhouse Gas Emissions.*) The new 2030 Climate Action Plan adopts a greenhouse gas (GHG) emissions reduction target of 50 percent below 2018 levels by 2030. It also features resilience measures in response to likely and imminent climate change impacts, including climate-induced fire hazards, and updated thresholds of significance for local projects. The CAP was adopted in August 2024 (County of Santa Barbara 2024).

3.17.4 ENVIRONMENTAL IMPACT ANALYSIS

This section discusses the potential wildfire-related impacts associated with the Project.

3.17.4.1 Thresholds of Significance

California Environmental Quality Act (CEQA) Guidelines

The following thresholds of significance are based on Appendix G of the CEQA Guidelines. For purposes of this Program Environmental Impact Report (EIR), implementation of the Project may have a significant adverse impact relating to wildfire if it would:

a. Substantially impair an adopted emergency response plan or emergency evacuation plan;

b. Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire;

c. Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines, or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment; or

d. Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes.

Appendix G of the CEQA Guidelines also includes the following threshold of significance for impacts relating to hazards and hazardous materials.

f. Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan.

g. Expose people or structures, either directly or indirectly, to a significant risk of loss, injury, or death involving wildland fires.

As discussed in Section 3.9, *Hazards and Hazardous Materials,* due to the relationship of these thresholds of significance to wildfire hazards, these impacts are discussed in this section of the Program EIR, rather than in Section 3.9, *Hazards and Hazardous Materials*.

County of Santa Barbara Environmental Thresholds and Guidelines

The County's *Environmental Thresholds and Guidelines Manual* (2021) does not identify applicable thresholds related to wildfire hazards; therefore, for this analysis, the Program EIR relies upon the County's Initial Study Checklist. Under the Fire Protection section of the County's Initial Study Checklist, the County considers a project's impact on wildfire potentially significant if it would result in:

a) Introduction of development into an existing high-fire hazard area or exposure of people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires;

b) Project-caused high fire hazard;

c) Introduction of development into an area without adequate water pressure, fire hydrants, or adequate access for firefighting

d) Require the installation or maintenance of associated infrastructure (such as roads, fuel breaks, emergency water sources, power lines or other utilities) that may exacerbate fire risk or that may result in temporary or ongoing impacts to the environment;

e) Introduction of development that will substantially impair an adopted emergency response plan, emergency evacuation plan, or fire prevention techniques such as controlled burns or backfiring in high fire hazard areas?

f) Development of structures beyond safe Fire Dept. response time.

Potential impacts associated with threshold (f) of the County's Initial Study Checklist are discussed in Section 3.13, *Public Services*. Potential impacts associated with threshold (c) of the County's Initial Study Checklist are discussed in Section 3.16, *Utilities and Water Supply*.

Methodology

As described in Chapter 2, *Project Description*, the Project plans for parks, trails, and recreational facilities in unincorporated areas within the county. Project-level siting and design details are not known, so the impact analysis provided below does not evaluate impacts related to wildfire at a project- or site-specific level. The programmatic analysis provided by this Program EIR addresses the potential for parks, recreation, trails, and related development under the Project to affect adopted emergency response or evacuation plans; increase the risk for wildfire- or post-wildfire-related hazards; and impact other resources due to construction and operation of supporting infrastructure. Wherever possible, illustrative examples are provided to describe particular areas of the county where the implementation of the Project would create impacts related to wildfire. As described in Section 1.4, *Program-Level EIR Analysis,* the impact analysis provided below is broad and qualitative such that the findings apply to any of the proposed uses and related development.

3.17.4.2 Project Impacts

Table 3.17-2 provides a summary of the proposed Project's impacts related to wildfire. A detailed discussion of each impact follows.

Table 3.17-2. Summary of Wildfire Impacts

Wildfire Impacts	Impact Classification	Mitigation Measures	Residual Significance
Impact WF-1. The Project would not substantially impair or physically interfere with an adopted emergency response plan or emergency evacuation plan.	Insignificant	No mitigation measures required.	Insignificant
Impact WF-2. The Project could exacerbate wildfire risks or expose people or structures to loss, injury, or death involving wildland fires or post-fire flooding or landslides.	Insignificant	No mitigation measures required.	Insignificant
Impact WF-3. The Project would involve construction and maintenance of trails that may exacerbate fire risk.	Insignificant	No mitigation measures required.	Insignificant
Cumulative Impacts	Insignificant	No mitigation measures required.	Insignificant

Impact WF-1. The Project would not substantially impair or physically interfere with an adopted emergency response plan or emergency evacuation plan.

As discussed in Section 3.17.2.7, *Evacuation and Emergency Response*, the County does not designate specific emergency evacuation routes and does not maintain a specific emergency evacuation plan. Emergency response plans and evacuations in the county are meant to be scalable, adaptable, and responsive to specific emergency situations. Because wildfire behavior varies dramatically based on location and conditions, emergency response and evacuation orders are provided in response to each wildfire event to ensure orderly and timely evacuation of potentially affected residents.

SBCFD is responsible for assessing hazard areas to identify evacuation requirements, fire prevention, and protection during wildfires. SBCFD also coordinates with County agencies and departments (e.g., Santa Barbara County Sheriff's Office, SBCOEM) to ensure that residents in SRAs are evacuated, as necessary. At a countywide level, law enforcement agencies such as the Sheriff's Department, California Highway Patrol, and local police departments are responsible for implementing emergency evacuations. County jurisdictions have established various communication pathways to inform the public of emergencies and recommend protective actions. (Refer to Section 3.17.2.7, *Evacuation and Emergency Response*.)

Development proposed or enabled by the Project entails new or expanded parks, recreation facilities, and trails, which would not result in significant permanent increases in resident populations within the county and requiring an increase in demand for emergency response services. In addition, all projects would fall within SBCFD, Montecito Fire Protection District, or Carpinteria-Summerland Fire Protection District service areas. Therefore, service ratios and

response times would not be affected. (Refer to Section 3.13, *Public Services*, for additional discussion.)

In addition, any development in the SRA or VHFHSZ proposed and enabled under the Project would have to comply with the California Building Code, California Fire Code, SBCFD Development Standards, and Fire Safe Regulations, which outline requirements for evacuation and emergency vehicle access. Future development indirectly enabled under the Project (e.g., Recreation Benefit Project [RBP] Program projects) would have to comply with all of the above regulations, as well as policies in the Seismic Safety and Safety Element of the County's Comprehensive Plan, and would need to adhere to the proposed development standards, which require that site access for all parks and playgrounds meets applicable fire agency roadway and access standards.

Under the Project, trails projects may be proposed within the WUI or within High/Very High FHSZs. This would introduce the potential need to evacuate or rescue trail users who may become stranded during a wildfire. (Refer to Section 3.17.2.5, *Recreation and Wildfire*.) However, as discussed in Section 3.17.2.7, *Evacuation and Emergency Response*, and in the County's EOP, in the event of a wildfire, emergency staff from multiple agencies (e.g., SBCFD, Sheriff's Department) coordinate to carry out response activities. In addition, both the Sheriff's Department and SBCFD operate search and rescue units that are equipped to rescue people in extreme conditions.

Further, parks and recreation facilities can used as evacuation zones or staging areas in the event of emergencies, such as wildfire. Trails in more rural recreation areas have also been used as access routes for firefighters. Therefore, an increase in parks and trails would support access for emergency services and increase the number of staging areas for emergency personnel.

As a result of the nature of proposed and future recreation projects, the current capabilities of various emergency response agencies within the county, and requirements for compliance with regulations addressing emergency access and response, direct and indirect Project impacts on any emergency response or evacuation plan would be *insignificant*.

Impact WF-2. The Project could exacerbate wildfire risks or expose people or structures to loss, injury, or death involving wildland fires or post-fire flooding or landslides.

As described in Section 3.17.2.3, *Fire Hazard Severity Zones*, and Section 3.17.2.4, *Wildland-Urban Interface and Communities at Risk*, much of the county falls within High/Very High FHSZs, the WUI, or other designated high-risk communities. The main areas with high fire risk and proposed park and recreation projects are along the Gaviota Coast, Mission Canyon, Eastern Goleta Valley, Carpinteria Valley, Summerland, Toro Canyon, and parts of Cuyama and New Cuyama. The Project would not directly or indirectly result in permanent increases in the residential population within the county. Regardless, development proposed or enabled by the

Project could exacerbate wildfire risks or expose project occupants to pollutant concentrations from, or the uncontrolled spread of, a wildfire.

Wildfire Risk

The Project includes planned parks, recreation facilities, and trail projects that would create new facilities or expand existing facilities. The potential for the Project to directly cause impacts related to wildfire depends largely on project type and location. For example, most County projects proposed in highly developed urban areas would not exacerbate wildfire risks, since these are not in high fire hazard areas. Some County projects, however, are proposed in the WUI or High/Very High FHSZs. Depending on the project type, construction activities could exacerbate wildfire risk. For example, the use of machinery for the construction of an aquatic facility or an indoor recreation center in a high fire hazard area could increase the risk of ignition and spread of wildfire.

The operation and use of any type of park or recreation project, from a corner or neighborhood park to a large sports complex, in an area of high fire hazard would expose project occupants to potential pollutant concentrations from wildfire or the uncontrolled spread of a wildfire. For example, the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan is in an area of high wildfire risk, which could increase risks of ignition and spread of wildfire from increased access and use. Similarly, the proposed Jalama Beach Campground Expansion & Upgrade Project would increase operations to accommodate additional visitation in High and Very High FHSZs, which would increase the number of project occupants exposed to potential wildfires. For both of these projects, the introduction of additional campgrounds and campfires could increase the potential for ignition and spread of wildfire. However, the County already operates parks and recreational facilities in areas of high fire hazard, as discussed in Section 3.17.2.5, *Recreation and Wildfire*. The increased exposure of project occupants resulting from park and recreation projects would be limited in scale and transitory, and visitors would generally have the ability to evacuate if needed in the event of a wildfire. In addition, parks and recreational facilities generally decrease fire risk; County parks projects proposed under the Project would operate consistent with County Parks operational procedures for Red Flag day closures and restrictions and would generally involve land clearing, fuels reduction, irrigation, active management of facilities, and staffing resources (e.g., park rangers) to monitor activities and weather conditions, all of which decrease fuel load and the potential for ignition. In addition, all development proposed for County park projects would be subject to relevant policies and regulations related to wildfire (e.g., CFC, CBC, and applicable PRC sections), which aim to reduce the potential for ignition of and damage from wildfire during construction and operation.

The Project also includes amendments to the Comprehensive Plan and zoning ordinances to enable the development of public parks, trails, and RBPs, which would include a public

recreation component in addition to a private development component as allowed by the zoning ordinances. It is impossible to predict how, when, and where projects enabled under the proposed amendments, including eligible RBP Program projects, would take place. Likewise, it is difficult to predict the scope, scale, and extent of development proposed by these projects. Therefore, additional park, recreation, and related projects could be proposed in areas of high wildfire hazard, and the Project could indirectly cause impacts related to wildfire. Again, the type and location of projects would affect the potential for wildfire-related impacts. Many projects enabled under the Project would not exacerbate wildfire risk or increase exposure of project occupants to pollutants from, or the uncontrolled spread of, a wildfire. Park and recreation projects proposed in highly urbanized areas, for example, are not likely to be within high fire hazard areas.

In the WUI or High/Very High FHSZs, the construction and operation of park and recreation projects enabled under the Project could result in wildfire-related risks, similar to those discussed for County parks projects above. For example, trail projects could increase the potential for ignition through operational risks (e.g., a hiker smoking a cigarette). However, all projects enabled by the zoning ordinance amendments that are processed with any permit level would be subject to existing development standards, including the USFS standards for design, construction, and maintenance of trails that are adopted by the County. Park and recreation projects would also need to follow the proposed development standards, which state that development shall not create hazards to life and property, including fire hazards.

Other, non-recreational development resulting from private components of RBP Program projects, such as a country inns or a visitor-serving café, could also be proposed in the WUI or High/Very High FHSZs. However, these projects would still need to adhere to all regulatory requirements and development standards, such as the CFC and CBC. In addition, these projects would need to be consistent with all policies in the County's Comprehensive Plan, including those relating to fire safety. For example, in the Seismic Safety and Safety Element, Policy FIRE-3.1 requires that new development meets or exceeds the State Fire Safe Regulations through application of the Fire Code and wildfire development standards pertaining to fuel modification and defensible space. If any project is found to have the potential to exacerbate wildfire risks, either through location, nature, or scale, it would be subject supplemental environmental review.

Post-Wildfire Risk

As previously described, the Project includes planned park, recreation, and trail projects that would create new facilities or expand existing facilities, as well as amendments to the Comprehensive Plan and zoning ordinances to enable the development of public parks, trails, and RBPs. While the majority of these projects and related development would be sited in urban, developed areas that are not at high risk for wildfire, some County projects, as well as

RBPs, may be in areas subject to high fire hazard. In addition to risks from wildfire, development in these areas may be subject to risks from post-wildfire-related hazards, such as debris flows, mudslides, flooding, and drainage changes.

Major risk areas for these hazards include fire-scarred areas, where significant amounts of water have saturated soil and loosened material. These conditions are typically a result of torrential downpours or other severe weather events that limit activity and travel. Debris flows also present a greater risk in areas with steep slopes and along creeks. Elevation and topographic features in the county vary, but these features are present in some areas, particularly in the foothills of the Santa Ynez and San Rafael Mountains.

However, most structural development related to County-proposed park, recreation, and trail projects is not sited in high-risk areas. In addition, future development indirectly enabled under the Project (e.g., RBPs) would be subject to the County's permitting process, which requires compliance with all relevant laws, regulations, and development standards aiming to prevent post-wildfire hazards, such as those in the CFC and the Seismic Safety and Safety Element of the County's Comprehensive Plan. Relevant policies and programs address planning and prevention for debris flows and mudslides in detail, and include a Debris Control Program. Future development would also need to follow the development standards in the proposed zoning ordinance amendment and that it does not create hazards to life and property, including flooding or geologic hazards. Lastly, as previously discussed, park and recreation facility users are transitory populations, typically only at facilities for short periods, and generally can evacuate should the need arise due to a post-wildfire hazard.

Therefore, while the Project may directly or indirectly result in development within the WUI or High/Very High FHSZs in unincorporated areas of the county, compliance with all existing laws, regulations, and policies would ensure that any development, both planned and enabled under the Project, would not significantly exacerbate wildfire risk or result in a significant increase in project occupants to the uncontrolled spread of wildfire, pollutant concentrations from a wildfire, or post-wildfire hazards such as debris flows. Therefore, impacts would be *insignificant*.

Impact WF-3. The Project would involve the construction and maintenance of trails that may exacerbate fire risk.

As previously discussed, the Project would result in increased construction, maintenance, and operation of trails and related facilities, either directly (e.g., through County trails projects) or indirectly (through RBPs). Several proposed trail projects, such as the Point Sal Trails & Coastal Access Improvements, Jalama Bluff Trail, Mission Hills Community Trail, Lake Cachuma North Shore Trails & Recreation Facilities Management Plan, and Baron Ranch Trails projects, fall within High/Very High FHSZs in SRA.

The construction and maintenance of trails in rural and High/Very High FHSZs could increase the risk for ignition and spread of wildfire. For example, the operation of stampers or excavators, often used to grade areas during trail construction in the county, would increase the risk of wildfire ignition. Malfunction or misuse of hand tools used for vegetation clearing, such as chainsaws, could also cause sparks, thereby increasing the risk of ignition during trail maintenance.

However, the construction and maintenance of all trails in the county, both County-proposed and indirectly enabled as a result of the Project, would need to follow the U.S. Forest Service's Plans for Trail and Trail Bridge Structures, which the County has adopted. These identify strategies for trail design, construction, and maintenance to reduce hazards, including wildfire. Construction and maintenance of trails would also need to be conducted during appropriate weather conditions (e.g., avoiding red-flag days) and employ trained staff carrying fire extinguishers. All trail projects would also need to adhere to the development standards in the proposed zoning ordinance amendments, which outline siting, parking, preservation of site features, materials and design, and consistency with the County's Comprehensive Plan to support the public health, safety, and welfare of the community.

Further, the proposed zoning amendments would allow and regulate trails as a permitted use in zoning districts where they are currently not permitted, including agricultural, resource protection, residential, commercial, special purpose, and industrial zones. Currently, in these zones, unofficial and unregulated trails are often established, since they are not permitted. These unregulated trails do not follow development standards or County policies, which can result in a higher risk for ignition and spread of wildfire. The addition of trails as a permitted use in these zones would increase their regulation and ensure that they adhere to relevant policies and development standards, which would reduce the risk of wildfire and other hazards.

Therefore, while the Project may directly or indirectly result in trail projects within the WUI or High/Very High FHSZs in unincorporated areas of the county, compliance with existing and proposed regulations and development standards would ensure that construction, operation, and maintenance of trails would not significantly exacerbate wildfire risk. Impacts would be *insignificant*.

3.17.4.3 Cumulative Impacts

As described in Chapter 3, *Environmental Impact Analysis*, the cumulative setting for the proposed Project involves a variety of policies and initiatives in the county, as well as development projects in the unincorporated county and surrounding incorporated cities. These projects include parks and trail projects within the cities, state parks, and federal properties; related projects such as master plans and the California Coastal Trail; other plans such as General Plan updates; and the County's current cumulative projects list. The Project, in

combination with other cumulative pending plans and projects, would not result in substantial adverse impacts relating to emergency operation or evacuation plans, wildfire-related hazards, environmental impacts from associated infrastructure, or post-wildfire hazards.

SBCOEM implements its EMP continuously to ensure life and property safety, security, and protection, as well as the overall well-being of the population, during a disaster, including providing hazard warning and emergency response services. Because wildfire behavior varies dramatically based on location and conditions, emergency response and evacuation orders are provided in response to each wildfire event to ensure orderly and timely evacuation of potentially affected residents. Further, all new development throughout the unincorporated areas of the county is subject to the CFC, CBC, and other various local and state regulations, which require adequate and unobstructed emergency access and would ensure that all cumulative pending development provides adequate access during a wildfire to allow emergency response to and evacuation of the site, either through multiple points of ingress/egress or through other actions deemed appropriate by SBCFD. Therefore, impacts associated with impairment of an adopted emergency response plan or emergency evacuation plan would be cumulatively *insignificant.*

As discussed in Impact WF-2, the Project would require that all planned County parks projects comply with relevant policies (e.g., CFC, CBC, PRC) related to wildfire and post-fire hazards. Future parks and recreation projects enabled by the proposed zoning ordinance amendments would also need to comply with existing County policies and regulations (e.g., Chapters 10 and 15 of the County Code, Seismic Safety and Safety Element of the County's Comprehensive Plan, applicable community plans, LUDC, MLUDC, CLUP, CZO), as well as proposed development standards, which state that development shall not create hazards to life and property, including fire, flood, and geologic hazards. Therefore, impacts related to wildfire- or post-wildfire-related hazards would be cumulatively *insignificant*.

Lastly, any associated infrastructure (e.g., utility lines, emergency water sources, access roads) required to support development proposed or enabled under the Project would be subject to the same regulations listed above (aimed at reducing risk for wildfire) and would undergo County permit review processes, which would ensure that all potential secondary impacts are identified and addressed. Therefore, cumulative impacts related to associated infrastructure would be *insignificant*.

3.17.4.4 Proposed Mitigation

No mitigation measures are required.

3.17.4.5 Secondary Impacts

No mitigation measures are required to reduce impacts associated with the proposed Project. Therefore, no direct secondary impacts would occur.

3.17.4.6 Residual Impacts

Impact WF-1. The County does not designate specific emergency evacuation routes and does not maintain a specific emergency evacuation plan. Emergency response plans and evacuations in the county are meant to be scalable, adaptable, and responsive to specific emergencies. Potential development resulting from the Project would be required to comply with existing regulations of the CFC, CBC, County Code, Comprehensive Plan, and various other local and state regulations that require adequate and unobstructed emergency access for fire department apparatus and personnel to facilitate emergency response and evacuation. Compliance with these policies would ensure that the Project would not significantly impair an emergency response plan or emergency evacuation plan, and residual impacts would be *insignificant*.

Impact WF-2. Compliance with all existing laws, regulations, and policies would ensure that any development planned and enabled under the Project would not significantly exacerbate wildfire risk; result in a significant increase in exposure of project occupants to the uncontrolled spread of wildfire or pollutant concentrations from a wildfire; or significantly exacerbate post-wildfire hazards or risks, including mud and debris flows. Therefore, impacts would remain *insignificant*.

Impact WF-3. Compliance with all existing laws, regulations, and policies related to wildfire prevention would ensure that any associated infrastructure required to support development proposed or enabled under the Project does not increase risk for wildfire. In addition, all structural development requiring defensible space would undergo County permit review processes, and all potential secondary impacts would be identified and addressed. Therefore, impacts relating to associated infrastructure, such as access roads, fuel breaks, or utilities, would remain *insignificant*.

4.0 ALTERNATIVES ANALYSIS

4.1 INTRODUCTION

The California Environmental Quality Act (CEQA) Guidelines Section 15126.6 requires that an Environmental Impact Report (EIR) describes a range of reasonable alternatives to the project or to the location of the project that could feasibly avoid or reduce any significant environmental impacts while attaining the basic objectives of the project. This chapter describes three potential alternatives to the proposed Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (Project) that were considered, analyzes potential physical environmental impacts resulting from these alternatives, compares these impacts to those that could result from the proposed Project, and identifies the Environmentally Superior Alternative. The purpose of this section is to provide sufficient information about each alternative to allow meaningful evaluation, analysis, and comparison with the Project.

Key provisions of CEQA Guidelines Section 15126.6 pertaining to the alternatives analysis are summarized below:

- The discussion of alternatives will focus on alternatives to the project or its location that are capable of avoiding or substantially reducing any significant effects of the project, even if those alternatives would impede to some degree the attainment of the Project Objectives or would be more costly.
- The "No Project Alternative" will be evaluated, along with its impacts. The No Project Alternative analysis will discuss the existing conditions at the time the Notice of Preparation (NOP) was published, as well as what would be reasonably expected to occur in the foreseeable future if the project were not approved, based on current plans and consistent with available infrastructure and community services.
- The range of alternatives required in an EIR is governed by a "rule of reason;" therefore, the EIR must evaluate only those alternatives necessary to permit a reasoned choice. Alternatives will be limited to ones that would avoid or substantially lessen any of the significant effects of the project.
- For alternative locations, only locations that would avoid or substantially reduce any of the significant effects of the project would need to be considered for inclusion in the EIR.
- An EIR need not consider an alternative whose effects cannot be reasonably ascertained and whose implementation is remote and speculative.

The range of feasible alternatives is selected and discussed in a manner that fosters meaningful public participation and informed decision-making. Among the factors that may be taken into account when addressing the feasibility of alternatives (as described in CEQA Guidelines Section 15126.6[f][1]) are environmental impacts, economic viability, social and political acceptability, technological capacity, availability of infrastructure, general plan consistency,

regulatory limitations, and jurisdictional boundaries. An EIR need not consider an alternative whose effects could not be reasonably identified, whose implementation is remote or speculative, or that would not achieve the basic project objectives.

4.1.1 Project Objectives

As described in Chapter 2, *Project Description*, the Recreation Master Plan includes eight objectives that the County developed based on public input and in recognition of the County's core community values, as follows:

1. Expand and improve parks, trails, and recreation facilities to help meet countywide needs for play, sports, leisure, exercise, and outdoor exploration.
2. Facilitate interagency cooperation and coordination to foster a countywide plan for public parks, recreation, and trails.
3. Address unmet and future recreation needs to help guide overall recreation through 2050 while retaining flexibility for each agency or service provider.
4. Develop funding and implementation programs for County Parks to support the construction and operation of existing and planned parks, trails, and recreation facilities.
5. Enact the Recreation Benefit Project Program to create opportunities for public-private partnerships to develop new public parks, trails, and recreation facilities.
6. Build upon existing and ongoing transportation planning efforts to increase access to parks and recreation facilities via transit and active transportation, such as bike paths and trails.
7. Update and modernize the County of Santa Barbara's policies and regulations to support public parks, trails, and recreation facilities, to meet the needs identified in the Recreation Master Plan.
8. Establish development standards for public parks and trails that foster streamlined and efficient permitting.

4.1.2 Summary of Potentially Significant and Unavoidable Impacts

Based on the analysis provided in this Program EIR, the proposed Project would result in potentially significant and unavoidable impacts on agricultural resources and transportation. The proposed Project would also result in substantial contributions to cumulatively significant impacts on several of these resource areas.

- **Agricultural Resources.** The Project could potentially convert Prime Farmland, Unique Farmland, Farmland of Local Importance, and Farmland of Statewide Importance to non-agricultural uses. Additionally, the Project would convert existing agriculturally zoned lands to non-agricultural uses, impair agricultural productivity, and potentially conflict with existing zoning.

- **Transportation.** The proposed Project could result in potentially significant increases in total vehicle miles traveled (VMT) within the county. While many proposed and future recreation development projects enabled by the Project would likely not result in an increase in VMT individually, other larger projects proposed or enabled under the Project would have the potential generate a net increase in VMT compared to existing conditions.

4.2 ALTERNATIVES CONSIDERED AND DISCARDED

CEQA Guidelines Section 15126.6(c) requires that an EIR disclose alternatives that were considered and rejected and provide a brief explanation as to why such alternatives were not fully considered in the EIR. The following alternatives were considered but were ultimately eliminated from further analysis by the County due to infeasibility, inability to avoid or substantially reduce significant project impacts, or inconsistency with the Project Objectives.

4.2.1 Elimination of the South Coast Aquatic Center, Goleta Community Sports Park, and Guadalupe Community Park & Campground Projects

Under this alternative, certain planned parks, recreation, and trails projects involving the development of larger visitor-oriented recreational development projects would not be implemented, including:

- South Coast Aquatic Center
- Goleta Community Sports Park
- Guadalupe Community Park & Campground

The primary intent of this alternative would be to reduce or avoid impacts associated with larger park and recreation development projects proposed under the Project. In particular, this alternative is likely to reduce impacts associated with the conversion of commercial agricultural lands, generation of criteria pollutant emissions from large-scale recreation development, impacts to biological resources, impacts from the construction of new utility infrastructure, and impacts associated with generation of additional countywide VMT. However, this alternative would eliminate several key recreation improvements identified as critical projects for meeting the recreational needs of communities located in the Goleta Valley and Eastern Goleta Valley, and residents of the City of Guadalupe. Without implementation of these projects, this alternative would likely fail to fully meet several Project Objectives.

4.2.2 Elimination of Campground Projects

Under this alternative, planned parks, recreation, and trails projects involving the development of new or expanded camping facilities would not be implemented. This would mean the elimination of the following projects:

- Jalama Beach Campground Expansion & Upgrade Project
- Gaviota Marine Terminal Recreation Area

Under this alternative, the following projects would also be modified such that elements relating to any campground improvements are eliminated (all other non-campground improvements would continue to be implemented under this alternative):

- Lake Cachuma North Shore Trails & Recreation Facilities Management Plan
- Lake Cachuma Campground & South Shore Facilities Improvements
- Guadalupe Community Park & Campground

The primary intent of this alternative is to avoid or substantially reduce significant impacts associated with the physical development and operation of camping facilities (e.g., light and glare, agricultural resources, biological resources, cultural resources, hydrology and water quality, noise, utilities and service systems, VMT, and wildfire). However, in addition to the reduced ability to meet identified needs for new or expanded camping options throughout the county, this alternative would potentially substantially reduce County revenue and hinder County's ability to fund future recreational improvements and operations. As demonstrated in the Recreation Master Plan, a significant portion of County Parks operating budget is recovered through revenue from camping, concessionaries, and cabin/yurt rentals. By eliminating these proposed improvements, this alternative would potentially reduce the ability to meet key economic and financially-oriented Project objectives (Project Objectives No. 4), as well as eliminate important sources of funding for proposed and future recreational improvements, and ultimately posing concerns for economic feasibility of this alternative.

4.2.3 Vehicle Miles Traveled (VMT) Reduction Alternative

This alternative would involve the exclusion of planned rural parks, recreation, and trail projects to focus new recreational development within Urban and Inner-Rural areas, closer to residential communities and established multi-modal transportation networks, as a means to reduce Project VMT. Under this alternative, the following planned park, recreation, and trail projects would not be proposed given their location within distant rural areas and their nature as visitor-serving or large trip generating uses:

- Lake Cachuma North Shore Trails & Recreation Facilities Management Plan
- Lake Cachuma Campground & South Shore Facilities Improvements
- Jalama Beach Campground Expansion & Upgrade Project
- Point Sal Trails & Coastal Access Improvements
- Gaviota Marine Terminal Recreation Area
- Guadalupe Community Park & Campground
- South Coast Foothill Mountain Bike Park

The primary intent of this alternative would be to reduce potentially significant VMT impacts of the Project; however, added benefits of this alternative would be the slight reduction in some impacts associated with physical development and construction-related activities on vacant or underutilized rural sites (e.g., agricultural resources, biological resources, cultural resources, hydrology and water quality). While this alternative would likely reduce some impacts when

compared to the Project, it would come at the cost of eliminating key recreational improvements critical to meeting specific recreational needs of communities, particularly for communities located in the Santa Ynez Valley, Lompoc Valley, and Santa Maria Valley. Similar to the Elimination of Campground Projects alternative described above, eliminating larger, rural recreational improvement projects would reduce the County's ability to meet identified needs for recreational improvements in the rural areas (e.g., camping, coastal access to North County beaches). Further, this alternative would also potentially substantially reduce County revenue and hinder County's ability to fund future recreational improvements and operations. As demonstrated in the Recreation Master Plan, a significant portion of County Parks operating budget is recovered through revenue from camping, concessionaries, and cabin/yurt rentals. By eliminating these proposed improvements, this alternative would potentially reduce the ability to meet key economic and financially-oriented Project objectives (Project Objectives No. 4), as well as eliminate important sources of funding for proposed and future recreational improvements, and ultimately posing concerns for economic feasibility of this alternative.

4.2.4 Elimination of the Recreation Benefit Project (RBP) Program

Under this alternative, proposed Comprehensive Plan and zoning ordinance amendments relating to the establishment of a RBP Program would not be implemented. All other elements of the proposed Project would be implemented under this alternative. While this alternative has the potential to reduce some impacts associated with future recreational development enabled by the RBP Program, it would eliminate a key strategy of the Recreation Master Plan. Elimination of the RBP Program would substantially reduce the ability to achieve Project Objectives for expanding and improving recreational opportunities to meet the existing and future needs of county residents.

4.2.5 Modification of the RBP Program to Prohibit RBPs on AG-II Zones with Minimum Lot Size 40 Acres or Less

This alternative would implement all of the same elements of the proposed Project, but would modify the proposed standards for the RBP Program to prohibit RBPs on sites zoned AG-II with a lot size of less than 40 acres. The intent of this alternative is to reduce the potential for development of recreational and non-recreational uses that could create conflicts with or adverse quality of life impacts for surrounding agricultural and residential uses, particularly within the predominately zoned AG-II lands within and surrounding the communities of Santa Ynez, Los Olivos, and Los Alamos. However, this alternative would eliminate a significant portion of lands from eligibility for future RBPs, reducing the ability for this alternative to support the development of meaningful recreational improvements within the County's predominantly zoned agricultural and residential communities and reducing the ability to achieve key Project Objectives. Further, eliminating these zones from eligibility for RBPs is not

anticipated to substantially reduce or avoid potential impacts compared to the Project. As described for the proposed Project, future RBPs would be subject to proposed development standards designed to prevent or reduce potential conflicts between uses and quality of life impacts, which includes standards for scale, size, location, and intensity of the use, as well as mandatory requirement for consistency with all applicable policies of the County's Comprehensive Plan and community and area plans.

4.3 ALTERNATIVES CONSIDERED AND ANALYZED

The purpose of considering and analyzing alternatives under CEQA is to identify other means to attain the Project Objectives (Section 2.4, *Project Objectives*) while avoiding or substantially reducing potentially significant environmental impacts caused by adopting the proposed Project, as described in Section 4.2.1, *Summary of Potentially Significant and Unavoidable Impacts*. A reasonable range of alternatives with the potential to attain the basic Project Objectives but avoid or substantially lessen significant impacts is analyzed below. Each alternative is discussed relative to the Project Objectives. Alternatives selected for this analysis include:

- No Project Alternative (as required by CEQA Guidelines Section 15126.6[e])
- Alternative 1 – Reduced Eligibility of RBPs
- Alternative 2 – Increased Agricultural Buffers

4.3.1 No Project Alternative

Under the No Project Alternative, the Project would not be implemented by the County. As described in Chapter 2, *Project Description*, Santa Barbara County has never implemented a countywide Recreational Master Plan. The last time that countywide recreational needs were analyzed was in 1980 during the development of the County Comprehensive Plan. Since that date, the county has increased in population by 36 percent (U.S. Census 2025). The purpose of the Recreation Master Plan is to identify the recreational needs within the five recreation planning regions and propose capital improvements, programs, funding, and implementation strategies to guide a range of recreational development projects through 2050. The identified recreational needs for the five recreational planning areas include, but are not limited to: the need for expansion and diversity of recreational development; the identification of funding sources for recreation improvements and operations; the integration of recreation planning with economic development to maximize the economic benefits in disadvantaged communities; increasing access to parks and recreation facilities via transit and active transportation; and assisting disadvantaged or underserved communities by providing improved parks and recreation services within or accessible to such communities.

Table 4-1. Summary of Alternatives Considered and Analyzed

Alternative	Key Details/Description

No Project Alternative	• No implementation of the programs featured in the Recreation Master Plan and supplemental amendments, including but not limited to:
	  ◦ Newly planned park, recreation, and trail projects.
	  ◦ Amendments to the County's Comprehensive Plan to update the Recreation Section of the Land Use Element, modernize the "Recreation" designation, revisions to the Parks, Recreation, and Trails (PRT) maps and the Public and Private Parks/Recreation Facility Overlay map to align with the Recreation Master Plan, and update the Agricultural Element to align agricultural goals and policies to allow for outdoor recreation, trails, and related uses in agricultural areas.
	  ◦ Amendments to the County's zoning ordinance to support permitting parks, recreation, and trails in unincorporated areas, including changes in permitting requirements for parks and trails and addition of new specific use and development standards.
	  ◦ Changes in the Recreation (REC) Zoning Regulations to support and encourage a diversity of recreational uses that support both active and passive recreation and enhance access to recreation areas for the public.
	  ◦ Approval of the Recreation Benefit Project (RBP) Program which would allow and foster public-private partnerships to help fulfill recreational needs identified by the Recreation Master Plan.

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

Alternative 2 – Increased Agricultural Buffers	• Implementation of modified zoning ordinance amendments that considers some of the comments received from the public, Parks Commission, Planning Commission to provide more protection from agricultural uses by:
	  ◦ Increasing buffer requirements from active agriculture on adjacent properties to 500 feet at a minimum for RBPs and privately-proposed recreational uses, unless the site is within the Public and Private Park/Recreation Facility Overlay.
	  ◦ Prohibiting RBPs on sites within the Limited Agricultural Enterprise Overlay and within 1,000 feet of any mapped Limited Agricultural Enterprise Overlay site.
	• All other elements described for the proposed Project would continue to be implemented under this alternative.

Under the No Project Alternative, the Recreation Master Plan would not be implemented and countywide recreational needs identified within the Plan would go unaddressed. Other elements of the Project including: the proposed Comprehensive Plan Amendments which would update the Recreation Section of the Land Use Element and policies within the County's Comprehensive Plan; the amendments to the County's Land Use Development Code (LUDC), the Montecito's

LUDC, and the Coastal Zoning Ordinance to update REC zoning districts and allow for parks and trails as permitted uses in selected zoning districts; and the targeted rezones of public park properties to REC zoning would not be implemented under the No Project Alternative. As such, without implementation of the Project, any future public recreational development would not be guided by the proposed guidance and programs that would increase the ease of implementation and allow for a larger range of viable recreational parcels and uses throughout the county. Rather, under the No Project Alternative, future recreation development would continue to rely on existing County policies and programs, which are based on out-of-date data and do not provide for the scope of actions and beneficial outcomes for meeting countywide recreation needs as those included in the Recreation Master Plan.

Resource Impact Analysis

Aesthetics and Visual Resources

Under the No Project Alternative, recreational development and related amendments described in the proposed Project would not be implemented. Recreational development would continue to be allowed under existing zoning regulations, but without any streamlining permitting processes or additional opportunities for funding sources. Some of the uses would continue to be allowed under existing zoning regulations but would require an MCUP or CUP, while other uses simply would not be allowed. Expansion of recreational development, such as parks, trails, and facilities, would not be expected to be implemented at the rate or extent of expansion described in the Project. As such, under the No Project Alternative there would be less construction of new recreational facilities and supplemental structures. The County's existing design standards would continue to apply to all new recreation development. These standards address height, setbacks, and lighting, described in the LUDC and Article II CZO, and, depending on location (typically within Community Plan areas), issues such as siting development, building coverage, and design review. Any new structures and exterior modifications/additions to existing structures would be required to comply with the policies in the County's Comprehensive Plan as well as the design standards in any applicable Design Overlay Zone District. Recreational planning would continue to require permits (e.g., MCUP or CUP), which would include County-imposed conditions to avoid any potential impacts to aesthetics and visual resources and ensure consistency with the County's Comprehensive Plan policies. Overall, impacts to aesthetics and visual resources under the No Project Alternative would be less adverse than those described in Section 3.1, *Aesthetics and Visual Resources*, and would be *insignificant*.

Agricultural Resources

Under the No Project Alternative, agricultural properties in unincorporated areas of the county identified for planned parks, trails, and recreational development under the Project would not be developed for recreational facilities or other complimentary, non-agricultural uses. In contrast with the proposed Project, no changes or additions of allowed uses in the AG-I and/or

AG-II zoning districts would occur. Subsequently, low-intensity recreational development in rural areas zoned AG-II would also continue to not be allowed. Agricultural zones areas would continue to operate as urban agriculture with orchards, row crops, and greenhouses. In general, expansion of recreational development, such as parks, trails, and facilities, would not be expected to be implemented at the rate or extent of expansion described in the Project. As such, under the No Project Alternative there would be less construction of new recreational facilities and supplemental structures, and less conversion or development of agricultural lands. Compliance with existing relevant Comprehensive Plan policies, the LUDC and the CZO, and the Uniform Rules would continue to limit future conversion of agricultural lands and the allowed uses within such districts within the unincorporated areas of the county. As a result, impacts on agricultural resources under the No Project Alternative would be substantially less adverse than those described in Section 3.2, *Agricultural Resources* under the proposed Project, and would be *insignificant*.

Air Quality

Under the No Project Alternative, recreational development and related amendments described in the proposed Project would not be implemented. Recreational development would continue to be allowed under existing zoning regulations, but without any streamlining permitting processes or additional opportunities for funding sources. Some of the uses would continue to be allowed under existing zoning regulations but would require an MCUP or CUP, while other uses simply would not be allowed. Expansion of recreational development, such as parks, trails, and facilities, would not be expected to be implemented at the rate or extent of expansion described in the Project. As such, there would be less construction of related new recreational facilities and supplemental structures. Therefore, the impacts to air quality under the No Project Alternative would be substantially less adverse compared to the proposed Project and would be *insignificant*.

Biological Resources

Under the No Project Alternative, recreational development and related amendments described in the proposed Project would not be implemented. Recreational development would continue to be allowed under existing zoning regulations, but without any streamlining permitting processes or additional opportunities for funding sources. Some of the uses would continue to be allowed under existing zoning regulations but would require an MCUP or CUP, while other uses simply would not be allowed. Expansion of recreational development, such as parks, trails, and facilities, would not be expected to be implemented at the rate or extent of expansion described in the Project. As such, there would be less construction of related new recreational facilities and supplemental structures. Future recreational development under existing zoning on vacant sites would be subject to the County's design review and permitting process, which would ensure recreational development is sited and designed to protect ESH, riparian corridors, wetlands, oak woodlands, and other sensitive habitats, and natural communities. Additionally, all recreational development would be required to comply with existing relevant County

Comprehensive Plan policies that protect biological resources and may require site-specific studies or additional environmental review. Therefore, impacts to biological resources under the No Project Alternative would be similar to, but less adverse than those described in Section 3.4, *Biological Resources,* and would be *insignificant*.

Cultural and Tribal Cultural Resources

Under the No Project Alternative, recreational development and related amendments described in the proposed Project would not be implemented. Recreational development would continue to be allowed under existing zoning regulations, but without any streamlining permitting processes or additional opportunities for funding sources. Some of the uses would continue to be allowed under existing zoning regulations but would require an MCUP or CUP, while other uses simply would not be allowed. Expansion of recreational development, such as parks, trails, and facilities, would not be expected to be implemented at the rate or extent of expansion described in the Project. As such, there would be less construction of related new recreational facilities and supplemental structures. Federal, state, and County policies and regulations, including the County Comprehensive Plan, Community and Area plans, and the County's zoning ordinances, as well as CEQA and tribal consultation requirements under Assembly Bill (AB) 52 and Senate Bill (SB) 18, preserve and protect historic and pre-historic resources by requiring development projects avoid disturbance and/or preserve significant resources. Significant cultural and tribal cultural resources would be identified on a project-by-project basis through site-specific, onsite reconnaissance before approval of a development permit(s) (e.g., demolition permit, building permit) to avoid disruption, alteration, destruction, or adverse effects. The disposition of human remains is governed by the California Health and Safety Code Section 7050.5 and PRC Sections 5097.94 and 5097.98 and falls within the jurisdiction of the Native American Heritage Commission (NAHC). Overall, impacts on cultural resources and tribal cultural resources would be similar to, but less adverse than those described in Section 3.5, *Cultural and Tribal Cultural Resources,* and would be *insignificant*.

Energy

Under the No Project Alternative, recreational development and related amendments described in the proposed Project would not be implemented. Recreational development would continue to be allowed under existing zoning regulations, but without any streamlining permitting processes or additional opportunities for funding sources. Some of the uses would continue to be allowed under existing zoning regulations but would require an MCUP or CUP, while other uses simply would not be allowed. Expansion of recreational development, such as parks, trails, and facilities, would not be expected to be implemented at the rate or extent of expansion described in the Project. As such, there would be less construction of related new recreational facilities and supplemental structures. Ongoing and future recreational development under the County's existing land use plans and policies would result in construction-related energy demand. Such energy demand is difficult to quantify as the details of construction, design, size, and timing of each future project are unknown. However, given the reduction in recreational development under the No Project Alternative, construction-related energy consumption would

be reduced commensurately. As described for the proposed Project, future recreational development under the No Project Alternative would also increase operational energy consumption. Given the reduction in recreational development under the No Project Alternative, operational energy consumption would also be reduced. Comparatively, the impacts related to energy under the No Project Alternative would be less adverse than those described in Section 3.6, *Energy,* and would be *insignificant*.

Geology and Soils

Under the No Project Alternative, recreational development and related amendments described in the proposed Project would not be implemented. Recreational development would continue to be allowed under existing zoning regulations, but without any streamlining permitting processes or additional opportunities for funding sources. Some of the uses would continue to be allowed under existing zoning regulations but would require an MCUP or CUP, while other uses simply would not be allowed. Expansion of recreational development, such as parks, trails, and facilities, would not be expected to be implemented at the rate or extent of expansion described in the Project. As such, there would be less construction of related new recreational facilities and supplemental structures. Nevertheless, development of permitted uses under the No Project Alternative, including building modifications and upgrades, would be subject to the most current standards of the Santa Barbara County Code, the LUDC, and the Article II CZO. This would include compliance with the County Building Regulations, which adopt California Building Code (CBC) standards by reference with local amendments, as well as applicable County fire and/or environmental health standards. In addition, pursuant to Chapter 14 of the Santa Barbara County Code, applicants for a proposed use triggering the need for a grading or building permit for site improvements may be required to prepare and submit an engineering geology report and/or a geotechnical (soil) engineering report prepared by a licensed professional geologist or geotechnical engineer for review and approval by the County Building Official. Mandatory compliance with existing Santa Barbara County Environmental Health Services (EHS) permitting requirements (Chapter 18C of the County Code) would ensure that any proposed uses involving the construction, modification, or maintenance of on-site wastewater treatment systems (OWTS) would be implemented in a manner that would avoid impacts associated with soils that may have inadequate capacity to support on-site sewage disposal. Therefore, impacts to and from geologic and soil resources under the No Project Alternative would be similar to, but less adverse than those described in Section 3.7, *Geology and Soils,* and would be *insignificant*.

Greenhouse Gas (GHG) Emissions

Under the No Project Alternative, future recreational development within the unincorporated areas of the county would be substantially less than the proposed Project and would occur in accordance with existing adopted plans, policies, and regulations. Proposed recreational development and improvements described in the proposed Project would not be enabled or

streamlined for permitting. Some of the uses would continue to be allowed under existing zoning regulations but with a MCUP or CUP, while other uses simply would not be allowed. Expansion of recreational development, such as parks, trails, and facilities, would not be expected to be implemented at the rate or extent of expansion described in the Project. As such, there would be less construction of related new recreational facilities and supplemental structures. Future development under existing land use plans and policies would generate short-term construction-related GHG emissions and long-term operational GHG emissions that would be substantially less than the proposed Project. Given the reduction in recreational development under the No Project Alternative, construction-related GHG emissions would be reduced commensurately. As described for the proposed Project, future recreational development under the No Project Alternative would also increase operational GHG emissions. Given the reduction in recreational development under the No Project Alternative, operational GHG emissions would also be reduced. Therefore, the impacts related to GHG emissions under the No Project Alternative would be similar to, but less adverse than those described in Section 3.8, *Greenhouse Gas Emissions,* and would be *insignificant*.

Hazards and Hazardous Materials

Under the No Project Alternative, recreational development and related amendments described in the proposed Project would not be implemented. Recreational development would continue to be allowed under existing zoning regulations, but without any streamlining permitting processes or additional opportunities for funding sources. Some of the uses would continue to be allowed under existing zoning regulations but would require an MCUP or CUP, while other uses simply would not be allowed. Expansion of recreational development, such as parks, trails, and facilities, would not be expected to be implemented at the rate or extent of expansion described in the Project. As such, there would be less construction of related new recreational facilities and supplemental structures. Development of permitted uses under the No Project Alternative would still be subject to mandatory compliance with existing Federal, State, and local regulations described in Section 3.9.3, Regulatory Setting – including the Resource Conservation and Recovery Act (RCRA), Hazardous Materials Release Response Plans and Inventory Act, Hazardous Waste Control Act, etc. – to ensure the continued safety of the surrounding public and environment. Uses requiring a grading permit would be subject to existing County permit review that would ensure future uses are compatible with any land use controls on the participating parcels and do not pose a substantial threat to humans or the environment from the risk of release of hazardous materials. These uses would also be required to comply with the procedures and regulations of California Geologic Energy Management Division (CalGEM), including the Construction Site Plan Review Program, which assists local permitting agencies in identifying and reviewing the status of oil or gas wells located near or beneath proposed structures. Therefore, impacts related to hazards and hazardous materials under the No Project Alternative would be similar to, but less adverse than those described in Section 3.9, *Hazards and Hazardous Materials*, and would be *insignificant*.

Hydrology and Water Quality

Under the No Project Alternative, recreational development and related amendments described in the proposed Project would not be implemented. Recreational development would continue to be allowed under existing zoning regulations, but without any streamlining permitting processes or additional opportunities for funding sources. Some of the uses would continue to be allowed under existing zoning regulations but would require an MCUP or CUP, while other uses simply would not be allowed. Expansion of recreational development, such as parks, trails, and facilities, would not be expected to be implemented at the rate or extent of expansion described in the Project. As such, there would be less construction of related new recreational facilities and supplemental structures. Development of permitted uses under the No Project Alternative would continue to be subject to the Conservation Element and Seismic Safety and Safety Element of the County's Comprehensive Plan as well as the Grading Ordinance (Chapter 14 of the Santa Barbara County Code) and the County's Storm Water Management Program. Individual projects that would disturb an area of 1 acre or more would have to comply with the requirements of the Construction General Permit (State Water Resources Control Board [SWRCB] Order No. 2012-0006-DQA) in addition to the County's policies and regulations to protect associated water quality. With regard to groundwater use, the County would continue to require that an adequate and approved water source is available for the development of permitted uses under the No Project Alternative. However, without a tiered permitting system, the implementation of small-scale, secondary, supplemental uses would continue to be time consuming and often cost prohibitive by requiring a MCUP or CUP. Therefore, it is anticipated that overall water demand, including groundwater use, would be reduced as compared to the proposed Project. Permitted uses under the No Project Alternative would continue to be subject to Section 29-47, Discharge prohibitions, of Chapter 29 of the Santa Barbara County Code, which prohibit the discharge of pollutants or waters containing any pollutants that cause or contribute to a violation of applicable water quality standards. Overall, impacts related to surface water and groundwater under the No Project Alternative would be similar to, but less adverse than those described in Section 3.10, *Hydrology and Water Quality*, and would be *insignificant*.

Land Use and Planning

The No Project Alternative would not involve any amendments to the LUDC, Article II CZO, or the Uniform Rules. Proposed recreational development and improvements described in the proposed Project would not be enabled or streamlined for permitting. Expansion of recreational development such as parks, trails, and facilities would not be expected to be implemented to the extent described in the Project, and therefore, there would be less construction of related new buildings and structures. As such, the No Project Alternative would not meet the primary intent of the proposed Project: to support the implementation of the Recreation Master Plan over 10 to 20 years and enhance the quality of life for county residents by improving parks,

trails, and recreation facilities. Under the No Project Alternative, the changing of County policies and regulations to support the development of public parks, recreation, and trails through public-private partnerships would not occur, and beneficial impacts related to plans, goals, and policies focused on recreation would not be achieved. However, under the No Project Alternative, recreational development that would result in construction-related and operational-related adverse quality-of-life effects (e.g., noise, traffic, physical environmental impacts) on existing communities, particularly in Inner-Rural and Rural areas, would not occur at the same scale. Therefore, the impacts related to land use and planning under the No Project Alternative would be less adverse than those described in Section 3.11, *Land Use and Planning,* and would be *insignificant*.

Noise

Under the No Project Alternative, recreational development and related amendments described in the proposed Project would not be implemented. Recreational development would continue to be allowed under existing zoning regulations, but without any streamlining permitting processes or additional opportunities for funding sources. Some of the uses would continue to be allowed under existing zoning regulations but would require an MCUP or CUP, while other uses simply would not be allowed. Expansion of recreational development, such as parks, trails, and facilities, would not be expected to be implemented at the rate or extent of expansion described in the Project. As such, there would be less construction of related new recreational facilities and supplemental structures. Subsequently, less recreational uses that would bring temporary populations to rural, low-noise premises (e.g., AG-I, AG-II zones) for noise-generating activities, such as sports games, special events, or educational opportunities, would occur. Development of permitted recreational uses under the No Project Alternative would continue to be subject to limitation on construction hours for grading and activities occurring within 1,600 feet of sensitive receptors (Section 3.12.4, *Regulatory Setting*). Operationally, permitted uses under the No Project Alternative would continue to be subject to the County's Nighttime Noise Restrictions. Overall, impacts related to noise under the No Project Alternative would be less adverse than those described in Section 3.12, *Noise*, and would be *insignificant*.

Public Services

Under the No Project Alternative, recreational development and related amendments described in the proposed Project would not be implemented. Recreational development would continue to be allowed under existing zoning regulations, but without any streamlining permitting processes or additional opportunities for funding sources. Some of the uses would continue to be allowed under existing zoning regulations but would require an MCUP or CUP, while other uses simply would not be allowed. Expansion of recreational development, such as parks, trails, and facilities, would not be expected to be implemented at the rate or extent of expansion described in the Project. As such, there would be less construction of related new recreational facilities and supplemental structures. Similar to the proposed Project, the No Project

Alternative would not be expected to create a permanent population increase that would subsequently create an increased demand for police, fire, schools, libraries, and recreation services. Therefore, impacts to public services under the No Project Alternative would be less adverse than those described in Section 3.13, *Public Services*, and would be *insignificant*.

Recreation

As described in Section 3.14.4.1, *Thresholds of Significance*, the County employs a standard ratio of 4.7 acres of public parkland for every 1,000 residents per the 1980 Land Use Element. Countywide, the existing parkland-to-population ratio currently meets this standard, with approximately 4.9 acres of parkland for every 1,000 persons; however, the acreage of parkland within the Santa Maria Valley fails to meet this standard, providing only 3.0 acres of parkland for every 1,000 residents. Further, when accounting for future population growth within the county, the ratio of public parkland per 1,000 residents declines, and it is projected that the ratio of public parkland countywide would fall below the County's adopted standards. Future recreational development under the No Project Alternative would continue to increase the amount of parkland-to-population ratio, but not at the expedited rate of the proposed Project. The continued increases in demand could result in physical deterioration of existing recreational facilities and the No Project Alternative would not result in any *beneficial* impacts, as described in Section 3.14, *Recreation*.

However, future recreational development would rely on existing County policies that aim to preserve, expand, and fund recreational facilities. Ordinance 4317 enacts the Quimby Act, which requires that new residential subdivisions must dedicate parkland or pay in-lieu fees (or both, in some circumstances). As described in Section 3.14.2, *Regulatory Setting,* the Quimby Act allows fees to be collected for up to 5 acres of parkland per 1,000 residents to serve the needs of residents of the subdivision and the greater public residing in the city or county. County Ordinance 4348 also imposes DIMFs for new residential development which does not involve the subdivision of land; fees are to be consistent with current Quimby Act fees. The Mello-Roos Community Facilities Act of 1982 and the Landscaping and Lighting Act of 1972 also help to ensure funding for the construction or maintenance of new or existing parks. Additionally, under the No Project Alternative, adverse physical impacts on the environment resulting from the development of recreational development would be substantially less than those described for the proposed Project. Therefore, impacts to recreation under the No Project Alternative would be similar to, but less adverse than those described in Section 3.14, *Recreation,* would be *insignificant*.

Transportation

Under the No Project Alternative, recreational development and related amendments described in the proposed Project would not be implemented Recreational development would continue to be allowed under existing zoning regulations, but without any streamlining permitting processes or additional opportunities for funding sources. Some of the uses would continue to be allowed under existing zoning regulations but would require an MCUP or CUP, while other

uses simply would not be allowed. Expansion of recreational development, such as parks, trails, and facilities, would not be expected to be implemented at the rate or extent of expansion described in the Project. As such, future recreational development would be less than that described in the proposed Project and would result in less construction of related new facilities and supplemental structures. Under the No Project Alternative, there would be no increase in annual countywide VMT, no substantial changes to travel patterns, and no effect on traffic safety. Transportation impacts under the No Project Alternative would be substantially less than those described for the proposed Project in Section 3.15, *Transportation*, and would be *insignificant*.

Utilities and Water Supply

Similar to the proposed Project, under the No Project Alternative future residential growth within the unincorporated areas of the county would not be influenced and any indirect growth would occur in accordance with existing adopted plans, policies, and regulations. Proposed recreational development and improvements described in the proposed Project would not be enabled or streamlined for permitting. Some of the uses would continue to be allowed under existing zoning regulations but with a MCUP or CUP, while other uses simply would not be allowed. Expansion of recreational development, such as parks, trails, and facilities, would not be expected to be implemented at the rate or extent of expansion described in the Project. However, future recreational development under the No Project Alternative could continue to increase the demand for utilities and water supplies, which could necessitate the construction or expansion of utilities, such as water and wastewater facilities. With the increase in water demand and wastewater generation at a given location, individual projects may trigger the need for the construction of new laterals and/or the replacement/expansion of existing mains, pumps, and lift stations necessary to provide adequate water supply, water pressure, and wastewater conveyance. Consistent with Section 35.30.100 of the LUDC and corresponding sections of the MLUDC (35.430.100), the Article II CZO (35-60, 35-172.8, 35-174.7), and the Coastal Land Use Plan (CLUP) (Policy 2-6), future project applicants would be required to provide documentation demonstrating that adequate water and wastewater services are available to serve the project. Similar to the proposed Project, any population growth anticipated under the No Project Alternative would be consistent with previous regional growth forecasts and would not exceed the capacity of water purveyors. Therefore, impacts related to the construction, expansion, or replacement of utilities, and those related to solid waste generation would be similar to, but less adverse than those described for the proposed Project in Section 3.16, *Utilities and Water Supply,* and would be *insignificant*.

Wildfire

Under the No Project Alternative, recreational development and related amendments described in the proposed Project would not be implemented. Recreational development would continue to be allowed under existing zoning regulations, but without any streamlining permitting processes or additional opportunities for funding sources. Some of the uses would continue to

be allowed under existing zoning regulations but would require an MCUP or CUP, while other uses simply would not be allowed. Expansion of recreational development, such as parks, trails, and facilities, would not be expected to be implemented at the rate or extent of expansion described in the Project. As such, there would be less construction of related new recreational facilities and supplemental structures. Development of permitted uses under the No Project Alternative would continue to be subject to best management practices (BMPs), rules, and regulations that address and aim to minimize the risk of fire ignition during these activities. Such regulations can be found in Chapter 33 of the California Fire Code (CFC) and Chapter 18C of the County Code and include provisions relating to motorized construction equipment. Permitted uses would also be required to comply with safety guidelines (Chapter 15 of the County Fire Code) to minimize the risk of damage/destruction during a wildfire including CFC and CBC requirements, policies, and development standards in various community wildfire protection plans (CWPPs), and requirements from the Santa Barbara County Fire Department (SBCFD) relating to defensible space and emergency access. Therefore, impacts related to wildfire under the No Project Alternative would be similar to, but less adverse than those described in Section 3.17, *Wildfire*, and would be *insignificant*.

Conclusion and Relationship to Project Objectives

Under the No Project Alternative, the County would not approve the proposed Recreation Master Plan. The No Project Alternative would not change any of the current regulatory and permitting mechanisms that govern the recreational development on unincorporated lands or change allowed uses for areas zoned AG-I and/or AG-II. As a result, adoption of the No Project Alternative would have less adverse impacts to the majority of the beforementioned environmental resources; however, the No Project Alternative would not align with any of the Project Goals or achieve any of the Project Objectives. Without a tiered permitting system, the implementation of additional and supplemental uses for recreational development would continue to be time consuming and often cost prohibitive by requiring a MCUP or CUP, such that recreational expansion and opportunities for project funding would be substantially limited. As such, the No Project Alternative would not meet the primary intent of the proposed Project: to identify the recreational needs within the five recreation planning regions and propose capital improvements, programs, funding, and implementation strategies to guide a range of recreational development projects through 2050. Under the No Project Alternative, the beneficial impacts to recreational resources (Impact REC-1) that could result by providing additional recreational facilities, parks, and trails that would reduce the physical deterioration of existing recreational facilities, and the updated related plans, goals, and policies focused on recreation resources would not be achieved.

4.3.2 Alternative 1 — Reduced Eligibility of RBPs

The Reduced Eligibility of RBPs Alternative (Alternative 1) would implement all of the same components of the proposed Project; however, Alternative 1 would involve modifications to the

proposed RBP Program eligibility to allow for RBPs only within a limited number of zone districts. Specifically, under this alternative, RBPs would not be allowed within designated Resource Protection Zones, including the Mountainous Gaviota (MT-GAV), Mountainous Goleta (MT-GOL), Mountainous Toro Canyon (MT-GOT), and Resource Management Zones (RMZ) (refer to Table 4-2). All other aspects of the proposed Project and RBP Program be implemented under this alternative. These changes to RBP Program eligibility implement some of the suggested revisions to the proposed Project received from the public, the Parks Commission, and the Planning Commission during public hearings held on January 23, 2025, December 3, 2025, and January 14, 2026, on the Draft Recreation Master Plan.

Table 4-2. Zones Allowing Eligible Recreation Benefit Projects under Alternative 1[1]

Zone Type	RBPs Permitted by Zone (Project)	RBPs Permitted by Zone (Alternative 1)
Agricultural	AG-I & AG-II	AG-I & AG-II
Resource Protection	MT-GAV, MT-GOL, MT-TORO, RMZ	*No Eligible Zones*
Residential	RR, DR, PRD, OT-R	RR, DR, PRD, OT-R
Commercial	C-1, C-2, C-3, CH, C-V, CM-LA	C-1, C-2, C-3, CH, C-V, CM-LA
Industrial	M-RP	M-RP
Special Purpose	MU, PU, OR-R/GC, OT-R/LC	MU, PU, OR-R/GC, OT-R/LC

Notes:
[1] Recreation Benefit Projects would only be permitted uses if found eligible by County Parks.

The primary intent of this alternative is to reduce the eligibility of RBPs to try to concentrate potential future RBPs within less rural regions of the county, reducing VMT and avoiding lands known to contain or support protected or sensitive resources. As described in this EIR, the proposed Project has the potential to generate potentially significant impacts to the natural and human environment, particularly as a result of the construction and operation of new recreational facilities within the rural areas of the county.

Resources Impact Analysis

Aesthetics and Visual Resources

Similar to the proposed Project, the recreational improvements proposed or facilitated by Alternative 1 would potentially be visible from public viewing areas such as Scenic Highways or could otherwise obstruct scenic views. However, Alternative 1 has the potential to result in less adverse impacts compared to the Project due to RBPs being ineligible within Resource Protection zone districts, which are defined in Section 35.22.020(d) of the LUDC as "[a]reas with outstanding resource values, including environmentally sensitive habitats and/or watersheds." Many of the County's Resource Protection zoned lands are located in mountainous and rural areas of the County that are noted for or contribute to areas of significant aesthetic value and are visible from designated scenic view points and corridors, such as U.S. Highway 101 along the Gaviota Coast, where lands are predominately designated MT-GAV. By eliminating these zones from consideration for future RBP development, Alternative 1 would

avoid potential for impacts to aesthetics and visual resources within these areas of the county. For all other proposed and future recreational development enabled under Alternative 1 continue to be subject to proposed development standards governing the design of new improvements, preservation of natural features, and limitations on lighting, as well as mandates for consistency with the Comprehensive Plan's visual resource protection policies and County zoning ordinances. Therefore, impacts to scenic vistas, visual character, and light and glare within Resource Protection zone districts would be reduced under Alternative 1, but overall, would be similar to those described in Section 3.1, *Aesthetics and Visual Resources* and would be *insignificant*.

Agricultural Resources

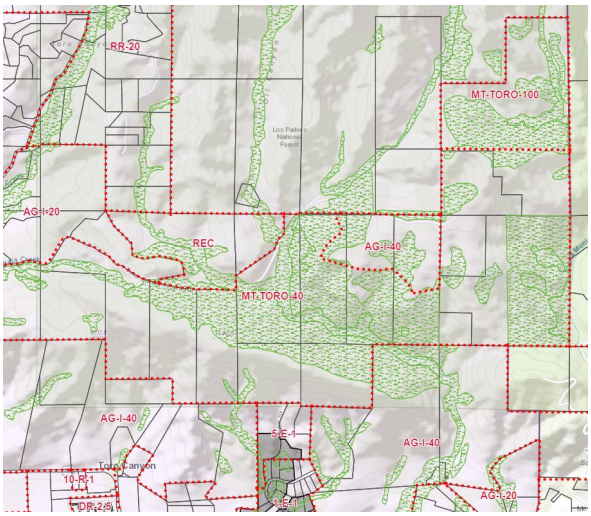
Implementation of Alternative 1 and the reduced eligibility of RBPs in Resource Protection zone districts would not result in a substantial change in in the severity of impacts described for the proposed Project. As described in Section 3.2, *Agricultural Resources,* RBPs are anticipated to have limited potential to convert or adversely affect agricultural lands, as these proposed uses and related development would be subject to numerous development standards to avoid impacts to onsite and adjacent agricultural lands. Alternative 1 would not eliminate eligibility of RBPs from being allowed on agricultural-zoned lands, and much of the County's Resource Protection zoned lands do not support active agricultural uses, lands designated as important agricultural land under the Farmland Mapping and Monitoring Program (FMMP), or lands enrolled in Williamson Act contracts. Under Alternative 1, planned parks, recreation, and trail projects and zoning ordinance amendments would continue to result in the potential conversion of existing agricultural uses and agricultural-zoned lands to non-agricultural uses. Therefore, impacts to agricultural resources would be similar to those described in Section 3.2, *Agricultural Resources* and would remain *significant and unavoidable*.

Air Quality

Implementation of Alternative 1 would slightly reduce the potential for development of future RBPs by reducing the eligibility of RBPs on Resource Protection zoned lands. This would result in a potential slight reduction in the number of future RBPs developed under Alternative 1 compared to the proposed Project, reducing the amount of future development and associated construction and operational criteria pollutant emissions generated under this alternative. However, individual RBPs proposed within Resource Protection zone districts are anticipated to be smaller in scale, and generate less construction and operational emissions as compared to the large-scale recreational development scenario described for the Project. Thus, the elimination of RBPs within Resource Protection zone districts under Alternative 1 is considered to have only a negligible reduction in the potential air quality impacts compared to the Project. Given Resource Protection zone districts tend to be located within more rural areas of the county, future RBPs within these zones would not be anticipated to generate emissions affecting sensitive receptors. Further, Alternative 1 would not result in greater consistency or inconsistency with applicable air quality plan. Implementation of **MM AQ-1 (PM_{10} and Dust Control)** and **MM AQ-2 (Equipment Exhaust)** would continue to be required to ensure that

future recreational construction projects would not generate or contribute to a violation of federal and state air quality standards. Therefore, impacts to air quality would be only slightly reduced compared to the described for the Project in Section 3.3, *Air Quality*, and would remain *significant but mitigable*.

Biological Resources



Depicted is a map of Resource Protection zoned lands within the Toro Canyon Community Plan Area. The shaded green overlay depicts the extent of mapped environmentally sensitive habitats.

As described above, Alternative 1 has the potential to result in less adverse impacts compared to the Project due to RBPs being ineligible within Resource Protection zone districts, which are defined in Section 35.22.020(d) of the LUDC as "[a]reas with outstanding resource values, including environmentally sensitive habitats and/or watersheds." For instance, in the Toro Canyon Community Plan Area, environmentally sensitive riparian corridors, coast live oak forests, and scrub oak chaparral are mapped within the majority of properties zoned MT-TORO-40. By excluding these zone districts from being eligible sites for future RBPs, Alternative 1 would reduce the potential for direct and indirect disturbance to sensitive habitats and species present within these areas of the county. For all other proposed and future development enabled under Alternative 1, recreational development would continue to be subject to existing policies and development standards, as well as proposed development standards and required mitigation measures that would reduce direct and indirect impacts of development to biological resources. This includes **MM BIO-1 (Species-Specific and Sensitive Habitat Avoidance and Minimization Measures)** and **MM BIO-2 (General Construction Avoidance and Minimization Measures)** which would ensure that site-specific impacts associated with implementation of the Jalama Beach County Park Expansion and Coastal Access Improvements Project would be reduced, as well as **MM NOI-1 (Recreation Noise Standards)** which would ensure new recreational facilities do not generate noise which would not cause substantial disturbance of biological resources. Therefore, impacts to biological resources within Resource Protection zone districts would be reduced under Alternative 1, but overall, Alternative 1 would result in similar to those described for the Project in Section 3.4, *Biological Resources* and would remain *significant but mitigable*.

Cultural Resources and Tribal Cultural Resources

Implementation of Alternative 1 would result in a potential slight reduction in the number of future RBPs compared to the proposed Project, reducing the amount of future development and associated construction and ground disturbance generated under this alternative. However, as

noted in Section 3.5, *Cultural and Tribal Cultural Resources,* most recreation project types and locations would have extremely limited potential to impact unknown cultural and historic resources due to limitations of allowed uses and development standards, including for RBPs. Therefore, reducing the eligibility of future RBPs within Resource Protection zoned lands under Alternative 1 is considered to result in only a slight reduction in potential for impacts to cultural and tribal cultural resources. For all other proposed and future development enabled under Alternative 1, recreational development would continue to be subject to existing policies and development standards, as well as proposed development standards and required mitigation measures that would reduce direct and indirect impacts of development to cultural and tribal cultural resources. Implementation of **MM CTCR-1 (Objective Development Standards for Addressing Historic and Archaeological Resources)** would continue to be required to ensure that impacts to known resources are avoided and that appropriate measures are taken in the event of inadvertent discovery of unknown archaeological resources. In addition, **MM CR-2 (Avoidance of Disturbance to Native Soils), MM CR-3 (Location-Specific Phase 2 Testing),** and **MM CR-4 (Extended Phase 1/Phase 2 Testing Program)** would continue to be required to ensure that significant impacts to known archaeological resources at the Jalama Beach Campground Expansion & Upgrade Project site are avoided. As such, impacts to cultural and tribal cultural resources would be similar to those described in Section 3.5, *Cultural and Tribal Cultural Resources*, and would remain *significant but mitigable.*

Energy

Implementation of Alternative 1 would result in a potential slight reduction in the number of future RBPs compared to the proposed Project, reducing the amount of future development and associated demand for energy supplies generated under this alternative. Similar to the proposed Project, this alternative would not be anticipated to generate a substantial increase in demand for energy supplies, or result in the development of new uses which would conflict with plans, policies, and regulations regarding energy conservation. By reducing the eligibility of RBPs and potential for development of non-recreational development in rural areas of the county, demand for such services would be reduced compared to the proposed Project. Therefore, impacts to energy resources under this alternative would be similar to, but slightly less adverse than those described in Section 3.6, *Energy* and would remain *insignificant*.

Geology and Soils

This alternative would reduce the scope of the proposed Project by reducing the eligibility of RBPs on Resource Protection zoned lands. Nevertheless, as described for the proposed Project, this alternative would continue to propose planned parks, recreation, and trail improvement projects throughout the county and amend the County's Comprehensive Plan and zoning ordinances to enable future recreational development to meet the existing and future recreational needs of the County's residents. New development proposed or enabled under Alternative 1 would continue to be subject to existing policies and regulations, as well as proposed development standards, requiring uses to be constructed in a manner that avoids or reduces risks associated with geologic and soils hazards. All projects that would require

physical alteration of existing recreational structures or new recreational facilities or buildings would be required to adhere to the most current building standards of the County Code, including the County Building Regulations, which adopt CBC standards by reference with local amendments, as well as applicable County fire, building, and/or environmental health standards. Adherence to the County Code and County Building Regulations requirements would ensure the maximum practicable protection available for all structures. Lands zoned for Resource Protection within the county tend to include areas that exhibit steeper slopes or hazardous associated with hillsides and mountainous terrain. Reducing the eligibility of RBPs from occurring within these zones would therefore result in a corresponding reducing in the potential for adverse impacts associated with development in these areas. Implementation of **MM GEO-1 (Paleontological Resource Assessment and Monitoring)** and **MM GEO-2 (Stop Work at Encounter)** would continue to be required to reduce impacts associated with the potential inadvertent discovery of unknown, buried paleontological resources. Overall, impacts related to geology and soils under this alternative would be similar to those described in Section 3.7, *Geology and Soils* and would remain *significant but mitigable*.

Greenhouse Gas Emissions

Implementation of Alternative 1 would potentially result in a greater degree consistency with the County's 2030 Climate Action Plan compared to the Project, resulting in a slight reduction in impacts from GHG emissions. Similar to the proposed Project, the development of new parks, trails, and recreational facilities under this alternative by the County is subject to mandatory consistency with adopted County plans and policies, including the measures identified in the 2030 CAP. Parks projects are generally consistent with CAP policies, including preserving open space and habitat, providing natural landscaping and vegetation, and sequestering carbon while providing shade and urban cooling. Parks and trails are generally viewed as advantageous components of community land use plans to reduce GHG emissions, including locating parks, recreation, and trails within existing communities to reduce VMT and encouraging the use of active transportation modes like walking, biking, skating, and public transit. As previously described, the primary intent of this alternative is to reduce the eligibility of RBPs to try to concentrate potential future RBPs within less rural regions of the county, which would reduce VMT. Reducing VMT is a primary goal and objective of the County's 2030 Climate Action Plan, as the transportation sector is the largest contributor of GHG emissions in the county. By reducing the potential number of future RBPs and reducing eligibility in rural areas of the county, Alternative 1 would result in a slight reduction in the total amount of VMT generated compared to the Project, thereby increasing consistency with Measure TR-2 of the Climate Action Plan. Development of new parks and recreational facilities countywide in compliance with policies of the County's Comprehensive Plan and be consistent with the 2030 Climate Action Plan measures, and impacts under Alternative 1 would remain similar to those described in Section 3.8, *Greenhouse Gas Emissions.* Impacts would remain *insignificant.*

Hazards and Hazardous Materials

This alternative would propose all of the same improvements described for the proposed Project but reduce the eligibility of RBPs on Resource Protection zoned lands. Nevertheless, as described for the proposed Project, this alternative would continue to propose planned parks, recreation, and trail improvement projects throughout the county and amend the County's Comprehensive Plan and zoning ordinances to enable future recreational development to meet the existing and future recreational needs of the County's residents. These uses could involve the transport, use, and disposal of hazardous materials and could result in an increased risk for release of hazardous materials. As described for the proposed Project, future uses and related development under this alternative would be required to comply with existing Federal, State, and local regulations described in Section 3.9.3, *Regulatory Setting*, including, but not limited to, those established by the U.S. Environmental Protection Agency (USEPA), California Environmental Protection Agency (CalEPA), Occupational Health and Safety Administration (OSHA), California OSHA, Department of Toxic Substance Control (DTSC), SBCFD, and County Public Health to ensure the continued safety of recreational uses, the surrounding public, and environment. Implementation of **MM HAZ-1 (Hazards Management for Public Parks)** and **MM HAZ-2 (Incidental Discovery of Contamination)** would continue to be required to ensure that future recreational development avoids adverse effects of nearby hazardous sites and the investigation and remediation of any contamination encountered during site development. Similar to the proposed Project, mandatory compliance with policies and compatibility criteria defined in the respective Airport Land Use Compatibility Plan (ALUCP). Further, implementation of the proposed improvements and amendments would not impair or interfere with emergency response or evacuation plans. Therefore, impacts related to hazards and hazardous materials under this alternative would be similar to those described in Section 3.9, *Hazards and Hazardous Materials* and would be *significant but mitigable*.

Hydrology and Water Quality Resources

This alternative would reduce the scope of the proposed Project by reducing the eligibility of RBPs on Resource Protection zoned lands. Nevertheless, as described for the proposed Project, this alternative would continue to propose planned parks, recreation, and trail improvement projects throughout the county and amend the County's Comprehensive Plan and zoning ordinances to enable future recreational development to meet the existing and future recreational needs of the County's residents. New development proposed or enabled under Alternative 1 would continue to be subject to existing policies and regulations, as well as proposed development standards, requiring uses to be constructed in a manner that avoids or reduces adverse impacts to hydrologic resources and water quality. All projects that would require physical alteration of existing recreational structures or new recreational facilities or buildings would be required to adhere to existing regulations governing the construction and design of site improvements to control runoff, prevent erosion, and limit pollution to surface water and groundwater, as well as proposed development standards requiring the avoidance or minimization of flood risks and the alteration of natural landforms. Lands zoned for Resource Protection within the county tend to include areas that exhibit steeper slopes or and water

features (e.g., creeks or riparian corridors) due to their location in hillsides and mountainous terrain. Reducing the eligibility of RBPs from occurring within these zones would therefore result in a corresponding reducing in the potential for adverse impacts associated with development in these areas. Implementation of **MM HYD-1 (Recycled Water in Parks)** would continue to be required to ensure new parks use recycled water whenever possible to reduce reliance on groundwater sources and potential impacts to groundwater supplies. Overall, impacts related to hydrology and water quality under this alternative would be similar to those described in Section 3.10, *Hydrology and Water Quality* and would remain *significant but mitigable*.

Land Use and Planning

This alternative would reduce the scope of the proposed Project by reducing the eligibility of RBPs on Resource Protection zoned lands, which often are located in rural areas of the county and exhibit outstanding resource values. However, as described for the proposed Project, this alternative would continue to propose planned parks, recreation, and trail improvement projects throughout the county and amend the County's Comprehensive Plan and zoning ordinances to enable future recreational development to meet the existing and future recreational needs of the County's residents. New development proposed or enabled under Alternative 1 would continue to be subject to existing plans, policies, and regulations, as well as proposed development standards, requiring uses to avoid adverse environmental impacts and adverse effects on quality of life. The reduced eligibility of RBPs would represent a decrease in potential recreational and non-recreational development within the county. However, implementation of planned parks, trails, and recreational improvements, as well as the proposed Comprehensive Plan and zoning ordinance amendments under would not result in a conflict with applicable land use plans, policies, or regulations, or adverse quality of life impacts. Implementation of **MM NOI-1 (Recreation Noise Standards)** would continue to be required to reduce potential indirect operational noise impacts and ensure substantial adverse impacts on quality of life are avoided. Therefore, impacts related to land use and planning under this alternative would be similar to, but slightly less adverse than those described in Section 3.11, *Land Use and Planning* and would remain *significant but mitigable*.

Noise

This alternative would reduce the scope of the proposed Project by reducing the eligibility of RBPs on Resource Protection zoned lands. Nevertheless, as described for the proposed Project, this alternative would continue to propose planned parks, recreation, and trail improvement projects throughout the county and amend the County's Comprehensive Plan and zoning ordinances to enable future recreational development to meet the existing and future recreational needs of the County's residents. New development proposed or enabled under Alternative 1 would continue to be subject to existing policies and regulations, as well as proposed development standards, requiring uses to avoid adverse effects from noise. The reduced eligibility of RBPs would represent a decrease in potential recreational development and associated construction and operational noise within rural areas of the county. However, given limited zoning and proposed standards for RBPs, this would represent only a minor

decrease in noise exposure compared to the Project. Implementation of **MM NOI-1 (Recreation Noise Standards)** would continue to be required to reduce impacts from events and recreation facilities. Overall, impacts related to noise under this alternative would be similar to, but slightly less adverse than those described in Section 3.12, *Noise* and would remain *significant but mitigable*.

Public Services

This alternative would reduce the scope of the proposed Project by reducing the eligibility of RBPs on Resource Protection zoned lands. Similar to the proposed Project, this alternative would not be anticipated to create a permanent population increase that would create an increased demand for fire protection, law enforcement, emergency medical response, healthcare, schools, or library services or facilities. By reducing the eligibility of RBPs and potential for development of non-recreational development in rural areas of the county, demand for such services would be reduced compared to the proposed Project. Impacts to public services under this alternative would be similar to, but slightly less adverse than those described in Section 3.13, *Public Services* and would remain *insignificant*.

Recreation

This alternative would propose all of the same improvements described for the proposed Project but reduce the eligibility of RBPs on Resource Protection zoned lands. Nevertheless, as described for the proposed Project, this alternative would continue to propose planned parks, recreation, and trail improvement projects throughout the county and amend the County's Comprehensive Plan and zoning ordinances to enable future recreational development to meet the existing and future recreational needs of the County's residents. As described for the proposed Project, this alternative would not directly or indirectly result in increases in resident populations in the county or place additional demand on existing parks and recreational facilities. Some uses proposed under the proposed Project and Alternative 1 would have the potential to result in conflicts in the established recreational use of an area or cause conflicts between user groups, such as hikers, mountain bikers, and equestrian trail users. However, the adoption of proposed policies and development standards would ensure adverse conflicts are avoided or reduced. Implementation of required mitigation measures identified in this EIR would continue to be required to reduce impacts resulting associated with the physical construction or expansion of utility infrastructure. By reducing the eligibility of RBPs and potential for development of non-recreational development in rural areas of the county, Alternative 1 would reduce future opportunities for future recreational improvements in some areas of the county. Overall, impacts to recreation under this alternative would be similar to, but slightly less adverse than those described in Section 3.14, *Recreation* and would remain *significant but mitigable.*

Transportation

This alternative would reduce the scope of the proposed Project by reducing the eligibility of RBPs on Resource Protection zoned lands, which are predominately located in rural areas of the county, far from population centers and multi-modal transportation infrastructure. While it is difficult to anticipate or analyze the potential impacts to VMT that might result from future allowed RBPs as part of this EIR, operationally, the reduction of RBP eligibility is expected to sightly reduce VMT compared to the Project by reducing potential regional and local trip generation, as well as the length of trips. However, the slight reduction in VMT under Alternative 1 would not eliminate the *significant and unavoidable* VMT impacts given the County's conservative significance threshold of no net increase in countywide VMT. Impacts related to construction and operational traffic safety as well as emergency access would remain similar to those described in Section 3.15, *Transportation.* Overall, impacts would remain *significant and unavoidable*.

Utilities and Water Supply

This alternative would reduce the scope of the proposed Project by reducing the eligibility of RBPs on Resource Protection zoned lands, thereby reducing the potential for development of recreation and non-recreational uses in rural areas of the county. Similar to the proposed Project, this alternative would not be anticipated to substantially increase demand for water, wastewater, or solid waste disposal facilities, or impair the ability for utility service providers to serve existing and future development within the county. By reducing the potential for development in rural areas of the county, indirect impacts associated with the construction or extension of utility infrastructure to such sites would be reduced compared to the proposed Project. Implementation of required mitigation measures identified in this EIR would continue to be required to reduce impacts resulting from the construction or expansion of utility infrastructure. Therefore, impacts to utilities and water supply under this alternative would be similar to, but slightly less adverse than those described in Section 3.16, *Utilities and Water Supply* and would remain *significant but mitigable.*

Wildfire

This alternative would propose all of the same improvements described for the proposed Project but reduce the eligibility of RBPs on Resource Protection zoned lands. Nevertheless, as described for the proposed Project, this alternative would continue to enable and streamline the development and permitting of parks, trails, and recreational uses countywide, including in Very High and High Fire Hazard Severity Zones (FHSZ) and in the Wildland Urban Interface (WUI). As described for the proposed Project, these uses and related development would continue to be subject to the California Building Code, California Fire Code, SBCFD Development Standards, and Fire Safe Regulations that address emergency site access, structural fire prevention and suppression, and defensible space requirements. Recreational development proposed or enabled under this alternative would also be subject to existing and proposed development standards applicable to parks, trails, recreational facilities, and RBPs for reducing

fire hazards. Reducing the potential for RBPs within Resource Protection zone districts would reduce potential for wildfire and post-wildfire hazards, as many of the lands zoned Resource Protection often exhibit increased fire risk due to steeper slopes, proximity to water features, and abundance of vegetation. However, as described in Section 3.17, *Wildfire,* compliance with existing regulations and the County's existing discretionary review process would reduce potential impacts associated with the development and operation of future RBPs. Therefore, impacts related to wildfire under this alternative would be similar to, but slightly reduced compared to those described in Section 3.17, *Wildfire* and would remain *insignificant*.

Conclusion and Relationship to Project Objectives

Overall, Alternative 1 would result in a slight reduction in impacts compared to the Project. However, this alternative would not substantially reduce or avoid any of the impacts identified for the proposed Project, or eliminate the need for any of the required mitigation measures. Alternative 1 would continue to result in significant and unavoidable impacts to agricultural resources and transportation as a result of the conversion of agricultural lands and generation of new VMT. As summarized in Table 4-3 below, this alternative would continue to achieve the Project Objectives, but to a slightly lesser degree as a result of a reduction in opportunities for public-private partnerships to develop new parks, trails, and recreational facilities.

Table 4-3. Alternative 1 – Comparison to Project Objectives

Project Objective	Ability for Alternative to Achieve Objective
1. Expand and improve parks, trails, and recreation facilities to help meet countywide needs for play, sports, leisure, exercise, and outdoor exploration.	**Meets Objective.** This alternative would propose the same improvements and amendments to the Comprehensive Plan and zoning ordinances as the proposed Project that would directly facilitate the expansion and improvement of parks, trails, and recreational facilities to meet countywide needs.
2. Facilitate interagency cooperation and coordination to foster a countywide plan for public parks, recreation, and trails.	**Meets Objective.** This alternative would propose the same improvements and amendments to the Comprehensive Plan and zoning ordinances as the proposed Project, including those that would facilitate interagency cooperation and coordination.
3. Address unmet and future recreation needs to help guide overall recreation through 2050 while retaining flexibility for each agency or service provider.	**Meets Objective.** This alternative would propose the same improvements and amendments to the Comprehensive Plan and zoning ordinances as the proposed Project that would directly facilitate the expansion and improvement of parks, trails, and recreational facilities to meet existing and future recreational needs.
4. Develop funding and implementation programs for County Parks to support the construction and operation of existing and planned parks, trails, and recreation facilities.	**Meets Objective.** This alternative would propose the same improvements and amendments to the Comprehensive Plan and zoning ordinances as the proposed Project that would facilitate funding and implementation of existing and planned parks, trails, and recreation facilities.

Table 4-3. Alternative 1 – Comparison to Project Objectives (Continued)

Project Objective	Ability for Alternative to Achieve Objective
5. Enact the Recreation Benefit Project Program to create opportunities for public-private partnerships to develop new public parks, trails, and recreation facilities.	**Meets Objective, but to a Lesser Degree.** Alternative 1 proposes the same amendments that would establish and facilitate the RBP Program. However, by reducing the eligibility of RBPs in Resources Protection zone districts, this alternative would potentially reduce opportunities for future RBPs, particularly those providing opportunities for rural recreation, compared to the Project.
6. Build upon existing and ongoing transportation planning efforts to increase access to parks and recreation facilities via transit and active transportation, such as bike paths and trails.	**Meets Objective.** Recreational improvements and proposed amendments to the Comprehensive Plan and zoning ordinances under this alternative would continue to build upon existing and ongoing transportation planning efforts by facilitating development of parks in areas linked by or proposed for multi-modal improvements. Reducing the eligibility of RBPs in rural areas of the county under Alternative 1 would potentially help to focus RBPs in areas closer to these facilities.
7. Update and modernize the County of Santa Barbara's policies and regulations to support public parks, trails, and recreation facilities, to meet the needs identified in the Recreation Master Plan.	**Meets Objective.** This alternative would propose the same amendments to the Comprehensive Plan and zoning ordinances as the proposed Project to support parks, trails, and recreational facilities.
8. Establish development standards for public parks and trails that foster streamlined and efficient permitting.	**Meets Objective.** This alternative would propose the same amendments to the Comprehensive Plan and zoning ordinances as the proposed Project, including the proposed development standards for public parks and trails.

4.3.3 Alternative 2 — Increased Agricultural Buffers

The Increased Agricultural Buffers Alternative (Alternative 2) would implement all of the same components of the proposed Project; however, Alternative 2 would involve the adoption of modified standards for development of privately proposed parks/playgrounds and trails to provide additional protection of commercial agricultural lands. Specifically, under Alternative 2, the County would add the following modified standards:

Changes to Standards for Specific Land Uses: Parks, Playgrounds & Trails

- **Parks and Playground Standards**
  - **Proposed Project Standard:** Parks/playgrounds may not impair agricultural viability on productive agricultural land adjacent to the site. Parks/playgrounds must be outside a 200-foot buffer from active agriculture on adjacent properties, with a 1,000-foot buffer in the Limited Agricultural Enterprise Overlay unless the facility lies within the Public or Private Park/Recreational Facility Overlay.

  - **Modified Standard:** Parks/playgrounds may not impair agricultural viability on productive agricultural land adjacent to the site. Parks/playgrounds must be outside a 500-foot buffer from active agriculture on adjacent properties, with a 1,000-foot buffer in the Limited Agricultural Enterprise Overlay unless the facility lies within the Public or Private Park/Recreational Facility Overlay.

- **Trails for Hiking and Riding**

  - **Proposed Project Standard:** Trails may not impair agricultural viability on productive agricultural land adjacent to the site. Trails must be outside a 200-foot buffer from agriculture on adjacent properties, with a 1,000-foot buffer in the Limited Agricultural Enterprise Overlay unless the trail lies within the Public or Private Park/Recreational Facility Overlay.
  - **Modified Standard:** Trails may not impair agricultural viability on productive agricultural land adjacent to the site. Trails must be outside a 500-foot buffer from agriculture on adjacent properties, with a 1,000-foot buffer in the Limited Agricultural Enterprise Overlay unless the trail lies within the Public or Private Park/Recreational Facility Overlay.

Proposed Additional Standards in REC Zone

- **Agricultural Viability**

  - **Proposed Project Standard:** Development may not impair agricultural viability on productive agricultural land adjacent to the site. Development may not fragment agricultural fields. Development shall be sited within disturbed areas of the site to the extent feasible.
  - **Modified Standard:** Development may not impair agricultural viability on productive agricultural land adjacent to the site. Development shall be sited within disturbed areas of the site to the extent feasible. Otherwise, development next to agricultural land must be located a minimum distance of 500 feet from productive agricultural lands (measured as the closest distance between the property boundary of the adjacent agricultural parcel and the proposed recreational facilities), and use required landscape screening, fencing, or other techniques consistent with County standards. No RBPs shall be eligible on any site located within 1,000 feet of any mapped Limited Agricultural Enterprise Overlay site.

The primary intent of this alternative is to ~~reduce~~ afford greater protection to the county's viable, productive agricultural lands and reduce land use conflicts potentially raised by siting private recreational uses in or proximate to the actively producing agricultural lands.

Resource Impact Analysis

Aesthetics and Visual Resources

This alternative would propose all of the same improvements described for the proposed Project but would impose greater requirements for buffers from agricultural uses for privately-

proposed parks, playgrounds, and trails. As described for the proposed Project, this alternative would continue to propose planned parks, recreation, and trail improvement projects throughout the county and amend the County's Comprehensive Plan and zoning ordinances to enable future recreational development to meet the existing and future recreational needs of the County's residents. Proposed parks, trails, and recreational facility improvements and future development enabled under Alternative 2 would continue to be subject to the proposed development standards governing the design of new improvements, preservation of natural features, and limitations on lighting, along with mandates for consistency with the Comprehensive Plan's visual resource protection policies and County zoning ordinances. Therefore, impacts to scenic vistas, visual character, and light and glare would be similar to those described in Section 3.1, *Aesthetics and Visual Resources* and would remain *insignificant*.

Agricultural Resources

Alternative 2 would propose all of the same improvements described for the proposed Project but would impose greater requirements for buffers from agricultural uses for privately-proposed parks, playgrounds, and trails. As described for the proposed Project, this alternative would continue to propose planned parks, recreation, and trail improvement projects throughout the county and amend the County's Comprehensive Plan and zoning ordinances to enable future recreational development to meet the existing and future recreational needs of the County's residents. Under Alternative 2, planned parks, recreation, and trail projects and zoning ordinance amendments would continue to result in the potential conversion of existing agricultural uses and agricultural-zoned lands to non-agricultural uses. Increased buffer requirements for future, privately-proposed park, playground, and trail development projects would ensure a greater level of protection for adjacent agricultural lands and operations; however, even with robust development standards for parks, trails, recreation facilities, and RBPs, the Project could impair agricultural productivity and conflict with existing agricultural zoning standards, which currently do not allow recreational development. Therefore, impacts to agricultural resources would be similar to, but slightly reduced compared to those described in Section 3.2, *Agricultural Resources* and would remain *significant and unavoidable*.

Air Quality

Alternative 2 would propose all of the same improvements described for the proposed Project but would impose greater requirements for buffers from agricultural uses for privately-proposed parks, playgrounds, and trails. As described for the proposed Project, this alternative would continue to propose planned parks, recreation, and trail improvement projects throughout the county and amend the County's Comprehensive Plan and zoning ordinances to enable future recreational development to meet the existing and future recreational needs of the County's residents. Increased requirements for buffers from agricultural uses may make some future recreational development projects more challenging to development on some parcels, or make recreational development infeasible for others, thereby potentially reducing the amount of future recreational development enabled under Alternative 2 when compared to the proposed Project. However, the slight reduction in potential future recreational

development under Alternative 2 is considered to have only a negligible reduction in the potential air quality impacts compared to the Project. Implementation of **MM AQ-1 (PM_{10} and Dust Control)** and **MM AQ-2 (Equipment Exhaust)** would continue to be required to ensure that future recreational construction projects would not generate or contribute to a violation of federal and state air quality standards. Therefore, impacts to air quality would similar to those described in Section 3.3, *Air Quality*, and would remain *significant but mitigable.*

Biological Resources

Alternative 2 would propose all of the same improvements described for the proposed Project but would impose greater requirements for buffers from agricultural uses for privately-proposed parks, playgrounds, and trails. As described for the proposed Project, this alternative would continue to propose planned parks, recreation, and trail improvement projects throughout the county and amend the County's Comprehensive Plan and zoning ordinances to enable future recreational development to meet the existing and future recreational needs of the County's residents. Proposed and future development enabled under Alternative 2, recreational development would continue to be subject to existing policies and development standards, as well as proposed development standards and required mitigation measures that would reduce direct and indirect impacts of development to biological resources. This includes **MM BIO-1 (Species-Specific and Sensitive Habitat Avoidance and Minimization Measures)** and **MM BIO-2 (General Construction Avoidance and Minimization Measures)** which would ensure that site-specific impacts associated with implementation of the Jalama Beach County Park Expansion and Coastal Access Improvements Project would be reduced, as well as **MM NOI-1 (Recreation Noise Standards)** which would ensure new recreational facilities do not generate noise which would not cause substantial disturbance of biological resources. Therefore, impacts to biological resources under Alternative 2 would be similar to those described in Section 3.4, *Biological Resources* and would remain *significant but mitigable*.

Cultural Resources and Tribal Cultural Resources

This alternative would propose all of the same improvements described for the proposed Project but would impose greater requirements for buffers from agricultural uses for privately-proposed parks, playgrounds, and trails. As described for the proposed Project, this alternative would continue to propose planned parks, recreation, and trail improvement projects throughout the county and amend the County's Comprehensive Plan and zoning ordinances to enable future recreational development to meet the existing and future recreational needs of the County's residents. As noted in Section 3.5, *Cultural and Tribal Cultural Resources,* most recreation project types and locations would have extremely limited potential to impact unknown cultural and historic resources due to limitations of allowed uses and development standards. For all other proposed and future development enabled under Alternative 2, recreational development would continue to be subject to existing policies and development standards, as well as proposed development standards and required mitigation measures that would reduce direct and indirect impacts of development to cultural and tribal cultural resources. Implementation of **MM CTCR-1 (Objective Development Standards for Addressing**

Historic and Archaeological Resources) would continue to be required to ensure that impacts to known resources are avoided and that appropriate measures are taken in the event of inadvertent discovery of unknown archaeological resources. In addition, **MM CR-2 (Avoidance of Disturbance to Native Soils), MM CR-3 (Location-Specific Phase 2 Testing),** and **MM CR-4 (Extended Phase 1/Phase 2 Testing Program)** would continue to be required to ensure that significant impacts to known archaeological resources at the Jalama Beach Campground Expansion & Upgrade Project site are avoided. As such, impacts to cultural and tribal cultural resources would be similar to those described in Section 3.5, *Cultural and Tribal Cultural Resources*, and would remain *significant but mitigable.*

Energy

Implementation of Alternative 2 would result in a potential slight reduction in the amount of future, privately-proposed recreational development compared to the proposed Project due to increased buffer requirements from agricultural uses, reducing the associated demand for energy supplies generated under this alternative. Similar to the proposed Project, this alternative would not be anticipated to generate a substantial increase in demand for energy supplies, or result in the development of new uses which would conflict with plans, policies, and regulations regarding energy conservation. Therefore, impacts to energy resources under this alternative would be similar to, but slightly less adverse than those described in Section 3.6, *Energy* and would remain *insignificant*.

Geology and Soils

This alternative would propose all of the same improvements described for the proposed Project but would impose greater requirements for buffers from agricultural uses for privately-proposed parks, playgrounds, and trails. Nevertheless, as described for the proposed Project, this alternative would continue to propose planned parks, recreation, and trail improvement projects throughout the county and amend the County's Comprehensive Plan and zoning ordinances to enable future recreational development to meet the existing and future recreational needs of the County's residents. New development proposed or enabled under Alternative 2 would continue to be subject to existing policies and regulations, as well as proposed development standards, requiring uses to be constructed in a manner that avoids or reduces risks associated with geologic and soils hazards. All projects that would require physical alteration of existing recreational structures or new recreational facilities or buildings would be required to adhere to the most current building standards of the County Code, including the County Building Regulations, which adopt CBC standards by reference with local amendments, as well as applicable County fire, building, and/or environmental health standards. Adherence to the County Code and County Building Regulations requirements would ensure the maximum practicable protection available for all structures. Implementation of **MM GEO-1 (Paleontological Resource Assessment and Monitoring)** and **MM GEO-2 (Stop Work at Encounter)** would continue to be required to reduce impacts associated with the potential inadvertent discovery of unknown, buried paleontological resources. Overall, impacts related

to geology and soils under this alternative would be similar to those described in Section 3.7, *Geology and Soils* and would remain *significant but mitigable*.

Greenhouse Gas Emissions

This alternative would propose all of the same improvements described for the proposed Project but would impose greater requirements for buffers from agricultural uses for privately-proposed parks, playgrounds, and trails. Similar to the proposed Project, the development of new parks, trails, and recreational facilities under this alternative by the County is subject to mandatory consistency with adopted County plans and policies, including the measures identified in the 2030 CAP. Parks projects are generally consistent with CAP policies, including preserving open space and habitat, providing natural landscaping and vegetation, and sequestering carbon while providing shade and urban cooling. Parks and trails are generally viewed as advantageous components of community land use plans to reduce GHG emissions, including locating parks, recreation, and trails within existing communities to reduce VMT and encouraging the use of active transportation modes like walking, biking, skating, and public transit. As described in the discussion of transportation impacts below, this alternative is anticipated to only slightly reduce the potential for future recreational development as a result of increased buffer requirements, making recreational development more challenging for some sites. As such, Alternative 2 would result in slight reduction in the total amount of VMT generated compared to the Project, thereby increasing consistency with Measure TR-2 of the Climate Action Plan. Therefore, impacts under Alternative 2 would remain similar to those described in Section 3.8, *Greenhouse Gas Emissions*. Impacts would remain *insignificant*.

Hazards and Hazardous Materials

This alternative would propose all of the same improvements described for the proposed Project but would impose greater requirements for buffers from agricultural uses for privately-proposed parks, playgrounds, and trails. As described for the proposed Project, this alternative would continue to propose planned parks, recreation, and trail improvement projects throughout the county and amend the County's Comprehensive Plan and zoning ordinances to enable future recreational development to meet the existing and future recreational needs of the County's residents. These uses could involve the transport, use, and disposal of hazardous materials and could result in an increased risk for release of hazardous materials. As described for the proposed Project, future uses and related development under this alternative would be required to comply with existing Federal, State, and local regulations described in Section 3.9.3, *Regulatory Setting*, including, but not limited to, those established by the USEPA, CalEPA, OSHA, California OSHA, DTSC, SBCFD, and County Public Health to ensure the continued safety of recreational uses, the surrounding public, and environment. Implementation of **MM HAZ-1 (Hazards Management for Public Parks)** and **MM HAZ-2 (Incidental Discovery of Contamination)** would continue to be required to ensure that future recreational development avoids adverse effects of nearby hazardous sites and the investigation and remediation of any contamination encountered during site development. Similar to the proposed Project, mandatory compliance with policies and compatibility criteria defined in the respective ALUCP.

Further, implementation of the proposed improvements and amendments would not impair or interfere with emergency response or evacuation plans. Therefore, impacts related to hazards and hazardous materials under this alternative would be similar to those described in Section 3.9, *Hazards and Hazardous Materials* and would be *significant but mitigable*.

Hydrology and Water Quality Resources

This alternative would propose all of the same improvements described for the proposed Project but would impose greater requirements for buffers from agricultural uses for privately-proposed parks, playgrounds, and trails. As described for the proposed Project, this alternative would continue to propose planned parks, recreation, and trail improvement projects throughout the county and amend the County's Comprehensive Plan and zoning ordinances to enable future recreational development to meet the existing and future recreational needs of the County's residents. New development proposed or enabled under Alternative 2 would continue to be subject to existing policies and regulations, as well as proposed development standards, requiring uses to be constructed in a manner that avoids or reduces adverse impacts to hydrologic resources and water quality. All projects that would require physical alteration of existing recreational structures or new recreational facilities or buildings would be required to adhere to existing regulations governing the construction and design of site improvements to control runoff, prevent erosion, and limit pollution to surface water and groundwater, as well as proposed development standards requiring the avoidance or minimization of flood risks and the alteration of natural landforms. Implementation of **MM HYD-1 (Recycled Water in Parks)** would continue to be required to ensure new parks use recycled water whenever possible to reduce reliance on groundwater sources and potential impacts to groundwater supplies. Overall, impacts related to hydrology and water quality under this alternative would be similar to those described in Section 3.10, *Hydrology and Water Quality* and would remain *significant but mitigable*.

Land Use and Planning

This alternative would propose all of the same improvements described for the proposed Project but would impose greater requirements for buffers from agricultural uses for privately-proposed parks, playgrounds, and trails. As described for the proposed Project, this alternative would continue to propose planned parks, recreation, and trail improvement projects throughout the county and amend the County's Comprehensive Plan and zoning ordinances to enable future recreational development to meet the existing and future recreational needs of the County's residents. New development proposed or enabled under Alternative 2 would continue to be subject to existing plans, policies, and regulations, as well as proposed development standards, requiring uses to avoid adverse environmental impacts and adverse effects on quality of life. Increased buffer requirements for future, privately-proposed park, playground, and trail development projects would ensure a greater degree of separation between recreational and agricultural uses, reducing potential land use conflicts and quality of life impacts. However, similar to the Project, proposed improvements would not result in a substantial conflict with applicable land use plans, policies, or regulations, or adverse quality

of life impacts. Implementation of **MM NOI-1 (Recreation Noise Standards)** would continue to be required to reduce potential indirect operational noise impacts and ensure substantial adverse impacts on quality of life are avoided. Therefore, impacts related to land use and planning under this alternative would be similar to those described in Section 3.11, *Land Use and Planning* and would remain *significant but mitigable*.

Noise

This alternative would propose all of the same improvements described for the proposed Project but would impose greater requirements for buffers from agricultural uses for privately-proposed parks, playgrounds, and trails. As described for the proposed Project, this alternative would continue to propose planned parks, recreation, and trail improvement projects throughout the county and amend the County's Comprehensive Plan and zoning ordinances to enable future recreational development to meet the existing and future recreational needs of the County's residents. New development proposed or enabled under Alternative 2 would continue to be subject to existing policies and regulations, as well as proposed development standards, requiring uses to avoid adverse effects from noise. Implementation of **MM NOI-1 (Recreation Noise Standards)** would continue to be required to reduce impacts from events and recreation facilities. Overall, impacts related to noise under this alternative would be similar to those described in Section 3.12, *Noise* and would remain *significant but mitigable*.

Public Services

Similar to the proposed Project, this alternative would not be anticipated to create a permanent population increase that would create an increased demand for fire protection, law enforcement, emergency medical response, healthcare, schools, or library services or facilities. Alternative 2 would result in a potential slight reducing in the amount of future recreational development compared to the proposed Project due to increased buffer requirements, resulting in a equivalent reduction in impacts associated with the demand for public services. However, given the reduction in impacts would be largely negligible, impacts to public services under this alternative would be similar to those described in Section 3.13, *Public Services* and would remain *insignificant*.

Recreation

This alternative would propose all of the same improvements described for the proposed Project but would impose greater requirements for buffers from agricultural uses for privately-proposed parks, playgrounds, and trails. As described for the proposed Project, this alternative would continue to propose planned parks, recreation, and trail improvement projects throughout the county and amend the County's Comprehensive Plan and zoning ordinances to enable future recreational development to meet the existing and future recreational needs of the County's residents. Some uses proposed under the proposed Project and Alternative 2 would have the potential to result in conflicts in the established recreational use of an area or cause conflicts between user groups, such as hikers, mountain bikers, and equestrian trail users.

However, the adoption of proposed policies and the development standards, as modified by Alternative 2, would ensure adverse conflicts are avoided or reduced. Implementation of required mitigation measures identified in this EIR would continue to be required to reduce impacts resulting associated with the physical construction or expansion of utility infrastructure. While this alternative is anticipated to only slightly reduce the potential for future recreational development as a result of increased buffer requirements, making recreational development more challenging for some sites, impacts to recreation under this alternative would be similar to those described in Section 3.14, *Recreation* and would remain *significant but mitigable*.

Transportation

Alternative 2 would propose all of the same improvements described for the proposed Project but would impose greater requirements for buffers from agricultural uses for privately-proposed parks, playgrounds, and trails. This alternative is anticipated to only slightly reduce the potential for future recreational development as a result of increased buffer requirements, making recreational development more challenging for some sites. However, the slight reduction in VMT anticipated under Alternative 2 would not eliminate the *significant and unavoidable* VMT impacts given the County's conservative significance threshold of no net increase in countywide VMT. Impacts related to construction and operational traffic safety as well as emergency access would remain similar to those described in Section 3.15, *Transportation.* Overall, impacts would remain *significant and unavoidable*.

Utilities and Water Supply

Alternative 2 would propose all of the same improvements described for the proposed Project but would impose greater requirements for buffers from agricultural uses for privately-proposed parks, playgrounds, and trails. Similar to the proposed Project, this alternative would not be anticipated to substantially increase demand for water, wastewater, or solid waste disposal facilities, or impair the ability for utility service providers to serve existing and future development within the county. Development of new recreational facilities could result in potential indirect impacts associated with the construction or extension of utility infrastructure, but. Implementation of required mitigation measures identified in this EIR would continue to be required to reduce impacts resulting from the construction or expansion of utility infrastructure. Therefore, impacts to utilities and water supply under this alternative would be similar to those described in Section 3.16, *Utilities and Water Supply* and would remain *significant but mitigable*.

Wildfire

Alternative 2 would propose all of the same improvements described for the proposed Project but would impose greater requirements for buffers from agricultural uses for privately-proposed parks, playgrounds, and trails. Nevertheless, as described for the proposed Project, this alternative would continue to enable and streamline the development and permitting of

parks, trails, and recreational uses countywide, including in Very High and High and in the WUI. As described for the proposed Project, these uses and related development would continue to be subject to the California Building Code, California Fire Code, SBCFD Development Standards, and Fire Safe Regulations that address emergency site access, structural fire prevention and suppression, and defensible space requirements. Recreational development proposed or enabled under this alternative would also be subject to existing and proposed development standards applicable to parks, trails, recreational facilities, and RBPs for reducing fire hazards. Therefore, impacts related to wildfire under this alternative would be similar to those described in Section 3.17, *Wildfire* and would remain *insignificant*.

Conclusion and Relationship to Project Objectives

Overall, Alternative 2 would result in similar impacts to the proposed Project. Impacts to agricultural resources would be slightly reduced compared to the proposed Project due to increased requirements for buffers from agricultural uses; however, even with more robust development standards for parks, trails, recreation facilities, and RBPs, the Project could impair agricultural productivity and conflict with existing agricultural zoning standards, which currently do not allow recreational development. Thus, this alternative would not substantially reduce or avoid any of the impacts identified for the proposed Project, or eliminate the need for any of the required mitigation measures. Alternative 2 would continue to result in significant and unavoidable impacts to agricultural resources and transportation as a result of conversion of agricultural lands and generation of new VMT. As summarized in Table 4-4, this alternative would achieve all of the Project Objectives.

4.4 IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

CEQA Guidelines Section 15126.6(e)(2) indicates that an analysis of alternatives shall identify an environmentally superior alternative among the alternatives evaluated in the EIR. In general, the environmentally superior alternative as defined by CEQA should minimize adverse impacts to the project site and its surrounding environment. The Lead Agency, however, is not obligated to select the Environmentally Superior Alternative for implementation if it would not accomplish the basic project objectives and/or is infeasible (CEQA Guidelines Section 15126.6[a], [c] and [f]). In many cases, the No Project alternative would have the fewest or least intense impacts. However, the CEQA Guidelines Section 15126.6(e)(2) states that "[i]f the environmentally superior alternative is the 'no project' alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives."

Table 4-4. Alternative 2 – Comparison to Project Objectives

Project Objective	Ability for Alternative to Achieve Objective
1. Expand and improve parks, trails, and recreation facilities to help meet countywide needs for play, sports, leisure, exercise, and outdoor exploration.	**Meets Objective.** This alternative would propose the same improvement and amendments to the Comprehensive Plan and zoning ordinances as the proposed Project that would directly facilitate the expansion and improvement of parks, trails, and recreational facilities to meet countywide needs.
2. Facilitate interagency cooperation and coordination to foster a countywide plan for public parks, recreation, and trails.	**Meets Objective.** This alternative would propose the same improvement and amendments to the Comprehensive Plan and zoning ordinances as the proposed Project, including those that would facilitate interagency cooperation and coordination.
3. Address unmet and future recreation needs to help guide overall recreation through 2050 while retaining flexibility for each agency or service provider.	**Meets Objective.** This alternative would propose the same improvement and amendments to the Comprehensive Plan and zoning ordinances as the proposed Project that would directly facilitate the expansion and improvement of parks, trails, and recreational facilities to meet countywide needs.
4. Develop funding and implementation programs for County Parks to support the construction and operation of existing and planned parks, trails, and recreation facilities.	**Meets Objective.** This alternative would propose the same improvement and amendments to the Comprehensive Plan and zoning ordinances as the proposed Project that would facilitate funding and implementation of existing and planned parks, trails, and recreation facilities.
5. Enact the Recreation Benefit Project Program to create opportunities for public-private partnerships to develop new public parks, trails, and recreation facilities.	**Meets Objective.** This alternative would propose the same improvement and amendments to the Comprehensive Plan and zoning ordinances as the proposed Project that would enact the RBP Program.
6. Build upon existing and ongoing transportation planning efforts to increase access to parks and recreation facilities via transit and active transportation, such as bike paths and trails.	**Meets Objective.** Recreational improvements and proposed amendments to the Comprehensive Plan and zoning ordinances under this alternative would continue to build upon existing and ongoing transportation planning efforts by facilitating development of parks in areas linked by or proposed for multi-modal improvements.
7. Update and modernize the County of Santa Barbara's policies and regulations to support public parks, trails, and recreation facilities, to meet the needs identified in the Recreation Master Plan.	**Meets Objective.** This alternative would propose the same amendments to the Comprehensive Plan and zoning ordinances as the proposed Project to support parks, trails, and recreational facilities.
8. Establish development standards for public parks and trails that foster streamlined and efficient permitting.	**Meets Objective.** This alternative would propose the same amendments to the Comprehensive Plan and zoning ordinances as the proposed Project, including the proposed development standards for public parks and trails.

For the implementation of a planning and policy document such as the Recreation Master Plan, there may not be a clear Environmentally Superior Alternative. Selection of the Environmentally Superior Alternative may be difficult, especially when the differences between the impacts of the alternatives involve trade-offs between types of impacts. An alternative may reduce environmental impacts to certain resource areas and increase impacts to other resource areas as compared to the proposed Project, while another alternative may reduce different environmental impacts. Although CEQA does not provide specific guidance in this matter, where an alternative is anticipated to result in reduced impacts for a majority of resource areas and/or substantially reduced impacts in especially critical resource areas, this can support a finding that the alternative is environmentally superior. In such instances, the EIR may disclose the differences between the alternatives and identify how each alternative may be superior. The Lead Agency retains the authority to identify the Environmentally Superior Alternative based on the evidence in the EIR, agency and public input, Lead Agency standards and policies, and the Lead Agency's independent decision-making.

Table 4-5 summarizes the environmental impact findings for each alternative analyzed in the section relative to the proposed Project. This assessment considers the overall advantages and disadvantages associated with the analyzed alternatives relative to the proposed Project. Of the alternatives considered, the No Project Alternative eliminates the significant and unavoidable impacts identified for the proposed Project; therefore, it is environmentally superior to any project that would lead to a change in existing conditions. However, the No Project Alternative would not achieve any of the Project Objectives. Without the Recreation Master Plan and proposed amendments to the Comprehensive Plan and zoning ordinances, recreational needs of the County's communities are likely to go unmet, as recreational uses would continue to be subject to existing, dated policies and limitations on recreational development within many of the County's zone districts. Permitting and environmental review of recreational development projects would not be streamlined, resulting in continuation of existing permitting processes that can be costly, time consuming, and disincentivizing for public recreational improvement projects. As such, the No Project Alternative would not meet the primary intent of the proposed Project to facilitate the expansion and improvement of parks, trails, and recreational facilities to help meet countywide needs for diverse forms of recreation. Under the No Project Alternative, the *beneficial* impacts to recreational resources (Impact REC-1) would not be achieved. As described, CEQA Guidelines Section 15126.6 states that if the environmentally superior alternative is the No Project Alternative, the EIR shall also identify an environmentally superior alternative from among the other alternatives.

Alternative 1, the Reduced Eligibility of RBPs Alternative, would reduce the scope of the proposed Project by reducing the eligibility of RBPs on Resource Protection zones. While this alternative would continue to implement the planned parks, recreation, and trail improvement projects and amend the County's Comprehensive Plan and zoning ordinances to enable future recreational development, the location and extent of future RBPs would be reduced. By making RBPs ineligible within Resource Protection zone districts, which often exhibit a high degree of natural resources and are often located within rural areas of the county, Alternative 1 would

potentially result in a reduction in the amount of potential future development and associated physical impacts. The reduction of RBP eligibility in rural areas is also expected to sightly reduce VMT compared to the Project. However, recreational development would continue to be proposed or enabled on other rural and working lands throughout the county, and Alternative 1 would not eliminate the *significant and unavoidable* impacts associated with the conversion of agricultural lands to non-agricultural uses, or generation of new VMT described for the proposed Project.

Alternative 2, the Increased Agricultural Buffer Alternative would propose all of the same components of the proposed Project, but would involve modified development standards for privately-proposed parks/playgrounds and trails to provide additional protection of commercial agricultural lands. As compared to the proposed Project, it is expected that this alternative would reduce potential conflicts between recreational and adjacent agricultural uses and afford greater protection of the viability of agriculture on adjacent site. By increasing the required buffer distances between these uses, it is anticipated that this alternative would make it more challenging for properties to be developed with recreational uses, particularly in areas where parcels are smaller in size and surrounded by existing agricultural operations, potentially reducing the amount of future recreational development that could be enabled as compared to the proposed Project. However, recreational development would continue to be proposed or enabled on other rural and working lands throughout the county, and Alternative 2 would not eliminate the *significant and unavoidable* impacts associated with the conversion of agricultural lands to non-agricultural uses, or generation of new VMT described for the proposed Project.

Other than the No Project Alternative, none of the alternatives would avoid the significant and unavoidable impacts related to agricultural resources and VMT. Further, neither Alternative 1 nor Alternative 2 would result in a substantial reduction in the severity impacts or eliminate need for any of the mitigation measures described for the proposed Project. Alternative 2, the Increased Agricultural Buffer Alternative, is considered the Environmentally Superior Alternative since it would slightly reduce significant and unavoidable impacts related to agricultural resources as a result of requiring increased buffers from and protection of adjacent agricultural uses, while continuing to meet all of the Project Objectives.

Table 4-5. Comparison of Project Impacts by Alternative

Resource Area	Proposed Project	No Project Alternative	Alternative 1 – Reduced Eligibility of RBPs	Alternative 2 – Increased Agricultural Buffers
Aesthetics and Visual Resources	Insignificant	Less Adverse	Similar	Similar
Agricultural Resources	Significant and Unavoidable	Substantially Less Adverse	Similar	Slightly Less Adverse
Air Quality	Significant but Mitigable	Substantially Less Adverse	Slightly Less Adverse	Similar
Biological Resources	Significant but Mitigable	Less Adverse	Slightly Less Adverse	Similar
Cultural and Tribal Cultural Resources	Significant but Mitigable	Less Adverse	Similar	Similar
Energy	Insignificant	Less Adverse	Slightly Less Adverse	Similar
Geology and Soils	Significant but Mitigable	Less Adverse	Similar	Similar
Greenhouse Gas Emissions	Insignificant	Less Adverse	Similar	Similar
Hazards and Hazardous Materials	Significant but Mitigable	Less Adverse	Similar	Similar
Hydrology and Water Quality	Significant but Mitigable	Less Adverse	Similar	Similar
Land Use and Planning	Significant but Mitigable	Less Adverse	Slightly Less Adverse	Similar
Noise	Significant but Mitigable	Less Adverse	Slightly Less Adverse	Similar
Public Services	Insignificant	Less Adverse	Slightly Less Adverse	Similar
Recreation	Significant but Mitigable	Less Adverse	Slightly Less Adverse	Similar
Transportation	Significant and Unavoidable	Substantially Less Adverse	Similar	Similar
Utilities and Water Supply	Significant but Mitigable	Less Adverse	Slightly Less Adverse	Similar
Wildfire	Insignificant	Less Adverse	Slightly Less Adverse	Similar
Project Objectives Met	Yes	No	Yes, but to a Lesser Extent	Yes
Reduce Significant and Unavoidable Impacts?	--	Yes	No	No

This page intentionally left blank.

5.0 OTHER CEQA CONSIDERATIONS

This section presents the evaluation of additional considerations required by the California Environmental Quality Act (CEQA) that are not covered within the other sections of this Program Environmental Impact Report (EIR) for the Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (Project). CEQA Guidelines Section 15126 requires that all aspects of a project must be considered when evaluating its impact on the environment, including planning, acquisition, development, and operation. Accordingly, in addition to the analysis provided in Chapter 3, *Environmental Impact Analysis*, this Program EIR must identify growth-inducing impacts and significant irreversible environmental changes that would potentially result from the proposed Project. Accordingly, other CEQA considerations include: 1) significant and unavoidable environmental effects of the proposed Project; 2) reasons why the Project is being proposed notwithstanding its significant and unavoidable impacts; 3) significant irreversible environmental changes; 4) growth-inducing impacts (including removal of obstacles to growth); and 5) resource areas that are found not to be significant.

5.1 SIGNIFICANT UNAVOIDABLE ENVIRONMENTAL EFFECTS

CEQA Guidelines Section 15126.2(c) requires that an EIR describe any significant impacts that cannot be avoided, even with the implementation of feasible mitigation measures. Where there are significant impacts, their implications, and the reasons why the project is being proposed, notwithstanding their effect, should be described.

Based on the analysis presented in this Program EIR, the Project would create significant and unavoidable impacts on:

- Agricultural resources;
- Transportation, including related vehicle miles traveled (VMT);

(Refer to Section 3.2, *Agricultural Resources and* Section 3.15, *Transportation* for a complete description of significant and unavoidable impacts to these environmental issue areas.)

Under CEQA Guidelines Section 15065(c)(4), when an EIR demonstrates that a proposed project will cause significant and unavoidable impacts that cannot be fully mitigated, the agency must issue a Statement of Overriding Considerations before approving the proposed project. Under CEQA Guidelines Section 15093, a Statement of Overriding Considerations is a report of the lead agency's findings regarding the merits of approving a proposed project despite its significant environmental impacts and reflects the balancing of competing public objectives. Therefore, the County would be required to adopt a Statement of Overriding Considerations to address the significant impacts identified above and discussed in detail in Chapter 3, *Environmental*

Impact Analysis. In this instance, the County may weigh the long-term benefits of the proposed Project, such as: enhancing the access, quantity, and quality of the County's recreational resources; promoting, encouraging, and facilitating recreational development through public and private partnerships; provide a more accurate and timely description of parks, trails, and open spaces; and address the public's recreation goals and needs, as indicated by community outreach and engagement. To facilitate consideration of these issues, this Program EIR discloses potential impacts and provides a range of alternatives to the proposed Project that could more fully alleviate environmental concerns. In addition, Chapter 2, *Project Description*, provides an overview of the County's policy context, as well as the proposed policy updates, which offers information on how the proposed Project meets several important County policy objectives and where it may raise concerns over consistency with other County policies. All this information should be reviewed when considering the Project.

5.2 REASONS THE PROJECT IS BEING PROPOSED NOTWITHSTANDING ITS SIGNIFICANT AND UNAVOIDABLE IMPACTS

In addition to the identification of a project's significant unavoidable impacts, CEQA Guidelines Section 15126.2(c) requires a description of the reasons why a project is being proposed, notwithstanding significant unavoidable impacts associated with the project.

In Santa Barbara County, recreation facilities are programs are provided by local, state, and federal agencies, as well as private recreation service providers. Each agency has a unique approach to planning for parks, recreation, and trails based on its adopted recreation planning framework, the facilities managed, and the user groups served. Additionally, recreation demands can be quite different in each jurisdiction. This diversity of demands and services requires interagency coordination to provide adequate parks and recreation with each filling different needs in particular regions. Planning for recreation involves considering those unique needs in the adopted goals, policies, actions, and programs for the recreation service providers.

The mission of the County of Santa Barbara Community Services Department - Parks Division (County Parks) is to provide, protect, and enhance parks, recreation, and trails for the enjoyment, education, and inspiration of present and future generations in a safe and resilient environment. The recreation planning in the County is served by several key recreation planning documents that are considered out-of-date (i.e., adopted more than 40 years ago) and no longer reflect the current setting, needs, or plans for recreation. These include the Comprehensive Plan, including the 1980 Land Use Element, and ten community plans.

As previously described in Chapter 1, *Introduction* and Chapter 2, *Project Description*, the Project aims to update and enhance the recreational access and experience for Santa Barbara County residentis of all ages through near-term and long-term acquisitions and improvements to public parks, trails, and recreation facilities. Improved and expanded parks, trails, and

recreation facilities would support the demands of a range of recreation users and activities through 2050. Improvements would be made through phases of funding, planning, and development. Amendments would include updated policies for parks, recreation, open spaces, and trails within the Comprehensive Plan that reflect current community input and more actively support the County's efforts and attention to recreation needs in the unincorporated area. The Project would also amend the County's zoning ordinances to support permitting public parks and trails by private entities. These changes would alter the regulatory environment for privately proposed recreation and trails projects, such as those proposed by the Recreation Benefit Project (RBP) Program. The RBP Program would create a voluntary opportunity for private development projects to contribute directly to the County's public recreation system. Additionally, amendments to the Land Use Element would include updates the the Recreation Section (Section II), last updated in 1980, to provide more accurate and timely description of parks, trails, and open spaces and the value of these resources for outdoor recreation, public health, and community stability.

Taken together, the Project would substantially improve public recreation, which is a valuable community resource. Significant environmental impacts would occur in balance with the substantial benefits of the Project for community recreation and quality of life.

5.3 SIGNIFICANT IRREVERSIBLE ENVIRONMENTAL CHANGES

CEQA Guidelines Section 15126.2(d) requires a discussion of:

> "*...significant irreversible environmental changes which would be caused by the proposed project should it be implemented. Uses of nonrenewable resources during the initial and continued phases of the project may be irreversible since a large commitment of such resources makes removal or nonuse thereafter unlikely. Primary impacts and, particularly, secondary impacts (such as highway improvement which provides access to a previously inaccessible area) generally commit future generations to similar uses. Also, irreversible damage can result from environmental accidents associated with the project. Irretrievable commitments of resources should be evaluated to assure that such current consumption is justified*."

Analysis of environmental impacts of the Project considers effects on the environment from future uses and related development enabled under the proposed Project. Minor updates and alterations associated with public parks and recreation would only require small-scale construction activities and would not require substantial additional development. However, the development of recreation facilities on large and/or undeveloped sites with additional land uses, potential projects proposed under the RBP Program, and major park and trail projects, such as new community or regional parks, sports complexes, campgrounds, and/or aquatic facilities, would require substantial development within existing communities, including the

development of public infrastructure and irreversible alteration of the built environment. As such, the Project would entail the commitment of non-renewable energy resources; human resources; and relatively small amounts of other resources such as sand and gravel, asphalt, steel, copper, lead, other metals, and water resources, most of which are non-renewable or locally limited resources. Resources that would be permanently and continually consumed during the life of the Project include electricity, natural gas, transportation fuels, and miscellaneous materials to be used as supplies for certain uses. However, the amount and rate of consumption of these resources would not result in the inefficient or wasteful use of resources and compliance with all state and local regulations, development standards, and applicable building codes would ensure that natural resources are conserved to the maximum extent feasible. While future construction and operational activities anticipated to occur under the Project would result in the irretrievable commitment of non-renewable energy resources (primarily in the form of fossil fuels, including fuel oil, natural gas, and gasoline for automobiles and construction equipment), consumption of such resources is associated with any development in the region and is not unique or unusual to the Project. Additionally, new technologies or systems may emerge in the future, or become more cost-effective or user-friendly, to further reduce the reliance on nonrenewable natural resources such as solar photovoltaic energy and other renewable energy sources. In fact, proposed Comprehensive Plan policies under the Project would encourage sustainable parks and recreation, including support for renewable energy facilities integrated with public recreation.

The Project would not be expected to result in environmental accidents that have the potential to cause irreversible damage to the natural or human environment. The Project primarily involves recreational development within the unincorporated areas of the County, which does not typically generate substantial hazardous materials. While construction for new recreational development would result in the limited use, transport, storage, and disposal of common hazardous materials, all activities would comply with applicable federal and state laws related to hazardous materials transport, use, and storage, which would significantly reduce the likelihood and severity of accidents that could result in irreversible environmental damage. Overall, since the Project does not involve substantial environmental hazards or unreasonably consume non-renewable resources, the irreversible environmental changes that would result from the proposed Project would be *insignificant*.

5.4 GROWTH-INDUCING IMPACT ANALYSIS

CEQA Guidelines Section 15126.2(e) requires a discussion of ways in which a project could foster economic or population growth, including ways in which a project could remove an obstacle to growth that could result in potentially significant irreversible changes. Growth does not necessarily create significant physical changes to the environment. However, depending upon the type, magnitude, and location of growth, it can result in significant adverse environmental

effects. A project may induce growth if it directly or indirectly fosters economic or population growth or the construction of additional housing, removes obstacles to population growth, taxes community service facilities to the extent that the construction of new facilities would be necessary, or encourages or facilitates other activities that cause significant environmental effects. In general, a project may foster physical, economic, or population growth in a geographic area if it meets any one of the criteria identified below:

- The project results in the urbanization of land in a remote location (leapfrog development);
- The project removes an impediment to growth (e.g., the establishment of an essential public service, or the provision of new access to an area);
- The project establishes a precedent-setting action (e.g., a change in zoning or general plan amendment approval); or
- Economic expansion or growth occurs in an area in response to the project (e.g., changes in revenue base, employment expansion, etc.).

If a project meets any one of these criteria, it may be considered growth-inducing. Generally, growth-inducing projects are in isolated, undeveloped, or underdeveloped areas, necessitating the extension of major infrastructure such as sewer and water facilities or roadways, or encouraging premature or unplanned growth. However, in urban areas, growth-inducing projects typically involve proposed plans or policies that alleviate barriers to growth or increase development opportunities.

To comply with CEQA, an EIR must discuss how the project could promote economic or population growth near the project area and how that growth would, in turn, affect the surrounding environment (CEQA Guidelines Section 15126.2[e]). Under CEQA, this growth is not to be considered necessarily detrimental, beneficial, or of significant consequence. Induced growth is considered a significant impact only if it affects – either directly or indirectly – the ability of agencies to provide needed public services, or if it can be demonstrated that the potential growth, in some other way, significantly affects the environment.

In accordance with County goals and state requirements, the Project primarily identifies an implementation plan to accommodate the recreational needs of communities across the County, including necessary goals, policies, actions, and programs to initiate recreational development. As described in Chapter 2, *Project Description,* the Project would be implemented over approximately 20 to 30 years and therefore, the specifics of future recreational development associated with the Project are unknown. However, the Project would not include any substantial development of new utility infrastructure; any required utility development would be necessary to accommodate increased public visitation and usage of recreational resources in an area that was previously undeveloped or not developed for that purpose. In this case, the expansion of utilities would not entice future unplanned growth. Similarly, the Project would only include development of new roadways or parking facilities that are directly

associated with the visitation needs of new recreational development. Generally, the Project would expand existing utilities infrastructure or improve access roadways in areas, but these minor improvements, along with accessory structure development (e.g., public restrooms, water fountains, parking lots) would not induce regional growth.

Short-term construction-related employees are expected to be hired from the local labor force and would therefore generate little, if any, short-term or long-term population increases. Standard operation of certain recreational developments may require few full-time employees (e.g., aquatic facilities, sports complexes, concessionaires, etc.), which could be hired from the existing local labor market. The Project would not result in a new significant creation or need for new housing or additional development in the county. Any increases in population associated with the Project would be limited to transient populations associated with use of public parks and trails, including by sports teams and other groups. Additionally, temporary visiting populations may be generated by new lodging, campgrounds, special events, or educational experiences or opportunities afforded by the proposed RBP Program, which incentives private development of public recreation facilities with allowances for these uses. However, the location and size of any such uses would be limited by the Project to ensure consistency with the County's zoning ordinances and avoid substantial regional growth.

Ultimately, the scale of development and growth is anticipated as a result of the Project would be negligible. Additionally, any larger-scale projects would be non-exempt, and therefore subject to discretionary review, which would address land use conflicts and neighborhood compatibility issues on a project-specific level before permit issuance. Therefore, the effects of the proposed Project on growth inducement would be *insignificant*.

5.5 EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines Section 15128 requires a statement briefly indicating the reasons that various possible significant effects of a project were determined not to be significant and, therefore, were not discussed in detail in the EIR. For this Program EIR, issues related to mineral resources were found not to be significant as discussed below. Based on the scoping study prepared for the Project (Appendix A), the County determined that the proposed Project would have *no impact* or *insignificant* impacts on the following resources:

5.5.1 Forestry

A large portion of the unincorporated Santa Barbara County consists of forest land as defined under the California Public Resources Code (PRC) Section 12220(g). These forest lands are located within the Los Padres National Forest (LPNF) and managed by the U.S. Forest Service. Timberland is defined by PRC Section 4526 as land, other than land owned by the federal government and land designated by the board as experimental forest land, which is available

for, and capable of, growing a crop of trees of a commercial species used to produce lumber and other forest products, including Christmas trees. The Project would not have the potential for significant impacts associated with forestry resources. As described in Chapter 2, *Project Description*, the Project involves the adoption and implementation of goals, policies, and programs aimed to guide, incentivize, and facilitate recreational development in a manner that addresses the recreation needs in the county, as established in the proposed Recreation Master Plan. Proposed projects and programs within the Plan do not occur on any sites zoned for or which support traditional forestry resources or timberlands designated for timber extraction and none of these aspects of the Project would directly affect forestry resources in the county. As such, the proposed Project does not propose any actions that would substantially affect such resources within the county or surrounding region. Therefore, the Project would have *no impact* on these resource areas.

5.5.2 Mineral Resources

The Project would not have the potential for significant impacts associated with mineral resources. As described in Chapter 2, *Project Description*, the Project would establish a strategic long-term plan to fund and construct new public parks and trails, along with implementing the RBP Program, which would foster public-private partnerships to help fulfill the established recreational needs. Mineral resource sites in the county, particularly sand and gravel operations, coincide with areas designated for open space. The Project does not propose any development on any established mineral resource sites, as defined by the county or the state. Additionally, the Project does not propose any development that would convert any site into a surface mining operation or any other related mineral resource use. Therefore, the Project would not disrupt substantial mining operations, and the Project would have *no impact* related to mineral resources.

5.5.3 Population and Housing

The Project would not induce substantial population growth in the county because it would not include residential land use and development or facilitate substantial employment growth. The Project would not result in the demolition, construction, or renovation of any residential uses or units within the county. Generally, recreational development under the Project could generate short-term employment opportunities during construction, which would draw most workers from the existing regional workforce. Some proposed land uses allowed under RBP Program involve commercial, retail, or market services and require additional employees for operation. However, as stated above, most workers would be drawn from the existing regional workforce and any additional employees would have a negligible effect on employment in the county due to limits on the size and location of potential RBPs. Therefore, the Project would not be considered growth-inducing as it would not substantially affect short- or long-term

employment opportunities or introduce additional permanent populations or encourage future growth. Therefore, potential impacts of the Project associated with population and housing would be considered *insignificant*.

6.0 LIST OF PREPARERS

County of Santa Barbara, Community Services Department, Parks Division

Jesus Armas	Director of Community Services Department
Jeff Lindgren	Deputy Director of County Parks
Jill Van Wie	Capital Projects Manager

County of Santa Barbara, Planning & Development Department

Jeff Wilson	Assistant Director
Tina Mitchell	Planner

WSP USA Inc.

Taylor Lane	Project Manager
Gina Sawaya	Environmental Analyst
Samantha Senaldi	Environmental Analyst
Kaitlyn Halpin	Environmental Analyst
Isabel Hadly	Environmental Analyst
Emma Avotins	Environmental Analyst
Kelly Nishimura	Environmental Analyst
Nick Meisinger	Quality Assurance / Quality Control
Aaron Johnson	GIS Specialist
Janice Depew	Word Processor

Bjornstad LLC

Erika Leachman	Principal Planner

Cartifact, Inc.

James Mansfield	President
Taylor Ross	Senior Designer
Kaileen Smith	Designer

This page intentionally left blank.

7.0 REFERENCES

Chapter 2, *Project Description*

U.S. Census Bureau. 2025. "U.S. Census Bureau QuickFacts: United States." https://www.census.gov/quickfacts/fact/table/US/PST045225.

Section 3.1, *Aesthetics and Visual Resources*

California Department of Transportation (Caltrans). 2016. Letter of Intent for the State Scenic Highway Designation of Highway 101. Available at: https://dot.ca.gov/-/media/dot-media/programs/design/documents/f0002772-2016-12-gaviota-state-scenic-hwy-va-and-cpp-a11y.pdf.

Caltrans. 2017. Scenic Highways. Available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

Caltrans. 2019. State Scenic Highway Program. Available at: https://dot.ca.gov/programs/design/lap-landscape-architecture-and-community-livability/lap-liv-i-scenic-highways.

County of Santa Barbara. 2009a. Open Space Element. Available at: https://cosantabarbara.app.box.com/s/tjpi5vq90gul6pmsww66q8nwpiqq2kqg.

County of Santa Barbara. 2009b. Scenic Highways Element. Available at: https://cosantabarbara.app.box.com/s/jwf0nztwk7tveuqx0iay67jmd6he5pb9.

County of Santa Barbara. 2009c. Environmental Resource Management Element. Available at: https://cosantabarbara.app.box.com/s/581yjfsussondhel9pz8b5d5zxisa5ap.

County of Santa Barbara. 2009d. Santa Ynez Valley Community Plan Final EIR. Available at: https://cosantabarbara.app.box.com/s/eey2anomja8jxirj5ajhfagre3fv1ksn.

County of Santa Barbara. 2024. Santa Barbara County Environmental Thresholds and Guidelines Manual. Available at: https://content.civicplus.com/api/assets/3a8f7de7-7ec5-4971-8ec4-326ec1dc3f23.

County of Santa Barbara Planning and Development Department (P&D). 2022. Visual/Aesthetic Resources Existing Setting and Issues. Available: https://content.civicplus.com/api/assets/ca-santabarbaracounty/8a5f37ca-3d4a-4dc0-a487-73a973b6d9e6/orcutt-community-plan-pdf-.pdf?sq=c3024cb2-ca22-99de-3b73-fb50d06f546e&scope=all.

Section 3.2, *Agricultural Resources*

Agricultural Advisory Committee. 2022. https://www.countyofsb.org/338/Agricultural-Advisory-Committee.

Agricultural Impact Associates. 2016. “Economic Contributions of Santa Barbara County Agriculture.”

American Farmland Trust. 2007. “Santa Barbara County Agricultural Resources Environmental/Economic Assessment (Area) Study.” December. https://farmlandinfo.org/publications/santa-barbara-county-agricultural-resources-environmental-economic-assessment-area-study/.

California Department of Conservation. 2016. "Rangeland Changes in Santa Barbara County." ArcGIS. Available at: https://storymaps.arcgis.com/stories/e8c4ad837c284d74ab0877a95b6a6967.

California Department of Conservation. 2023. “Farmland Mapping & Monitoring Program: California Important Farmland Finder.” https://www.conservation.ca.gov/dlrp/fmmp.

California Department of Conservation. 2025a. “DLRP Important Farmland Finder.” https://maps.conservation.ca.gov/DLRP/CIFF/.

California Department of Conservation. 2025b. “Williamson Act Contracts.” https://www.conservation.ca.gov/dlrp/wa/Pages/contracts.aspx.

County of Santa Barbara. 2007. “Uniform Rules for Agricultural Preserves and Farmland Security Zones.” September. https://cosantabarbara.app.box.com/s/8eurvow9bgsyxiww537s8cjg65qyql2q.

County of Santa Barbara. 2009. “Santa Barbara County General Plan, Agriculture Element.” May. https://cosantabarbara.app.box.com/s/rdbaorkvulbjkxmo1jufgwoxh1qaoxu9.

County of Santa Barbara. 2015. "Eastern Goleta Valley Community Plan." October. https://content.civicplus.com/api/assets/c045b531-6a10-4bf5-9f34-d03284a623ae.

County of Santa Barbara. 2024a. "Uniform Rules for Agricultural Preserves and Farmland Security Zones." December. https://content.civicplus.com/api/assets/2af891e9-a004-4c3a-9d94-7f2229dc3b44.

County of Santa Barbara. 2024b. “2024 Agricultural Preserve Contract List.” https://content.civicplus.com/api/assets/e9dc7ab1-d68b-402a-89fb-f0f91ffd50c6.

County of Santa Barbara. 2024c. "Environmental Thresholds and Guidelines Manual." https://content.civicplus.com/api/assets/3a8f7de7-7ec5-4971-8ec4-326ec1dc3f23.

County of Santa Barbara. 2025. “Agricultural Preserve Program | Santa Barbara County, CA - Official Website.” https://www.countyofsb.org/290/Agricultural-Preserve-Program.

County of Santa Barbara P&D. 2018. Santa Barbara County Land Use and Zoning Map. https://www.arcgis.com/home/webmap/viewer.html?webmap=fa3545a29dac49aeacc81669b956e3e5.

County of Santa Barbara P&D. 2025. “Santa Barbara County Land Use and Zoning Map.” https://sbcopad.maps.arcgis.com/apps/webappviewer/index.html?id=0f24610ca52d4e28b12e2d76bfb1d5ec.

Department of Conservation, Division of Land Resources Protection. 2019. “Williamson Act Program Overview.” https://www.conservation.ca.gov/dlrp/wa/Pages/wa_overview.aspx.

Lane Farms. 2022. “Lane Farms - Santa Barbara Produce Stand & Pumpkin Patch.” Lane Farms. https://www.lanefarmssb.com/.

Santa Barbara County Agricultural Commissioner's Office. 2023. "Crop & Livestock Report 2023." https://content.civicplus.com/api/assets/149b2f9a-e302-46a1-8f54-2ffd1a47d2c9.

U.S. Department of Agriculture (USDA). 2025. “NRCS Prime and Other Important Farmlands.” https://efotg.sc.egov.usda.gov/references/public/LA/Prime_and_other_Important_Farmland.html#top.

USDA. 2023. "Land Evaluation and Site Assessment." https://www.nrcs.usda.gov/conservation-basics/land/evaluation-and-assessment.

Section 3.3, *Air Quality*

Caltrans. 2025. “Caltrans Traffic Census Program 2023 Traffic Volumes.” https://dot.ca.gov/programs/traffic-operations/census.

California Air Resources Board (CARB). 2023a. “iADAM: Air Quality Data Statistics - Select 8 Summary-First Steps.” 2023. https://www.arb.ca.gov/adam/select8/sc8start.php.

CARB. 2023b. “Summary: Diesel Particulate Matter Health Impacts | California Air Resources Board.” 2023. https://ww2.arb.ca.gov/resources/summary-diesel-particulate-matter-health-impacts#footnote1_sjcp059.

County of Santa Barbara. 2021. “Climate Change Vulnerability Assessment.” https://s3-us-west-2.amazonaws.com/mysocialpinpoint/uploads/redactor_assets/documents/8c4aa5d7d81a96f8896bce055b229c2e7ec3c010a9866b35a18b7ae86aef7067/44589/SantaBarbaraCounty_CCVA_Report_PublicDraft_withExecSummary__09-21-21_reduced.pdf.

County of Santa Barbara. 2024. "Environmental Thresholds and Guidelines Manual." https://content.civicplus.com/api/assets/3a8f7de7-7ec5-4971-8ec4-326ec1dc3f23.

County of Santa Barbara Planning and Development Department. 2009. “Santa Barbara County Comprehensive Plan Land Use Element, Air Quality Supplement.”

Santa Barbara County Air Pollution Control District (SBCAPCD). 2017. “Development Near Busy Roadways: Guidance for Santa Barbara County.” https://www.ourair.org/wp-content/uploads/sbcapcd-near-roadway-June2017-final.pdf.

SBCAPCD. 2018. “Annual Air Quality Report 2018.” https://ourair.org/wp-content/uploads/2019-Annual-Air-Quality-ReportA.pdf.

SBCAPCD. 2019. “Annual Air Quality Report 2019.” https://ourair.org/wp-content/uploads/2019-Annual-Air-Quality-ReportA.pdf.

SBCAPCD. 2020. “Annual Air Quality Report 2020.” https://ourair.org/wp-content/uploads/2020-Annual-Air-Quality-Report.pdf.

SBCAPCD. 2021a. “Annual Air Quality Report 2020.” https://ourair.org/wp-content/uploads/2020-Annual-Air-Quality-Report.pdf.

SBCAPCD. 2021b. “Annual Air Quality Report 2021.” https://www.ourair.org/wp-content/uploads/2021-Annual-Air-Quality-Report-1.pdf.

SBCAPCD. 2022a. “2022 Ozone Plan.” https://www.ourair.org/wp-content/uploads/2022-Ozone-Plan.pdf.

SBCAPCD. 2022b. “Annual Air Quality Report 2021.” https://www.ourair.org/wp-content/uploads/2021-Annual-Air-Quality-Report-1.pdf.

SBCAPCD. 2022c. “Scope and Content of Air Quality Sections in Environmental Documents.” https://www.ourair.org/wp-content/uploads/ScopeContentJanuary2022-LimitedUpdates.pdf.

SBCAPCD. 2023a. “Annual Air Quality Report 2022.” https://www.ourair.org/wp-content/uploads/2022-Annual-Air-Quality-Report.pdf.

SBCAPCD. 2023b. “Emission Inventory | Santa Barbara County Air Pollution Control District.” 2023. https://www.ourair.org/emissions-inventory/.

SBCAPCD. 2024a. “Annual Air Monitoring Network Plan for Santa Barbara County.” https://ourair.org/wp-content/uploads/2024-SBCAPCD-Annual-Air-Monitoring-Network-Plan_Final.pdf.

SBCAPCD. 2024b. “Annual Air Quality Report 2023.” https://www.ourair.org/wp-content/uploads/2024-10bd-g1-pp.pdf.

SBCAPCD. 2025a. “Meeting Air Quality Standards.” 2025. https://www.ourair.org/air-quality-standards/.

SBCAPCD. 2025b. “Significant Risk Facilities.” 2025. https://www.ourair.org/significant-risk-facilities/.

South Coast Air Quality Management District. 2015. “Multiple Air Toxics Exposure Study in the South Coast Air Basin Final Report.” 2015. https://www.aqmd.gov/docs/default-source/air-quality/air-toxic-studies/mates-iv/mates-iv-final-draft-report-4-1-15.pdf?sfvrsn=7.

Section 3.4, *Biological Resources*

California Department of Fish and Wildlife (CDFW). 2025. “California Natural Diversity Database BIOS Viewer.”

California Native Plant Society (CNPS). 2025. “California Rare Plant Ranks | California Native Plant Society.” California Native Plant Society (blog). 2025. https://www.cnps.org/rare-plants/california-rare-plant-ranks.

County of Santa Barbara. 1995. “Montecito Community Plan Update.” December 1995. https://cosantabarbara.app.box.com/s/40p7iwk8zixzuujte847rk620psduve7.

County of Santa Barbara. 2009. “Santa Ynez Valley Community Plan Final EIR.” 2009. http://longrange.sbcountyplanning.org/planareas/santaynez/documents/Board%20of%20Supervisors%20Adoption/Electronic%20Docket/Attachment%20C%20FEIR%20Volume%201%2009-2009.pdf.

County of Santa Barbara. 2010. “Santa Barbara County Comprehensive Plan - Conservation Element.” 2010. http://longrange.sbcountyplanning.org/programs/genplanreformat/PDFdocs/Conservation.pdf.

County of Santa Barbara. 2011. “Los Alamos Community Plan.” http://longrange.sbcountyplanning.org/planareas/losalamos/documents/Final-LACP-Adopted-2011-2-15/ADOPTED-Final-LACP-Update-2011-2-15.pdf.

County of Santa Barbara. 2014. “Cuyama Solar Facility and Comprehensive Plan/Land Use Development Code Amendments Project (SCH #2011121009).” County of Santa Barbara Planning and Development Energy Division. 2014. http://www.sbcountyplanning.org/energy/projects/CuyamaSolarArrayCFEIR.asp.

County of Santa Barbara. 2015. “Eastern Goleta Valley Community Plan Draft Final Environmental Impact Report.”

https://cosantabarbara.app.box.com/s/o9fp2865sykaqn98s0702plaa96xj7t5/file/438104264361.

County of Santa Barbara. 2024. "Environmental Thresholds and Guidelines Manual." https://content.civicplus.com/api/assets/3a8f7de7-7ec5-4971-8ec4-326ec1dc3f23.

National Audubon Society. 2025. "Important Bird Areas - National Audubon Society." https://gis.audubon.org/portal/apps/sites/?_gl=1*1a9n0vq*_gcl_au*MTEzMjUyMzQ3OS4xNzgyMTU1NDYy*_ga*MTQwMDM3MDI1MS4xNzgyMTU1NDYz*_ga_X2XNL2MWTT*czE3ODIxNTU0NjIkbzEkZzAkdDE3ODIxNTU0NjIkajYwJGwwJGgw#/nas-hub-site.

Storrer and Semonsen Environmental Services. 1990a. “Botanical Resources of Point Sal Technical Report.”

Storrer and Semonsen Environmental Services. 1990b. “Wildlife Resources Assessment for Point Sal Technical Report.” 6/30/2025.

The Next Summit. 2024. “Why Sticking to Trails Matters: Protecting Nature with Every Step.”

U.S. Fish and Wildlife Service (USFWS). 2025a. “USFWS Information for Planning and Consultation (IPaC).” https://ipac.ecosphere.fws.gov/user/login.

USFWS. 2025b. “USFWS Threatened & Endangered Species Active Critical Habitat Report.” https://ecos.fws.gov/ecp/report/table/critical-habitat.html.

Section 3.5, *Cultural and Tribal Cultural Resources*

City of Santa Barbara. 2022. “History of Santa Barbara | City of Santa Barbara.” June 17, 2022. https://santabarbaraca.gov/government/priorities-policies/historic-preservation/history-santa-barbara.

County of Santa Barbara. 2010. “Conservation Element.” 2010. http://longrange.sbcountyplanning.org/programs/genplanreformat/PDFdocs/Conservation.pdf.

County of Santa Barbara. 2024a. “List of Places of Historic Merit.” January 2024. https://www.countyofsb.org/1683/Places-of-Historic-Merit.

County of Santa Barbara. 2024b. "Environmental Thresholds and Guidelines Manual." https://content.civicplus.com/api/assets/3a8f7de7-7ec5-4971-8ec4-326ec1dc3f23.

County of Santa Barbara. 2025. “List of Historic Landmarks.” March 2025. https://www.countyofsb.org/1659/Historic-Landmarks.

County of Santa Barbara P&D. 2010. “Los Alamos Community Plan Update Final Environmental Impact Report. SCH No. 2008101147.”

County of Santa Barbara Surveyor. 2008. "Santa Barbara County Rancho Map." 2008. http://cosb.countyofsb.org/pwd/Surveyor/downloads/Ranchos.pdf.

Erlandson, J.M. 1993. "Cultural Setting. In Archaeological Investigations at CA SBA 1731: A Transitional Middle-to-Late Period Site on the Santa Barbara Channel, Edited by Jon Erlandson and Joyce Gerber. Dames & Moore, Santa Barbara, California. Submitted to Exxon Company, Goleta, California."

Erlandson, J.M., T.G. Cooley, and R. Carrico. 1987. "A Fluted Projectile Point Fragment from the Southern California Coast: Chronology and Context at CA SBA 1951." Journal of California and Great Basin Anthropology 9:120–28.

Gerber, Joyce. 2022. "Revised Plan Review, Native American Outreach, and Preliminary Recommendations: Cultural Resources Services for Jalama Beach County Park Public Access CEQA Support."

Glassow, M. A., Wilcoxon, L., and Erlandson, J. 1988. "Cultural and Environmental Change during the Early Period of Santa Barbara Channel Prehistory." In The Archaeology of Prehistoric Coastlines, Edited by G. Bailey and J. Parkington, 64–67. Cambridge University Press, New York.

Glassow, M.A. 1990. "Archaeological Investigations on Vandenberg Air Force Base in Connection with the Development of Space Transportation System Facilities, with Contributions by Jeanne E. Arnold, G. A. Batchelder, Richard T. Fitzgerald, Brian K. Glenn, D. A. Guthrie, Donald L. Johnson, and Phillip L. Walker. Department of Anthropology, University of California, Santa Barbara." Submitted to U.S. Department of the Interior, National Park Service, Western Region Interagency Archeological Services Branch, San Francisco, Contract No. CX-8099-2-0004.

Glassow, M.A. 1996. "Purisimeño Chumash Prehistory: Maritime Adaptations along the Southern California Coast. Case Studies in Archaeology. Jeffrey Quilter, Series Editor." Harcourt Brace College Publishers, San Diego.

Governor's Office of Planning and Research (OPR). 2005. "California Tribal Consultation Guidelines." 2005. http://opr.ca.gov/docs/09_14_05_Updated_Guidelines_922.pdf.

King, C.D. 1990. "Evolution of Chumash Society: A Comparative Study of Artifacts Used for Social System Maintenance in the Santa Barbara Channel Region before A.D. 1804. The Evolution of North American Indians, Edited by David Hurst Thomas. Garland, New York."

Kroeber, Alfred L., and Putnam, Frederic. 1911. "American Archaeology and Ethnology; the Chumash and Costanoan Languages- Kroeber, A. L." University of California Publications.

Landberg, L.C.W. 1965. “The Chumash Indians of Southern California. Southwest Museum Papers 19. Los Angeles. Latis, D.W., Steiner R., and Karinen A.E. 197.”

Lebow, C.G., D.R. Harro, R.L. McKim, and C. Denardo. 2001. “Archaeological Excavations at CA SBA 246, An Early Holocene Site on Vandenberg Air Force Base, Santa Barbara County, California.” Applied EarthWorks, Inc., Fresno, California, for Tetra Tech, Inc., Santa Barbara, California. Submitted to 30 CES/CEV, Vandenberg Air Force Base, California, USAF Contract No. F04684-95-C-0045.

Lompoc Valley Historical Society. 2017. “Lompoc History.” 2017. http://lompochistory.org/index.php/history/.

Native American Heritage Commission (NAHC). 2025. “State Laws and Codes.” 2025. https://nahc.ca.gov/codes/state-laws-and-codes/.

Office of Historic Preservation (OHP). 2025a. “California Historical Landmarks by County: Santa Barbara.” California State Parks. 2025. https://www.parks.ca.gov/?page_id=21521.

OHP. 2025b. “California Register of Historical Resources.” California State Parks. 2025. https://www.parks.ca.gov/?page_id=21238.

Rife, J. 1977. “Where the Light Turns Gold: The Story of Santa Ynez Valley.” Fresno Valley Publishers.

Strudwick, I. 1985. “The Single-Piece Circular Fishhook: Classification and Chronology.” Pacific Coast Archaeological Society Quarterly 21 (2): 32–69.

U.S. National Park Service. 2025a. “List of National Historic Landmarks by State.” May 2, 2025. https://www.nps.gov/subjects/nationalhistoriclandmarks/list-of-nhls-by-state.htm.

U.S. National Park Service. 2025b. “National Register of Historic Places Digital Archive on NPGallery.” 2025. https://npgallery.nps.gov/NRHP/SearchResults?view=list.

Victorino, Ken, and David Stone. 2018. “Phase 1 Archaeological Survey: Jalama Beach County Park Dedication Property, Dangermond Preserve, Santa Barbara County, California.”

Section 3.6, *Energy*

Central Coast Community Energy (3CE). 2022. 3CE 2021 Power Content Label. Available at: https://3cenergy.org/wp-content/uploads/2023/02/2021-3CE-Power-Content-Label-1.pdf.

3CE. 2023. About 3CE - Central Coast Community Energy. Available at: https://3cenergy.org/about-us/, https://3cenergy.org/about-us/.

California Department of Motor Vehicles. 2025. DMV Statistics. Available at: https://www.dmv.ca.gov/portal/news-and-media/dmv-statistics/.

California Energy Commission (CEC). 2023a. "2010-2022 CEC-A15 Results and Analysis." California Energy Commission. California Energy Commission. 2023. https://www.energy.ca.gov/media/3874.

CEC. 2023b. "2021 Total System Electric Generation." California Energy Commission. California Energy Commission. 2023. https://www.energy.ca.gov/data-reports/energy-almanac/california-electricity-data/2021-total-system-electric-generation.

CEC. 2023c. "Electricity Consumption by County." California Energy Commission. 2023. http://www.ecdms.energy.ca.gov/elecbycounty.aspx.

CEC. 2023d. "Final 2022 Integrated Energy Policy Report Update." https://www.energy.ca.gov/data-reports/reports/integrated-energy-policy-report/2022-integrated-energy-policy-report-update.

CEC. 2023e. "Gas Consumption by County." 2023. http://www.ecdms.energy.ca.gov/gasbycounty.aspx.

County of Santa Barbara. 2019. Strategic Energy Plan for the County of Santa Barbara. Available at: https://content.civicplus.com/api/assets/036c2b91-6755-43ec-8989-7a64ec0889d0.

County of Santa Barbara. 2024. "Environmental Thresholds and Guidelines Manual." https://content.civicplus.com/api/assets/3a8f7de7-7ec5-4971-8ec4-326ec1dc3f23.

County of Santa Barbara and One Climate Initiative. 2022. 2030 Climate Action Plan Website. Available at: https://sbco.mysocialpinpoint.com/2030cap/.

Pacific Gas & Electric Company (PG&E). 2022. PG&E 2021 Power Content Label. Available at: https://www.pge.com/pge_global/common/pdfs/your-account/your-bill/understand-your-bill/bill-inserts/2022/1022-Power-Content-Label.pdf.

Santa Barbara County Association of Governments (SBCAG). 2021. Census 2020 Summary: Initial Analysis of the Census 2020 Redistricting File for the Santa Barbara County Region.

Southern California Edison (SCE). 2022. SCE 2021 Power Content Label. Available at: https://www.sce.com/sites/default/files/custom-files/Web%20files/2021%20Power%20Content%20Label.pdf.

Southern California Gas Company (SoCalGas). 2023. Company Profile | SoCalGas. Available at: https://www.socalgas.com/about-us/company-profile.

U.S. Environmental Protection Agency (USEPA). 2023. “Regulations for Greenhouse Gas Emissions from Passenger Cars and Trucks.” Other Policies and Guidance. 2023. https://www.epa.gov/regulations-emissions-vehicles-and-engines/regulations-greenhouse-gas-emissions-passenger-cars-and.

Section 3.7, *Geology and Soils*

California Department of Conservation. 2022. Earthquake Zones of Required Investigation. Available at: https://maps.conservation.ca.gov/cgs/EQZApp/app/.

California Department of Water Resources (DWR). 2021. "California's Groundwater Update 2020." November. https://data.cnra.ca.gov/dataset/calgw_update2020.

DWR. 2026. "GSP Status Summary." https://sgma.water.ca.gov/portal/gsp/status.

County of Santa Barbara. 2023. "Seismic Safety and Safety Element." July. https://content.civicplus.com/api/assets/f0b97ebb-c2c6-4f92-afd0-e04bf738537d.

County of Santa Barbara. 2024. "Environmental Thresholds and Guidelines Manual." https://content.civicplus.com/api/assets/3a8f7de7-7ec5-4971-8ec4-326ec1dc3f23.

Society of Vertebrae Paleontology (SVP). 2010. Standard Procedures for the Assessment and Mitigation of Adverse Impacts to Paleontological Resources. Available at: https://vertpaleo.org/wp-content/uploads/2021/01/SVP_Impact_Mitigation_Guidelines-1.pdf.

U.S. Geological Survey (USGS). 2013. Geology, Water-Quality, Hydrology, and Geomechanics of the Cuyama Valley Groundwater Basin, California, 2008-12. Scientific Investigations Report 2013-5108. Available at: https://pubs.usgs.gov/sir/2013/5108/pdf/sir2013-5108.pdf.

U.S. Geological Survey (USGS). 2016. Land Subsidence From Ground-Water Pumping. Available at: https://geochange.er.usgs.gov/sw/changes/anthropogenic/subside/.

Section 3.8, *Greenhouse Gas Emissions*

Brasher, Lance T., Liz Malone, and Joshua B. Nickerson. 2025. “Energy and the Environment: Fossil Fuel Extraction Is Encouraged, Clean Energy and Protections Are Under Review.” Skadden. January 31, 2025. https://www.skadden.com/insights/publications/executive-briefing/energy-and-the-environment.

California Natural Resources Agency (CNRA) . 2018a. “California’s Fourth Climate Change Assessment: Central Coast Region Report.” http://www.climateassessment.ca.gov/about/.

CNRA. 2018b. “Safeguarding California Plan: 2018 Update.” https://resources.ca.gov/CNRALegacyFiles/docs/climate/safeguarding/update2018/safeguarding-california-plan-2018-update.pdf.

CARB. 2017. “The 2017 Climate Change Scoping Plan Update.” 2017. https://www.arb.ca.gov/cc/scopingplan/2030sp_pp_final.pdf.

CARB. 2024. “California Greenhouse Gas Emissions from 2000 to 2022: Trends of Emissions and Other Indicators.” https://ww2.arb.ca.gov/sites/default/files/2024-09/nc-2000_2022_ghg_inventory_trends.pdf.

CARB. 2025a. “Community Air Protection Program.” 2025. https://ww2.arb.ca.gov/capp/community-air-protection-program.

CARB. 2025b. “Community Emission Reduction Program Approvals: Executive Orders.” 2025. https://ww2.arb.ca.gov/resources/documents/community-emission-reduction-program-approvals-executive-orders.

CARB. 2025c. “GHG Global Warming Potentials | California Air Resources Board.” 2025. https://ww2.arb.ca.gov/ghg-gwps.

CEC. 2023. “Cal-Adapt.” 2023. https://cal-adapt.org/tools/annual-averages.

City of Goleta. 2024. “Building Electrification and Reach Codes.” 2024. https://www.cityofgoleta.org/live/sustainability/building-electrification-and-reach-codes.

County of Santa Barbara. 2021. “Climate Change Vulnerability Assessment.” https://s3-us-west-2.amazonaws.com/mysocialpinpoint/uploads/redactor_assets/documents/8c4aa5d7d81a96f8896bce055b229c2e7ec3c010a9866b35a18b7ae86aef7067/44589/SantaBarbaraCounty_CCVA_Report_PublicDraft_withExecSummary__09-21-21_reduced.pdf.

County of Santa Barbara. 2024a. “2030 Climate Action Plan.” https://cosantabarbara.app.box.com/s/uz1b15s7uu3f03u6mzj6dujn73w7tyr3.

County of Santa Barbara. 2024b. "Environmental Thresholds and Guidelines Manual." https://content.civicplus.com/api/assets/3a8f7de7-7ec5-4971-8ec4-326ec1dc3f23.

County of Santa Barbara. 2025. “Energy Reach Code Development.” 2025. https://sbco.mysocialpinpoint.com/sbcollaborative/reachcode/.

Intergovernmental Panel on Climate Change (IPCC). 2021. “Climate Change 2021 - The Physical Science Basis.” https://www.ipcc.ch/report/ar6/wg1/downloads/report/IPCC_AR6_WGI_FullReport.pdf.

Langridge, R. (University of California, Santa Cruz). 2018. "Central Coast Summary Report. California's Fourth Climate Change Assessment." https://www.energy.ca.gov/sites/default/files/2019-11/Reg_Report-SUM-CCCA4-2018-006_CentralCoast_ADA.pdf.

Malone, Liz. 2025. "Trump Administration Rolls Back Climate Initiatives and Orders EPA To Set Sunset Dates for Regulations." Skadden. April 30, 2025. https://www.skadden.com/insights/publications/2025/04/trump-administrations-first-100-days/trump-administration-rolls-back-climate-initiatives.

National Oceanic and Atmospheric Administration (NOAA). 2023. "Global Monitoring Laboratory - Carbon Cycle Greenhouse Gases." 2023. https://gml.noaa.gov/ccgg/trends/.

SBCAPCD. 2022a. "2022 Ozone Plan." https://www.ourair.org/wp-content/uploads/2022-Ozone-Plan.pdf.

SBCAPCD. 2022b. "Planning for Clean Air." 2022. https://www.ourair.org/planning-clean-air/.

SBCAG. 2021. "Connected 2050 Regional Transportation Plan Sustainable Communities Strategy." August 2021. http://www.sbcag.org/uploads/2/4/5/4/24540302/connected_2050_final.pdf.

U.S. Global Change Research Program. 2017. "Climate Science Special Report: Fourth National Climate Assessment, Volume I." https://science2017.globalchange.gov/chapter/front-matter-about/.

USEPA. 2016. "Climate Impacts on Water Quality." Overviews and Factsheets. May 10, 2016. https://www.epa.gov/arc-x/climate-impacts-water-quality.

USEPA. 2020. "Air Quality - National Summary." 2020. https://www.epa.gov/air-trends/air-quality-national-summary.

USEPA. 2023. "Climate Change Indicators: Ecosystems." Reports and Assessments. 2023. https://www.epa.gov/climate-indicators/ecosystems.

USEPA. 2024a. "Climate Change Indicators in the United States, Fifth Edition." https://www.epa.gov/system/files/documents/2024-09/climate_indicators_2024.pdf.

USEPA. 2024b. "Inventory of U.S. Greenhouse Gas Emissions and Sinks." 2024. https://www.epa.gov/ghgemissions/inventory-us-greenhouse-gas-emissions-and-sinks.

USEPA. 2025. "About the Greenhouse Gas Reduction Fund." February 13, 2025. https://www.epa.gov/greenhouse-gas-reduction-fund/about-greenhouse-gas-reduction-fund.

World Meteorological Organization. 2018. "WMO Greenhouse Gas Bulletin." November 22, 2018. https://library.wmo.int/doc_num.php?explnum_id=5455.

Section 3.9, *Hazards and Hazardous Materials*

California Department of Toxic Substances Control (DTSC). 2025. "EnviroStor." https://www.envirostor.dtsc.ca.gov/public/.

Caltrans. 2011. "California Airport Land Use Planning Handbook." https://dot.ca.gov/-/media/dot-media/programs/aeronautics/documents/californiaairportlanduseplanninghandbook-a11y.pdf.

California Office of Emergency Services (CalOES). 2024. "Spill Release Reporting." https://www.caloes.ca.gov/office-of-the-director/operations/response-operations/fire-rescue/hazardous-materials/spill-release-reporting/.

County of Santa Barbara. 2022. "Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan." https://www.countyofsb.org/510/2022-Hazard-Mitigation-Plan-Update.

Federal Motor Carrier Safety Administration. 2009. "Hazardous Materials Route Registry." https://www.fmcsa.dot.gov/sites/fmcsa.dot.gov/files/docs/Hazardous_Materials_Route_Registry_9-28-2009_508.pdf.

SBCAG. 2022. "Vandenberg Space Force Base Airport Land Use Compatibility Plan." https://www.sbcag.org/wp-content/uploads/2023/09/vsfb_alucp_final.pdf.

SBCAG. 2023a. "Lompoc Airport Land Use Compatibility Plan." https://www.sbcag.org/wp-content/uploads/2023/09/lompoc_alucp_final.pdf.

SBCAG. 2023b. "Santa Barbara Airport Land Use Compatibility Plan." https://www.sbcag.org/wp-content/uploads/2023/09/sba_alucp_final.pdf.

SBCAG. 2023c. "Santa Maria Airport Land Use Compatibility Plan." https://www.sbcag.org/wp-content/uploads/2023/09/smx_alucp_v2_final.pdf.

SBCAG. 2023d. "Santa Ynez Airport Land Use Compatibility Plan." https://www.sbcag.org/wp-content/uploads/2023/09/santa-ynez_alucp_final.pdf.

State Water Resources Control Board (SWRCB). 2025. "GeoTracker." https://geotracker.waterboards.ca.gov/.

USEPA. 2022. "What Is Superfund?" https://www.epa.gov/superfund/what-superfund.

Section 3.10, *Hydrology and Water Quality*

Central Coast Regional Water Quality Control Board. 2024. Water Quality Control Plan for the Central Coastal Basin, June 2024 Edition. California Environmental Protection Agency. https://www.waterboards.ca.gov/rwqcb3/water_issues/programs/basin_plan/docs/2024_basin_plan_r3.pdf

City of Ventura. 2020. "Water Demand Factor Study." https://www.cityofventura.ca.gov/DocumentCenter/View/21211/2020-Water-Demand-Factor-Study?bidId=.

County of Santa Barbara. 2022. “Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan.” https://www.countyofsb.org/510/2022-Hazard-Mitigation-Plan-Update.

County of Santa Barbara. 2023. "Seismic Safety and Safety Element." July. https://content.civicplus.com/api/assets/f0b97ebb-c2c6-4f92-afd0-e04bf738537d.

County of Santa Barbara. 2025a. "Water Supply." https://www.countyofsb.org/2514/Water-Supply.

County of Santa Barbara. 2025b. "Operation & Maintenance." https://www.countyofsb.org/2156/Operation-Maintenance.

DWR. 2004a. “Carpinteria Groundwater Basin.”

DWR. 2004b. “Montecito Groundwater Basin.”

DWR. 2004c. “Santa Barbara Groundwater Basin.”

DWR. 2004d. “Foothill Groundwater Basin.”

DWR. 2004e. “Goleta Groundwater Basin.”

DWR. 2004f. “Santa Ynez River Valley Groundwater Basin.”

DWR. 2004g. “San Antonio Creek Valley Groundwater Basin.”

DWR. 2004h. “Santa Maria River Valley Groundwater Basin.”

DWR. 2025. "SGMA Basin Prioritization Dashboard." https://gis.water.ca.gov/app/bp-dashboard/final/#.

Santa Barbara County Cooperating Entities. 2021. "Santa Barbara County-Wide Integrated Stormwater Resource Plan." https://cosantabarbara.app.box.com/s/mnm32iybrw5bz30g4lsjo0bjicd3z1rr.

Santa Barbara County IRWM Cooperating Partners. 2019. "Santa Barbara County Integrated Regional Water Management Plan Update 2019." https://content.civicplus.com/api/assets/89d60832-8fd8-47ae-b7e8-787ad1253820.

Santa Barbara County Public Works Department. 2024. "Santa Barbara County 2024 Groundwater Basins Summary Report." https://content.civicplus.com/api/assets/29ac08e3-0b04-47d1-ae56-8113fdf3b851.

SWRCB. 2022. “Appendix H: 2018 303(d) List of Impaired Waters.” https://www.waterboards.ca.gov/water_issues/programs/water_quality_assessment/2020_2022_integrated_report.html.

USGS. 2014. "Hydrologic Model and Analysis of Water Availability in Cuyama Valley, California." Scientific Investigations Report. https://pubs.usgs.gov/sir/2014/5150/pdf/sir2014-5150.pdf.

USGS. 2022. "Hydrogeologic Characterization of the San Antonio Creek Valley Watershed, Santa Barbara County, California." Scientific Investigations Report. https://pubs.usgs.gov/sir/2022/5001/sir20225001.pdf.

Section 3.11, *Land Use and Planning*

County of Santa Barbara. 2009. "Santa Ynez Community Plan." https://content.civicplus.com/api/assets/6dab7f22-f638-4cc9-ac95-e390e969e1f1.

County of Santa Barbara. 2014. “Circulation Element.” https://cosantabarbara.app.box.com/s/z9h6t9g0y1fnsqc3bb27xw4r344y5lxo.

County of Santa Barbara. 2023. "Seismic Safety and Safety Element." July. https://content.civicplus.com/api/assets/f0b97ebb-c2c6-4f92-afd0-e04bf738537d.

County of Santa Barbara. 2024. "Environmental Thresholds and Guidelines Manual." https://content.civicplus.com/api/assets/3a8f7de7-7ec5-4971-8ec4-326ec1dc3f23.

Section 3.12, *Noise*

ACOUSTICS (Australian Acoustical Society). 2011. “Prediction of Noise from Small to Medium Sized Crowds.” https://www.acoustics.asn.au/conference_proceedings/AAS2011/papers/p133.pdf.

Caltrans. 2013. “Transportation and Construction Vibration Guidance Manual.” http://www.dot.ca.gov/hq/env/noise/pub/TCVGM_Sep13_FINAL.pdf.

Caltrans. 2020. “Transportation and Construction Vibration Guidance Manual.” https://dot.ca.gov/-/media/dot-media/programs/environmental-analysis/documents/env/tcvgm-apr2020-a11y.pdf.

County of Santa Barbara. 2009. "Noise Element." https://cosantabarbara.app.box.com/s/3yex3g6a5vex3cjpkx1bxg1pgvzp9k1y.

County of Santa Barbara. 2024. "Environmental Thresholds and Guidelines Manual." https://content.civicplus.com/api/assets/3a8f7de7-7ec5-4971-8ec4-326ec1dc3f23.

Culbertson, Adams & Associates, Inc. 2002. “Santa Monica Airport Park Draft Environmental Impact Report.”

Department of the Air Force. 2025. “Environmental Impact Statement for Authorizing Changes to the Falcon Launch Program at Vandenberg Space Force Base.” https://www.vsfbfalconlauncheis.com/.

Federal Aviation Administration (FAA). 2023. "Community Response to Noise." https://www.faa.gov/regulations_policies/policy_guidance/noise/community.

Federal Transit Administration (FTA). 2018. "Transit Noise and Vibration Impact Assessment Manual." https://www.transit.dot.gov/sites/fta.dot.gov/files/docs/research-innovation/118131/transit-noise-and-vibration-impact-assessment-manual-fta-report-no-0123_0.pdf.

Harris Miller Miller & Hanson Inc. 2006. “Transit Noise and Vibration Impact Assessment.” May. http://www.fta.dot.gov/documents/FTA_Noise_and_Vibration_Manual.pdf.

Kawada, Tomoyuki. 2004. "The Effect of Noise on the Health of Children." Vol. 71. https://doi.org/10.1272/jnms.71.5.

Massachusetts Pickleball. 2025. “The Impact of Pickleball Noise on Communities: Understanding the Issue.” https://masspickleballguide.com/sport/pickleball-noise-impact/.

Nikolett Jégh-Czinege, Tamás Faragó, and Péter Pongrácz. 2019. “A Bark of Its Own Kind – the Acoustics of ‘Annoying’ Dog Barks Suggests a Specific Attention-Evoking Effect for Humans.” Bioacoustics 29 (2). https://www.tandfonline.com/doi/full/10.1080/09524622.2019.1576147#d1e298.

SBCAG. 2018. “Airport Land Use Commission.” http://www.sbcag.org/airport-land-use-commission.html.

SBCAG. 2023. "SBCAG Airport Land Use Compatibility Plan (ALUCP)." https://storymaps.arcgis.com/stories/30eeb151f7f84ab39a6e4bfe6901799f.

San Luis Obispo County. 2012. Final Program Environmental Impact Report for the Nipomo Community Park Master Plan. Available at: https://slocountyparks.com/wp-content/uploads/2017/04/4-8-Noise.pdf.

U.S. Environmental Protection Agency (USEPA). 1971. "Noise from Construction Equipment and Operations, Building Equipment, and Home Appliances." December.

U.S. Environmental Protection Agency. 1979. "Noise Effects Handbook: A Desk Reference to Health and Welfare Effects of Noise." National Association of Noise Control Officials. http://www.nonoise.org/library/handbook/handbook.htm.

United States Space Force. 2025. “About Us.” https://www.vandenberg.spaceforce.mil/About-Us/.

Wolfgang, B. 2005. Guest Editorial: Noise and Health. Environmental Health Perspective 113(1) (January): A14–15.

Wolfgang, B. 2008. Road Traffic Noise and Cardiovascular Risk. Noise and Health 10 (38): 27–33.

Section 3.13, *Public Services*

California Department of Forestry and Fire Protection (CAL FIRE). 2014. “CAL FIRE Conservation Camp Program.” https://www.fire.ca.gov/media/10172/campprogram.pdf.

CAL FIRE. 2018. “What Is CAL FIRE?” https://www.fire.ca.gov/media/sp0fb3k3/whatiscalfire.pdf.

CAL FIRE. 2022a. “Fire and Emergency Response.”

CAL FIRE. 2022b. “Volunteers in Prevention (VIP).” https://www.fire.ca.gov/programs/communications/volunteers-in-prevention/.

CAL FIRE. 2023a. “2023 Wildfire Activity Statistics (Redbook).” https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/calfire-website/our-impact/fire-statistics/2023_redbook_final.pdf?rev=e3ba4cccf9fe4d0e97a921189d85baaf&hash=9593161EBE9D4EAC55B5ACD30F46228A.

CAL FIRE. 2023b. “Total Annual Incidents.” https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/calfire-website/images---misc/2023-total_annual_incidents.jpg?rev=cc38446a00044923b45989d028c399dc&hash=6E74FED028919C381CC6C94C349DF2A3.

CAL FIRE. 2024a. “CAL FIRE Strategic Plan 2024.” https://cal-fire-communications.paperturn-view.com/cal-fire-strategicplan24-web?pid=ODg8828162&v=2.

CAL FIRE. 2024b. “Lake Fire Incident Update.”

CAL FIRE. 2025. “California CWPP Toolkit.”

California Climate Investments. 2024. “Fire Prevention Program.” https://www.caclimateinvestments.ca.gov/fire-prevention.

California Tax Data. 2023a. “What Is a 1972 Act Landscaping and Lighting District?” http://www.californiataxdata.com/pdf/1972LLact.pdf.

California Tax Data. 2023b. “What Is Mello-Roos?” http://www.californiataxdata.com/pdf/Mello-Roos2.pdf.

Citygate Associates, LLC. 2020. “Fire Department Operational Enhancements Update.” https://citygateassociates.com/wp-content/uploads/Vol-1-Technical-Report-Santa-Barbara-County-OEU-11-10-20.pdf.

County of Santa Barbara. 2022. “Library Services.” 2022. https://www.countyofsb.org/309/Library-Services.

County of Santa Barbara. 2023a. “4.5 Fire Protection.” https://files.ceqanet.opr.ca.gov/63346-4/attachment/vp_1woyHm1t76w2dukPqTwHADekXRYoZUdRxzS9r4OYpZ_7_KrEBYwnmafA7YSWjII-aaz_ym3kV3HC30.

County of Santa Barbara. 2023b. “Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) 2022.” https://www.countyofsb.org/510/2022-Hazard-Mitigation-Plan-Update.

County of Santa Barbara P&D. 2011. “Los Alamos Community Plan.” https://content.civicplus.com/api/assets/ca6dffa1-158a-4a38-97ac-b7616d92b364.

Jeffrey Lindgren. 2025. “Police or Fire Dept. Calls/Response in Parks/Trails,” 2025.

KCLU. 2024. “Battle from the Air: Santa Barbara County’s Air Unit on Front Lines of Lake Fire.”

National Fire Protection Association (NFPA). 2020a. “NFPA 1710: Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments.” 2020. https://www.nfpa.org/codes-and-standards/all-codes-and-standards/list-of-codes-and-standards/detail?code=1710.

NFPA. 2020b. “Standards for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments.” https://docinfofiles.nfpa.org/files/AboutTheCodes/1710/TIA_1710_20_1.pdf.

Santa Barabra County Education Office. 2025. “Districts & Schools Overview.”

Santa Barbara County Community Services. 2023. “Library Services.” https://www.countyofsb.org/309/Library-Services.

Santa Barbara County Education Office. 2022. “Programs and Services Overview.” 2022. https://www.sbceo.org/domain/http%3A%2F%2Fwww.sbceo.org%2Fsite%2Fdefault.aspx%3FDomainID%3D106.

Santa Barbara County Education Office. 2024. “DIstricts & Schools Overview.” https://www.sbceo.org/districts/overview.

Santa Barbara County Sheriff’s Office. 2025. “Proud to Protect and Serve Santa Barbara County.” https://www.sbsheriff.org/about-us/.

Santa Barbara County Fire Department (SBCFD). 2022a. “About the Santa Barbara County Fire Department.” June 2022. https://sbcfire.com/about/.

SBCFD. 2022b. “Air Support Unit.” https://sbcfire.com/air-support-unit-2/.

SBCFD. 2022c. “County Fire Stations.” https://sbcfire.com/county-fire-stations/.

SBCFD. 2022d. “Story Map.” https://sbcfire.com/story-map/.

SBCFD. 2022e. “Water Rescue Team.”

SBCFD. 2023. “Annual Statistics.” https://sbcfire.com/annual-statistics/.

SBCFD. 2025. “2025 Unit Strategic Fire Plan.” https://34c031f8-c9fd-4018-8c5a-4159cdff6b0d-cdn-endpoint.azureedge.net/-/media/osfm-website/what-we-do/community-wildfire-preparedness-and-mitigation/santa-barbara-county-fire-department-sbc-2025-unit-fire-plan.pdf?rev=85c10839d6614e5b9f0c6817ad70833c&hash=51E7D692DF82CBE5C74C6263EAB80280.

SBCFD Headquarters. 2025. Phone Call with SBCFD Headquarters.

Section 3.14, *Recreation*

California Department of Parks and Recreation. 2022. “Find a California State Park.” https://www.parks.ca.gov/ParkIndex/.

California Tax Data. 2023a. “What Is a 1972 Act Landscaping and Lighting District?” http://www.californiataxdata.com/pdf/1972LLact.pdf.

California Tax Data. 2023b. “What Is Mello-Roos?” http://www.californiataxdata.com/pdf/Mello-Roos2.pdf.

County of Santa Barbara. 2024. "Environmental Thresholds and Guidelines Manual." https://content.civicplus.com/api/assets/3a8f7de7-7ec5-4971-8ec4-326ec1dc3f23.

Section 3.15, *Transportation*

Caltrans. 2024. "California 2023 Public Road Data." December. https://dot.ca.gov/-/media/dot-media/programs/research-innovation-system-information/documents/hpms2023-prd-final.pdf.

City of Lompoc. 2023. "COLT System Map." March. https://www.cityoflompoc.com/home/showpublisheddocument/38012/638235626471630000.

City of Lompoc. 2025. "COLT Wine Country Express." January. https://www.cityoflompoc.com/home/showpublisheddocument/41312/638737399844670000.

Clean Air Express. 2025. "Schedules and Stops." https://cleanairexpress.com/schedules-stops/.

County of Santa Barbara. 2015. "Eastern Goleta Valley Community Plan." https://content.civicplus.com/api/assets/c045b531-6a10-4bf5-9f34-d03284a623ae.

County of Santa Barbara. 2023a. "Active Transportation Plan." May. https://content.civicplus.com/api/assets/11fcd3bc-c7f8-4022-8769-a34decd8cd6e.

County of Santa Barbara. 2023b. "Program Environmental Impact Report (EIR) for the 2023-2031 Housing Element Update." December. https://files.ceqanet.lci.ca.gov/280421-2/attachment/HqX-CRAj2DCI7fZgt3mZvCvuEfqT7cK-JifVKVOQQXQnStPMXcGDKGnIguYqvVzeM8ohAk6rsDDjP-Po0.

County of Santa Barbara. 2025. "Transportation." https://www.countyofsb.org/190/Transportation.

County of Santa Barbara and Fehr and Peers. 2020. "Transportation Analysis Updates in Santa Barbara County." July. https://content.civicplus.com/api/assets/e348fe57-f614-42fb-8254-5dc219041b78.

Easy Lift Transportation. 2023. "About Us." https://www.easylift.org/about-us/.

OPR. 2018. "Technical Advisory on Evaluating Transportation Impacts in CEQA." December. http://opr.ca.gov/docs/20190122-743_Technical_Advisory.pdf.

MTD. 2024a. "Line 20 - Carpinteria." August 19. https://sbmtd.gov/routes/route-20/.

MTD. 2024b. "Lines 6 and 11." August. https://sbmtd.gov/wp-content/uploads/2023/11/Line-6-11-with-stops.pdf.

MTD. 2025. About MTD. https://sbmtd.gov/about/about-mtd/.

SBCAG. 2015. “Regional Active Transportation Plan.” http://www.sbcag.org/uploads/2/4/5/4/24540302/ratp_final_august2015.pdf.

SBCAG. 2016. Transit – Traffic Solutions. https://www.trafficsolutions.org/Transit.

SBCAG. 2021. “Connected 2050 Regional Transportation Plan and Sustainable Communities Strategy Draft Programmatic Environmental Impact Report.” May. http://www.sbcag.org/uploads/2/4/5/4/24540302/connected_2050_peir_may_2021.pdf.

SBCAG. 2025. “Multimodal Programs.” https://www.sbcag.org/departments/multimodal/.

San Luis Obispo Regional Transit Authority (SLORTA). 2025. “Route 10 San Luis Obispo to Santa Maria.” https://www.slorta.org/schedules-fares/route-10/.

Santa Maria Regional Transit (SMRT). 2025. “Ride Guide.” January 4. https://www.cityofsantamaria.org/home/showpublisheddocument/31753/638717730036870000.

Santa Ynez Valley Transit (SYVT). 2025. “SYVT Fixed-Route Brochure.” https://syvt.com/364/Schedule.

Transit.Wiki. 2023. “Santa Maria Regional Transit Route 50.” July 1. https://www.transit.wiki/Santa_Maria_Regional_Transit_Route_50.

U.S. Census. 2023. “Commuting Characteristics by Sex.” https://data.census.gov/table/ACSST1Y2023.S0801?q=santa+barbara+county+commuting.

U.S. Census. 2024. “QuickFacts Santa Barbara County, California.” July 1. https://www.census.gov/quickfacts/santabarbaracountycalifornia.

Ventura County Transportation Commission (VCTC). 2025. “Routes 80-89 Schedule.” January 20. https://www.goventura.org/wp-content/uploads/2025/01/2002_02_006_Coastal-Express.pdf.

Section 3.16, *Utilities*

ADS Environmental Services. 2016. Depth Perception, Tracking Sewer Performance Using Design Guidelines and Regulatory Expectations.

California Department of Resources Recycling and Recovery (CalRecycle). 2025a. “SWIS Facility/Site Activity Details – Santa Barbara County.” https://www2.calrecycle.ca.gov/SolidWaste/Site/Search.

CalRecycle. 2025b. “Waste Classification and Management.” https://calrecycle.ca.gov/swfacilities/permitting/checkitems/rdsi/chapter2/.

Carpinteria Sanitary District. 2022. "Sewer System Management Plan." https://carpsan.com/wp-content/uploads/2022/11/SSMP_2022.pdf.

Carpinteria Valley Water District (CVWD) and Woodard and Curran. 2021. "2020 Urban Water Management Plan." https://www.cvwd.net/files/a77774c46/CVWD-UWMP_Public-Draft-w-Appendices.pdf.

City of Buellton Public Works Department. 2022. "Annual Water Supply Report." https://www.cityofbuellton.com/files/Water%20PW/Exhibit%20A%20-%20COB%20Annual%20Water%20Supply%20Report%202022.pdf.

City of Guadalupe. 2022. "Wastewater Treatment Plant Annual Report." https://ci.guadalupe.ca.us/wp-content/uploads/2022/11/2021%20WWTP%20Annual%20Report.pdf.

City of Lompoc and Water Systems Consulting, Inc. (WSC). 2021. "2020 Urban Water Management Plan." https://www.cityoflompoc.com/home/showpublisheddocument/32302/637608244534770000 .

City of Santa Barbara Water Resources Division and WSC. 2021. "2020 Enhanced Urban Water Management Plan." https://sustainability.santabarbaraca.gov/sites/default/files/documents/Public%20Works/Water%20Vision/Final%202020%20Enhanced%20Urban%20Water%20Management%20Plan.pdf.

City of Ventura. 2020. "Water Demand Factor Study." https://www.cityofventura.ca.gov/DocumentCenter/View/21211/Water-Demand-Factor-Study.

County of Santa Barbara. 2019. "Santa Barbara County Integrated Regional Water Management Plan Update 2019." https://content.civicplus.com/api/assets/89d60832-8fd8-47ae-b7e8-787ad1253820.

County of Santa Barbara. 2022. "Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan." https://www.countyofsb.org/510/2022-Hazard-Mitigation-Plan-Update.

County of Santa Barbara. 2025a. "Where Does Your Water Come From." https://www.countyofsb.org/2382/Where-Your-Water-Comes-From.

County of Santa Barbara. 2025b. "Waterwise: Current Water Supply Status and Drought Planning." https://www.countyofsb.org/2531/Current-Water-Supply-Status-Drought-Plan.

Goleta Water District. 2021. "Lake Cachuma: Our Largest Water Supply Source." https://www.goletawater.com/water-supply/lakecachuma.

Golden State Water Company, Tully and Young, and Zanjero. 2021. "Orcutt Service Area 2020 Urban Water Management Plan." https://www.gswater.com/sites/main/files/file-attachments/orcutt_2020_uwmp_0.pdf?1624993860.

Goleta Water District and Woodard and Curran. 2021. "2020 Urban Water Management Plan." https://www.goletawater.com/doc/1193/.

Goleta West Sanitary District. 2019. "Sewer System Management Plan." https://goletawest.org/component/jdownloads/?task=download.send&id=1&catid=2&m=0&Itemid=101.

Los Alamos Community Services District. 2022. "Sewer System Management Plan." http://www.losalamoscsd.com/Sewer_System_Managment_Plan_-_Updated_11-10-22.pdf.

Montecito Water District and Tully and Young. 2021. "2020 Urban Water Management Plan." https://www.montecitowater.com/doc/7475/.

Provost and Pritchard Consulting Group. 2021. "City of Santa Maria Urban Water Management Plan 2020 Update." https://www.cityofsantamaria.org/home/showpublisheddocument/28900/637613361539900000.

Questa Engineering Corporation. 2003. "Septic System Sanitary Survey for Santa Barbara County." https://content.civicplus.com/api/assets/889248cc-9f22-4039-8d3e-96b43f87fa23?cache=1800.

Santa Barbara County Flood Control District. 2025. "Rainfall and Reservoir Summary." https://files.countyofsb.org/pwd/hydrology/Rainfall%20Reports/rainfallreport.pdf.

Santa Barbara County Public Health Department. 2025. "Santa Maria Regional Landfill Solid Waste Facility Permit Revision Application." https://content.civicplus.com/api/assets/b6d59922-ae39-454b-8437-15c47ebbebcf.

Santa Barbara County Public Works Department, Water Resources Division. 2024. "County of Santa Barbara Groundwater Basins Status Report." https://content.civicplus.com/api/assets/146465d0-16d7-4c25-ac21-d0bc11ee98a5.

Santa Barbara County Public Works Department, Water Resources Division. 2025. "Cachuma Reservoir." https://www.countyofsb.org/2554/Cachuma-Reservoir.

Santa Barbara County Resource Recovery and Waste Management Division (RRWMD). 2022. "County Waste Facilities. Less Is More." https://lessismore.org/materials/175-county-waste-facilities/.

RRWMD. 2023. “Annual Report 2022/2023: Solid Waste Management Services.” https://cosantabarbara.app.box.com/s/rx1c0qpkgoc74hubibz0zvm4dllwir57.

Section 3.17, *Wildfire*

CAL FIRE. 2022. “2022 Fire Season Outlook.” 2022. https://www.fire.ca.gov/incidents/.

CAL FIRE. 2025a. “2024 Fire Season Incident Archive.” January 2025. https://www.fire.ca.gov/incidents/2024.

CAL FIRE. 2025b. “Fire Hazard Severity Zone Viewer.” 2025. https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0.

CAL FIRE. 2025c. “Fire Hazard Severity Zone Viewer - LRA.” 2025. https://experience.arcgis.com/experience/6a9cb66bb1824cd98756812af41292a0.

CAL FIRE. 2025d. “Incidents.” May 23, 2025. https://www.fire.ca.gov/incidents.

Governor’s Office of Emergency Services (Cal OES). 2023. “California State Hazard Mitigation Plan.” https://www.caloes.ca.gov/wp-content/uploads/Hazard-Mitigation/Documents/2023-California-SHMP_Volume-1_12.15.2023-FINAL.pdf.

California Department of Conservation. 2019. “Post-Wildfire Debris Flows.” 2019. https://www.conservation.ca.gov/cgs/landslides/debris-flows.

Caltrans. 2019. “2019 Traffic Volumes on California State Highways.” https://dot.ca.gov/programs/traffic-operations/census/traffic-volumes/2017/route-7-10.

CBS News. 2024. “Search Crews Find Group of 13 Hikers Missing within Royal Fire Zone in Placer County.” July 8, 2024. https://www.cbsnews.com/sacramento/news/group-of-13-hikers-missing-within-royal-fire-zone-in-placer-county-sheriff-says/.

Cohen, J.D. 1999. “Reducing the Wildland Fire Threat to Homes: Where and How Much.”

Colorado Geological Survey. 2021. “Debris and Mud Flows.” https://coloradogeologicalsurvey.org/hazards/debris-flows/.

County of Santa Barbara. 2015. “Santa Barbara County General Plan, Seismic Safety and Safety Element.” https://cosantabarbara.app.box.com/s/85hcgkw8xelm0n60ctyu62a7if1lhxfi.

County of Santa Barbara. 2021. “Santa Barbara County Climate Change Vulnerability Assessment.” https://s3-us-west-2.amazonaws.com/mysocialpinpoint/uploads/redactor_assets/documents/29baa3db6e78f84f6dca44393f76fcdf775c4838e2f3876efb16adabb64543c1/48273/SantaBarbaraCounty_CCVA_Report_Final_Clean.pdf.

County of Santa Barbara. 2024. "2030 Climate Action Plan." 2024. https://www.countyofsb.org/1217/2030-Climate-Action-Plan.

County of Santa Barbara. 2025. "FY 2025-2026 Budget Workshops." April 2025. https://content.civicplus.com/api/assets/ce9519d1-0cb7-4871-a6e6-c9e361efbe1e.

County of Santa Barbara P&D and CH2MHILL. 2007. "Lompoc Wind Energy Project Public Draft Environmental Impact Report." https://cosantabarbara.app.box.com/s/o9fp2865sykaqn98s0702plaa96xj7t5/file/444814575776?sb=/details.

County of Santa Barbara P&D and SBCFD. 2019. "San Marcos Pass-Eastern Goleta Valley Mountainous Communities Community Wildfire Protection Plan." https://sbfiresafecouncil.org/community-wildfire-protection-plans/.

U.S. Department of the Interior (DOI). 2024. "Behind the Scenes: Who Is Responsible for Wildfire Management in the U.S.?" Blog Post. December 12, 2024. https://www.doi.gov/wildlandfirenews/behind-scenes-who-responsible-wildfire-management-us.

National Interagency Fire Center. 2020. "Wildfire Investigation." 2020. https://www.nifc.gov/fire-information/fire-prevention-education-mitigation/wildfire-investigation.

NFPA. 2025. "State Listing of Participants." 2025. https://www.nfpa.org/education-and-research/wildfire/firewise-usa/firewise-usa-sites/state-listing-of-participants.

NOAA. 2021. "Drought Impacts on Wildfire Management." Drought.Gov. 2021. https://www.drought.gov/sectors/wildfire-management.

NOAA. 2025. "Santa Barbara County Conditions." May 20, 2025. https://www.drought.gov/states/california/county/Santa%20Barbara.

Office of the State Fire Marshal. 2019. "Communities at Risk List." July 2019. https://bof.fire.ca.gov/media/0x5eysuw/ada-communities-at-risk.pdf.

OPR. 2022. "Fire Hazard Planning Technical Advisory." https://lci.ca.gov/docs/20220817-Fire_Hazard_Planning_TA.pdf.

OPR. 2025. "Community Wildfire Protection Plans." ResilientCA. 2025. https://resilientca.org/plans/community-wildfire-protection-plans/.

Santa Barbara County Fire Safe Council. 2023a. "Free Community Chipping Program." February 6, 2023. https://sbfiresafecouncil.org/chipper/.

Santa Barbara County Fire Safe Council. 2023b. "Regional Wildfire Mitigation Program." RWMP. 2023. https://rwmpsantabarbara.org/.

SBCFD. 2005. “Santa Barbara County ‘All Risk’ Mutual Aid Plan.” https://www.cafsti.org/wp-content/uploads/briefingroom/S_B_County_2005_Fire_Mutual_Aid_Plan.pdf.

SBCFD. 2022. “Ready, Set, Go! Wildfire Action Plan.”

SBCFD. 2025. “Fire History Map.” 2025. https://sbcfire.com/project/fire-history-map/.

SBCFD and CAL FIRE. 2021. “2021 Unit Strategic Fire Plan.”

Santa Barbara County Office of Emergency Management (SBCOEM). 2023. “Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP).” https://content.civicplus.com/api/assets/ebc26205-512c-48d7-bca7-cfa0a18faa24.

State Board of Forestry and Fire Protection and CAL FIRE. 2018. “2018 Strategic Fire Plan for California.” https://osfm.fire.ca.gov/media/5590/2018-strategic-fire-plan-approved-08_22_18.pdf.

U.S. Bureau of Reclamation (USBR). 2010. “Cachuma Lake Final Resource Management Plan Environmental Impact Statement.” https://www.usbr.gov/mp/nepa/nepa_project_details.php?Project_ID=283.

U.S. Forest Service (USFS). 2000. “Improving Firefighter Safety in the Wildland-Urban Intermix.” https://www.fs.fed.us/t-d///pubs/pdfpubs/pdf00512811/pdf00512811pt01.pdf.

USFS. 2021. “Wildfires: When Fun Turns to Flames.” US Forest Service. April 12, 2021. https://www.fs.usda.gov/about-agency/features/wildfires-when-fun-turns-flames.

USFS. 2023. “LPF Districts at a Glance.” https://www.facebook.com/photo?fbid=597554449066457&set=pcb.597554699066432.

USFS. 2025. “Los Padres National Forest: About the Area.” 2025. http://www.fs.usda.gov/r05/lospadres/about-area.

Chapter 4, *Alternatives Analysis*

U.S. Census Bureau. 2025. “U.S. Census Bureau QuickFacts: United States.” https://www.census.gov/quickfacts/fact/table/US/PST045225.

8.0 RESPONSE TO COMMENTS

8.1 INTRODUCTION

The Final Program Environmental Impact Report (EIR) provides responses to all written comments received on the Draft Program EIR during the 45-day public review period, which began on June 26, 2026, and ended on August 10, 2026. Comments on the Draft Program EIR include issues raised by the public, agencies, and community groups that warrant clarification or correction of certain statements in the Draft Program EIR. None of the corrections and additions constitute significant new information or substantial changes to the Project Description as defined by California Environmental Quality Act (CEQA) Guidelines Section 15088.5.

8.2 DISTRIBUTION OF THE DRAFT PROGRAM EIR

The Draft Program EIR was distributed to federal, state, regional, and local agencies, key stakeholders, interested parties, and neighborhood groups as well as the State Clearinghouse. The Draft Program EIR and all documents incorporated by reference were made available for review at County offices located at 123 E. Anapamu Street, Santa Barbara, CA 93101 and 624 Foster Rd., Santa Maria, CA 93455. The document was also made available on the Parks Division website: https://www.countyofsb.org/recreation-master-plan.

8.3 COMMENTS ON THE DRAFT PROGRAM EIR

8.3.1 Introduction and Organization

Each comment letter has been assigned an abbreviation to indicate whether the comment was received from an agency, non-governmental organization, or individual, or provided as a verbal comment (e.g., state agency comments have been abbreviated as “S”, local agencies and advisory groups have been abbreviated as “L”, non-governmental organizations and community group comments have been abbreviated as “O”, and individuals have been abbreviated as “I"). The body of each comment letter has been separated into individual comments, which have been numbered. This results in a numbering system whereby the first comment in the first letter from an agency is depicted as Comment S.1-1, S.1-2, S.1-3, and so on. These numbered comments are included in their entirety, followed by the corresponding responses. Copies of the comment letters are included proceeding the responses to each comment letter. Table 8-1 presents a list of all persons or agencies who submitted written comments on the Draft Program EIR.

Table 8-1. List of Public Comments Received on the Draft Program EIR

Comment Set	Name of Commenter	Date Received	Response Location
Agencies			
S.1	California Department of Fish and Wildlife	Monday, August 10, 2026	8-58
Local Agencies and Advisory Groups			
L.1	Santa Barbara County Riding and Hiking Trail Advisory Committee	Monday, August 10, 2026	8-73
Non-Governmental Organizations and Community Groups			
O.1	WeWatch – Board of Directors	Friday, August 7, 2026	8-89
O.2	WeWatch -Save Our Stars Committee	Sunday, August 9, 2026	8-104
O.3	Santa Ynez Valley Riders and Equestrian Trail Alliance	Monday, August 10, 2026	8-120
O.4	Santa Barbara County Trails Council	Monday, August 10, 2026	8-131
O.5	Jackson Family Wines	Monday, August 10, 2026	8-141
O.6	Grower-Shipper Association of Santa Barbara and San Luis Obispo Counties	Monday, August 10, 2026	8-189
O.7	Land Trust for Santa Barbara County	Monday, August 10, 2026	8-205
O.8	Coastal Ranches Conservancy	Monday, August 10, 2026	8-213
Individuals			
I.1	Tim Mahoney	Friday, July 10, 2026	8-222
I.2	Nancy Emerson	Monday, August 3, 2026	8-226
I.3	Beth Dipietro	Tuesday, August 4, 2026	8-228
I.4	Pam Tanase	Thursday, August 6, 2026	8-230
I.5	Gail Ward	Thursday, August 6, 2026	8-232
I.6	Scott Putnam	Saturday, August 8, 2026	8-234
I.7	Doug Campbell	Sunday, August 9, 2026	8-237
I.8	Brownstein Hyatt Farber Schreck, LLP	Monday, August 10, 2026	8-325
I.9	Celeste Anderson	Monday, August 10, 2026	8-337
I.10	Erika Kato	Monday, August 10, 2026	8-342
I.11	Tania Wojdak	Monday, August 10, 2026	8-344
I.12	Phil Jones	Monday, August 10, 2026	8-353
I.13	Charles Rotbart	Monday, August 10, 2026	8-356

8.4 RESPONSE TO COMMENTS RECEIVED ON THE DRAFT PROGRAM EIR

The following pages contain copies of the comment letters and responses to each comment. Presented first is a copy of the comment letter with vertical lines indicating the extent of specific numbered comments, and on the subsequent pages are the corresponding numbered responses to individual comments.

8.4.1 State Agencies

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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.

S.1-1

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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. S.1-1 Cont

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.

S.1-2

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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

(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.

S.1-2 (Cont.)

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.

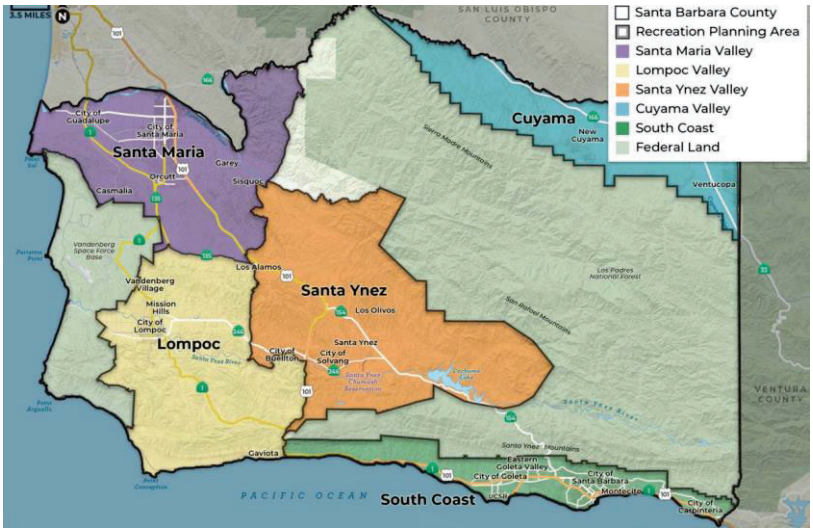


Figure 1. Planning and Project Area

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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. S.1-2 (Cont.)

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: S.1-3

Amphibians: Foothill yellowlegged frog –South Coast DPS (*Rana boylii* pop. 6; ESA listed endangered; CESA listed endangered), western spadefoot (*Spea hammondii*; 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);

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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);

S.1-3 (Cont.)

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 lynchii*; 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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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 (*Delphiniumparryi* 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. l*oncholepis*; 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 rhothophilum*; CESA listed threatened; CRPR 1B.2), chaparral ragwort (*Senecio aphanactis*; CRPR 1B.2), Coulter's saltbrush (*Atriplex coulteri*; CRPR 1B.2);

S.1-3 (Cont.)

Reptiles: western pond turtle (*Actinemys pallida*; ESA proposed threatened; SSC), northern California legless lizard (*Anniella pulchra*; SSC), two-striped gartersnake (*Thamnophis hammondii*; 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

S.1-4

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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. S.1-4 (Cont)

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." S.1-5

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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. S.1-5 (Cont)

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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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. S.1-5 (Cont)

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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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]. S.1-5 (Cont)

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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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: S.1-5 (Cont)

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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

- 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.

S.1-5(
Cont)

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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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. S.1-5 (Cont)

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.

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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. S.1-5 (Cont)

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 S.1-6

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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. S.1-6 (Cont)

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.

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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. S.1-6 (Cont)

Habitat fragmentation and loss of connectivity constitute significant impacts under CEQA because they restrict wildlife movement, reduce genetic exchange, and impair the long-term viability of sensitive populations. Loss of riparian areas within the 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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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. S.1-6 (Cont)

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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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]

S.1-6 (Cont)

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.

S.1-7

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,

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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.

S.1-7 (Cont)

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:

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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. S.1-7 (Cont)

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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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. S.1-7 (Cont)

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. S.1-8

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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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:

S.1-8 (Cont)

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/

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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[22] (CNPS 2026b) as well as the Calflora's Information on Wild California Plants[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).

S.1-8 (Cont)

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.

S.1-9

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[24].

S.1-10

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

S.1-11

[22] https://rareplants.cnps.org/
[23] https://www.calflora.org/
[24] CCED_wm (FeatureServer)

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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. S.1-11 (Cont)

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. S.1-12

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. S.1-13

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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. S.1-14

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. S.1-15

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 S.1-16

[25] https://wildlife.ca.gov/Conservation/LSA

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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). S.1-16 (Cont)

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., CNDDB] 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 CNDDB by completing and submitting CNDDB 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). S.1-17

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. S.1-18

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 yeas 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 S.1-19

[26] https://wildlife.ca.gov/Licensing/Scientific-Collecting#53949678

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

S.1-19 (Cont)

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 (CNDDB). The CNDDB website[27] provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms. S.1-20

In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the Combined Rapid Assessment and Relevé Form[28].

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.) S.1-21

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/CNDDB
[28] https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities/Submit

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

Questions regarding this letter or further coordination should be directed to Angela Castanon[29], 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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

REFERENCES

Calflora. 2026. Information on Wild California Plants. Available from: https://www.calflora.org/

[CALIPC] California Invasive Plant Council. 2026. Invasive Plants. Available from: Invasive Plants – California Invasive Plant Council

[CDFW] California Department of Fish and Wildlife. 2026a. Natural Communities. Available from: https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities.

[CDFW] California Department of Fish and Wildlife. 2018. Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities. Available from: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959

[CDFW] California Department of Fish and Wildlife. 2026b. Scientific Collecting Permits. Available at: https://wildlife.ca.gov/Licensing/Scientific-Collecting

[CDFW] California Department of Fish and Wildlife. 2026c. Scientific Collecting Permits. Available at: California Natural Diversity Database

[CNPS] California Native Plant Society. 2026a. CNPS Rare Plant Ranks. Available from: https://www.cnps.org/rare-plants/california-rare-plant-ranks

[CNPS] California Native Plant Society, Rare Plant Program. 2026b. Inventory of Rare and Endangered Plants of California (online edition, v9-01 1.0). Available from: https://www.rareplants.cnps.org

Czech, B., P. Krausman, and P. Devers. 2000. Economic associations among causes of species endangerment in the United States. BioScience 50: 593-601

Losos, E., J. Hayes, A. Phillips, D. Wilcove, and C. Alkire. 1995. Taxpayer-subsidized resource extraction harms species. BioScience 45:446-455

[MFWP] Montana Fish, Wildlife and Parks. (2012). A Landowner's Guide to Wildlife Friendly Fences: How to Build Fence with Wildlife in Mind. Second Edition Revised and Updated. Available from: https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=134713&inline

[LCI] Governor's Office of Land Use and Climate Innovation. 2026. CEQA. Available: General Plan Guidelines - Chapter 10

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

Sawyer, J., T. Keeler-Wolf, and J. Evens. 2009. A Manual of California Vegetation, 2nd ed. ISBN 978-0-943460-49-9.

Western Association of Fish and Wildlife Agencies. 2019. Western Monarch Butterfly Conservation Plan 2019-2069. Available from: wafwa.org/wpdm-package/western-monarch-butterfly-conservation-plan-2019-2069/?ind=1602171186650&filename=WAFWA_Monarch_Conservation_Plan.pdf&wpdmdl=13048&refresh=60f9defee81e21626988286

Western Monarch Count. 2022. Overwintering Site Management and Protection. Available from: https://westernmonarchcount.org/overwintering-site-management-and protection/

Xerces Society for Invertebrate Conservation. 2017. Protecting California's Butterfly Groves. Management Guidelines for Monarch Butterfly Overwintering Habitat. Available from: 2017-040_ProtectingCaliforniaButterflyGroves.pdf (westernmonarchcount.org)

Xerces Society for Invertebrate Conservation. 2024a. Managing Monarch Habitat in the West. Available from: https://xerces.org/monarchs/western-monarch conservation/habitat Xerces Society for Invertebrate Conservation. 2024b. Pollinator-Friendly Native Plant Lists. Available from: https://xerces.org/pollinator-conservation/pollinator-friendly-plant-lists

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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)		

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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		

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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 (*Emys marmorata*) 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		

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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/

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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.		

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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]		

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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 California Natural Diversity Database[1] (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		

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

Mitigation Measure	Timing	Responsible Party
Communities[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 Manual of California Vegetation[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) Online Inventory of Rare and Endangered Plants of California[4] (CNPS 2026b) as well as the Calflora's Information on Wild California Plants[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		

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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/CNDDB [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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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~~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.	Prior to FPEIR	Lead Agency

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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., CNDDB] 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 CNDDB by completing and submitting CNDDB 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

Docusign Envelope ID: 52CC2999-22A4-8541-83BE-4EE45711B211

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 yeas 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

Comment Letter S.1 – California Department of Fish and Wildlife

Comment Response S.1-1

Thank you for your comments. The comment summarizes CDFW's role as a Trustee Agency. While these comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR, they have been noted.

Comment Response S.1-2

The comment provides a summary of the Project and alternatives described in this EIR. While these comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR, they have been noted.

Comment Response S.1-3

The comment provides a summary of the biological setting for the Project area. While these comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR, they have been noted.

Comment Response S.1-4

The comment provides a summary of the Project Notice of Preparation and scoping process, and CDFW's comment letter submitted on February 20, 2025, as part of the scoping period. CDFW's comment letter was received and is included in the record of this EIR in Appendix A.

Comment Response S.1-5

The comment states that direct and indirect impacts to biological resources may result from the Project and recommends that mitigation requiring special-status species surveys and avoidance/minimization measures be included in the EIR. Consistent with the commenter's assertion, the EIR evaluates direct and indirect impacts to biological resources that may result from the Project in detail in Section 3.4, *Biological Resources*. As described therein, potential impacts were determined to be potentially significant, and the EIR identified appropriate programmatic mitigation measures in the form of **MM BIO-1 (Tree Protection Plan)** and **MM BIO-2 (Habitat Protection Plan)** that would be applicable to planned County park projects, all permitted uses in Recreation zones, permitted parks and trails, and RBPs, and would require site-specific surveys of protected biological resources and the avoidance, minimization, or compensatory replacement of affected resources. While these mitigation measures do not identify survey, avoidance, and minimization measures specific to each special-status species that may be affected by the Project, the mitigation measures, particularly MM BIO-2, require that site-specific surveys be completed for individual future projects to determine the presence of sensitive biological resources at the project site, including special-status species and their habitats, ESH, Riparian Corridors, wetlands, and other sensitive natural communities. If the biologist finds that there are no potential sensitive biological resources at the project site, they shall submit a memorandum describing these findings to County P&D for review. If resources

are determined to be present or potentially present at the project site, a Habitat Protection Plan shall be prepared and describing minimum requirements for habitat avoidance, minimization, and mitigation in compliance with County P&D and applicable regulatory agency requirements, including CDFW permitting requirements.

Furthermore, the EIR describes that future parks, recreation, and trail development, as well as RBPs enabled by the Project, would also be subject to the wide range of existing federal, state, and county policies, community plan policies, and development standards proposed under the Project that would avoid or minimize impacts that could result from development of sites that provide suitable habitat for special-status species. These include policies and development standards mandating the protection of ESH areas which support numerous special-status species from any significant disturbance of habitat and mandate compliance with permit requirements of applicable regulatory agencies, including CDFW. For many projects, direct impacts would further be avoided through the implementation of and compliance with the additional development standards proposed as part of the Project zoning ordinance amendments, which establish objective development standards to ensure high-quality, safe, and accessible facilities to enhance community sustainability and protect natural resources, including important or special-status species. In addition, the development of future parks, recreational facilities, trails, and RBPs would continue to be subject to individual permit review. The County's standard review process for uses and activities requiring permits would assess the potential of adverse impacts to biological resources on a case-by-case basis. This review would ensure compliance with existing policies, regulations, and development standards relating to the protection of biological resources.

Comment Response S.1-6

The comment states that direct and indirect impacts to environmentally sensitive habitat areas, ESH, and wildlife connectivity areas may result from the Project and recommends that mitigation requiring buffers and setbacks and site-specific analysis of impacts be included in the EIR. Please refer to Comment Response S1.-5 above. As described therein, potential impacts were determined to be potentially significant, and the EIR identified appropriate programmatic mitigation measures that would be applicable to all permitted uses in Recreation zones, permitted parks and trails, and RBPs, and would require site-specific surveys of protected biological resources and the avoidance, minimization, or compensatory replacement of affected resources. **MM BIO-5 (Wildlife Movement Plan)** requires that a Wildlife Movement Plan be prepared by a biologist approved by County P&D to determine whether the project site has the potential to support wildlife linkages. If wildlife corridors are identified, the Wildlife Movement Plan shall analyze proposed fencing and identify project design features that would reduce potential impacts and maintain habitat and wildlife movement.

The EIR describes that future parks, recreation, and trail development, as well as RBPs enabled by the Project, would also be subject to the wide range of existing federal, state, and county policies, community plan policies, and development standards proposed under the Project that would protect biological resources and surface and groundwater policy. Such policies include

setbacks from sensitive habitats. Additionally, future development enabled under the Project's zoning ordinance amendments would be required to comply with additional development standards and conditions of approval which would be imposed on a universal and/or case-by-case basis and include conditions such as the establishment of special setbacks and buffers.

Comment Response S.1-7

The comment states that direct and indirect impacts to biological resources may result from increased human-wildlife interactions through the addition of new trails and recreational facilities, and recommends that mitigation such as educational signage and wildlife-proof trash receptacles at trailheads be implemented into the EIR. Consistent with the commenter's assertion, the EIR evaluates direct and indirect impacts to biological resources that may result from the Project in detail in Section 3.4, *Biological Resources.* As described therein under Impact BIO-1 and Impact BIO-2, the operation of new parks and trails would increase human presence and activities within the area, which could encroach upon these habitats and cause adverse impacts. However, recreation is generally considered compatible with biological resources as increased human presence and indirect impacts from use and operation of recreational facilities typically result in only negligible impacts. In fact, recreational uses, particularly trails, are often located within or constructed alongside the designation of natural open space or habitat conservation areas. Most users of parks and trails tend to confine themselves to the developed area or along the trail corridor. Furthermore, County Parks is required to design and implement public park and trail improvements consistent with the Comprehensive Plan and all applicable policies and standards, as well as federal and state regulations, to protect biological resources and surface and groundwater quality. Such policies include setbacks from sensitive habitats, mandatory requirements for the use of native plants in landscaping, or development standards to ensure the control of pollution and erosion. Policies of the Conservation Element describing the level of intensity of recreational activities to be permitting in each ecosystems would also apply and govern the siting and design of future projects to ensure recreational activities and uses are compatible with the ecosystem. For non-County projects countywide, including RBPs, and County Parks projects in the Coastal Zone, projects would be subject to existing County policies and regulations, as well as the Project's proposed standards for development of parks/playgrounds and trails, development in the Recreation zone, and requirements for RBPs, which would reduce potential for long-term direct and indirect impacts. Further, future development enabled under the Project's zoning ordinance amendments would also be required to comply with additional development standards and conditions of approval which would be imposed on a universal and/or case-by-case basis and include conditions such as the establishment of special setbacks and buffers, regulation of outdoor lighting, and regulation of noise and vibration. With the implementation of existing policies and regulations and proposed development standards for new recreational development, long-term direct and indirect impacts to sensitive habitats and natural communities as a result of future parks, recreation, and trail development, as well as RBPs, enabled by the Project were determined to be insignificant. In addition, while not required to reduce indirect impacts, any potential adverse effects on special-status wildlife from increased human presence would be further reduced as

a result in implementation of **MM NOI-1 (Recreation Noise Standards),** which would establish further limits on outdoor amplified sound and other uses generating noise.

Further, Impact BIO-5 describes the potential direct and indirect effects associated with interference with the movement of native resident or migratory species. As described therein, any future recreation projects permitted under the Project would be subject to the wide range of existing County policies, along with development standards proposed under the Project, that would ensure appropriate siting and design of development so as not to substantially adversely affect wildlife movement and corridors. However, it is possible that existing and proposed regulations alone might not fully avoid adverse effects, and impacts were considered potentially significant. To reduce such impacts, the EIR identifies **MM BIO-5 (Wildlife Movement Plan)** which would require applicants for recreational development projects and RBPs to prepare a Wildlife Movement Plan. The Wildlife Movement Plan would first determine if potential wildlife linkages traverse the project site, and then develop a wildlife fencing plan that would avoid disruption of wildlife movement, consistent with the commenter's recommendation regarding fencing designs. With implementation of this mitigation, direct and indirect effects on wildlife movement were deemed significant but mitigable.

Comment Response S.1-8

The comment states that projects included under the EIR may not be analyzed with adequate biological assessment, and that the County should conduct the appropriate biological resource and technical studies as part of project-level analysis. The EIR appropriately analyzes the potential impacts to species and ecological communities of particular value at a level of detail appropriate for a programmatic EIR. Section 3.4, *Biological Resources*, acknowledges that development and operation of the parks, recreation, and trails enabled by the Project could have a substantial adverse effect, either directly or indirectly 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 U.S. Fish and Wildlife Service (USFWS). As described in Section 3.4, *Biological Resources*, future recreational development enabled under the Recreation Master Plan would be subject to the wide range of existing federal, state, and county policies, and development standards proposed under the Project that would avoid or minimize impacts. This would include the proposed development standards for trails for hiking and riding requiring that trails be sited in disturbed or developed areas and comply with habitat and cultural resource protection standards. The EIR also identifies several mitigation measures to reduce impacts. These include **MM BIO-1 (Tree Protection Plan)** and **MM BIO-2 (Habitat Protection Plan)** that would apply to planned County parks projects, all permitted uses in Recreation zones, permitted parks and trails, and RBPs, and would require site-specific surveys of protected biological resources and the avoidance, minimization, or compensatory replacement of affected resources. With mandatory compliance with existing policies and proposed development standards, as well as with implementation of identified mitigation measures, Project impacts were determined to be significant but mitigable.

As described in Chapter 2, *Project Description*, a variety of park, recreation, and trail projects are proposed under the Project. Projects which are determined to be discretionary, such as RBPs, may result in adverse environmental impacts which extend beyond the scope of the EIR and would therefore be subject to individual environmental review and biological assessment. As California's Trustee Agency for fish and wildlife resources, CDFW would be invited to comment on these individual projects as they are proposed.

Comment Response S.1-9

The comment expresses support for Alterative 1 (Reduced Eligibility of RBPs). These comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR.

Comment Response S.1-10

The comment states that established Conservation Lands may be impacted by implementation of the Project and recommends that analysis of potential impacts resulting from the construction of projects described in the Project be included. As previously described, the EIR provides a programmatic analysis of the potential impacts associated with implementation of a recreation land use planning and policy framework. Except for some of the County-proposed projects listed in Section 2.5.1, *Planned County Parks, Recreation, and Trails Projects under the Recreation Master Plan,* the Project and EIR does not identify nor provide site-specific analysis of impacts associated with future recreational development enabled under the Project, as the location, scale, and type of proposed development cannot be predicted at this time. However, of the County-proposed projects where sites have been identified or targeted, none of those sites are proposed on sites identified as conservation easement lands on the California Conservation Easement Database (CCED; 2026). Nevertheless, any and all future projects enabled under the Recreation Master Plan would be subject to compliance with any established underlying easement affecting the proposed site. If future recreational development is proposed on a site with an underlying conservation easement, the proposed development and use of the site must comply with all terms of the easement, or otherwise formally release or terminate the easement. Future parks, recreation, and trails projects would also be subject to subsequent review of potential conflicts with adjoining conservation easement lands on a case-by-case basis.

Please also refer to Comment Response S.1-5 through Comment Response S.1-9 above for response to comments regarding potential impacts on sensitive natural communities, species, and wildlife movement, mandatory compliance with existing and proposed development standards, and mitigation measures identified in this EIR required to reduce impacts on resource potentially present on the site or adjacent sites to proposed parks, recreation, and trail projects.

Comment Response S.1-11

The comment recommends removing genetic testing from MM BIO-3 and recommends that CDFW be consulted whenever Gaviota tarplant or other CESA-protected plant species is found at an individual project site. This mitigation measure has been revised to remove requirements for collection of voucher specimens for genetic analysis, consistent with the commenter's recommendation. Consistent with County policies, proposed development standards, and existing federal and State regulations, future activities enabled under the Project with potential to affect California Endangered Species Act resources shall be required to consult with CDFW and obtain necessary regulatory agency permits/approvals prior to approval of individual development projects.

Comment Response S.1-12

The comment recommends that MM BIO-1 define "mature" native trees by diameter at breast height (DBH) and that higher ratios be provided for locally important tree species. The comment also recommends that a monitoring period of 10 years is applied to oak species and 5 years for other tree species. **MM BIO-1 (Tree Protection Plan*)*** requires that a Tree Protection Plan be prepared by an approved arborist/biologist to determine whether mature native trees are located on the project site, and describe the appropriate avoidance, minimization, or compensatory measures to reduce impacts to affected trees. Determination of a mature tree will depend on the specific species of tree, and as such, it would not be appropriate to distinguish the minimum DBH for individual mature tree specimens in this programmatic mitigation measures. Similarly, the appropriate replacement ratios and monitoring period will depend upon the size and species of affected native tree. Under MM BIO-1, the Tree Protection Plan must describe the appropriate replacement ratios and monitoring requirements for any compensatory mitigation measures. The specifications and requirements outlined in the Tree Protection Plan would be subject to review and approval by County P&D prior to issuance of final approvals or permits by the County.

Comment Response S.1-13

The comment provides recommendations for modifications to specific language in MM BIO-2. Where appropriate, **MM BIO-2 (Habitat Protection Plan)** has been revised consistent with the commenter's recommendations.

Comment Response S.1-14

The comment recommends that an additional mitigation measure be added to the EIR which would require that grading activities adjacent to vernal pools and watersheds be timed to avoid wet weather. A requirement for the avoidance of grading activities during wet weather conditions for any work adjacent to sensitive habitats, watercourses, or riparian habitats has been added to **MM BIO-2 (Habitat Protection Plan)**, consistent with the commenter's recommendations.

Comment Response S.1-15

The comment describes CDFW's regulatory authority related to hydrological systems pursuant to Fish and Game Code 1600 *et seq,* as well as CDFW's compliance with CEQA related to the issuance of a Lake or Streambed Alteration Agreement (LSAA). The EIR acknowledges and describes CDFW's authority as it relates to Sections 1600-1616 of the California Code of Regulations in discussion of the State regulatory setting in Section 3.4, *Biological Resources.* Pursuant to these existing regulatory requirements, future development enabled under the Project that will substantially divert or obstruct the natural flow of, or substantially change or use any material from the bed, channel, or bank of, any river, stream, or lake is required to notify CDFW of the project. In the course of this notification process, CDFW will review the project as it affects streambed habitats within the project area. CDFW may then place conditions in a LSAA to avoid, minimize, and mitigate any potentially significant adverse impacts within CDFW jurisdictional limits. As applicable and necessary, future development enabled under the Project may be subject to subsequent site-specific environmental review depending on the location, type, scale, and other specifications of the proposed project.

Comment Response S.1-16

The comment describes CDFW's authority to issue permits for the take or possession of wildlife pursuant to Fish and Game Code and recommends that the County should retain a qualified biologist(s) with appropriate handling permits. Where appropriate, **MM BIO-2 (Habitat Protection Plan)** has been revised consistent with the commenter's recommendations to require County-approved biologist(s) have appropriate collection and handling permits from CDFW and USFWS.

Comment Response S.1-17

The comment states that information on special-status species must be submitted to the California National Diversity Database (CNDDB) and that information on special status native plant populations be submitted to CDFW's Vegetation Classification and Mapping Program. Consistent with federal and State regulations, where biological surveys have been conducted or will be conducted as part of future site-specific environmental review for projects enabled under the Recreation Master Plan, appropriate information has been or will be incorporated into appropriated databases, such as CNDDB. For instance, site-specific biological surveys were completed for the County's proposed Jalama Beach County Park Campground Expansion & Upgrade Project and Jalam Bluff Trail project by Storrer Environmental Services in Spring 2022. As part of this survey, a CNDDB Online Field Survey Form Report was completed, and the results of the survey were submitted to CNDDB. A copy of the CNDDB Online Field Survey Form Report is included as part of the *Biological Resources Assessment for the Jalama Beach County Park – Blufftop Trail & Campground Improvement Project* provided in Appendix C of this EIR.

Comment Response S.1-18

The comment recommends that projects following the EIR which include fuel modification should include avoidance and mitigation measures for fuel modification activities. The comment also recommends that weed management plan be implemented for areas subject to fuel modification disturbance and that fuel modification zones do not allow for the introduction of Argentine ants. As described in Section 3.17, *Wildfire*, future development enabled under the Project would be subject to mandatory compliance with existing standards governing fuel management and weed abatement. For example, in the Seismic Safety and Safety Element, Policy FIRE-3.0 and FIRE-3.1 require that new development be consistent with County Fire Department Development Standards addressing defensible space requirements and weed abatement, and require that new development meets or exceeds the State Fire Safe Regulations through application of the Fire Code and wildfire development standards pertaining to fuel modification and defensible space. Further, pursuant to **MM BIO-2 (Habitat Protection Plans)** applications for permitted uses in Recreation zones, permitted parks and trails, and RBPs shall be required to prepare a Habitat Protection Plan, which shall require that projects located adjacent to sensitive habitats, watercourses, or riparian habitats be landscaped with only native, non-invasive, or compatible species to the adjacent habitat. Given this requirement, along with requirement for mandatory compliance with existing policies and proposed development standards protecting native habitats, additional mitigation requiring site-specific weed management is not considered necessary.

With respect to the comments regarding the prevention of introduction of invasive Argentine ants, MM BIO-2 has been revised to include requirements that materials for landscaping and habitat restoration be inspected to ensure it is free of pest species that could invade natural areas, including but not limited to Argentine ants.

Comment Response S.1-19

The comment suggests that weed management plans be developed for projects following implementation of the EIR to prevent the spread of invasive plants and establish a monitoring schedule. Pursuant to **MM BIO-2 (Habitat Protection Plans)** applications for permitted uses in Recreation zones, permitted parks and trails, and RBPs shall be required to prepare a Habitat Protection Plan, which shall require that projects located adjacent to sensitive habitats, watercourses, or riparian habitats be landscaped with only native, non-invasive, or compatible species to the adjacent habitat. Given this requirement, along with requirement for mandatory compliance with existing policies and proposed development standards protecting native habitats, additional mitigation requiring site-specific weed management is not considered necessary.

Comment Response S.1-20

The comment states that information on special-status species must be submitted to the CNDDB and that information on special status native plant populations be submitted to CDFW's Vegetation Classification and Mapping Program. Please refer to Comment Response S.1-17.

Comment Response S.1-21

The comment describes fee requirements related to the Project upon filling of a Notice of Determination. The Project will comply with all necessary fees as required by CEQA and State law, including payment of the appropriate filling fees with CDFW upon filling of the Notice of Determination following County decision-maker approvals.

8.4.2 Local Agencies and Advisory Groups

CRAHTAC

COUNTY RIDING AND HIKING TRAILS ADVISORY COMMITTEE

CHAIR
Otis Calef

ICE CHAIR
Faith Deeter

ECRETARY
Desiree Woodill

1st DISTRICT
Carolyn Adams
m Fly
evin Snow

2nd DISTRICT
ack Bish
Otis Calef
Dan Gira

3rd DISTRICT
Faith Deeter
Desiree Woodill
Chip Wulbrandt

4th DISTRICT
ohn Karamitsos

5th DISTRICT
Galilea Acosta

AFF
effery Lindgren

August 10,2026
Submitted via email

Mr. Jeff Lindgren, Deputy Director
Santa Barbara County Community Service Department, Parks Division
123 E Anapamu Street
Santa Barbara CA, 93101

Re: Draft Environmental Impact Report for the Draft County Recreation Master Plan

Dear Mr. Lindgren,

The Santa Barbara County Riding and Hiking Trails Advisory Committee (CRAHTAC) is writing to you regarding the proposed Draft Environmental Impact Report (DEIR) for the County Recreation Master Plan. Our main concerns are to seek clarifications in the project description, to ensure that Recreational Benefit Projects receive maximum benefits from the DEIR, and to clarify some areas of impacts analysis. We also wish to recommend that the DEIR clearly identify and discuss the **beneficial mpacts** of trails and outdoor recreation on public health and welfare, particularly for environmental justice communities. While this later issue is discussed extensively in the draft RMP, it appears largely overlooked in the DEIR.

As the Parks Division is aware, CRAHTAC is a standing committee appointed by the Santa Barbara County Board of Supervisors to advise the County on projects and policies related to the County's trail system and trail users. We have tried to keep our comments focused on those issues within our Board-assigned purview.

First, we would like to thank the Parks Division and its consultant team for pursuing this important project, which will have **mportant benefit impacts** for residents throughout the County with generally limited or modest adverse environmental impacts. This multi-year effort has been a huge undertaking for a division with limited staff and funding, so the team's efforts are greatly appreciated!

We respectfully offer the following comments and suggest several changes and additions to the DEIR as follows:

1. We support the DEIR's finding that the project will have some potential impacts to agriculture but would request that these be clarified as limited to the extent feasible. For example, total development envisioned under the project would seem to have the potential to impact tens, or in the low hundreds, of acres of land designated for agricultural use. This impact would occur in the context of hundreds of thousands of acres of agricultural land countywide and often be limited to non-prime agricultural lands. The impacts of new trails to agriculture would be even more limited, particularly with proposed siting guidelines and added mitigation measures such as signage and fencing (where needed).
2. We also recommend that the Parks Division continue to coordinate with members of the agricultural community, recreational user groups, landowners, and representatives to explore ways to lessen potential impacts to agriculture and work cooperatively to resolve these issues.

L.1-1

3. We recommend that any mitigation measures be reasonable and proportionate to the project's relatively low potential for environmental impacts in order to limit excessive costs for this important project. This is particularly true for proposed setbacks of trails from agricultural land and biological resource mitigations. (see below). While CRAHTAC supports protection of both agriculture and biological resources, we do not believe that trail construction and operation have substantial impacts on these resources, and we think this has been borne out repeatedly in the County's own environmental documents.
4. Our specific comments on sections of the DEIR include:
    a. Section ES-2, page ES-2: The bulleted list of project components does not include known Recreational Benefit Projects (RBP) that we believe are or are proposed to be pending, nor any Housing Element planned developments, both of which could provide the most substantial near-term recreation development over the next 5-10 years. While we understand that the County has elected to treat these as cumulative projects rather than as a part of the RMP, the RBP and Housing Element projects are potentially so important to public recreation over the next decade that they deserve specific mention here, perhaps with a link to two clear tables listing these out, not just buried in the extensive cumulative projects list table. For all incentives for the RBP, there should be more flexibility on scale of projects. Across the board limitations are unreasonable.
    b. Section ES-2, page ES-2: The County's Parks, Recreation and Trails Maps (PRT Maps) are a key tool for recreation and trail planning, and as discussed further below. We ask that the County include in the project description any details on these maps and any proposed additions or deletions.
    c. Section ES-5, page ES-4: We note that the Draft EIR does not appear to discuss the proposed project's **signif cant beneficial impacts to public health and welfare** in any meaningful way and that the California Environmental Quality Act requires the County to identify and discuss all significant environmental effects, **whether adverse or beneficial**. We note that Section ES-5, page ES-1 lists beneficial impacts as a required area of analysis and that page ES-10 lists Recreation as a beneficial impact but fails to discuss public health and welfare. This is perplexing as the RMP contains extensive discussion of the beneficial relationship of recreation and trails to public health and welfare, as do the proposed Land Use Element amendments. Therefore, as humans are part of the environment, the Final EIR should add a new section that briefly discusses and identifies the project's substantial beneficial impacts on public health and welfare as follows:
        - Briefly summarize and reference findings from the County's Draft Recreation Master Plan that hiking and walking are the most popular form of outdoor recreation in the County and find that such recreation is essential to the public health and welfare.
        - Briefly summarize and reference the pending draft Land Use Element Amendments that support the finding that recreation is essential to the public health and welfare and describe that the proposed projects would provide accessible outdoor recreation to residents countywide, which is often lacking in many neighborhoods, particularly in disadvantaged communities.
        - Note that many of the proposed projects are located proximate to and serving disadvantaged communities whose residents suffer

L.1-1 cont)

L.1-2

L.1-3

disproportionately from diseases such as obesity and diabetes as documented in the County's draft Recreation Master Plan.

- Note that new recreation and trails could create **beneficial impacts** to public health and welfare and address such major public health concerns.
- In addition to health and wellness benefits, discuss Agri-tourism impacts and benefits.

L.1-3 cont)

5. We also note that the County's new Environmental Justice Element specifically discusses the importance of trails to disadvantaged communities. This should be discussed in both the Consistency with Plans and Policies section and in the new focused beneficial impacts section. We also recommend that the County include recreational improvements adjacent to environmental justice communities.
6. Section ES-7, page ES-7; Biological Resources: We appreciate the Jalama Beach and RBPs being called out specifically here and suggest adding in Pt Sal as well given the rich biological resources in that region. L.1-4
7. Table ES-1; Alternative 2: The increased agricultural buffers do not appear to be warranted by project impacts, which are more related to land conversion than conflicts, as the DEIR's analysis does seem to support the conclusion for significant conflicts between RBPs and recreation with agriculture with imposition of more reasonable buffers and siting criteria such as using natural features such as drainages or hillsides as buffers. We recommend that the DEIR state that buffers should match identified environmental impacts and be proportionate to the concern. Example, landowner proposes trail location that requires setbacks, the owner should determine setbacks from any onsite agriculture under owner's control.
8. Table ES-3, Impact AG-1: Given the project's limited potential for impacts to conversion of agriculture, please consider amending this statement to either reference "limited conversion of agricultural land" or, better yet, actual project acreages. The current statement leaves readers with a somewhat misleading understanding of such impacts.
9. Table ES-3, Impact AG-1: We suggest separating land conversion with interfering with agricultural productivity and zoning conflicts, as they are fundamentally different impacts. We understand identifying agricultural land conversion as an unavoidable significant impact, but do **not** believe that the DEIR analysis supports a conclusion that such land use conflicts are significant and unavoidable. Rather, such potential conflicts can be addressed by reasonable development standards and mitigation measures such as signs, fencing, and reasonable siting standards. We also note that the County's recently issued draft EIR for the Santa Maria Levee Trail found no unmitigable conflicts with agriculture for the 6-mile bike path adjacent to prime agricultural land.

L.1-5

10. Table ES-3, Impact Bio-1: Although we strongly support protecting biological resources, the list of mitigation measures here seems more applicable to a shopping mall than a recreation or trail project. Please consider refining this list to distinguish between project types, as trails don't typically create substantial resource impacts, as demonstrated by approved County environmental documents for both the Baron Ranch Trail system and the Franklin Trail. We note that MM BIO-2 requires a 100-foot buffer for vegetation disturbance, yet **trails are specifically an allowed use within ESH areas** and have been found to cause limited resource impacts. Further, the measure seems to require boxing of all plants in a habitat area, an expensive and unnecessary measure for most trails. Please consider refining these measures so that excessive bio mitigations don't exceed the cost of trail construction itself. L.1-6
11. Section 1.7, page 1-7: As discussed above, please add a specific beneficial impacts section. L.1-7

12. Section 1.7.1, page 1-8: Please edit the 5th bullet to say: “Equestrian and other users safety”……. L.1-8
13. Section 2.2.1, page 2-5; Recreation Planning in the County: Please add a brief description of the Open Space Element, as Open Space Protection for Outdoor Recreation is one of the key issues addressed on this Element, which is currently being updated. L.1-9
14. Section 2.2.1, page 2-7: Please check the 134-acre figure for this recreation overlay, as we believe that the Las Varas Ranch overlay itself covers several hundred acres. L.1-10
15. Section 2.2.1, page 2-8: Please provide a separate bolded subheading for the PRT map discussion, as the PRT Maps have historically been a far more important planning tool than the Proposed Public or Private Park/Recreational Facility or Resort/Visitor Serving Commercial Overlays. Please also provide details on any amendments or changes to the PRT maps such as new trails, extended trails, etc. L.1-11
16. Section 2.2.2, page 2-12: Please clarify the acres listed for the Santa Maria Valley, as the total doesn’t seem to include 300+ acres of open space in Orcutt Hills, 900 at Point Sal, 500 at Guadalupe Dunes, or 1,200 at the City’s Las Flores Park. Alternatively, separate the acreages of passive open natural spaces from that of more developed parks.
17. Section 2.2.2, page 2-14: Please clarify acres listed for the South Coast, as the totals don’t seem to include the City of Santa Barbara’s Gould Canyon or Rattlesnake Canyon Parks or Goleta’s Ellwood Mesa or Lake Los Carneros, or other agency open spaces such as state parks or UCSB. Alternatively, at least reference these other agency open spaces. L.1-12
18. Table 2.2: Should Orcutt Key Site 3 Open Space and trails be added, as it may be dedicated to the County by the time of plan adoption?
19. Table 2.2: Should San Marcos Foothills Park be added to this list?
20. Section 2.3; Lake Cachuma North Shore Trails & Recreation Facilities Management Plan, page 2-30: CRAHTAC has supported more fully utilizing this large public open space by allowing pedestrian access, which most equestrians we have heard from at least accept if not support. However, CRAHTAC believes that the concerns of the equestrian community need to be respected regarding introducing mountain bikes and/or dogs, with such a decision postponed for consideration until a later date consistent with federal planning for this area. We believe that introducing this element into the RMP will cause unneeded controversy and potential litigation, which could derail the RMP and cause unneeded expense. From the testimony we have heard, this is not a high priority for the mountain bike community, so it seems prudent to delete mountain biking and minimize controversy. L.1-13
21. Section 2.3, page 2-31: Please clarify Baron Ranch US 101 tunnel improvements, as we understand that Caltrans may replace the culvert with a bridge. L.1-14
22. Section 2.5.2; page 2-39: Please provide the details on exactly how the County would update the PRT Maps. The overlay maps are there for a reason. CRAHTAC is concerned that removing the Public and Private Parks/Recreation Facility Overlay Map from Las Varas and Dos Pueblos Ranches would greatly increase the challenges of acquiring the California Coastal Trail and vertical coast access at these locations and would undermine the County’s ability to negotiate with UCSB over acquisition of such public access improvements. The EIR needs to thoroughly analyze such impacts and the policy inconsistencies with the adopted Gaviota Coast Plan and Local Coastal Plan. L.1-15
23. Section 2.5.2, table 2-4: While these improvements are worthy, the proposal is too restricted and should add back in the Dos Pueblos and Las Varas Ranches as well as other sites such as

Mussel Rock to link Point Sal with Guadalupe Dunes. We request that County Parks, CRAHTAC and the Park Commission coordinate with County planning and Development on the update of the open space element, to identify additional sites such as Muscle Rock for expansion on the overlay, long term protection.

L.1-15 cont)

24. Section 2.5.4, page 2-45: This section would benefit from a table listing **all** known RBPs, as these are lost within the cumulative list and are key to recreational improvements.

L.1-16

25. Impact REC-3, page 13.14-21: The analysis in this impact needs to specifically discuss public safety for equestrians, document past accidents, and provide a more credible analysis to address concerns consistently raised by the equestrian community. We also ask that County Counsel be directed to provide recommendations for ways the County could address owner concerns over potential liability when providing new trail easements.

L.1-17

Thank you for considering this input.

Sincerely,



Otis Calef, Chair
CRAHTAC

cc: Santa Barbara County Board of Supervisors
Santa Barbara County Planning Commission
Jeff Wilson, Assistant Director, Santa Barbara County Planning & Development Department

Comment Letter L.1 – County Riding and Hiking Trails Advisory Committee (CRAHTAC)

Comment Response L.1-1

Thank you for your comments. This comment generally supports the Recreation Master Plan and EIR, along with its findings of impacts to agricultural resources. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR.

With respect to the Project's asserted beneficial impact on public health, the County acknowledges that one of the primary purposes of the Recreation Master Plan is to expand access to parks, trails, open space, and recreational opportunities throughout the county. These objectives, which would consequently contribute to public health, wellness, quality of life, and equitable access to recreation, are described throughout the Recreation Master Plan and reflected in the Project objectives presented in Chapter 2, *Project Description.*

The purpose of the EIR, however, is to evaluate and disclose the potential environmental impacts of implementing the proposed Project and to identify mitigation measures where appropriate. Consistent with CEQA, the EIR evaluates the Project's environmental impacts and discloses both adverse and beneficial effects where relevant in the environmental analysis. For example, Section 3.14, *Recreation*, discusses the beneficial effects of implementing the Recreation Master Plan, including expanding recreational opportunities for existing and future county residents, improving access to parks and trails, reducing demand on existing recreational facilities, and helping to avoid the physical deterioration of recreational resources through the provision of additional recreational amenities. Furthermore, CEQA does not require a separate analysis of social, economic, or policy benefits unless those benefits are related to a physical environmental effect. Accordingly, the EIR adequately describes the recreational benefits associated with implementation of the Recreation Master Plan as it relates to the thresholds for environmental analysis contained in the CEQA Guidelines Appendix G and the County's *Environmental and Thresholds Manual*. Nevertheless, these comments will be forwarded to County decision-makers for their consideration.

Comment Response L.1-2

The comment requests revisions to the EIR Project Description to provide additional information regarding the County's Parks, Recreation, and Trail (PRT) maps. The comment pertains to the organization of and discussion of the history and use of the PRT maps provided in the Project Description rather than the adequacy of the EIR's analysis of environmental impacts, mitigation measures, or alternatives. The Recreation Master Plan is a countywide planning document and does not approve site-specific trail projects or final trail alignments. Accordingly, the Project Description focuses on the proposed planning framework and trail network concepts rather than detailed mapping revisions. Section 2.5.2, *Comprehensive Plan Amendments for Parks, Recreation, and Trails*, includes information specifically about the PRT maps necessary to

support and inform the programmatic analysis. As described in Section 2.5.2, the Project would amend the PRT map to align with the Recreation Master Plan and depict existing and planned County of Santa Barbara Community Services Department, Parks Division's (County Parks) facilities only based on the parkland and trail inventory prepared for the Recreation Master Plan. The inventory of existing and planned County Parks' facilities and trail inventory prepared for the Recreation Master Plan and are planned to be depicted on the PRT maps can be viewed on the County's RecPrint website at: https://storymaps.arcgis.com/stories/8b34a77d97a946f9bc777ec5e6b89557. The PRT map updates would not affect adopted community plans. Rather, the updated PRT maps accurately depict the status and location of existing and planned trails and add new planned trail projects included in the Recreation Master Plan.

Detailed updated maps and description of specific amendments to the County's PRT maps will be provided as part of the proposed amendments package presented to County decision-makers.

Comment Response L.1-3

The comment requests that the EIR include additional discussion of the beneficial effects associated with parks, trails, and recreational amenities. Please refer to Comment Response L.1-1 above.

Comment Response L.1-4

The comment requests that Point Sal be specifically identified in the biological resources discussion of Section ES-7, *Summary of Project Impacts* because of the area's significant habitat and recreational importance. The discussion referenced by the commenter provides a summary of mitigation measures identified in the EIR to minimize or avoid impacts to biological resources broadly from the implementation of future privately-proposed recreational improvements and Recreation Benefit Projects (RBPs), as well as the County-proposed Jalama Beach County Park Expansion and Coastal Access Improvements Project, for which project-specific mitigation measures have been identified. Reference to the Point Sal Coastal Access Improvements in this discussion is not directly relevant. However, potential impacts associated with these improvements are discussed in detail in Section 3.4, *Biological Resources*.

Comment Response L.1-5

The comment suggests increased agricultural buffers proposed under Alternative 2 are not warranted and requests greater flexibility in establishing setbacks based on site-specific conditions. As a programmatic document, the EIR evaluates buffer setbacks and potential agricultural conversion broadly, as site-specific details for future projects are not available. Future recreation projects would undergo site-specific review, during which final trail alignments, recreation facilities, placements near agricultural areas, and appropriate buffer treatments would be evaluated based on the conditions present at each project location.

As noted by the commenter, impacts associated with potential conversion of agricultural lands and conflicts between uses enabled under the Project and existing agricultural operations are analyzed Section 3.2, *Agricultural Resources.* Impacts are currently separated into two impact discussions. Impacts associated with the direct or indirect conversion of agricultural lands to non-agricultural uses is described in Impact AG-1, while the potential impacts associated with conflicts agricultural zoning are described in Impact AG-2. The separation of these impacts is consistent with the request made by the commenter.

As described therein, the potential for the Project to convert agricultural lands to non-agricultural uses is low, but is not inconsiderable. While the proposed amendments to the County's zoning ordinances with development standards for parks, trails, recreation facilities, and RBPs would help ensure agricultural productivity is not impaired and that future development under the Project is consistent with the County's zoning ordinances, as amended, the Project would directly convert or help to facilitate the conversion of existing agriculturally zoned land to support two community parks and a potential sports complex concept plan. Further, the EIR identifies that even with robust development standards for parks, trails, recreation facilities, and RBPs, the Project could result in development on agriculturally zoned land, conversion of agricultural land, impairment of agricultural productivity, and conflicts with existing agricultural zoning standards, which currently do not allow recreational development. However, the EIR does not identify a potential impact associated with conflicts between recreational uses and existing agricultural operations, primarily due to mandatory compliance with the proposed amendments to the County's Comprehensive Plan, zoning ordinances, and proposed development standards protecting agricultural operations.

Regarding the proposed increase in agricultural buffers under Alternative 2, the primary intent of this alternative is to afford greater protection to the county's viable, productive agricultural lands and reduce land use conflicts potentially raised by siting private recreational uses in or proximate to the actively producing agricultural lands. The proposed increase in buffers under Alternative 2 presents a broad policy alternative affording analysis of a range of options for the County to consider and serves to respond to comments raised during the EIR scoping process regarding concerns for adverse effects on agricultural land, crops, and viability.

Nevertheless, the commenter's concerns regarding the proposed increase in buffers and belief that conflicts between recreational and agricultural uses are insignificant will be forwarded to County decision-makers for their consideration.

Comment Response L.1-6

The comment requests that biological mitigation measures be refined to distinguish between low-impact trail projects and more intensive recreation projects. The Recreation Master Plan encompasses a range of future recreational opportunities, including parks, trails, and RBPs, of which the specific locations, scale, design, and operational characteristics are not currently known. Accordingly, the EIR evaluates impacts and identifies mitigation measures at a programmatic level based on the reasonably foreseeable development potential associated with implementation of the proposed Project. The mitigation measures identified in the EIR are

intended to provide a framework for avoiding, minimizing, and mitigating potential impacts that could result from future recreational development, including from County-proposed recreational improvements, privately-proposed parks and trails, and RBPs. The EIR does not assume that all mitigation requirements would apply uniformly to every future project. Rather, future projects would be subject to project-level permitting, during which the County would evaluate site-specific conditions, determine the applicability of individual mitigation measures, and identify any additional or modified measures necessary to address project-specific impacts.

However, as recognized and discussed throughout the EIR, construction and use of recreational trails designed and constructed in accordance with the project's proposed development standards would not result in adverse environmental impacts requiring the implementation of mitigation measures identified in this EIR. The proposed trail development standards and policies under the Project would ensure that trails are sited and designed to avoid adverse environmental impacts.

Comment Response L.1-7

The comment requests that the EIR be revised to discuss specific beneficial impacts characterized by the commenter in an earlier comment. Please refer to Comment Response L.1-1 above.

Comment Response L.1-8

The comment requests a revision to cite equestrian and other users' safety as an area of known controversy for the Project. This revision recommended by the commenter has been incorporated.

Comment Response L.1-9

The comment requests inclusion of a brief discussion of the County's Open Space Element in the Recreation Planning in the County section of the Project Description. A detailed discussion of the Open Space Element is located in Section 3.14.3.2, *Local Regulations* in Section 3.14, *Recreation*.

Comment Response L.1-10

The comment questions the stated acreage for the Proposed Public and Private Park/Recreation Facility Overlay at Las Varas Ranch and requests verification of acreage figures. The acreages stated in the referenced discussion accurately reflect the current acreage of lands under the Proposed Public and Private Park/Recreation Facility Overlay.

Comment Response L.1-11

The comment requests additional information regarding PRT Maps, project inventories, recreation acreage calculations, and clarification regarding future updates to the PRT Maps. Please refer to Comment Response L.1-2 above.

Comment Response L.1-12

The comment requests clarification of recreation acreage totals and asks that passive open space acreage be distinguished from developed park acreage. The recreation inventory summarized in Section 2.2.2, *Recreation Planning Regions,* characterizes the public parkland and facilities throughout the County's recreation planning regions that exist at the time of preparation of the Recreation Master Plan and this EIR. While the Recreation Master Plan recognizes the importance of the designated open spaces, the inventory excludes many of these, as the Recreation Master Plan is not a plan for the expansion or designation of new open spaces, and their inclusion in this EIR is not directly relevant. Nevertheless, County Parks will review the facilities identified in the comment and consider revisions and clarifications where appropriate. Future acquisitions, dedications, partnerships, and recreation opportunities may occur over time independent of the projects specifically identified in the Recreation Master Plan. The County acknowledges the suggested additions and may consider them during future updates to recreation planning documents and implementation programs.

Comment Response L.1-13

The comment expresses concerns about potential expansion of the trails system along Lake Cachuma's north shore to include mountain biking and dogs. As described in Section 2.5.1 under the discussion of Lake Cachuma North Shore Trails & Recreation Facilities Management Plan, the Recreation Master Plan does not propose or approve specific recreational improvements on the north shore of Lake Cachuma. Rather, it would empower County Parks, in partnership with the U.S. Bureau of Reclamation, to prepare a Cachuma North Shore Trail System & Recreation Facility Management Plan to provide public recreational access while protecting natural resources, including water quality, biological resources, geology and soils, agricultural resources, and public recreation. The identification of this improvement plan is not a new improvement project proposed as part of the Recreation Master Plan, but instead reflects the existing management strategy and improvement program originally identified and described as part of Alternative 2 in the Cachuma Lake Final Resource Management Plan/ Environmental Impact Statement (EIS), which was selected and approved by the U.S. Bureau of Reclamation as part of its Record of Decision (ROD 10-112).

For recreation planning and programmatic environmental review purposes, the Recreation Master Plan describes the types of facilities that could be considered under the future management plan. However, approval of the Recreation Master Plan and related amendments would not constitute approval of any specific north shore improvements. The EIR explains that the Lake Cachuma North Shore Trail System & Recreation Facilities Management Plan would be prepared through a public process involving community and stakeholder input and subsequent environmental review in compliance with CEQA and NEPA. The Lake Cachuma North Shore Trail System & Recreation Facilities Management Plan is an existing planning effort and recreational project that is recognized as potentially contributing to recreation needs over the lifespan of the Recreation Master Plan. Adoption of the Recreation Master Plan does not approve or permit any project included in the plan.

Comment Response L.1-14

The comment requests clarification regarding the Baron Ranch Highway 101 crossing and notes that the California Department of Transportation (Caltrans) may replace the existing culvert with a bridge. As described in Chapter 2, *Project Description*, the Baron Ranch Trails project currently contemplates improvements to an existing crossing beneath U.S. Highway 101 to facilitate public access. Because project design remains conceptual, final engineering solutions and transportation improvements would be determined through future coordination with Caltrans and other responsible agencies. The proposed improvements are not a part of this programmatic analysis and do not appear to be in any public Caltrans work plans at this time. However, any proposed improvements to connect pedestrian access along Arroyo Quemada will be developed in consultation with any future improvements proposed by Caltrans.

Comment Response L.1-15

The comment requests additional information regarding proposed modifications to the Public and Private Parks/Recreation Facility Overlay, recommends retention or expansion of overlay areas such as the Las Varas Ranch and Dos Pueblos Ranch, and requests that the County coordinate with CRAHTAC and the Park Commission to identify additional sites for expansion on the overlay and long-term protection. The comment primarily addresses potential implications for future recreation planning and public access opportunities rather than impacts resulting from a physical change to the environment. Moreover, the commenter has not identified a direct physical environmental impact resulting from removal of the overlay designation. Rather, the comment expresses concern regarding the potential effect of the proposed amendment on future recreation planning, land acquisition opportunities, and implementation of public access objectives. The proposed overlay amendments are planning-level actions and do not by themselves authorize park development, land acquisition, or changes in public access. While the Project proposes to modify the County's PRT maps to eliminate some sites from the Proposed Public or Private Park/Recreational Facility Overlay, the Project does not propose to modify the County's PRT maps to eliminate or remove the currently mapped proposed Coastal Trail – Primary Route across Las Varas Ranch and Dos Pueblos Ranch.

As described in Section 3.11, *Land Use and Planning,* significant impacts are considered relative to their consistency or inconsistency with applicable policies, where a potential inconsistency with a policy that is adopted for the purpose of avoiding or mitigating significant physical environmental impacts might occur. The Project's potential to conflict with these policies does not represent a potential to cause an adverse physical impact on the environment, but instead represents a potential conflict or inconsistency pertaining to land use planning and policy considerations. Future projects would remain subject to all applicable permitting requirements, CEQA review, Comprehensive Plan and applicable Community or Area plan consistency, Local Coastal Program requirements, and California Coastal Act requirements where applicable.

Nevertheless, the Project's potential to conflict with or be inconsistent with all applicable County plans and policies would be determined by the County Board of Supervisors during

consideration of the proposed Project. Should the Board determine that the proposed Project is inconsistent with an existing County's Comprehensive Plan or regional plan policy, the proposed Project could not be approved unless measures are identified to eliminate this inconsistency.

Comment Response L.1-16

The comment recommends that the discussion of the RBP Program in Section 2.5.4, *Recreation Benefit Project (RBP) Program*, would benefit from a table listing all known RBPs. The comment pertains to the organization of and discussion of existing planned, proposed, or pending cumulative projects that may be eligible as RBPs under the proposed RBP Program, rather than the adequacy of the EIR's analysis of environmental impacts, mitigation measures, or alternatives. Given the RBP Program is a component of the Project still subject to approval by County decision-makers and that individual project eligibility as an RBP is subject to determination by the County at a future date, with individual projects potentially subject to independent permitting and environmental review, their inclusion in the Cumulative Project list is appropriate.

Comment Response L.1-17

The comment asserts that the EIR is lacking discussion of impacts regarding public safety for equestrians as it pertains to the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan. However, Section 3.14, *Recreation*, specifically addresses this issue under Impact REC-3, which discloses and evaluates the potential for future recreational development to result in substantial adverse conflicts between existing and proposed recreational uses, including among hikers, equestrians, and bicyclists. The EIR specifically discusses the potential impacts associated with the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan, citing the need for separate trail segments and facilities for equestrians and other non-motorized users, as well as horse-only bypasses where potential user conflicts may occur. The analysis concludes that compliance with proposed development standards and existing trail design requirements would ensure that future trail projects do not result in substantial adverse conflicts between user groups. Accordingly, Impact REC-3 concludes that such impacts would be insignificant. Furthermore, the future projects would be subject to project-level discretionary review, during which the County would evaluate site-specific trail alignments, user groups, design features, and operational characteristics and could incorporate design measures to address potential user conflicts, as appropriate.

Nevertheless, the comment, including the commenter's request for County Counsel to provide recommendations for ways the County could address owner concerns over potential liability when providing new trail easements, will be forwarded to County decision-makers for their consideration.

8.4.3 Non-Governmental Organizations and Community Groups

WE Watch

PO Box 830
Solvang, CA 93464
we-watch.org

August 7, 2026

Jeff Lindgren, Parks Division
County of Santa Barbara
Community Services Department, Parks Division
123 East Anapamu Street, Santa Barbara, CA 93101

Via Email: RecPlan@countyofsb.org

RE: Comments on the Recreation Master Plan and Recreation Benefit Program Draft Environmental Impact Statement (DEIR)

Dear Mr. Lindgren:

Thank you for the opportunity to review the revised Recreation Master Plan (Rec Plan) and Recreation Benefit Program (RBP) Draft Program Environmental Impact Statement (DEIR). We appreciate the public outreach that has been completed to define issues and opportunities that have permitted the Rec Plan to move forward.

While supportive of recreation, we have been concerned by the format and overall lack of clarity regarding interrelated parts of the Rec Plan, including the reference to draft policies and design standards that are not part of the Scoping process or DEIR document.

Our review is grounded in our understanding that under CEQA), specifically California Code of Regulations Title 14, Section 15125(d), an EIR must evaluate potential conflicts between a proposed project and applicable local plans. Although the project proposes Comprehensive Plan Amendments and updates to the Land Use and Development Code, it appears that this mechanism may reflect an attempt to "force-fit" or align the project with the County's existing laws and policies for development to such an extent that it threatens to break the overall plan. Changing land-use designations or text to facilitate the Rec Plan or RBP directly threatens a horizontal conflict with other unamended parts of the Santa Barbara County Comprehensive Plan, *e.g.,* overriding protections in the Agricultural and Conservation Elements. It appears that it may not be possible to reasonably reconcile the proposed changes with existing core policies, which would render the amendment(s) violative of state planning law. Moreover, changing foundational, long-term planning policies simply to clear a path for a specific project or incentive program undermines the integrity of the Comprehensive Plan. Instead of the

O.1-1

Comprehensive Plan dictating project compatibility, it appears that the project is dictating the content of the Comprehensive Plan.

Here, the overriding impact is that the RBP, for recreation benefit, will significantly alter the County's Zoning Ordinance, Comprehensive Plan, and the Policy Elements that guide overall planning in Santa Barbara County. All other resources and values will be made subordinate to tourism and human intrusion to wildland areas will be increased as well as having other adverse impacts on fire potential, erosion, water quality and supply degradation and others. The extensive changes to the Zoning Ordinance proposed to accommodate the RMP and RBP and their implementation can only be considered significant and unavoidable. If the Supervisors vote for justification and a Statement of Overriding Considerations of this program EIR with approval of the current draft of the RMP and associated RBP, the ability of the public to question the environmental soundness of proposed RBP projects will be very limited. We offer the following comments on the DEIR:

O.1-1 cont)

Executive Summary

Page ES-13, Table ES-2. page ES-13.

Human intrusion and mechanical equipment used to facilitate rapid and lower cost trail development and maintenance and RBP development on Agricultural and Resource Protection Zones, are considered significant environmental impacts, however, intrusion into these areas also violate the Conservation Element and Environmentally Sensitive Habitat Areas (ESH) overlays. Biological Resources, Cultural Resources, Geology and Soils, Hydrology and Water Quality, and Wildfire under any presented Alternative would be considered significant and unmitigable.

O.1-2

Table ES-3. Summary of Impacts, Mitigation, and Residual Impacts

General Comment: Delete "to the extent feasible" from all mitigation measures. "To the extent feasible" is a subjective qualifier (subject to staff determination), and it is unknown what individual bias will be applied at the time of project development. It defeats the intent of the mitigation, which is to mitigate the impact. All mitigations must be a definitive statement to be effective.

O.1-3

Page ES-19, Section 3.4 Biological Resources

Impact BIO-1 should cover impacts to ESH, riparian Corridors, wetlands, oak woodlands, native grasslands, other sensitive habitats, and natural communities. But instead, the impact/mitigation discussion is focused on tree protections and mitigations, nothing on the other habitats described. Please include mitigations (if available) to reduce the impacts of trail and RBP development but also the impacts of trail maintenance and human intrusion (trespass, cutting switchbacks, creating man-made fill structures to facilitate increased speed or thrills on trails, human waste, trash, etc.).

O.1-4

Also, mitigation measures are set forth to protect biological resources at Jalama Beach. Mitigation measures should be specific to the Cachuma Recreation Area and in particular the North Shore projects in the RMP. Please correct this discrepancy. For Cachuma projects add a sentence that requires any development to follow the mitigations in the applicable Cachuma Resource Management Plan and Management Agreement in effect at the time of development (see further discussion at **Page 2-29, Santa Ynez Valley, *Lake Cachuma Campground & South Shore Facilities Improvements and Lake Cachuma North Shore Trails & Recreational Facilities Management Plans* below).**

O.1-4 cont)

4.0 Alternatives Analysis

1. **Alternative 1. Reduced Eligibility of RBP.** Discuss the impact of increased human intrusion on trails and impacts on biological resources and that removing Resource Protection Zones from the RBP **is a viable mitigation measure** that would maintain the intent of the Resource Protection Zone and reduce impacts on Biological Resources.

2. **Alternative 2. Increased Ag Buffers**. The increased buffer requirements from active agriculture on adjacent properties to 500' at minimum for RBPs and privately proposed recreational uses unless site is within the Public & Private Park/Recreation Facility Overlay site are welcome. The alternative should also discuss prohibiting "double dipping" – prohibiting development under both the RBP and Agricultural Enterprise Ordinance (AEO) to reduce impacts.

3. **Page ES-12.** Neither Alterative 1 nor 2 would result in substantial reduction in the severity of impacts even with mitigation measures. Alternative 2 is considered the Environmentally Superior alternative. However, with the additional actions considered in the comments below, additional impact reduction may be achieved.

O.1-5

Section 2.0 Project Description

New facilities, Cachuma Lake, Santa Ynez Valley, Page 2-19, **Table 2-2. Summary of Planned Park, Recreation, and Trail Projects**

1. Please correct the table to show the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan will add 3 additional miles. Currently the North Shore has 12 miles of equestrian trail on the North Shore.

2. Also correct the Trails Inventory Map to identify the US BOR Jeep trail on Cachuma's north shore as the Live Oak Equestrian Trail. The Parks Division collects daily use fees, and the trail has been in use since 1989.

O.1-6

Page 2-29, Santa Ynez Valley, *Lake Cachuma Campground & South Shore Facilities Improvements and Lake Cachuma North Shore Trails & Recreational Facilities Management Plans.*

O.1-7

Please include a detailed description of the guiding documents for recreational development at Cachuma Recreation Area in similar detail as is provided for Jalama Beach.

The Cachuma Lake Resource Management Plan EIS/EIR (May 2010) (CRMP) and the Management Agreement between the County of Santa Barbara and the US BOR for Management of the Cachuma Recreation Area were both adopted in January 2012 by the Board of Supervisors and will be in effect until 2037. The CRMP notes that recreational uses at the Lake are incidental to and must be "consistent with the original purpose of the Reclamation project." The purpose of the CRMP is to provide a program and set of policy guidelines necessary to encourage orderly use, development, and management of the reservoir and the surrounding lands. The plan identifies outdoor recreational opportunities, enhanced by Cachuma Lake and its shoreline, compatible with the surrounding scenic, environmental, and cultural resources." In addition, the CRMP proposes recreational uses that will be compatible with the primary purpose of the Cachuma Project - that is operation of the reservoir for water delivery.

Because the CRMP is the guiding document for the Cachuma Recreation Area, please ensure all mitigations in the CRMP are included by reference in the Cachuma projects' RMP description along with a summary of the approval process. Also ensure RMP Project impact levels in the DEIR and the CRMP are identical.

We appreciate that the Lake Cachuma South Shore facilities & improvements and 2 miles of additional trails will be added in the next 5-10 years.

O.1-7 cont)

Page 2-37, Recreation Land Use Designation & Definition of Public and Private Parks/Recreation Facility

1. Please provide a map of the Overlay areas as proposed. Throughout the document the DEIR text refers to "align with the Comprehensive Plan" but in practice, the Land Use Element will be significantly changed to accommodate the RMP and RBP. To "align the Land Use Element designation with the Recreation Master Plan and related zoning amendments," the entire Land Use Element and other elements of the Comprehensive Plan, development standards, policies, Zoning Ordinance and County Code will require revisions to allow all aspects of the RMP and RBP. Please explain this in detail in the DEIR introduction.

O.1-8

Page 2-46, Section 2.5.4 Recreation Benefit Project (RBP) Program

1. Please revise the responsible County Department for the evaluation of and approval of proposed RBP projects for status and decision-making from the Parks Division to the decision making efforts of both Parks & Planning and Development working together. These two departments need to have input on the decisions about what is appropriate to qualify under the RBP, including planning related benefits, which will go on to Planning for permit processing.

O.1-9

4.2.4 Elimination of the Recreation Benefit Project (RBP) Program

1. We suggest that the following alternatives analyses be addressed to adequately examine and fully disclose options considered in lieu of or to enhance the RBP Program.
    a. A bed tax or other tax that would address the burden of tourist- generated recreation impacts on local resources and eliminate impacts associated with the RBP.
    b. A non-profit to collect and manage park and trail donations and gifts, foster public-private and non-profit partnerships that will help fulfill existing maintenance and recreational needs identified by the RMP.
    c. An increase/expansion of Parks development fees to:
        i. Generate funding for additional parklands and trails identified on County-owned lands,
        ii. Address the maintenance backlog at existing Park facilities,
        iii. Address existing staffing shortages,
        iv. Prioritize new recreational facilities based on community need, (i.e., connecting existing trail right of ways and easements),
        v. Prioritize new recreational facilities and connections between facilities near communities and population centers to “get the most bang (public benefit) for the buck” from available funds.

    WE Watch urges the alternatives be focused on 1) **Emphasizing Public Benefit:** The owner or developer of an agricultural parcel is offering ag land to meet a public recreation need the County has identified to benefit local residents based on objective standards and main component parts, both of which must be satisfied in order to qualify for participation in the RBP and 2) **Development Incentive Qualifications:** Ensure RBP incentives allowed on agricultural land are recreational in nature and/or consistent with existing protections for agricultural land in unincorporated Santa Barbara County.

O.1-10

4.2.5 Modification of the RBP Program to Prohibit RBPs on AG-II Zones with Minimum Lot Size of 40 Acres or Less

We disagree that this alternative would eliminate a significant portion of lands from eligibility for future RBPs and therefore requires revision. Our suggested revisions would ensure continued viability of agriculture in the Santa Ynez Valley. Additionally, the uses under the RBP are commercial and quasi-commercial enterprises that are not in keeping with the communities surrounding AG parcels (rural ranchette for example) or on smaller AG-I and II parcels less than 40 acres. The extensive development of commercial endeavors such as County Inns at the maximum height and room number proposed would most certainly have significant impacts and would most certainly change the character of the Valley’s rural nature, impair agricultural

practices on smaller parcels, and have significant impacts on the continuation of agriculture viability in the Valley.

Increasing available land for recreation at the cost of viable agriculture and sacrificing the way of life for existing residents in the Valley is unacceptable even at the expense of the Project's "Key Objectives." The RBP objectives can be met even with a reduction of available agricultural land without resorting to "benefits." There are existing mechanisms and processes in the County's Zoning laws that allow for changing zoning from agriculture to recreation for all size parcels. For example, if an agricultural parcel is mountainous or hilly and provides little or no appropriate land for grazing or crop production, then this would be an ideal situation where agricultural zoned land could be re-zoned for recreational use. The existing Zoning Change process allows for extensive public notification and comment, an important process that will be significantly reduced or eliminated under the RBP. The Zoning Change process also requires development standards designed to prevent or reduce potential conflicts between uses and quality of life impacts, which includes standards for scale, size, location, and intensity of the use, as well as mandatory requirement for consistency with all applicable policies of the County's Comprehensive Plan and community and area plans.

Prohibiting RBPs on parcels under 40 acres will not reduce the ability to support the development of meaningful recreational improvements within the County's predominantly zoned agricultural lands and protect agriculture on smaller parcels and adjacent residential communities while allowing achievement of key Project Objectives of the RBP. Further, eliminating these zones from eligibility for RBPs would substantially reduce or avoid potential impacts to agricultural lands compared to the Project.

O.1-10 cont)

Section 4.3.2 Alternative 1 — Reduced Eligibility of RBPs

We appreciate the intent of Alternative 1 and support the revision to involve modifications to the proposed RBP Program eligibility to allow for RBPs only within a limited number of zone districts. RBPs should not be allowed within designated Resource Protection Zones, including the Mountainous Gaviota (MT-GAV), Mountainous Goleta (MT-GOL), Mountainous Toro Canyon (MT-GOT), and Resource Management Zones (RMZ) (refer to Table 4-2).

O.1-11

Section 4.3.3 Alternative 2 — Increased Agricultural Buffers

Alternative 2 would reduce impacts on agriculture compared with Alternative 1 and has been selected as environmentally superior because of that attribute. However, our recommended modifications to the alternative under Section 4.2.5, above, would further eliminate impacts to smaller agricultural parcels and impacts to agriculturally adjacent communities and neighborhoods.

We support increasing agricultural buffers to the level of the AEO and also applying modification of the RBP to prohibit RBP incentives on AG-II zones with a minimum lot size of 40 acres or less. Maximum setbacks from agriculture demonstrates that the full extent of the

O.1-12

RBP and agricultural impacts can be further eliminated and still meet the goals of the RMP and the Agricultural Element of the County's Comprehensive Plan.

O.1-12 cont)

5.0 Other CEQA Considerations

5.1 Significant Unavoidable Environmental Effects

Based on the analysis presented in this Program EIR, the Project would create significant and unavoidable impacts on agricultural resources and transportation, including related vehicle miles traveled (VMT). We agree the VMTs cannot be mitigated, but in the interest of full disclosure, revise this section with information from our comments to reduce impacts on Agriculture.

O.1-13

5.2 Reasons The Project Is Being Proposed Notwithstanding Its Significant And Unavoidable Impacts

The RMP and RBP aim to update and enhance recreational access and experience for Santa Barbara County residents of all ages through near-term and long-term acquisitions and improvements to public parks, trails, and recreation facilities. The document states that improved and expanded parks, trails, and recreation facilities would support the demands of a range of recreation users and activities through 2050.

However, in the Santa Ynez Valley planning area, the trail miles are being met as per the RMP's evaluation criteria, and future parks and recreation facilities (such as a swimming pool complex and sports fields) are concentrated in the communities of Buellton, Solvang, Santa Ynez, and Los Olivos. Why are agricultural lands under 40 acres being considered for the RBP? This question must be answered in the DEIR to fully disclose why impacts are acceptable and why alternatives to reduce agricultural impacts are dismissed.

O.1-14

The document also proposes amendments that include updated policies for parks, recreation, open spaces, and trails within the Comprehensive Plan that reflect current community input and more actively support the County's efforts and attention to recreation needs in the unincorporated area. Further, the project would also amend the County's zoning ordinances to support permitting public parks and trails by private entities. Additionally, amendments to the Land Use Element would include updates of the Recreation Section (Section II), last updated in 1980, to provide more accurate and timely description of parks, trails, and open spaces and the value of these resources for outdoor recreation, public health, and community stability.

We recognize the good that increased recreational opportunities will bring to the general public where there is a perceived need. But if adopted, these changes will alter the regulatory environment for privately proposed recreation and trails projects, such as those proposed by the RBP and the amendments will cause sweeping changes to the County's Comprehensive Plan and Zoning; in some cases, prioritizing recreation over other more critical protection measures and safeguards put in place through the Comprehensive Plan and Zoning. These measures put the need for recreation over the viability and way of life in communities that will threaten their identity. The conclusions made need to be supported by draft design standards

and an opportunity for the public to review and comment on the extensive the changes that will be required.

The RBP Program would create a voluntary opportunity for private development projects to contribute directly to the County's public recreation system, but at what cost to the existing communities? Tourism and its impact on local resources have not been adequately addressed.

Taken together, the Project would substantially improve public recreation, which is a valuable community resource, but the cost to other more critical values needs further evaluation. Significant environmental impacts will occur, but at what cost to the Santa Ynez Valley where much of the development proposed will occur through the RBP?

O.1-14 cont)

5.3 Significant Irreversible Environmental Changes and

5.4 Growth-Inducing Impact Analysis

The projects and opening new land to recreation would bring more tourism to the Santa Ynez Valley area. The future construction and operational activities anticipated under the Project would result in the irretrievable commitment of non-renewable resources. Consumption of such resources associated with any new development in the region has not been contemplated at this scale in the County's Comprehensive Plan nor in the Zoning throughout the County. The development potential promoted by the RMP and RBP will facilitate additional development and consequently will place increased burden on non-renewable resources in the region. The DEIR must consider the impacts of increased tourism as a significant contributor to the RMP and RBP impacts.

In conclusion, we reiterate our overarching concern that the DEIR appears to suffer from "project-level tunnel vision," failing to adequately assess the cumulative, long-term impacts that the textual updates to the Land Use and Development Code will have countywide. As such, the DEIR fails as an informational document under CEQA. Relatedly, it appears that the DEIR minimizes environmental impacts by comparing the project's consequences to what will be allowed under the newly amended Comprehensive Plan—rather than evaluating the impacts against the existing physical environmental baseline. As such it appears to violate CEQA's mandate to provide an accurate baseline analysis.

O.1-15

Thank you for the opportunity to comment.

Sincerely,

WeWatch Board of Directors

Comment Letter O.1 – WeWatch – Board of Directors

Comment Response O.1-1

Thank you for your comments. The comment expresses concern that the proposed zoning ordinance amendments would prioritize tourism over agriculture, biological resources, and other existing County planning policies. The comment also questions whether the proposed amendments would conflict with other portions of the Comprehensive Plan and states that the draft policy and development standard language has not been made sufficiently available for public review.

As described in Chapter 2, *Project Description*, the Project includes adoption of the Recreation Master Plan and targeted amendments to the Comprehensive Plan and County zoning ordinances. The Recreation Master Plan does not involve rezoning of any existing zone types in the county. Rather, it would modify the uses allowed within selected existing zones and establish development standards governing public parks, recreation facilities, trails, and RBPs. The Recreation Master Plan and proposed regulatory planning framework would not prioritize tourism over agricultural resources, biological resources, or other existing County goals and policies, but would instead support the expansion of opportunities for providing recreational uses to meet the identified needs of the county's residents while balancing existing goals and policies for protection of natural resources. For instance, under the proposed Comprehensive Plan amendments, the Project would establish new goals and policies requiring that parks, recreation facilities, and trails incorporate interpretation of local history, culture, and natural features, minimize impacts in environmentally sensitive habitat areas, and integrate facilities with natural and agricultural resources where feasible. Proposed amendments to the Agricultural Element would also be strictly limited to amendments to align the Agricultural Element with the recreation-related amendments to the Land Use Element and the Recreation Master Plan while keeping agriculture as the primary land use priority in agricultural areas. In substance, the amendments allow outdoor recreation, trails, and related uses in agricultural areas where those uses complement farming operations, maintain rural character, and preserve agricultural productivity. Under the proposed policies, recreation is compatible only when agricultural viability is preserved. The proposed amendments also require siting, buffers, access controls, and consistency with Williamson Act contracts and County Uniform Rules. The proposed zoning ordinance amendments would also include the establishment of new development standards applicable to privately-proposed parks, recreation, trails, and RBPs. These new development standards would require structures and trails to be sited in existing disturbed areas, minimize impacts to native habitats, and preserve natural features and native vegetation to the extent feasible.

With respect to availability of the draft Comprehensive Plan and zoning ordinance amendments language, draft ordinance language or amendment packages are not necessary to provide an accurate, stable, and finite project description, as required by CEQA. A detailed discussion of the proposed improvements and amendments to the Comprehensive Plan and zoning ordinances is presented in Section 2.5, *Project Components,* which forms the basis for the

programmatic impact analysis presented in this Program EIR. Specifically, a detailed summary of the proposed Comprehensive Plan amendments and proposed goals and policies addressing recreational uses is provided under Section 2.5.2, *Comprehensive Plan Amendments for Parks, Recreation, and Trails,* while a detailed summary of the proposed zoning ordinance amendments and detailed development standards is provided in Section 2.5.2, *Zoning Ordinance Amendments.* Each of these sections details the design standards, policies, and guidelines proposed by the Recreation Master Plan and serves as the basis for the forthcoming Comprehensive Plan and zoning ordinance amendments packages.

The County acknowledges that the final amendment language will be further refined as part of the public hearing process. As described in Section 2.2, *Recreation Master Plan Adoption and Implementation*, the proposed Comprehensive Plan and zoning ordinance amendments will be considered by the County Planning Commission and Montecito Planning Commission, which will make recommendations to the Board of Supervisors. The Board of Supervisors will subsequently consider adoption of the Recreation Master Plan, certification of the EIR, and adoption of the proposed amendments. The draft amendments and supporting agenda materials will be publicly available as part of those proceedings, providing additional opportunities for public review and comment.

Comment Response O.1-2

The comment asserts that construction, operation, maintenance, and increased use of future trails and recreational facilities could adversely affect Environmentally Sensitive Habitat, riparian corridors, wetlands, oak woodlands, native grasslands, special-status species, cultural resources, geology and soils, water quality, and wildfire risk. The EIR appropriately analyzes the potential adverse effects of the Project on these resources in Section 3.4, *Biological Resources,* Section 3.5, *Cultural and Tribal Cultural Resources,* Section 3.7, *Geology and Soils,* Section 3.10, *Hydrology and Water Quality,* and Section 3.17, *Wildfire,* respectively. As presented therein, the development of future recreation improvements under the Project would be subject to the wide range of existing federal, state, and county policies, and development standards proposed under the Project that would avoid or minimize impacts. This would include the proposed development standards for trails for hiking and riding requiring that trails be sited in disturbed or developed areas, integrate and avoid modification of natural features, and comply with habitat and cultural resource protection standards. Where existing and proposed policies or development standards would not be sufficient to avoid or minimize impacts, the EIR identifies and requires additional mitigation measures to reduce impacts.

Comment Response O.1-3

The comment requests removal of the phrase “to the extent feasible” from all mitigation measures because the commenter considers the phrase subjective and believes it could undermine enforceability. Since the Recreation Master Plan must be analyzed at the programmatic level, the phrase “to the extent feasible” in relation to mitigation measures included in this EIR is intended to provide flexibility to accommodate broader environmental settings and the nature of future individual projects. Site-specific studies would be conducted

on a project-level basis and subject matter experts would be able to recommend mitigation tailored to specific projects to attain a level of mitigation studies in the Program EIR. Where a measure uses the phrase "to the extent feasible," the responsible reviewing authority would be required to evaluate feasibility based on the evidence and circumstances associated with the individual project, rather than personal preference or unsupported discretion. Should future development projects not be able to avoid, minimize, or mitigate impacts to the maximum extent feasible, such projects may be subject to subsequent environmental analysis under CEQA.

Comment Response O.1-4

The comment asserts that mitigation measures identified in Impact BIO-1 of Section 3.4, *Biological Resources,* fail to address impacts to environmentally sensitive habitats, riparian corridors, wetlands, oak woodlands, native grasslands, and other sensitive habitats or natural communities. However, these resources are addressed in **MM BIO-2 (Habitat Protection Plan)**, which is a required mitigation measure identified to reduce impacts described in Impact BIO-1.

The comment further states that mitigation measures specific to the proposed improvements to the Cachuma Recreation Area should be identified in the EIR. This EIR is a program-level environmental review document prepared pursuant to CEQA Guidelines Section 15168. As described in Chapter 1, *Introduction*, a programmatic analysis is appropriate because site-specific development, land use, and operational details associated with potential future recreational improvements are not currently known. Accordingly, the Program EIR evaluates broad programmatic impacts, identifies mitigation measures and planning considerations that may apply to future implementing projects, and provides a framework for subsequent environmental review when project-specific information becomes available.

Because the Recreation Master Plan is a program-level planning document, many of the recreational facilities and improvements identified in Chapter 2, *Project Description*, are conceptual and have not been developed to a level that supports project-specific environmental analysis. Section 2.5.1, *Planned County Parks, Recreation, and Trails Project under the Recreation Master Plan,* identifies the Lake Cachuma North Shore Trails & Recreational Facilities Management Plan as an existing, ongoing planning effort that could guide recreational access on the north shore of Lake Cachuma and help meet recreational needs identified through the Recreation Master Plan. However, adoption of the Recreation Master Plan does not approve or permit a specific development project and does not define specific improvements or determine final trail alignments, facility locations, user assignments, or operational requirements. Rather, adoption of the Recreation Master Plan would empower County Parks, in partnership with the U.S. Bureau of Reclamation, to prepare a Cachuma North Shore Trail System & Recreation Facility Management Plan to provide public recreational access while protecting natural resources, including water quality, biological resources, geology and soils, agricultural resources, and public recreation. The identification of this improvement plan is not a new improvement project proposed as part of the Recreation Master Plan, but instead

reflects the existing management strategy and improvement program originally identified and described as part of Alternative 2 in the Cachuma Lake Final Resource Management Plan/EIS, which was selected and approved by the U.S. Bureau of Reclamation as part of its Record of Decision (ROD 10-112).

Section 2.5.1 further explains that the management plan, including any project-specific improvements, would be prepared through a public planning process and would be subject to subsequent environmental review pursuant to CEQA and NEPA. Future planning for the north shore would need to account for applicable legal, regulatory, resource management, and land management requirements then in effect, including any requirements arising from federal agency coordination or court judgments.

Comment Response O.1-5

The comment requests that Alternative 1 include additional discussion of human intrusion and biological resource impacts, supports exclusion of Resource Protection zones from RBP eligibility, and requests that Alternative 2 prohibit a project from receiving incentives under both the RBP Program and Agricultural Enterprise Ordinance. The commenter also states that Alternatives 1 and 2 would not sufficiently reduce Project impacts and recommends additional modifications.

Alternative 1 evaluates a reduction in the geographic and zoning eligibility of the RBP Program, including removal of the identified Resource Protection zones. Because fewer properties and environmentally sensitive areas would be eligible for RBPs, Alternative 1 would reduce the potential for construction disturbance, recreation-related human activity, lighting, noise, and other indirect effects analyzed in detail in Section 3.4, *Biological Resources*, compared to the proposed Project. However, Alternative 1 would not eliminate biological resource impacts associated with the planned County projects, public parks and trails allowed through the other proposed amendments, or RBPs that could occur within the remaining eligible zones. Future projects under Alternative 1 would also remain subject to applicable biological resource regulations, Project development standards, and mitigation measures identified in the EIR.

Alternative 2 evaluates increased agricultural buffers and was identified as environmentally superior because it would provide greater separation between certain recreational development and active agricultural operations, thereby reducing agricultural land use conflicts. The recommendation to prohibit projects from participating in both the RBP Program and Agricultural Enterprise Ordinance concerns the design and administration of the proposed RBP Program. The Project Description does not authorize a project to avoid applicable regulations or receive duplicative entitlements without County review and discretionary approvals. Any future proposal involving uses or incentives under more than one regulatory program would be reviewed for compliance with all applicable requirements, and the applicable land use permits and environmental review would be determined based on the complete project information and permit applications.

CEQA requires consideration of a reasonable range of alternatives that could feasibly attain most of the Project's basic objectives while avoiding or substantially lessening one or more

significant effects. It does not require every alternative to eliminate all significant impacts or to outperform the Project in every environmental category. The alternatives analysis discloses the comparative effects, benefits, and limitations of the alternatives so that County decision-makers may consider these factors when acting on the Project.

Comment Response O.1-6

The comment requests that Table 2-2 identify approximately three additional miles of trails associated with the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan because approximately 12 miles of equestrian trails already exist on the north shore. The comment also requests that the Recreation Inventory Map identify the U.S. Bureau of Reclamation jeep trail as the Live Oak Equestrian Trail.

The trail mileage presented in Table 2-2 is a programmatic-level estimate of the trail improvements and recreational opportunities that could be considered through the development and preparation of the future Lake Cachuma North Shore Trails & Recreation Facilities Management Plan. It is not intended to inventory the existing mileage of equestrian trails within the Cachuma Recreation Area.

The requested revisions to the Recreation Master Plan trails inventory map to identify the Live Oak Equestrian Trail have been noted.

Comment Response O.1-7

The comment states that the Draft EIR does not adequately disclose the applicable regulatory framework for recreation and trail expansion allowed on the north shore of Lake Cachuma. The comment identifies several documents that, in its view, should be discussed in the Program EIR, including the Cachuma Lake Final Resource Management Plan/EIS, the Agreement Between the United States of America and the County of Santa Barbara for the Management of the Recreation at Lake Cachuma (Management Agreement), the Superior Court Amended Writ of Mandate, the Santa Barbara County Comprehensive Plan Conservation Element, and the *Recommendations for a Management Plan for the Cachuma Lake Equestrian Trail*. The comment also references provisions and mitigation measures identified in the Cachuma Lake Final Resource Management Plan/EIS and states that they should be discussed in the EIR's regulatory setting and in relation to the future management framework for the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan. Please refer to Comment Response O.1-4 above.

Comment Response O.1-8

The comment requests a map of the proposed Public and Private Parks and Recreation Facility Overlay and further explanation of proposed Comprehensive Plan and zoning ordinance amendments. Chapter 2, *Project Description*, includes a detailed discussion of the proposed Comprehensive Plan and zoning ordinance amendments. Refer to Section 2.5.2, *Comprehensive Plan Amendments for Parks, Recreation, and Trails*, and Section 2.5.3, *Zoning Ordinance Amendments* for detailed discussions of proposed amendments. As presented therein, the

proposed Comprehensive Plan amendments would involve targeted updates and amendments to the Recreation Section of the Land Use Element and targeted amendments to Goal VII and associated policies of the Agricultural Element. The Project, as described in the EIR Project Description, does not propose broad, sweeping changes to the entirety of the Land Use Element or other elements of the Comprehensive Plan, as suggested by the commenter.

The County acknowledges that the final amendment language will be further refined as part of the public hearing process. As described in Section 2.2, *Recreation Master Plan Adoption and Implementation*, the proposed Comprehensive Plan and zoning ordinance amendments, along with the amended PRT maps, and maps depicting the Public and Private Parks/Recreation Facility Overlay as amended by the Project, will be made available and presented to County decision-makers as part of the Project approval and EIR certification process. The draft amendments and supporting agenda materials will be publicly available as part of those proceedings, providing additional opportunities for public review and comment.

Comment Response O.1-9

The comment recommends that County Parks and the County Planning & Development Department jointly evaluate RBP eligibility rather than assigning initial eligibility assessments to County Parks. As described in Section 2.5.4, *Recreation Benefit Project (RBP) Program*, County Parks would assess the public recreation component of the proposed RBP to determine eligibility. If County Parks determines that the proposal is eligible, County Planning & Development would evaluate the proposed private development, administer the applicable land use review process, determine compliance with zoning and development standards, and grant or deny any requested incentive through the applicable permitting process. Therefore, both departments would have primary roles in the evaluation process based on their permitting and review responsibilities.

Comment Response O.1-10

The comment recommends that the alternatives analysis consider a tourism tax, creation of a nonprofit organization to manage park donations, and expansion of park development fees as substitutes for or enhancements to the RBP Program. The comment further recommends that the RBP Program should emphasize public benefits and limit incentives on agricultural land to recreation-related uses that are consistent with existing agricultural protections. The comment also opposes RBPs on AG-I and AG-II parcels of 40 acres or less.

This comment suggesting evaluation of an alternative that would eliminate the RBP Program is noted and will be forwarded to County decision-makers for their consideration. However, CEQA requires consideration of a reasonable range of alternatives that could feasibly attain most of the Project's basic objectives while avoiding or substantially lessening one or more significant effects. The alternative proposed by the commenter would involve the elimination of an important component of the Project which has been identified and developed through the County's extensive recreation planning process and development of the Recreation Master Plan, which included extensive coordination with local stakeholders, recreation providers, advisory

committees, and County decision-makers. The EIR does include consideration of a similar alternative, which is described in Section 4.2.4, *Elimination of the Recreation Benefit Project (RBP) Program*. As discussed therein, elimination of the RBP Program would eliminate a key strategy of the Recreation Master Plan. Elimination of the RBP Program would substantially reduce the ability to achieve Project Objectives for expanding and improving recreational opportunities to meet the existing and future needs of county residents. As such, the EIR need not evaluate additional alternatives which would include establishment of a new tax or modification of the County's Development Impact Mitigation Fees, neither of which constitute a "project" pursuant to CEQA Guidelines Section 15378.

With respect to the EIR's alternative considering *Modification of the RBP Program to Prohibit RBPs on AG-II Zones with Minimum Lot Size of 40 Acres or Less*, the comment's opposition to and disagreement with the findings of this alternative has been noted and will be forwarded to County decision-makers for their consideration.

Comment Response O.1-11

The comment expresses support for Alterative 1 (Reduced Eligibility of RBPs). These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR.

Comment Response O.1-12

The comment expresses support for Alternative 2 (Increased Agricultural Buffers), but recommends combining those buffers with a prohibition on RBPs within AG-II zones with a lot size less than 40 acres. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR. Please also refer to Comment Response O.1-10 above for a detailed response to comments regarding the described alternative considering *Modification of the RBP Program to Prohibit RBPs on AG-II Zones with Minimum Lot Size of 40 Acres or Less*.

Comment Response O.1-13

The comment agrees with the EIR's finding of significant and unavoidable impacts to agricultural resources and vehicle miles traveled (VMT), but requests that Section 5.1, *Significant and Unavoidable Environmental Effects*, incorporate the commenter's suggestions for further reducing impacts to agricultural resources. Please refer to prior responses provided above for detailed response to each of the discrete comments provided in this letter.

Comment Response O.1-14

The comment questions why agricultural properties of less than 40 acres would be eligible for RBPs, especially in the Santa Ynez Valley, and states that identified park and trail needs may already be met in other areas of the region. As described in Chapter 2, *Project Description*, the RBP Program would create voluntary opportunities in unincorporated areas for private developers to contribute directly to the County's public recreation system. Incentives would be granted to applicants based on County Park's assessment of RBP eligibility. A project may qualify as an RBP if the public recreation amenity it provides satisfies an existing public need. The Recreation Master Plan includes a recreation facility needs assessment determined through extensive outreach, surveying, and inventory of existing facilities. The eligibility requirements for RBPs would ensure that projects which are approved and constructed under this program fulfill recreational amenities which are otherwise lacking in a specific area of the county.

The Project Description also includes planned County projects under the Recreation Master Plan in Section 2.5.1, *Planned County Parks, Recreation, and Trails Projects under the Recreation Master Plan*. Projects planned in the Santa Ynez Valley consist of various improvements around Lake Cachuma and the Drum Canyon Trail. No additional parkland is proposed in the Santa Ynez Valley under the Recreation Master Plan, due in part to the fact that the acreage of existing parkland in the Santa Ynez Valley already exceeds the County's goal for parkland.

The comment also expresses concern that the Project would alter the regulatory framework for privately proposed recreation projects, prioritize recreation and tourism over agricultural and community values, and provide insufficient opportunities for public review of the proposed policy and ordinance amendments. Please refer to Comment Response O.1-1 for a detailed response to concerns related to tourism and recreation being prioritized over other vital needs within the County.

Comment Response O.1-15

The comment asserts that the EIR does not adequately evaluate tourism, growth inducement, irreversible environmental changes, countywide cumulative impacts, or the long-term effects of the proposed Comprehensive Plan and zoning ordinance amendments. The comment further contends that the EIR improperly evaluates the Project against the proposed amended regulatory framework instead of the existing physical environmental baseline. However, as detailed throughout the EIR and in the responses to individual comments above, the EIR does in fact evaluate the direct, indirect, and secondary physical environmental effects of the Recreation Master Plan and related amendments against existing environmental conditions. This EIR is a program-level environmental review document prepared pursuant to CEQA Guidelines Section 15168. As described in Chapter 1, *Introduction*, a programmatic analysis is appropriate because site-specific development, land use, and operational details associated with potential future recreational improvements are not currently known. Accordingly, the Program EIR evaluates broad programmatic impacts, identifies mitigation measures and planning considerations that may apply to future implementing projects, and provides a

framework for subsequent environmental review when project-specific information becomes available.

The cumulative analyses evaluate the Project's effects together with other reasonably foreseeable development, long-range plans, recreation projects, and regional growth. The EIR does not conclude that future projects may rely on the Program EIR without further review. Rather, the improvements identified in this EIR and enabled by the Recreation Master Plan would be evaluated in the context of their proposed improvements and consistent with the existing and proposed policies and development standards to determine whether their environmental effects were adequately addressed by the Program EIR and whether additional site-specific analysis, mitigation, or environmental documentation is required under CEQA. Accordingly, the EIR provides an appropriate programmatic evaluation of the reasonably foreseeable countywide and long-term effects of the Recreation Master Plan and related amendments.

WE Watch, P.O Box 830, Solvang CA 93464



August 9, 2026

TO: Jeff Lindgren,
FROM: Nancy Emerson, Save Our Stars Committee Chairperson
WE Watch
RE: Recreation Master Plan EIR, Outdoor Lighting Sections

The goal of the WE Watch Save Our Stars Committee, formed in 2000, is to return the Santa Ynez Valley to being a dark sky region. We were instrumental in obtaining the 2025 County Outdoor Lighting Ordinance and similar ordinances for Buellton and Solvang. WE Watch sponsors the Central Coast Chapter of DarkSky International.

A.Our most important concern is that, within Lighting (and elsewhere), the RBP needs revisions to account for the unknown and unregulated individual and cumulative impacts of RBP allowed facilities on everything from AG-1-5 parcels to large 320 A + ranches with no limits on the size, number and location of 120 room country inns, 160 site campgrounds, 2,000 seat amphitheaters plus yet to be described outdoor "recreation facilities" proposals. The increase in outdoor artificial lighting's individual and cumulative impacts could be VERY substantial.

Despite a strong County Outdoor Lighting Ordinance, if there are too tall poles and fixtures with too bright bulbs, even though fixtures are "fully shielded" and point "downward", it will be impossible to prevent light pollution. In certain locations, full cut-off fixtures may be needed.

O.2-1

We question how, given the unregulated potential of projects added via the RBP, it is possible to determine that Lighting impacts will be "insignificant and no mitigation measures are required." The Santa Ynez Valley is a very attractive location for these projects, which means potential undue lighting environmental impacts on our Valley. Given that this is a program EIR, the public's ability to request or appeal for needed modifications to a RBP project that can have several exceptions to land use policies will be very limited. That includes Outdoor Artificial Lighting.

If our understanding is correct, this EIR, within a set of given environmental issues, evaluates how the implementation of the details of the Recreation Master Plan may impact those environmental issues. Nighttime use of artificial outdoor lighting at parks and other recreational sites is the primary source of potential lighting environmental impacts.

Interior lighting and vehicle headlights (depending on number of vehicles) may impact the environment, too. However, the County does not regulate these lighting sources. Interior lighting is not a major source of light pollution but vehicle headlights could be. There are no

mitigation tools unless number limits on vehicles or other regulations, e.g. requiring that certain projects use buses or vans, are added to Transportation standards.

Astro Tourism. We recommend that the RMP add the increasingly popular Astro Tourism to its recreational activities. It is dark skies that make this activity possible, yet another reason to take seriously the environmental impacts of outdoor artificial lighting In the EIR.

B.We hope we found all the references to lighting in the Project Description and the Aesthetics and Visual Resources sections. A list with our recommendations for them is attached.

1. Pg. 2-39. For clarity, we recommend adding "outdoor". Add "fully", as used in submitting the EIR for all but the Trails item.

2. Pg. 2-43. We support "no lighting" for trails.

3. Pg. 2-44. For clarity, we recommend adding "Outdoor" to Lighting. The exception in the Outdoor Lighting Ordinance is not a "blanket" exception of outdoor recreational facilities but an exception with very specific limits. In reality, it is an exception for sports fields and courts. It needs to either quote Section E. 1.c. from the Outdoor Lighting Ordinance or summarize it to make it clear this is a very limited exception. Also, the Planning Department has the 2/26 DarkSky International Sports Lighting Standards, which need to be used with this Outdoor Lighting Ordinance exception.

4. Pg.3.1-12 & 13. The existing narrative elaborates extensively on glare of all types, but outdoor artificial lighting glare is only 1 of 4 terms describing light pollution. It needs to focus on new sources of outdoor, artificial lighting in the RMP and their environmental impacts.

O.2-1 (cont)

DarkSky International, professional lighting designers and engineers, and our Committee use the term Light Pollution (human-made alteration of outdoor light levels from those occurring naturally), which has 4 descriptive terms for the environmental impacts of uncontrolled outdoor lighting and we recommend using these terms:

*Glare (excessive brightness of lights that causes visual discomfort),
*Light trespass (Light falling where not intended or needed),
*Sky glow (brightening of night sky over inhabited areas)
*Clutter (bright, confusing, and excessive groupings of light sources).

Paragraph 1: The impacts of light pollution are more than a "nuisance for sensitive" viewers. They are a problem as they cause both physical and emotional distress. Extensive research shows light pollution (all forms) do more than "disturb" wildlife. They cause health problems. Also, sky glow negatively impacts rural areas, too.

Paragraph 3: Note addition of “temporary lighting of cultivated agricultural land”, which is exempt from ordinance regulation.

Thank you for considering our suggestions. Our goal in submitting them is to help you make this EIR and the Recreation Master Plan as useful as possible.

Approved by WE Watch Board of Directors. 8/8/26

O.2-1
(cont)

References to Lighting, Recreation Master Plan, Draft EIR, 6/26

2.0 Project Description
Table 2-7, Summary of Proposed Standards for Development of Parks/Playgrounds & Trails

Pg. 2-39. Parks & Playgrounds. **Bullet 7.** Outdoor Lighting must be fully shielded and directed downward with limits on lighting for outdoor recreational facilities.

Pg. 2-43 Trails for hiking & riding, Bullet 3. Lighting not allowed.

Pg 2-44, Table 2-8. Summary of Proposed Additional Standards in REC Zone

Lighting. If outdoor lighting is provided, fixtures must be fully shielded and directed downward, except for lighting of sports fields and courts ~~associated with an outdoor recreational facility~~. Lighting for an outdoor recreational facility *(sports field and court?* may only be used to complete a specific organized recreational event in progress. ~~To the extent feasible,~~ Lighting must be directed away from habitat areas, nearby residences, and public roads with any exceptions for sports fields or courts made on an individual project basis.

3.1 Aesthetics and Visual Resources.
3.1.2.4 Artificial Light and Glare
Pg. 3.1-12 &13

O.2-1 (cont)

New sources of outdoor, artificial lighting can be a ~~nuisance~~ problem for ~~sensitive~~ viewers ~~through~~ because of light pollution ~~spill~~ (glare and light trespass). *(Following sentence repositioned)* ~~Glare~~ Both can cause unwanted and potentially objectionable sensations as ~~observed~~ experienced by a viewer. It ~~or~~ can create an ambient light glow (sky glow) that emanates upward and diminishes views of the clear night sky. Light pollution ~~spill~~ and ambient light glow can ~~disturb~~ impair the health of wildlife in natural habitat areas and negatively affect nighttime sky views in urbanized and more rural areas. ~~as they look toward a surface that creates glare~~. ~~Glare can be caused by a direct light source (direct glare) or, more commonly, by the reflection of the sun, moon, or artificial light source from a reflective surface (reflective glare).~~

The primary sources of ~~light and~~ glare and light trespass from artificial lighting differ between rural and urban areas. The primary sources of such light in urban areas include interior and exterior building lighting, landscape lighting, security lighting, illuminated signs, streetlights, and vehicle headlights. ~~airplanes~~, Particularly relevant to this EIR in both urban and more rural areas is outdoor lighting for parks and playgrounds, sports fields, courts, and other recreation facilities. ~~Sources of glare in these areas include windows and reflective building materials, such as metal roofs as well as reflections from vehicle windshields and airplanes.~~

In rural and semi-developed areas, there are fewer sources of artificial light, including exterior and interior building and landscape lighting, occasional illuminated signs and streetlights, vehicle headlights, and temporary lighting of cultivated agricultural land. ~~airplanes,~~. ~~Sources of glare in these areas include windows and reflective building materials, such as metal roofs; however, natural sources and farmlands are often the primary sources of glare. A source of glare can be natural in the form of water surfaces, such as rivers and land cover. Glare from water is not usually perceived as a negative aesthetic quality and can often be associated with high-quality and memorable visual experiences. Land cover can be exposed soil, seedlings, mature row crops, orchards, pasture, forest, and urban land cover, such as paved streets, sidewalks, and reflective roofing. These different cover types can produce different amounts of glare based on the amount of surface area and its roughness, reflectiveness, and coloring. For example, the~~ Plastic hoop greenhouses in the Santa Maria Valley and other areas can produce daytime glare due to the reflective material. The presence of permanent vegetation can reduce glare and light trespass from artificial light.

~~Lastly, light and glare can be affected by the absence of vegetation because vegetation acts to screen and filter light and soften the intensity of glare. For example, in areas of intense development that lack mature landscaping or where land has been denuded of natural vegetation for agriculture, there will be a notable increase in light and glare when compared to areas of development with mature landscaping or natural, vegetated areas.~~

O.2-1 (cont)

35.30.060 Design Compatibility Standards, pg 3.1-23
35.30.120 Outdoor Lighting

Section 35.30.120 Establishes standards for outdoor lighting that minimize light pollution caused by inappropriate or misaligned light fixtures. These standards conserve energy, preserve the nighttime sky, and protect neighbors and wildlife while maintaining night-time safety, utility, security and productivity. These provisions are intended to preserve and protect the nighttime environment of the County by regulating unnecessary and excessive outdoor lighting.

Table 3.1-1 Summary of Aesthetics and Visual Resources Impacts, pg. 3.1-23

Impact AV-4. Potential future development facilitated by the proposed Project could result in a new source of substantial light or glare that may adversely affect day or nighttime views in the area.

Insignificant
No mitigation
measures required.
Insignificant

Pg.3.1-25.
Lighting would also be limited to fully shielded, downward lighting directed away from habitat areas, nearby residences, and public roads. Outdoor recreation facilities that require sports field or court lighting may only be illuminated during recreational events.

Impact AV-1, pg. 3.1-25
Lighting would also be limited to fully shielded, downward lighting directed away from habitat areas, nearby residences, and public roads. Outdoor recreation facilities that require sports field or court lighting may only be illuminated during recreational events.

(List prepared by Save Our Stars Committee, WE Watch)



O.2-1
(cont)

Comment Letter O.2 – WeWatch – Save Our Stars Committee

Comment Response O.2-1

Thank you for your comment. The comment expresses concern that the RBP Program could allow for unregulated future recreational development that introduces substantial outdoor lighting and light pollution, particularly within the Santa Ynez Valley. The comment also questions the impact conclusions in Section 3.1, *Aesthetics* in the EIR regarding light and glare and suggests the inclusion of astro-tourism and dark-sky values as a recreation activity that could be affected by increased lighting in the Santa Ynez Valley.

The Recreation Master Plan and related amendments would not allow for or result in the unregulated development and operation of new recreation facilities and RBPs. The Recreation Master Plan and related amendments represent a comprehensive planning and policy framework that encourages and facilitate new recreation development to meet the identified needs of the county's communities. As described in Chapter 2, *Project Description,* and throughout the EIR's analysis of impacts, new development enabled by the Project would be subject to existing plans and policies addressing lighting and protection of night skies. These include policies and standards governing lighting, including Dev Std VIS-SYV-3.1 of the Santa Ynez Valley Community Plan and the outdoor lighting regulations of the County's Land Use and Development Code (LUDC) (Section 35.30.120), Montecito Land Use and Development Code (MLUDC) (Section 35.430.120), and coastal zoning ordinances (Section 35-139) that were recently updated and modernized by the Board in 2025. It also includes required compliance with the proposed Recreation and Agricultural policies of the Land Use Element amendments, the proposed development standards summarized in Table 2-7 and Table 2-8 as part of the zoning ordinance amendments, and the stringent application eligibility requirements and additional use standards proposed as the RBP Program that would limit the type and extent of potential future RBPs.

As described in Chapter 2, *Project Description*, the RBP Program would create voluntary opportunities in unincorporated areas for private developers to contribute directly to the County's public recreation system. Incentives would be granted to applicants based on County Park's assessment of RBP eligibility. A project may qualify as an RBP if the public recreation amenity it provides satisfies an existing public need. The Recreation Master Plan includes a recreation facility needs assessment determined through extensive outreach, surveying, and inventory of existing facilities. The eligibility requirements for RBPs would ensure that projects which are approved and constructed under this program fulfill recreational amenities which are otherwise lacking in a specific area of the county. However, if the recreational needs of a community or recreation planning region meet the needs identified in the Recreation Master Plan, a project may not be eligible for processing under the RBP Program. Thus, the extent and scale of future RBPs would be highly limited, particularly in the Santa Ynez Valley where the Recreation Master Plan does not identify any recreation needs.

Nevertheless, as described in Section 3.1.2.1, *Existing Visual Character by Region*, the County recognizes the Santa Ynez Valley as having rural character that is optimal for viewing the night

sky and provides unique opportunities for astronomical observations. Given the programmatic nature of the Recreation Master Plan, many of the recreational facilities and improvements identified in Chapter 2, *Project Description*, are conceptual and have not been developed to a level that supports project-specific environmental analysis. The EIR does not approve construction of specific future lighting systems, lighting intensities, pole heights, or fixture layouts. Rather, it evaluates the potential for future recreational development enabled by the Recreation Master Plan, associated zoning amendments, and the RBP Program, accounting for the types of improvements proposed or enabled by the Project and the implementation of mandatory development standards and existing regulations addressing light fixtures and night lighting.

Many of the types of recreation improvements proposed or enabled as part of the Project in the Rural and semi-rural areas where night lighting would have the greatest impact on dark skies involve low-intensity uses, such as new playgrounds or trails that do not involve the installation of nighttime light fixtures. For instance, within the Santa Ynez Valley, the only improvements directly proposed by the Project include the proposed Drum Canyon Trail, a new road shoulder or road-parallel trail along Drum Canyon Road that would not involve the installation of new light fixtures. They also include the proposed Lake Cachuma Campground and north shore improvements, which would involve some lighting improvements within the existing campground, as well as development of a plan which may include potential improvement and expansion of recreational trails, a new public equestrian facility, and rural primitive campground. With the exception of the public equestrian facility, none of the contemplated improvements at Lake Cachuma's north shore would involve the installation of new light fixtures that would affect dark skies. For these reasons, impacts are considered insignificant, and additional mitigation is not required. (Refer to Impact AV-4 for further discussion.)

With respect to the proposed text revisions provided by the commenter, where applicable to the EIR analysis, these revisions have been incorporated. Suggested edits to the proposed development standards presented in Chapter 2, *Project Description,* will be forwarded to County decision-makers for their consideration.

August 10, 2026

Mr. Jeff Lindgren
County of Santa Barbara Parks
VIA EMAIL

RE: Comments to the Draft Program EIR for the Recreation Master Plan and Recreation Incentive Benefit Program

Dear Mr. Lindgren,

Thank you for your and your team's effort put in to this Recreation Master Plan (Rec Plan) and Draft Program EIR (DEIR). We appreciate the public outreach that has been completed to define issues and opportunities that have allowed the Rec Plan to move forward.

The following comments focus on the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan, Cachuma Recreation Area and the projects included in the DEIR for the Cachuma's North Shore (DEIR, Pages 2-29 – 2-31):

O.3-1

Lake Cachuma North Shore Trails & Recreation Facilities Management Plan

Existing Applicable Documents. The DEIR does not adequately disclose the regulatory framework for recreation and trail expansion the must be fulfilled before increased recreational use may be allowed on the North Shore. These governing documents are the:

- Cachuma Resource Management Plan and Environmental Impact Statement (CRMP),[1]
- Agreement Between the United States of America, and The County Of Santa Barbara for the Management of the Recreation at Lake Cachuma (Management Agreement)[2],
- Superior Court Amended Writ of Mandate[3] and
- Santa Barbara County Comprehensive Plan, Conservation Element[4]
- Recommendations for a Management Plan for the Cachuma Lake Equestrian Trail.[5]

The DEIR discussion on these governing documents and actions at the Cachuma Recreation Area North Shore is woefully insufficient; some is inaccurate or not described at all. In our review of our previous correspondence and additional research of the CRMP, we have identified issues with noncompliance with the documents, the issues discussed at previous scoping meetings, provided comment letters and attended staff meetings that identified a detailed discussion of the regulatory framework is expected in the DEIR prior to finalization. These issues originate from the documents discussed below:

Cachuma Resource Management Plan EIS/EIR (CRMP)

[1] Dated May 2010 and accepted and approved by the County of Santa Barbara Board of Supervisors fulfilling CEAQ compliance, January 12, 2012
[2] Approved by the County of Santa Barbara Board of Supervisors fulfilling CEAQ compliance, January 12, 2012
[3] Case No. 21CV02683, Superior Court of the State Of California, County of Santa Barbara, Filed January 18, 2023
[4] Adopted 1979 by the County of Santa Barbara Board of Supervisors, Amended August 2010
[5] Recommendations for a Management Plan for the Cachuma Lake Equestrian Trail, Dated September 1989

O.3-1 cont.

The Cachuma Lake Resource Management Plan EIS/EIR (CRMP) was prepared as part of the Management Agreement review between the County of Santa Barbara and the US BOR. The CRMP specifically notes that recreational uses at the Lake are incidental to and must be "consistent with the original purpose of the Reclamation project." The purpose of the CRMP is to provide a program and set of policy guidelines necessary to encourage orderly use, development, and management of the reservoir and the surrounding lands. The CRMP proposes recreational uses that will be compatible with the primary purpose of the Cachuma Project, that is, operation of the reservoir for water delivery.

The CRMP was adopted by the County of Santa Barbara Board of Supervisors (the Board) for fulfillment of CEQA requirements in January 2012. Further, the Management Agreement between the US Bureau of Reclamation (USBR), was also approved on this date. The CRMP is for a period of 25 years beginning in 2012 and will be reviewed in 2037.

The DEIR's proposed Lake Cachuma North Shore Trails & Recreation Facilities Management Plan (North Shore Trails Project) must consider potential impacts and mitigation consistent with what is contemplated in the CRMP - Alternative 2, Limited Recreational Expansion was selected as the environmentally superior Alternative and is the basis for recreational development and management at Cachuma:

Comments:

1) Please include in the DEIR the following requirements from the CRMP in the discussion of a regulatory setting, and mitigations required for the North Shore Trails Project.

   a) LIMITED trail use by hikers and mountain bikes is allowed Under Alternative 2,[6].Include the following information about the North Shore in the DEIR:

      Off-highway motor vehicles and downhill biking will continue to be prohibited under all the alternatives. Existing levels of trail use on the south and north shores of the lake will be maintained.[7] (emphasis added)

   b) Currently, equestrian riding is limited at Cachuma. From the CRMP, use the trails description on Page 3-76 of the CRMP, Table 3.9-4, Existing Trails and Conditions for an accurate description of trails at Cachuma Recreation Area for the DEIR:

      Trails and paths are key elements of the recreational environment at Cachuma Lake (Figure 3.9-6). However, many fragile areas within the recreation area are feeling the pressure of use and lack of maintenance. Maintaining trails means more than keeping them clear or marking them well so that people can find their way. Maintaining trails also means preserving them for future use, protecting the surrounding environment, and preserving a

[6] CRMP, PAGE 2-16, 2.7 Management Actions For Alternative 2: Enhanced Recreation, 2.7.2 Allowable Land Uses and Management Actions.
[7] CRMP, Page 2-13, 2.5.3

O.3-1 cont

quality outdoor experience for all trail users. See Section 4.9 for recommendations on trail design and management at Cachuma Lake. Five trails within and adjacent to the park are available to visitors. The trails range in length from 0.25 mile to 8 miles roundtrip. ***These trails can be either hiked or biked; however, no horseback riding is allowed on these trails. One trail is open on the North Shore to equestrian use only (Figure 3.9-7 and Table 3.9-4)****.*[8]

2) Please add a summary of the recreational development guidance and reference mitigation measures required by the CRMP in DEIR.

O.3-2

Cachuma Management Agreement

the Cachuma Management Agreement between the US Bureau of Reclamation (USBR), was approved on January 12, 2012, by the County Board of Supervisors, concurrently with adoption of the CRMP The term of the agreement is 25 years and will be reviewed in 2037. Key pertinent components of the Management Agreement are:

- The Managing Partner (County) coordinates with Reclamation regarding the management of the recreation area and activities that could affect any Cachuma Project Works, water management or operation and maintenance activities.
- **The agreement does not require or commit the County as the managing partner to construct any specific project or construct any specific program set forth in the plan (i.e., CRMP).**
- **If the County seeks construction of structures or improvements, they shall be done with the prior written approval of Reclamation and after the completion of environmental review required by CEQA and NEPA.**
- **The County management of the area must be consistent with the resource master plan (CRMP) which designates allowable recreational uses in different areas of the plan. However, the agreement does not require the County, as the managing partner, to implement, facilitate or encourage any of those designated uses.**
- If the County seeks to enhance recreational activities at the Lake or develop recreational facilities, they shall be done in accordance with the resource management plan (CRMP) and appropriate NEPA and CEQA review.
- **The Plan also requires the County to develop, implement and maintain various plans, including fire management, integrated pest management, waste recycling and reduction, boating capacity and safety and grazing, and erosion control to**

[8] Link to CRMP Figure 3.9-7: https://www.usbr.gov/mp/nepa/includes/documentShow.php?Doc_ID=5636

O.3-2 cont.

meet Federal and State standards. These plans are subject to appropriate NEPA and CEQA review.

Comments: Please add a summary of the recreational development guidance provided in the Cachuma Management Agreement to the DEIR. Note that the County is not obligated to build or change management to recreational facilities discussed in the CRMP; they are options.

Additionally, the CRMP was approved by the Board of Supervisors in 2012 but required plans have not been completed or if completed not implemented. There does not appear to be funding or staff available to complete the plans. Please include this information in the DEIR.

The DEIR's proposed Lake Cachuma North Shore Trails & Recreation Facilities Management Plan (North Shore Trails Project) must be consistent with the Management Agreement.

O.3-3

Writ of Mandate

The Writ of Mandate was a result of challenge brought on and Categorical Exemption by the County of Santa Barbara to open the Live Oak Trail to hikers and mountain bikes via a Pilot Project. However, the project description of the Categorical Exemption did not specify "Pilot Project" thus clearing the way for introduction of new trail users in the long term. The Courts reviewed the case and found the County erred in its decision. The County's CEQA review was deemed inadequate. The County appealed the decision, and the Court upheld its determination. The Court issued its final decision in the Writ of Mandate filed 1/16/23.

The County was ordered to suspend all Live Oak Trail recreational activity other than horseback riding and any and all other activities pursuant to the challenged Project decisions, determinations, and approvals that could result in any change or alteration to the physical environment until all actions necessary to bring the Project's environmental review, decisions, and determinations into full compliance with CEQA, the CEQA Guidelines (Cal. Code of Regulations, title 14, §§ 15000 et seq.), the National Environmental Protection Act ("NEPA"), and the Court's Statement of Decision.

Further, the court ordered a number of measures to restore the Trail to equestrian use. Any and all measures used to control access to Live Oak Trail that were removed or modified to support the intensification (introduction of hikers and mountain bikes by the County during the pandemic) in lieu of the former equestrian-only usage were restored.

Comment: Please include a summary of the Courts' findings, direction and requirements in the Writ of Mandate that must be fulfilled prior to intensification of use on the Live Oak Trail.

County of Santa Barbara Comprehensive Plan, Conservation Element:

O.3-4

The Conservation Element of the County's Comprehensive Plan Provides guidance on the types of uses allowed on consumers North Shore and at the Santa Ynez River. These policies are discussed below:

O.3-4 cont.

PROTECTION OF WATER RESOURCES, Category 2, Areas Tributary to Present Major Surface Water Supplies – the Conservation Plan states that:

"*Facilities providing significant surface water supplies that were considered in defining Category 2 include Gibraltar, Jameson, and Cachuma reservoirs along with several small reservoirs located north of Goleta and Santa Barbara on the coastal side of the Santa Ynez Mountains. Twitchell Reservoir was excluded from Category 2 because its primary purpose is to provide groundwater recharge.*

In this category, activities should not be permitted that would significantly degrade the quality of the surface water supplies or increase silt production. Accordingly, the amount of development should be limited, and controls should be imposed on development to prevent deleterious effects.

Light recreational activities should cause few problems, provided that sanitary pollution from such usage is prevented and erosion is not increased. Intensive recreational usage could be somewhat more of a problem because of the potentially greater sanitary pollution load resulting in more people using the area. (Page 26)"

Comment: The North Shore Trails Project would, in fact, increase the type of recreation use as well as the number of recreational users drawn to the Live Oak Trail and increase human intrusion. Impacts from increased recreation was documented during the trail's brief opening to hikers during the Pandemic, where increases in trash, human waste, and erosion at the Santa Ynez River crossing and on the Live Oak Trail were conspicuous. Inadequate staffing and budget to support their increased responsibilities concerns (i.e., trash and restroom facilities) and monitoring of the Santa Ynez River crossing, as well as all along the Live Oak Trail would result in significant water quality impacts. Therefore, the Project cannot be found consistent with the Conservation Element of the Comprehensive Plan. As noted below, we also expect the River crossing to become the newest "swimming hole" on the Santa Ynez River – the new "Red Rock" decreasing water quality in the river, the County's primary surface water supply.

In addition, much of the trail system involves steep trails and blind curves and all of the trail system is untreated dirt. It is entirely disingenuous to ignore the obvious increase in erosion and siltation from unregulated mountain bike access to these trails. The lack of Park staff and monitoring will make intensification of use and human intrusion brought on by hikers and mountain bikes is a significant impact.

Under SPECIES AND ECOLOGICAL COMMUNITIES OF PARTICULAR VALUE it states that: O.3-5

"*Southern Bald Eagle (Haliaeetus leucocephalus) - Although not as rare as the Peregrine Falcon, this species, our national bird, is rapidly diminishing in numbers and faces the threat of extinction. According to Waldo Abbott of the Santa Barbara Museum of Natural History, several eagles nested in the late 1930's along the South Coast (Dos Pueblos Ranch, Rincon Creek,*

O.3-5 cont.

Mission Creek, Santa Cruz Island, and Anacapa Island) with the Dos Pueblos Ranch nest remaining active for about twenty years. There have been few recent sightings in the County. One bird, probably a migrant, was seen at the Santa Barbara Bird Refuge in the fall of 1971. Slightly more encouraging, however, is the almost yearly appearance of several wintering birds at Lake Cachuma. Metcalf (1972) comments that one to four birds have wintered at Cachuma in eight of the past eleven years. If we expect these birds to continue to use the area, it is imperative that portions of the lake be left undisturbed. The present policy of limiting camping and recreational activity to the western two-thirds of the lake is suitable. Under no circumstances should the eastern end of the lake be opened to human use; the continuing presence of the eagles may depend on it." (Pages 113-114).

Comments: Please add the following information:

An analysis for equestrian trail riding on the North Shore was conducted and focused on impacts to the Bald Eagle population on the north shore, east side of the lake as part of the **1989 Management Plan for the Cachuma Lake Equestrian Trail.** The study entitled "Management Recommendations for Bald Eagles at Lake Cachuma County Park", prepared by Phillip J. Detrich of ECOS Environmental Consultants (April 1989) was commissioned and evaluated recreational activities of Boat Tours, Fishing and Horseback Riding on the Bald Eagles. With respect to horseback riding, the study states:

"At the present time, riding is confined to trails which are not associated with eagle use areas. The back country horse trails north of the lake do not enter private lands which include the known roost sites. *In general, eagles are less disturbed by people on horseback than by people on foot. Combined, these factors suggest that the current level of riding use creates little disturbance to eagles; however, these activities should be monitored and any change in use patterns carefully evaluated."* (Page 11)

It has been over 30 years since that study was completed and trail rider numbers have remained steady or slightly increased according to our field observations. Actual data counts have been destroyed, according to Parks staff, and we believe the recently collected Parks data for equestrian use is inaccurate. In the intervening time, the Bald Eagles at Cachuma Lake have gone from an over-wintering migrant population to a permanent, resident nesting population. The Bald Eagle as an overall species has recovered from the brink of extinction, so much so that the species was delisted from the Federal Endangered Species list. However, the Bald Eagle, remains an Endangered Species under the California Threatened and Endangered Species Act to this day. Given the expansion of the Eagles' permanent use of Santa Cruz Canyon and Cachuma's North Shore, equestrian trail riders and grazing lease have is proof the uses are beneficial and compatible over all these years.

O.3-5 cont.

CEQA requires the “Best available science” defined as the **best scientific information and data** for informing management and policy decisions. Please add the information from and add to the DEIR bibliography and review the California Fish and Wildlife Journal (CFWJ) devoted to evaluating recreational trail users and their effect on wildlife during the Pandemic, the report entitled "Balancing Conservation and Recreation”[9], July, 2020 is the most recent scientific evidence on recreational use with the public’s increased interest in recreation (CFWJ is a peer-reviewed, scientific journal focused on the biology, ecology, and conservation of the flora and fauna of California).

The current Project to increase user number and types of recreation on the North Shore as proposed would result in increased human intrusion (hikers mountain bikes, bathers, picnickers). The CFWJ study by Elizabeth Lucas found that: all wildlife are disturbed by mountain biking, hiking, and horseback riding but *biking is the most disruptive, followed by hiking and then by horseback riding. ALL human activity disrupts wildlife.*

The findings attributed the disturbance to the following distinguishing facets of mountain biking:

"Together with the extent and creation and use of unauthorized trails and technical trail features by mountain bikers, the mass-marketing of the sport, and the very large numbers of mountain bikers (Burgin and Hardiman 2012), at least four facets of mountain biking distinguish it from other recreational activities such that it may be of potentially greater concern with respect to its effects on wildlife: distance traveled, speed of travel, biking in the dark, and political lobbying and advocacy.” (emphasis added).

Comment: To support the report’s finding, the equestrian trail riding on the Live Oak Trail obviously has not been detrimental to the Cachuma’s Bald Eagle population over time. But mountain biking is an incompatible use on Live Oak Trail. Introduction of mountain bikes and hikers into the area in and around Santa Cruz Canyon on Cachuma’s North Shore would have significant impacts to the Eagle population due to factors and behaviors cited above. We cannot determine the level of impacts because there has been no recent studies or analysis. We expect that if and when the County appropriately consults with the National Marine Fisheries Service (NMFS), some concern will be raised for Southern Steelhead.

The development and implementation of a Management Plan on the North Shore has been required through other environmental review and regulatory processes and documents (i.e. CRMP and others) and provides evidence that the mitigation to create yet another Management Plan for the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan in the DEIR and

[9] “A Review Of Trail-Related Fragmentation, Unauthorized Trails, and Other Aspects if Recreation Ecology In Protected Areas” by Elizabeth Lucas, Page 95, Balancing Conservation and Recreation, California Fish and Wildlife Journal, July 2020

O.3-5 cont.

its implementation cannot be assured and therefore is considered feasible mitigation. The CRMP prohibits a trail around the lake.

O.3-6

AQUATIC FRESHWATER COMMUNITIES. The Conservation Plan reads:

"96. Lake Cachuma (1-2-3, 1-1-1)

Location: In the eastern end of the Santa Ynez Valley, approximately 15 miles northwest of Santa Barbara.

Biological comments: Cachuma Lake, the largest inland body of water in the County, attracts numerous migratory birds and acts as home for a wide variety of plants and animals. A rookery of Great Blue Herons can be found in the dead Valley Oak (Quercus lobata) at the eastern end of the lake. It also is possible to observe such uncommon predatory birds as Sharp-shinned Hawks, Cooper's Hawks, Red-shouldered Hawks, Ospreys, and the endangered Southern Bald Eagle at this same section of the lake.

Recommendations: The eastern end of the lake, at present undisturbed, should continue to receive total protection. Traffic into this portion of the lake would reduce the attractiveness of this habitat to the large birds of prey which now frequent the area. It also would be desirable to maintain the Park Department's present policy of preventing use of the northern shore." (page 146)

CONCLUSIONS AND RECOMMENDATIONS

"Aquatic Habitats

The eastern end of Lake Cachuma should remain undisturbed to protect the bird habitat, and the lake's north shore also should remain closed to the public." (Page 157)

Comments: Total Protection. The Lake Cachuma North Shore Trails & Recreation Facilities Management Plan is inconsistent with this policy. The Santa Ynez River (River) crossing just past the Live Oak Trail Head is of major concern with new bathers, picnickers, pedestrian and bicycle users.

In the Spring, a deep pool forms on either side of the River crossing. With influx of the hikers and mountain bikers, the area may also attract bather and picnickers with no interest in the Trail, also an expansion of the Live Oak Trail's use. The pools are expected to become the new swimming hole that will surely be picked up on by social media and broadcast widely.
The attractiveness of the pools and the ease in which Live Oak Trail is accessed off the local highway, make this area ripe for astronomical human intrusion. We see the effects of human intrusion in other recreational areas, trailheads, parks, even in traditional dispersed camping areas. The Live Oak Trail River crossing would be subject to the same issues (trash, human waste, safety, and fire, conflict) as the popular Red Rock swimming area upstream, in the Los Padres National Forest. These issues will translate into degradation of water quality, riparian vegetation,

O.3-6 cont.

and aquatic habitat at the River crossing. The Project, therefore, as described, is inconsistent with the water quality policies of the Conservation Element of the Comprehensive Plan. In no other instance has the language, intended to protect aquatic habitats and consequently, water quality, been so precise and strongly targeted to a specific area.

The development and implementation of a Management Plan on the North Shore has been required through other environmental review and regulatory processes and documents (i.e. CRMP, Management Agreement and others). The lack of ability to develop and implement required Management Plans is evidence that the mitigation for the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan in the DEIR to create yet another Management Plan for the area and its implementation cannot to reduce any impacts cannot be assured and therefore is considered infeasible mitigation.

Please include this discussion in the DEIR.

O.3-7

Recommendations for a Management Plan for the Cachuma Lake Equestrian Trail 1989: The DEIR must disclose the historical development of the Live Oak trail and that a Management Plan (Management Plan) was created in 1989 to develop management strategy and the special studies accomplished prior to opening the Live Oak Trail to equestrian trail riding.

The detail with which the Management Plan was developed is the gold standard for any project considered for the North Shore. However, the implementing actions never completed management and promotion for the Live Oak (aka the Cachuma Equestrian Trail) as an equestrian trail and grazing. The document includes special status species reports, management recommendations, etc. which give a comprehensive 30 year history of the baseline conditions then and what they are now.

The 1989 Management Plan was accepted by the Parks Department Director at the time, Mike Pahos. Mr. Pahos in his September 25, 1989, memo to the Parks Commission (submitted during scoping) outlined implementation actions for Parks staff in the 1989 Management Plan for Management Plan implementation. A copy of the Management Plan has been provided to the Planning Commission, Parks Commission, the Parks Division and in our previous Scoping comments for the DEIR.

Comment: The DEIR must disclose the 1989 Management Plan and summarize the detail and special studies accomplished prior to opening the Live Oak Trail to equestrian trail riding.

We appreciate the attempt to fulfill one of the mitigation measures outlined in the CRMP and Management Agreement by requiring the County to prepare an overall North Shore Trails Management Plan for the DEIR. But past experience has shown that requiring a Management Plan is a huge hurdle in terms of funding and staffing to develop the plan, comply with address impacts and required mitigation measures in the existing applicable documents discussed above, and requires additional resources to implement the actions required in Management Plans. Professional and comprehensive effort was put into the 1989 Management Plan, but the County fell

O.3-7 cont.

short of implementing the actions described, the least of which was advertising the trail for horseback riding to increase the Trail's use (Please see attachment A)

Comment: Past performance of agreeing to prepare future Management Plan with no stated deadline or goals for a mitigation and management of the North Shore cannot be considered feasible. The lack of follow through, goals, action items and monitoring to describe and carry out management actions to achieve intended mitigation goals has a history of falling short when management plans have been required in the past (as required in the CRMP for example), providing little to no management at all. Significant impacts will result issue areas of the DEIR such as Biological Resources and Water Quality and Erosion on Cachuma's North Shore and be in conflict with the County's Comprehensive Plan policies discussed above.

Public Equestrian Facility, Page 2-30. O.3-8

It is appropriate to include trailer parking and equestrian trailhead access and signage as well as overnight accommodations as option to support equestrian trail use at the Live Oak Trail. The project would reestablish an equestrian campground at Live Oak Camp as anticipated in the Cachuma Resource Management Plan CRMP as discussed above.

Comment: We appreciate that a campground has been appropriately sited to provide a public outdoor equestrian facility near Live Oak Campground and Live Oak Trail. The two equestrian campgrounds formerly available at Cachuma Recreation Area have been removed without public notification or comment in past years. One camp was located at what is now Mohawk Group Camp that currently caters to mountain bike recreation, and the adjacent Mesa Trail (formerly an equestrian trail) has become a bike track. The other equestrian camp at Live Oak Camp is identified in the 2012 Cachuma Resource Management Plan but is not currently a dedicated equestrian camp by the County (See Figure 3.9-3 of the CRMP). Also note that horseback riding is currently prohibited from the trails on Cachuma's south shore.

O.3-9

Pack-In/Pack-Out Campground , Page 2-30. A remote campground on the North Shore of Cachuma Lake was anticipated in the CRMP, however, the project description in the RMP has implications for the Live Oak Trail, because the project does not identify if the camp will be open to new users by opening the Live Oak Trail and the North Shore to hikers, mountain bikes and others.

Comment: This action will intensify use and recreational use on the North Shore that is limited by the CRMP. If adding users in number and type of recreation are allowed to access the Camp via Live Oak Trail, the campground will be a vehicle to intensify use and increase human intrusion to this remote area. Significant impacts to water quality (due to the Santa Ynez River Crossing), biological resources (sensitive species, including bald eagles), fire protection and other resources will occur.

O.3-10

Comment: Please add the above information to the DEIR and describe the regulatory review required for this project as identified in our following comments and on the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan below, Ensure the DEIR includes CRMP

O.3-10 cont.

impact levels and mitigations by reference and that the two documents (CRMP and DEIR significance criteria and mitigations are consistent.

O.3-11

North Shore Trails Project , Page 2-30. Expanding the Live Oak Trail to hikers and bikers was included in the CRMP however, all projects proposed <u>are not required to be implemented</u> as per the Management Agreement. These documents work in concert to meet the goals of the CRMP. The Live Oak Trail and balance recreation with other resources at the Cachuma Recreation Area.

Comment: Please state the North Shore Trails Project objective. The Live Oak Trails is an equestrian trail, and the base line is retaining that trail use. The project objective must include the history and response to comments received by the Santa Ynez Community during public outreach and scoping. All new uses must be viewed as intensification of use and lead to human intrusion which require feasible mitigation. Human intrusion and effects on the rural area requires significant justification.

Comment: Revise the project description as follows in light of the requirements in the CRMP, Management Agreement, Wirt of Mandate and Comprehensive Plan. This revision to the project description will limit recreation intensification, human intrusion and continue to provide a recreation opportunity that recognizes equality for equestrians in the County's trail inventory. This is not a new concept for the Parks Division. The DEIR must disclose that other trails allow only certain users. For example, Foothill Preserve only allows hikers. The revision below will bring the project into compliance with the regulatory documents described above and the County's precedent of designated -one, -two, or more user types on any one trail:

The existing equestrian trail network on the north side of Lake Cachuma would be improved and expanded to support equestrians. The trail system would offer scenic routes in varying terrain for riders of various skill levels to encourage advancement of local equestrian pursuits. The trail system could provide an "out and back" experience. The trail system would connect to existing and planned facilities at Live Oak Campground and a proposed primitive pack-in/pack-out campground.

The purpose of the project is to expand and support the existing equestrian trail network that emphasizes horse and rider safety on the North Shore of Lake Cachuma

Lake Cachuma North Shore Trails & Recreation Facilities Management Plan Table, Page 2-31

O.3-12

Lake Cachuma North Shore Trails & Recreation Facilities Management Plan	
Type	*Recreational Trails, Campground*
Responsible Agencies	*County Parks, U.S. Bureau of Reclamation*
Add'l Parkland	*0 acres*
<u>Existing Trails</u>	*<u>12 miles</u>*
Add'l Trails	*~~15~~ <u>3</u> miles*
Timing	*Long-term (10 – 20 years)*

O.3-12 cont.

Comment: Edit the table above to reflect the accurate number on NEW miles anticipated for other users given the restrictions, requirements and mitigations of the CRMP. The current trail miles "officially" encompassing the Live Oak Trail is 12 miles. Please clarify that there are 12 miles of equestrian trail on the North Shore and adjust the number of miles added under the RMP, under the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan and, where it occurs, throughout the DEIR. An accurate number of existing equestrian trail miles on the north shore gives an accurate baseline for the future analysis to develop the Plan.

O.3-13

Comment: Revise the project description to be more in compliance with CRMP and other guiding documents. The DEIR should acknowledge that with the regulatory requirements and follow-up resources required to create and implement a North Shore Trails & Recreation Facilities Management Plan as well as past performance to carry out Management plans render this mitigation measure infeasible.

O.3-14

General Comments:

1. The extent of impacts of the RMP cannot be fully disclosed without design standards, policies and guidelines that would determine level of impacts and mitigations. There are references in the DEIR that elude to revising the Comprehensive Plan and its Element and Zoning to conform with the goals of the RMP and the Recreation Benefit Program (RBP) to increase recreation opportunities. Disclose that updates are currently occurring and awaiting the final RMP before going forward. The Open Space Element updated is currently in process to conform with the RMP. It appears the RMP is the driver for sweeping changes to the County's Comprehensive Plan and Zoning while minimizing public notification and comment for its anticipated 50 year life.

   For five years the County Riding and Hiking Advisory Committee (CRAHTAC) has asked for design guidelines, and a subcommittee was formed to develop a trail policy to ensure all trail recreation is represented based on safety, trail terrain and other qualifiers. That policy was developed and forwarded to the Parks Division, but policies are not part of the project description or analysis for the RMP. The full level of impacts and viable mitigations cannot be fully determined until they are more fully defined.

O.3-15

2. The Conservation Element Policies as discussed above must, at a minimum, be retained with current language. Do not touch the Conservation Element and in particular the policies pertinent to the North Shore and the Santa Ynez River to accommodate the RMP.

   If anything, the language in the Conservation Element should be strengthened to say **shall** be limited rather than should. No development or change in use has occurred on the North Shore for the past 30 years. Equestrians and grazing are the only uses allowed and are the baseline for any environmental analysis.

   The resources protected by the Conservation Element have become more critical In the cumulative sense such areas are becoming degraded, smaller and more fragmented. The RMP does not document the need for more trails in the Santa Ynez Valley planning area,

O.3-15 cont.

therefore no intensification of use and no additional human intrusion should be allowed on the North Shore of Cachuma. The need for more variety in trails in outweighed by the need to protect the resources that occur there.

O.3-16

3. Please add a mitigation measure in the DEIR requiring a policy that leaving the scene of an accident on a trail is a punishable offense. We have provided 20 years' worth of data in our scoping comments to document the frequency with which mountain bikers cause incidents with hikers and equestrians using trail then they leave the scene. The victims of the incidents have no way of holding the responsible party accountable nor recoup anything for their losses. Injuries from incidents result in injuries and deaths.

O.3-17

4. Please correct the Recreation Inventory Map for the Santa Barbara County Recreation Master Plan[10]. The map misidentifies the Live Oak Trail at Cachuma Recreation Area North Shore as US BOR- JEEP TRAIL. Relabel the trail as Live Oak Equestrian Trail.

Comments Summary:

O.3-18

The management of the Cachuma Recreation Area is unique in the County's inventory of parks and trails. The DEIR is required to fully disclose and discuss all applicable documents discussed above in this letter for management of the Cachuma Recreation Area.

Acknowledgement of the Live Oak Trail as a dedicated equestrian trail in 1989 and disclosure in the DEIR of its creation are mandatory under CEQA. The County over the years has failed to include the Live Oak Trail as an equestrian trail in any planning documents. The Board of Supervisors approval of the CRMP EIS/EIR and the establishment of fees for trail use when the trail was established in 1988-89. This action stands as proof the trail was established as a low intensity recreational resource for horseback riders and grazing for fire protection. T North Shore of Cachuma is identified as an important watershed area to protect water and water delivery in the US BOR's CRMP.

The DEIR for the Rec Plan must document the guiding documents and processes as well as the County's own Conservation Element policies of the Comprehensive Plan – Conservation Element - with required development standards required to expand recreational use on the North Shore if at all. The lack of mitigations, policies and development standard details that would limit increased recreational intensification, and human intrusion, and emphasize the North Shore's primary purpose to use grazing as a fuel reduction measure and reduce fire danger as well as maintaining equestrian riding as a low-impact, recreation activity limit intensification and human intrusion thus minimizing impacts to sensitive resources in compliance with the County's own Comprehensive Plan.

The impacts caused by implementation of the Rec Plan without disclosing design guidelines, policies and zoning changes as well as discussing impacts precipitated by those changes would all

[10]Recreation Inventory Map for the Santa Barbara County Recreation Master Plan, https://indib26d6560a53c.maps.arcgis.com/apps/instant/atlas/index.html?appid=29862124925448daa0f34d707d8155ea&webmap=6c533d5e281b42d381c814e3b492b008

O.3-18 cont.

be considered significant unavoidable in particular to the North Shore of Cachuma. The North Shore is a unique and important area hence the particular attention paid to it in the Conservation Element.

In conclusion, our concerns are that the DEIR is not fully disclosing the regulatory documents, impacts, mitigations and management that guide development and changes in use at Cachuma and the North Shore. The DEIR assumes development on the North Shore is a given and that with “minor” changes to the Conservation Element, could be brought into conformance with the County’s Comprehensive Plan, rather than evaluating the impacts against the existing physical environmental baseline.

Relatedly, it appears that the DEIR minimizes environmental impacts by comparing the project's consequences to what will be allowed under the newly amended Comprehensive Plan. It appears to violate CEQA's mandate to provide an accurate baseline analysis. As such, the DEIR fails as an informational document under CEQA.

Thank you for the opportunity to comment.

Sincerely,
Kathy Rosenthal, President
Santa Ynez Valley Riders and Equestrian Trail Coalition

Comment Letter O.3 – Santa Ynez Valley Riders and Equestrian Trail Alliance

Comment Response O.3-1

Thank you for your comments. The comment states that the Draft EIR does not adequately disclose the applicable regulatory framework for recreation and trail expansion allowed on the north shore of Lake Cachuma. The comment identifies several documents that, in its view, should be discussed in the Program EIR, including the Cachuma Lake Final Resource Management Plan/EIS, the Agreement Between the United States of America and the County of Santa Barbara for the Management of the Recreation at Lake Cachuma (Management Agreement), the Superior Court Amended Writ of Mandate, the Santa Barbara County Comprehensive Plan Conservation Element, and the *Recommendations for a Management Plan for the Cachuma Lake Equestrian Trail*. The comment also references provisions and mitigation measures identified in the Cachuma Lake Final Resource Management Plan/EIS and states that they should be discussed in the EIR's regulatory setting and in relation to the future management framework for the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan.

This EIR is a program-level environmental review document prepared pursuant to CEQA Guidelines Section 15168. As described in Chapter 1, *Introduction*, a programmatic analysis is appropriate because site-specific development, land use, and operational details associated with potential future recreational improvements are not currently known. Accordingly, the Program EIR evaluates broad programmatic impacts, identifies mitigation measures and planning considerations that may apply to future implementing projects, and provides a framework for subsequent environmental review when project-specific information becomes available.

Because the Recreation Master Plan is a program-level planning document, many of the recreational facilities and improvements identified in Chapter 2, *Project Description*, are conceptual and have not been developed to a level that supports project-specific environmental analysis. Section 2.5.1, *Planned County Parks, Recreation, and Trails Project under the Recreation Master Plan,* identifies the Lake Cachuma North Shore Trails & Recreational Facilities Management Plan as an existing, ongoing planning effort that could guide recreational access on the north shore of Lake Cachuma and help meet recreational needs identified through the Recreation Master Plan. However, adopting the Recreation Master Plan does not approve or permit a specific development project and does not define specific improvements, or determine final trail alignments, facility locations, user assignments, or operational requirements. Rather, adoption of the Recreation Master Plan would empower County Parks, in partnership with the U.S. Bureau of Reclamation, to prepare a Cachuma North Shore Trail System & Recreation Facility Management Plan to provide public recreational access while protecting natural resources, including water quality, biological resources, geology and soils, agricultural resources, and public recreation. The identification of this improvement plan is not a new improvement project proposed as part of the Recreation Master Plan, but instead reflects the existing management strategy and improvement program originally identified and

described as part of Alternative 2 in the Cachuma Lake Final Resource Management Plan/EIS, which was selected and approved by the U.S. Bureau of Reclamation as part of its Record of Decision (ROD 10-112).

Section 2.5.1 further explains that the management plan, including any project-specific improvements, would be prepared through a public planning process and would be subject to subsequent environmental review pursuant to CEQA and NEPA. Future planning for the north shore would need to account for applicable legal, regulatory, resource management, and land management requirements then in effect, including any requirements arising from federal agency coordination or court judgments.

Comment Response O.3-2

The comment discusses key provisions of the Cachuma Management Agreement and states that the agreement and its management requirements should be discussed in the Program EIR. The comment also notes that certain planning efforts identified in the Cachuma Lake Final Resources Management Plan have not been completed and states that future management planning should be consistent with the Cachuma Management Agreement. Please refer to Comment Response O.3-1 above.

Comment Response O.3-3

The comment discusses the background and context that resulted in the Writ of Mandate associated with prior County actions affecting the Live Oak Trail and states that additional discussion of the court's findings and requirements should be included in the Program EIR. Please refer to Comment Response O.3-1 above.

Comment Response O.3-4

The comment suggests that increased recreational opportunities, and therefore increased human presence, resulting from the Recreation Master Plan could create impacts to the Santa Ynez River and to Live Oak Trail. In particular, the comment asserts that increased human intrusion may result in significant water quality impacts. The comment also suggests that increased mountain bike usage on the existing trail system could increase erosion and siltation impacts to trails. The comment emphasizes that these potential impacts would directly conflict with the directives of Category 2 (Areas Tributary to Present Major Surface Water Supplies) found within the County's Conservation Element within the Comprehensive Plan.

The EIR appropriately analyzes the potential impacts to water quality at a level of detail appropriate for a programmatic planning document. Section 3.10, *Hydrology and Water Quality*, acknowledges that future parks, recreation facilities, and trails facilitated by the Recreation Master Plan could result in erosion, sediment transport, and polluted runoff during construction and operation. Specifically, the EIR recognizes that expansion of the trail network at Lake Cachuma could increase erosion and runoff-related impacts. Detailed programmatic analysis of such impacts is provided in Section 3.10, *Hydrology and Water Quality*. As discussed in the Impact HWR-1 and Impact HWR-3, future parks, recreation facilities, trails, and RBPs

facilitated by the Project would be required to comply with applicable federal, state, and local water quality regulations, including stormwater management, erosion and sediment control, grading, and discharge requirements. Projects disturbing one acre or more would be required to prepare and implement a Storm Water Pollution Prevention Plan (SWPPP) and incorporate best management practices to minimize erosion, sedimentation, and pollutant runoff. In addition, future recreation and trail projects would be subject to County development standards and permitting requirements intended to protect surface water and groundwater quality, and projects with the potential for site-specific water quality impacts would undergo additional environmental review, as appropriate.

Further, as discussed in Comment Response O.3-1 above, the Recreation Master Plan introduces the management plan as a framework for future recreation planning and identifies the types of recreational facilities and opportunities that could be considered on the north shore. However, the Recreation Master Plan does not approve specific recreational facilities, trail alignments, or operational changes on the north shore of Lake Cachuma. Future recreational access and facilities on the north shore would be further addressed through preparation of the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan, which would be developed through a public planning process and would be subject to subsequent environmental review pursuant to CEQA and NEPA, as well as all applicable legal proceedings and requirements. Applicable Conservation Element policies, resource protection requirements, and other planning provisions relevant to future recreational facilities, trail alignments, management actions, and operational provisions would be considered during preparation of the management plan and subsequent project-level environmental review, when sufficient detail regarding proposed trail and recreation facility improvements is available to evaluate. However, it is important to note that as a proposed County-sponsored project, the proposed plan and improvements must comply with all adopted plans and policies, including applicable policies of the County's Comprehensive Plan.

Comment Response O.3-5

The comment cites additional language from the County's Conservation Element regarding species and ecological communities of particular value in the vicinity of Lake Cachuma and references information regarding bald eagle management, wildlife responses to recreational activity, and potential effects on sensitive species, including Southern steelhead. The comment also references the *Recommendations for a Management Plan for the Cachuma Lake Equestrian Trail* (1989), and the California Fish and Wildlife Journal report *Balancing Conservation and Recreation* (2020), and asserts that expanded recreational uses could adversely affect wildlife resources on the north shore.

The EIR appropriately analyzes the potential impacts to species and ecological communities of particular value at a level of detail appropriate for a programmatic EIR. Section 3.4, *Biological Resources*, acknowledges that development and operation of the parks, recreation, and trails enabled by the Project could have a substantial adverse effect, either directly or indirectly 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 U.S. Fish and Wildlife Service (USFWS). As described in Section 3.4, *Biological Resources*, future recreational development enabled under the Recreation Master Plan would be subject to the wide range of existing federal, state, and county policies, and development standards proposed under the Project that would avoid or minimize impacts. This would include the proposed development standards for trails for hiking and riding requiring that trails be sited in disturbed or developed areas and comply with habitat and cultural resource protection standards. The EIR also identifies several mitigation measures to reduce impacts. These include **MM BIO-1 (Tree Protection Plan)** and **MM BIO-2 (Habitat Protection Plan)** that would be applicable to all permitted uses in Recreation zones, permitted parks and trails, and RBPs, and would require site-specific surveys of protected biological resources and the avoidance, minimization, or compensatory replacement of affected resources. With mandatory compliance with existing policies and proposed development standards, as well as with implementation of identified mitigation measures, Project impacts were determined to be significant but mitigable.

Notably, given that the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan is subject to the Cachuma Lake Final Resource Management Plan/EIS, any future improvements developed under this planned project would be subject to the findings and environmental commitments identified in the EIS and ROD. As specified in the ROD and described in this EIR's description of the proposed Lake Cachuma North Shore Trails & Recreation Facilities Management Plan, development of this proposed plan would require additional planning and subsequent environmental review in compliance with CEQA and NEPA.

Comment Response O.3-6

The comment references Conservation Element comments and recommendations intended to protect aquatic freshwater communities and wildlife habitat associated with Lake Cachuma and the Santa Ynez River corridor. The comment states that recreational use facilitated through the north shore improvements could increase human intrusion and adversely affect aquatic habitat, wildlife resources, water quality, and recreational values on the north shore. Please refer to Comment Response O.3-4 and Comment Response O.3-5 above.

Comment Response O.3-7

The comment introduces the *Recommendations for a Management Plan for the Cachuma Lake Equestrian Trail* (1989) and provides background on the document's purpose in relation to the development of Live Oak Trail. The comment states that the EIR should disclose the planning efforts and special studies completed before opening the trail for equestrian use, and asserts that without implementation of these recommendations, increased recreational use of the north shore could result in significant effects to water quality, riparian vegetation, aquatic habitats, and biological resources. Please refer to Comment Responses O.3-1, O.3-4, O.3-5, and O.3-6 above.

Comment Response O.3-8

The comment expresses support for the proposed public equestrian campground and notes the reduction of equestrian camping opportunities previously available at Lake Cachuma, as well as existing restrictions on horseback riding on south shore trails. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR.

Comment Response O.3-9

The comment states that the proposed pack-in/pack-out campground could intensify recreational use of the north shore and result in impacts to biological resources, water quality, fire protection, and other environmental resources. Please refer to Comment Responses O.3-1, O.3-4, O.3-5, and O.3-6 above.

With respect to concerns for fire protection, the EIR appropriately analyzes the potential impacts to wildfire risks at a level of detail appropriate for a programmatic planning document. Section 3.17, *Wildfire*, acknowledges that the County includes extensive areas subject to high wildfire hazards, including wildland-urban interface (WUI) areas or High/Very High Fire Hazard Severity Zones (FHSZ), and that future development and operation of parks, recreation, and trails enabled by the Recreation Master Plan could increase public access or recreational activity in areas vulnerable to wildfire. The EIR provides a detailed impact analysis for such disturbances at a programmatic level. As discussed in Section 3.17.2.5, *Recreation and Wildfire*, the County currently operates parks and recreational facilities in areas subject to high wildfire hazard and implements operational procedures, fuel management practices, and regulatory requirements designed to reduce wildfire risk. While future recreation projects facilitated by the Project could occur within High/Very High FHSZ, such projects would be required to comply with applicable fire safety regulations, Comprehensive Plan policies, County permitting requirements, and proposed development standards designed to reduce wildfire and post-wildfire hazards. Trail projects would be required to comply with U.S. Forest Service trail design, construction, and maintenance standards adopted by the County and would be subject to operational requirements intended to reduce ignition risk. In addition, by allowing trails as a regulated and permitted use in additional zoning districts, the Project would subject future trail development to established development standards and County oversight. Projects with the potential to exacerbate wildfire risks would be subject to discretionary review and, where appropriate, supplemental environmental review.

Further, with respect to the proposed Lake Cachuma North Shore Trails & Recreation Facilities Management Plan, the Recreation Master Plan and EIR describe that under this proposed plan, County Parks would limit access during severe fire conditions when prolonged high temperatures, winds, or other factors that may prohibit entry occur to minimize the risk of wildfire in the Cachuma Lake Recreation Area. As detailed in Comment Response I.8-1 above, the Lake Cachuma North Shore Trail System & Recreation Facilities Management Plan would

be prepared through a public process involving community and stakeholder input and subsequent environmental review in compliance with CEQA and NEPA, which would include further consideration of project-specific impacts on wildfire hazards. For these reasons, impacts were determined to be insignificant.

Comment Response O.3-10

The comment states that the EIR should include additional discussion regarding regulatory review requirements applicable to future north shore recreational projects and discussion of Cachuma Lake Final Resource Management Plan/EIS impact levels and mitigation requirements to ensure consistency. Please refer to Comment Response O.3-1 above.

Comment Response O.3-11

The comment states that the objectives of the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan should be specifically identified within the EIR and asserts that all new uses of existing recreational resources should be considered intensification of use. The comment further states that project objectives should reflect the history of public outreach and comments received from the Santa Ynez Valley community and proposes revisions to the Project Description that would limit certain recreational trails to specific user groups. Please refer to Comment Response O.3-1 above.

Comment Response O.3-12

The comment identifies what it characterizes as inaccuracies in the trail mileage information presented for the management plan and requests clarification regarding the existing and proposed trail mileage associated with the north shore trail system.

The trail mileage presented in the table under Section 2.5.1 is a programmatic-level estimate of trail improvements and recreational opportunities that could be considered through the development and preparation of the future Lake Cachuma North Shore Trails & Recreation Facilities Management Plan. It is not intended to inventory the existing mileage of equestrian trails within the Cachuma Recreation Area. Rather, the row denoting additional trails reflects the County's assumption that implementation of future projects under the management plan could result in the addition of up to approximately 15 miles of trail. This estimate is intended to illustrate the potential scale of trail improvements that may be considered under the management plan and informs the assumptions for the analysis of impacts in this Program EIR. However, as discussed in comment responses above, the Recreation Master Plan establishes a framework for future recreation planning but does not approve specific trail alignments or north shore improvements. Accordingly, the precise location, configuration, and mileage of future trails would be determined through preparation of the management plan and any subsequent project-level environmental review under CEQA and NEPA.

Comment Response O.3-13

The comment contends that the EIR Project Description should be revised to fully reflect the requirements of the Cachuma Lake Final Resource Management Plan/EIS and other planning documents applicable to future recreational use of the north shore. Please refer to Comment Response O.3-1 above.

Comment Response O.3-14

The comment asserts that the impacts of the Project cannot be fully disclosed or analyzed without design standards, policies, and guidelines proposed by the Recreation Master Plan and related amendments to the Comprehensive Plan, zoning regulations, and other County policies. However, draft ordinance language or amendment packages are not necessary to provide an accurate, stable, and finite project description, as required by CEQA. The Project Description provided in the EIR clearly meets the requirements of CEQA Guidelines Section 15124 and 15168. A detailed discussion of the proposed improvements and amendments to the Comprehensive Plan and zoning ordinances is presented in Section 2.5, *Project Components,* which forms the basis for the programmatic impact analysis presented in this Program EIR. Specifically, a detailed summary of the proposed Comprehensive Plan amendments and proposed goals and policies addressing recreational uses is provided under Section 2.5.2, *Comprehensive Plan Amendments for Parks, Recreation, and Trails,* while a detailed summary of the proposed zoning ordinance amendments and detailed development standards is provided in Section 2.5.2, *Zoning Ordinance Amendments.* Each of these sections details the design standards, policies, and guidelines proposed by the Recreation Master Plan and serves as the basis for the forthcoming Comprehensive Plan and zoning ordinance amendments packages.

The County acknowledges that the final amendment language will be further refined as part of the public hearing process. As described in Section 2.2, *Recreation Master Plan Adoption and Implementation*, the proposed Comprehensive Plan and zoning ordinance amendments will be considered by the County Planning Commission and Montecito Planning Commission, which will make recommendations to the Board of Supervisors. The Board of Supervisors will subsequently consider adoption of the Recreation Master Plan, certification of the EIR, and adoption of the proposed amendments. The draft amendments and supporting agenda materials will be publicly available as part of those proceedings, providing additional opportunities for public review and comment.

Following the environmental review process conducted as part of this Program EIR, the County would codify these amendments. The CEQA Guidelines and relevant case law clearly allow the description of proposed amendments and development standards as presented in the EIR, rather than the complete draft amendments/ordinance language, as it is the uses, the areas on which those uses could occur, the range of intensities described for the uses, and the standards governing development of those uses, that could manifest in the physical environmental impacts that are the subject of CEQA. In fact, the presentation of the information in this manner allows the Lead Agency to consider broad policy alternatives and program-wide mitigation measures at an early time when the agency has greater flexibility to deal with basic problems

or cumulative impacts consistent with CEQA Guidelines 15168(b). Thus, specific language or amendments/ordinance packages requested by the commenter is unnecessary and need not be included as part of this EIR.

The comment also states that trail-related policies developed by CRAHTAC should be included in the EIR Project Description and environmental analysis. The trail-related policies developed by CRAHTAC have been considered and have been incorporated into the proposed policies for trails for hiking and riding (see Table 2-7), where applicable.

Comment Response O.3-15

The comment expresses opposition to modifications affecting Conservation Element policies applicable to Lake Cachuma and the Santa Ynez River corridor. The comment also states that existing equestrian use and grazing activities should remain the basis for evaluating future conditions on the north shore and that no additional human intrusion should occur in the area. The County acknowledges the importance of the Conservation Element's resource protection policies, including policies applicable to Lake Cachuma's north shore area and the Santa Ynez River. However, the Project does not propose amendments to the Conservation Element, Open Space Element, or their associated goals and policies. Accordingly, the existing resource protection policies would remain unchanged and continue to apply to future projects and activities proposed or enabled under the Recreation Master Plan.

Comment Response O.3-16

The comment recommends adoption of a policy establishing penalties for individuals who leave the scene of an accident occurring on a recreational trail. The requested policy pertains to trail management and enforcement rather than the analysis of environmental impacts, mitigation measures, or alternatives evaluated in the Program EIR. Accordingly, the requested policy does not apply to the environmental analysis presented in the EIR. Nevertheless, the comment has been noted and will be forwarded to County decision-makers for consideration.

Comment Response O.3-17

The comment identifies a potential labeling error on the Recreation Inventory Map and recommends that the Live Oak Trail be labeled as the "Live Oak Equestrian Trail" rather than "US BOR - JEEP TRAIL." The comment has been noted and will be considered by County Parks.

Comment Response O.3-18

The comment reiterates early comments and contends that the Program EIR does not adequately disclose planning documents, regulatory requirements, management considerations, environmental impacts, and baseline conditions applicable to future recreational use of Lake Cachuma, particularly on the north shore. Please refer to Comment Responses O.3-1 through O.3-17 above for detailed response to individual comments.

Trails Council

Otis Calef
President

Dan Gira
Vice President

aul Herning
Treasurer

evin Wallace
Secretary

Susan Keller

erry Kellogg

imberly Fly

ancy Kaplan

Adam Donald

James Lutz

August 10, 2026

r. Jeff Lindgren, Deputy Director
Santa Barbara County Community Service Department, Parks Division
123 E Anapamu Street
Santa Barbara, CA 93101

Re: Draft Environmental Impact Report for the Draft County Recreation Master Plan

Dear Mr. Lindgren,

The Santa Barbara County Trails Council (Trails Council) is pleased to submit comments on the proposed Draft Environmental Impact Report (DEIR) for the County Recreation Master Plan. As you are aware, the Trails Council is a partner with the County on several key trail projects, including the Franklin Trail in Carpinteria, the Baron Ranch Trail on the Gaviota Coast, the Paradiso del Mare Trail, and the pending Bill Wallace-Gato Trail also on the Gaviota Coast.

We want to extend our thanks to the Parks Division and its consultants for this major planning effort, which will have **important beneficial impacts** for residents throughout the County. This year's long effort is a major accomplishment for County Parks with its very limited staff and funding. Thank you again for your persistence in pursuing this challenging project! Our main comments and concerns are set forth below:

1. **Recreational Benefit Projects (RBPs):** We are excited about the potential for this proposal to advance important trail projects in partnership with interested property owners. However, we request that the County continue to refine and simplify this program to encourage property owners to participate. We are concerned that the program now may be overly bureaucratic and thus not attractive to property owners. We also request that the EIR raise the stature of such projects by more fully incorporating them into the project description rather than treating them as cumulative projects that are buried in dozens of other, often unrelated projects and may not receive the attention they deserve.

   The County is a cosponsor of many of these projects, such as the Santa Ynez River Trail, the Bill Wallace-Gato Trail, potentially the Winchester Canyon Trails, and the Foxen Canyon Wine Trail, so we request that such projects be integrated into the RMP rather than being treated as simply cumulative projects. At a minimum, the RBP description (Section 2.5.4) should include a table listing our known RBPs with brief paragraph descriptions of each, supported by brief analysis in all relevant EIR sections. The RBP is proposed as a public-private partnership, and the DEIR should treat it as such.

   O.4-1

2. **Beneficial Impacts:** We also recommend that the DEIR clearly identify and discuss the *beneficial impacts* of trails and outdoor recreation on public health and welfare, particularly for environmental justice communities. While this later issue is discussed

   O.4-2

extensively in the draft RMP, it appears largely overlooked in the DEIR. The EIR does not appear to discuss the proposed project's **significant beneficial impacts to public health and welfare** in any meaningful way, and the California Environmental Quality Act requires the County to identify and discuss all significant environmental effects, **whether adverse or beneficial.** We note that, as part of the County's Housing element, the Board of Supervisors specifically found that public parks, trails, and open space are essential to public health and welfare, and that data and analysis in the RMP support this. Therefore, to be internally consistent, the DEIR should be revised to clearly identify such beneficial impacts in a brief standalone beneficial impacts section, with a focus on public health and welfare as well as disadvantaged communities.

O.4-2 Cont.

3. **Avoid Overly Burdensome Mitigation Measures:** Mitigation measures should be reasonable and proportionate to the project's relatively low potential for environmental impacts, particularly for trail projects which are inherently low impact. This is particularly true for proposed setbacks of trails from agricultural land and biological resource mitigations. (see below). We support reasonable protection of agriculture, biological resources, and other resources. Still, based on the Trails Council's extensive experience permitting and constructing trails, we do not believe that trail construction and operation have substantial potential for impacts. Approved County environmental documents for the Baron Ranch and Franklin Trails support this conclusion, as does the U.S. Forest Service Environmental Assessment for Baron Ranch.

O.4-3

4. **County Parks, Recreation and Trails Maps (PRT Maps)**: These maps have been central to trail planning and acquisition for decades, and the project description should provide relevant details on these maps and any proposed additions or deletions, particularly new trails, changes in trail descriptions, changes in mapping given improved technology, etc. Please provide a separate subheading for the PRT map discussion consistent with these maps' key historic role in trail planning and acquisition. Please also provide details on any amendments or changes to the PRT maps such as new trails, deleted or realigned trails, extended trails, etc.

O.4-4

5. **Environmental Justice:** We were puzzled that the DEIR does not appear to include detailed discussions of Environmental Justice-related issues given the County's new Environmental Justice Element and extensive discussion of this issue in the RMP. The proposed project would include many improvement projects located proximate to disadvantaged communities whose residents suffer disproportionately from diseases such as obesity and diabetes as documented in the County's draft Recreation Master Plan. At a minimum, the new Beneficial Impacts section should discuss how new recreation and trails could create **beneficial impacts** to public health and welfare and address such major public health concerns, particularly within EJ communities.

O.4-5

6. **Lake Cachuma North Shore Trails & Recreation Facilities Management Plan:** The Trails Council supports more public access to this large public open space, but only by allowing pedestrian trails and remote camping. We understand that this change is at least moderately acceptable to most equestrians. However, we understand that the equestrian community is alarmed by the proposed opening of even separate but equal trails for mountain bikes; therefore, the Trails Council does not support this change. Given the history of bike-equestrian conflicts and serious accidents, we believe that the

O.4-6

DEIR should identify this change as creating potentially unavoidable and significant impacts and thus be deleted from the RMP. When the federal government reviews issues in this area in the future, the agencies with jurisdiction may consider such changes with full participation of the equestrian community. We do not support this aspect of the RMP, which will cause unnecessary controversy and potential litigation that could derail the RMP and cause unnecessary expense. These improvements do not seem to be a high priority for the mountain bike community, which has benefited from other recent trail improvements in the vicinity. O.4-6 Cont

7. **Deletion of the Public and Private Parks/Recreation Facility Overlay map from Las Varas and Dos Pueblos Ranches:** The Trails Council request that the EIR provide analysis of the impact of this action and its potential impacts and conflicts with adopted policy. This change would greatly increase the challenges of acquiring the California Coastal Trail and vertical coastal access at these ranches, weakening local ability to negotiate with existing and future owners, including UCSB, over acquisition of such public access improvements. The EIR needs to thoroughly analyze such impacts and the policy inconsistencies with the adopted Gaviota Coast Plan and Local Coastal Plan. O.4-7

8. **Equestrian Safety Impacts:** The analysis in the Recreation Section must specifically discuss public safety for equestrians, document past accidents, and provide a more credible analysis to address concerns consistently raised by the equestrian community. This is a **public safety issue**, not just a trail user conflict issue. When a horse is spooked and riders thrown, serious injuries can result, and the revised EIR must identify such potential public safety impacts. *Even at More Mesa where equestrians typically mix with kers, dog walkers and some bikers, we understand that a high -speed collision occurred when a speeding e-bike rear-ended an equestrian who was thrown and suffered traumatic brain injuries.* The County should not downplay the severity of such potential safety impacts for walkers, runners, birders, bikers, hikers, equestrians and other trails users. All trail user groups and the County need to work together to ensure safe access for all who use our trails. O.4-8

We again thank you for the County Parks Division ongoing efforts to create a safer, healthier, and more connected Santa Barbara County.

Sincerely,



ark Wilkinson
Executive Director
wilkinson@sbtrails.org

: Santa Barbara County Board of Supervisors
Santa Barbara County Planning Commission
Jeff Wilson, Assistant Director, Santa Barbara County Planning & Development Department

Comment Letter O.4 – Santa Barbara County Trails Council

Comment Response O.4-1

Thank you for your comments. The comment requests revisions to the RBP Program to increase its attractiveness to property owners. The commenter also requests that the Draft EIR place greater emphasis on future RBP projects, noting that some recreational improvements may be implemented through public-private partnerships involving the County and the Santa Barbara County Trail Council. Specifically, the commenter requests that the Project Description identify known RBP projects and that the EIR include brief project-specific environmental analyses of those projects in the relevant EIR sections.

With regard to the commenter's request for modifications to the RBP Program, the comment pertains to the proposed Project and associated ordinance provisions rather than the adequacy of the EIR's analysis of environmental impacts, mitigation measures, or alternatives. The comment will be forwarded to County decision-makers for their consideration.

With regard to the requested revisions to the Project Description, Section 2.5.4, *Recreation Benefit Project Program*, adequately describes the RBP Program and its implementation framework, including the types of eligible projects, applicable development standards, and anticipated recreational benefits. The description is intended to encompass future RBP proposals that may be developed over the life of the Recreation Master Plan. Accordingly, the EIR evaluates the RBP Program as a discrete component of the proposed Project. The environmental analysis assesses the reasonably foreseeable impacts associated with implementation of the RBP Program at a programmatic level, based on the development envelope and regulatory framework described in the Project Description. Because specific future RBP projects have not been proposed for approval and sufficient site-specific information is not available, project-level analysis is not feasible at this time. Under the RBP Program, improvements, including those projects referenced by the commenter, may submit an application for development with the County under the RBP Program, and agreement to process the project as an RBP would be determined at the discretion of County Parks and the County Planning and Development Department (P&D) based on their RBP Program eligibility. Future RBP proposals would then be evaluated through subsequent project-level review, which may include tiering from this program EIR pursuant to CEQA Guidelines Section 15168, but may require additional environmental review required under CEQA.

Comment Response O.4-2

The comment requests that the EIR include additional discussion of the beneficial effects associated with parks, trails, and recreational amenities. Specifically, the commenter recommends adding a standalone discussion of the proposed Project's beneficial effects with respect to public health, welfare, and disadvantaged communities. The County acknowledges that one of the primary purposes of the Recreation Master Plan is to expand access to parks, trails, open space, and recreational opportunities throughout the county. These objectives, which would consequently contribute to public health, wellness, quality of life, and equitable

access to recreation, are described throughout the Recreation Master Plan and reflected in the Project objectives presented in Chapter 2, *Project Description.*

The purpose of the EIR, however, is to evaluate and disclose the potential environmental impacts of implementing the proposed Project and to identify mitigation measures where appropriate. Consistent with CEQA, the EIR evaluates the Project's environmental impacts and discloses both adverse and beneficial effects where relevant in the environmental analysis. For example, Section 3.14, *Recreation*, discusses the beneficial effects of implementing the Recreation Master Plan, including expanding recreational opportunities for existing and future county residents, improving access to parks and trails, reducing demand on existing recreational facilities, and helping to avoid the physical deterioration of recreational resources through the provision of additional recreational amenities. Furthermore, CEQA does not require a separate analysis of social, economic, or policy benefits unless those benefits are related to a physical environmental effect. Accordingly, the EIR adequately describes the recreational benefits associated with implementation of the Recreation Master Plan as it relates to the thresholds for environmental analysis contained in the CEQA Guidelines Appendix G and the County's *Environmental and Thresholds Manual*.

Comment Response O.4-3

The comment asserts that the mitigation measures identified in the EIR are disproportionate to the potential impacts associated with future trail projects. Specifically, the commenter states that while the Santa Barbara County Trail Council supports the reasonable protection of agricultural, biological, and other natural resources, trails generally have a low potential for environmental impacts. The Recreation Master Plan encompasses a range of future recreational opportunities, including parks, trails, and RBPs, of which the specific locations, scale, design, and operational characteristics are not currently known. Accordingly, the EIR evaluates impacts and identifies mitigation measures at a programmatic level based on the reasonably foreseeable development potential associated with implementation of the proposed Project. The mitigation measures identified in the EIR are intended to provide a framework for avoiding, minimizing, and mitigating potential impacts that could result from future recreational development, including from large County-proposed recreational improvements, privately-proposed parks, and trails. The EIR does not assume that all mitigation requirements would apply uniformly to every future project. Rather, future projects would be subject to project-level discretionary review, during which the County would evaluate site-specific conditions, determine the applicability of individual mitigation measures, and identify any additional or modified measures necessary to address project-specific impacts.

However, as recognized and discussed throughout the EIR, construction and use of recreational trails throughout the county do not always result in adverse environmental impacts requiring the implementation of mitigation measures identified in this EIR. In many cases, the proposed trail development standards and policies under the Project would ensure that trails are sited and design to avoid adverse environmental impacts.

Comment Response O.4-4

The comment requests revisions to the EIR Project Description to provide additional information regarding the County's PRT maps. Specifically, the commenter recommends adding a separate subsection describing the role and purpose of the PRT maps and identifying any proposed changes to trail descriptions or trail segments. The commenter also requests preparation of a revised exhibit depicting proposed modifications to the PRT maps, including new, removed, extended, or realigned trail segments.

The comment pertains to the organization of and discussion of the history and use of the PRT maps provided in the Project Description rather than the adequacy of the EIR's analysis of environmental impacts, mitigation measures, or alternatives. The Recreation Master Plan is a countywide planning document and does not approve site-specific trail projects or final trail alignments. Accordingly, the Project Description focuses on the proposed planning framework and trail network concepts rather than detailed mapping revisions. Section 2.5.2, *Comprehensive Plan Amendments for Parks, Recreation, and Trails*, includes information specifically about the PRT maps necessary to support and inform the programmatic analysis. As described in Section 2.5.2, the Project would amend the PRT map to align with the Recreation Master Plan and depict existing and planned County Parks' facilities only based on the parkland and trail inventory prepared for the Recreation Master Plan. The inventory of existing and planned County Parks' facilities and trail inventory prepared for the Recreation Master Plan and are planned to be depicted on the PRT maps can be viewed on the County's RecPrint website at: https://storymaps.arcgis.com/stories/8b34a77d97a946f9bc777ec5e6b89557. The PRT map updates would not affect adopted community plans. Rather, the updated PRT maps accurately depict the status and location of existing and planned trails and add new planned trail projects included in the Recreation Master Plan.

Detailed updated maps and description of specific amendments to the County's PRT maps will be provided as part of the proposed amendments package presented to County decision-makers.

Comment Response O.4-5

The comment asserts that the EIR does not adequately discuss environmental justice-related considerations given the County's recently approved Environmental Justice Element of the Comprehensive Plan and recommends additional discussion of the potential public health and welfare benefits associated with parks, trails, and recreational amenities, particularly for disadvantaged communities. The commenter further recommends that such benefits be addressed in a standalone beneficial impacts section.

However, this program EIR was prepared prior to release and adoption of the County's Environmental Justice Element, and therefore does not consider the County's Environmental Justice Element as part of the existing regulatory background relied upon for the analysis of Project impacts. The Notice of Preparation of this program EIR was published in January 2025 and the Draft Environmental Justice Element was released for public review by the County

several months later on August 7, 2025. The County's Environmental Justice Element was officially adopted by resolution by the Board of Supervisors on March 10, 2026 (Resolution No. 26-64).

Nevertheless, as discussed in Comment Response O.4-2, the County acknowledges that one of the primary purposes of the Recreation Master Plan is to expand access to parks, trails, open space, and recreational opportunities throughout the county. These objectives, which may contribute to public health, wellness, quality of life, and equitable access to recreation, are described throughout the Recreation Master Plan and reflected in the Project objectives presented in Chapter 2, *Project Description*. The EIR also recognizes the beneficial recreational effects of the proposed Project. For example, as discussed in Section 3.14, *Recreation*, implementation of the Recreation Master Plan would expand recreational opportunities, improve access to parks and trails, and reduce demands on existing recreational facilities throughout the County.

Comment Response O.4-6

The comment expresses support for expanded public access associated with the proposed Lake Cachuma North Shore Trails & Recreation Facilities Management Plan but raises concerns regarding the proposed allowance of bicycle use on trails. Specifically, the commenter cites the potential for conflicts between cyclists and equestrians and asserts that such conflicts may create safety concerns for trail users. The commenter recommends that separate mountain biking trails not be included as part of this future project.

As described in the EIR, the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan represents a conceptual planning framework. As stated in Chapter 2, *Project Description*, preparation of the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan would occur through a future public planning process involving community input and environmental review under CEQA and NEPA. Decisions regarding user groups, permitted recreational activities, trail design, operational restrictions, and safety measures would be evaluated during that future planning effort. The Project Description also notes that separate trail segments and design features may be incorporated where necessary to address potential conflicts among users.

Section 3.14, *Recreation*, specifically addresses this issue under Impact REC-3, which discloses and evaluates the potential for future recreational development to result in substantial adverse conflicts between existing and proposed recreational uses, including among hikers, equestrians, and bicyclists. The EIR specifically discusses the potential impacts associated with the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan, citing the need for separate trail segments and facilities for equestrians and other non-motorized users, as well as horse-only bypasses where potential user conflicts may occur. The analysis concludes that compliance with proposed development standards and existing trail design requirements would ensure that future trail projects do not result in substantial adverse conflicts between user groups. Accordingly, Impact REC-3 concludes that such impacts would be insignificant. Furthermore, the future projects would be subject to project-level discretionary review, during

which the County would evaluate site-specific trail alignments, user groups, design features, and operational characteristics and could incorporate design measures to address potential user conflicts, as appropriate.

Nevertheless, the comment will be forwarded to County decision-makers for their consideration.

Comment Response O.4-7

The comment expresses concern regarding the proposed removal of Las Varas Ranch and Dos Pueblos Ranch from the Public and Private Parks/Recreation Facility Overlay. The commenter asserts that removal of the overlay could reduce future opportunities for public recreational access, including implementation of the California Coastal Trail and vertical coastal access opportunities, and requests additional analysis regarding potential policy inconsistencies with the Gaviota Coast Plan and Local Coastal Program.

The comment primarily addresses potential implications for future recreation planning and public access opportunities rather than impacts resulting from a physical change to the environment. Moreover, the commenter has not identified a direct physical environmental impact resulting from removal of the overlay designation. Rather, the comment expresses concern regarding the potential effect of the proposed amendment on future recreation planning, land acquisition opportunities, and implementation of public access objectives. As described in Section 3.11, *Land Use and Planning,* significant impacts are considered relative to their consistency or inconsistency with applicable policies, where a potential inconsistency with a policy that is adopted for the purpose of avoiding or mitigating significant physical environmental impacts might occur. The Project's potential to conflict with these policies does not represent a potential to cause an adverse physical impact on the environment, but instead represents a potential conflict or inconsistency pertaining to land use planning and policy considerations.

Nevertheless, the Project's potential to conflict with or be inconsistent with all applicable County plans and policies would be determined by the County Board of Supervisors during consideration of the proposed Project. Should the Board determine that the proposed Project is inconsistent with an existing County Comprehensive Plan or regional plan policy, the proposed Project could not be approved unless measures are identified to eliminate this inconsistency.

Further, it should also be noted that while the Project proposes to modify the County's PRT maps to eliminate some sites from the Proposed Public or Private Park/Recreational Facility Overlay, the Project does not propose to modify the County's PRT maps to eliminate or remove the currently mapped proposed Coastal Trail – Primary Route across Las Varas Ranch and Dos Pueblos Ranch.

Comment Response O.4-8

The comment requests that the EIR include additional analysis of public safety impacts associated with shared-use trails, particularly potential conflicts between equestrians and

bicyclists. The commenter asserts that interactions between trail user groups may result in safety hazards and injuries and recommends that the EIR address these concerns in greater detail.

The EIR addresses the public safety impacts associated with shared-use trails. As previously described, Impact REC-3 under Section 3.14, *Recreation*, discloses and evaluates the potential for future parks, trails, and recreational facilities to result in adverse conflicts among user groups, including hikers, bicyclists, and equestrians. As described therein, the analysis recognizes the importance of trail siting and design in order to avoid user conflicts, such as through the inclusion of separate facilities, designated trail segments, horse-only bypasses, and other potential design standards intended to promote safe recreational use. As such, the EIR analyzes potential hazards at a programmatic level. Future trail projects would be subject to project-level discretionary review, during which the County would evaluate site-specific trail alignments, anticipated user groups, operational characteristics, and safety considerations. As appropriate, project-specific design features, trail management measures, or operational requirements could be incorporated to address user compatibility and safety concerns.

August 10th, 2026

Attn: Jeff Lindgren, Assistant Director Parks Division
County of Santa Barbara Community Services Department, Parks Division
123 East Anapamu Street, Santa Barbara, CA 93101

Re: Comments on the Santa Barbara County Recreation Master Plan and Draft Program Environmental Impact Report

Dear Mr. Lindgren:

Jackson Family Wines has long been a steward of agricultural lands in Santa Barbara County, where we currently farm thousands of acres across more than a dozen properties. Our vineyards and rural holdings reflect a commitment to sustainable farming, environmental stewardship, and responsible land management. Through thoughtful investment in the region's agricultural heritage, we strive to protect working landscapes, enhance natural resources, and ensure that these lands remain productive and resilient or future generations.

Jackson Family Wines strongly supports the Recreational Master Plan (RMP) and the Recreational Benefit Program (RBP) and appreciates the County's efforts to balance public benefits with the preservation of working agricultural lands. We believe the RBP can attract private investment in public recreation facilities while maintaining the rural and agricultural character of unincorporated Santa Barbara County. The Draft EIR properly recognizes that outdoor recreation, trails, agritourism, and related visitor-serving uses are compatible with agricultural areas when such uses are designed to complement farming operations, maintain rural character, and preserve agricultural productivity.

We support the overall objectives of the RMP and the Recreational Benefit Program currently under review and respect ully submit the following comments for consideration:

Comments Related to EIR Identified Impacts

1. Impacts AG-1 and AG-2 do not ully consider project-level measures that could avoid or reduce agricultural compatibility conflicts. RBP projects may demonstrate agricultural compatibility through project-specific design and operational measures, including clustered development, preservation of large open-space or agricultural areas, use of existing disturbed areas where feasible, buf ers where appropriate, managed public access, agricultural operations plans, uest disclosures, and long-term stewardship commitments. Acknowled ing the

O.5-1

potential for such measures will allow for the evaluation of actual project design and operational plans when determining agricultural compatibility, rather than relying solely on generalized assumptions at the program level.

O.5-1 (cont)

2. The EIR should also clarify how future RBP projects will tier under the Program EIR's transportation and Vehicle Miles Traveled (VMT) analysis, while still providing project-specific transportation review where required. Because the RBP is intended to encourage public recreation access and visitor-serving uses in appropriate rural locations, the CEQA analysis should recognize that future projects may incorporate transportation demand management, managed access, shuttle programs, employee trip reduction measures, event management, trailhead operations, and other operational strategies to reduce or manage total VMT indicated in Impact T-2.

O.5-2

3. The EIR should further explain that the RBP is intended to allow future decision makers discretion to balance project-specific environmental impacts against the public benefits created by permanent recreation improvements, long-term maintenance obligations, public access, open-space preservation, agricultural stewardship, and rural economic benefits. It should state that future ordinance amendments should preserve sufficient discretion for the County to approve RBP projects that provide substantial public recreation, stewardship, and resulting economic benefits, including projects on large rural or agricultural properties where clustered development or other design measures can preserve the majority of the site in agriculture, open space, or recreation use.

O.5-3

Comments Related to the Project Description

1. In the EIR Project Description, the County proposes a 120-room maximum for eligible RBP "Country Inns." However, the EIR should clarify that the referenced example of 30,000–50,000 square foot gross floor area range shown in Table 2-11 is an illustrative estimate for smaller Country Inn formats, not a universal cap applicable to all future RBP hospitality projects. The County's existing lodging definitions already recognize related rural hospitality uses, including Guest Ranches, which are generally farm or ranch-based vacation resorts that provide food, lodging, and recreational activities for paying visitors or guests. RBP projects on larger agricultural or ranch-scale parcels may function more like a Guest Ranch or rural resort than a small inn while still fitting within the RBP framework and the proposed 120-room limit. The Draft EIR appropriately evaluates the RBP Country Inn concept primarily as a maximum 120-room use, allowing for uture project-level design, site planning, infrastructure, and environmental review to determine the suitable development envelope for any specific project. The implementing ordinance should therefore provide flexibility to establish gross floor area standards based on parcel size, clustering, rural character, agricultural compatibility, recreation/public benefit value, and infrastructure needs. Open and flexible ross

O.5-4

room and supporting building sizes are essential to the economic viability of RBP hospitality projects.

Alisal Ranch in the Santa Ynez Valley has served for more than 80 years as a prominent example of agricultural preservation supported by compatible hospitality uses. This guest ranch operates in a manner similar to the EIR's de ined Country Inn use, with 74 resort units (keys), an additional 72 residential units on commonly owned land, and a range of resort amenities that support a working cattle ranch. The guest units typically range from 600 sf to 2,100 sf and have not been identified as creating environmental impacts. O.5-4 (cont)

2. The County should consider adding flexibility to the Table 2-7 trail siting standards. While locating trails along parcel edges and existing linear features may be appropriate in many circumstances, strict adherence to these criteria could unintentionally limit opportunities to establish important regional trail connections. In practice, regional trail systems are often implemented incrementally and may temporarily terminate at property boundaries until adjoining landowners participate. The standards should therefore recognize interim conditions and allow trail segments that advance long-term connectivity, even where a complete regional connection is not immediately available.

   Additionally, the preference for trails "along parcel edges" should not preclude consideration of trails located within the interior of a property when doing so would provide a superior recreational experience, improved access to scenic resources, or better alignment with topography, environmental constraints, or operational considerations. In some cases, interior trail alignments may offer greater public benefit while also reducing potential conflicts with neighboring properties. We recommend revising the standards to provide greater discretion for site-specific trail design that achieves the underlying goals of connectivity, resource protection, agricultural compatibility, and public enjoyment. O.5-5

3. Table 2-11 should provide greater flexibility to allow restaurants, cafés, and similar food service facilities associated with Country Inns, Guest Ranches, and other agriculturally compatible visitor-serving uses to serve both registered guests and the general public. Public access to dining facilities can enhance the recreational value of a project, expand public enjoyment of rural and agricultural landscapes, support local agriculture and wine tourism, and provide a meaningful public benefit without creating conflicts with surrounding agricultural uses. We recommend clarifying that food service facilities may be open to the public when operated in a manner consistent with the goals of the RMP. O.5-6

4. Also in Table 2-11, the requirement that no guest stay longer than 30 days within any 90-day period is overly restrictive, does not reflect the full range of legitimate O.5-7

agriculturally compatible visitor-serving lodging experiences, and is not appropriate in an environmental impact assessment. Extended stays can occur or a variety of temporary recreational, educational, wellness, agricultural, or business-related purposes without resulting in permanent residential occupancy. We recommend that the implementing ordinance be developed to provide flexibility through administrative review or other mechanisms that allow longer stays while maintaining the visitor-serving nature of the use. O.5-7 (cont)

Lastly, we commend the County for its proactive and visionary approach in developing this thoughtful project.

We look forward to continuing to work with the County as it finalizes the RMP and RBP and develops the implementing ordinance. Our comments are intended to inform implementation of the project as described and analyzed in the Draft EIR and to encourage ordinance provisions that preserve appropriate site-specific discretion within that analyzed framework. We believe this approach can expand high-quality, noteworthy public recreation opportunities while protecting Santa Barbara County s important agricultural lands and rural character.

Sincerely,

LeeAnne Edwards
Executive Vice President, Real Estate
Jackson Family Wines, Inc.

Leeanne.Edwards@jfwmail.com

CC: Geoff Scott
Senior Vice President, Planning
Jackson Family, Wines, Inc.

Geoff.Scott@jfwmail.com

Comment Letter O.5 – Jackson Family Wines

Comment Response O.5-1

Thank you for your comments. The comment asserts that Impacts AG-I and AG-II do not fully consider project-level measures that could avoid or reduce agricultural compatibility conflicts and recommends potential design and operational measures that may be incorporated into future RBPs. As described in Chapter 3, *Environmental Impact Analysis*, this Program EIR considers the reasonably foreseeable worst-case scenario for the proposed Project's components in the analysis. Details of future development enabled under the proposed Project, such as location, uses, design, or recreation benefits, are not known at this time and therefore are not evaluated in this Program EIR.

Section 3.2, *Agricultural Resources*, evaluates the Project's potential effects on and compatibility with agricultural resources at the programmatic level. The analysis considers whether future public and private park, trail, and RBP development could increase conflicts with agricultural operations, result in the loss of agricultural resources, or affect agricultural productivity. In doing so, the EIR evaluates the regulatory framework that would govern future development, including existing County regulations and proposed amendments to the County Comprehensive Plan and zoning ordinances. The specific use standards, as summarized in Table 2-11, are also considered in the analysis. Furthermore, future RBP proposals would be evaluated through project-level review, during which the County would assess site-specific conditions and determine whether additional environmental review, mitigation measures, or operational requirements are necessary to address potential agricultural compatibility conflicts.

Comment Response O.5-2

The comment requests clarification regarding how future RBP proposals would tier from the Program EIR's transportation and VMT analysis. The commenter further recommends recognizing that future RBP projects may incorporate transportation demand management (TDM) and operational measures to reduce transportation impacts.

Section 3.15, *Transportation and Traffic*, evaluates transportation and VMT impacts at a programmatic level based on the reasonably foreseeable development potential associated with implementation of the Recreation Master Plan and related amendments to the County Comprehensive Plan and zoning ordinances. As previously described, the proposed Project does not include specific RBP projects; therefore, the appropriateness and effectiveness of project-specific transportation measures cannot be determined at this time. Instead, future RBP projects that tier from this Program EIR would be subject to project-level environmental review, during which the County would evaluate site-specific transportation conditions and any applicant-proposed operational or TDM measures to determine whether the project's impacts

are adequately addressed by the Program EIR or whether additional environmental review, analysis, or mitigation is required.

Comment Response O.5-3

The comment recommends additional discussion regarding the future discretion available to County Parks, County P&D, and County decision-makers when considering RBP proposals and the potential public benefits associated with such projects. The comment does not pertain to the adequacy of the EIR's analysis of environmental impacts, mitigation measures, or alternatives. However, for informational purposes, the EIR's purpose is to evaluate and disclose the potential environmental effects of implementing the Recreation Master Plan and related amendments. The EIR does not prescribe how future decision-makers must weigh environmental impacts, public benefits, or other considerations when evaluating individual project proposals. Future RBP proposals would be subject to project-specific discretionary review based on the specific characteristics of the proposed project and the applicable regulatory framework. Nevertheless, this comment will be forwarded to County decision-makers for their consideration.

Comment Response O.5-4

The comment expresses concern regarding the allowable use description of the "Country Inn" presented in Table 2-11. The commenter requests clarification that the estimated gross floor area range of 30,000 to 50,000 square feet is illustrative and should not be interpreted as a maximum development standard for future Country Inn projects. The commenter further recommends that future ordinance provisions maintain flexibility in establishing floor area and building size standards based on site-specific considerations, such as parcel size, project design, agricultural compatibility, and recreational or public benefit features.

The comment does not pertain to the adequacy of the EIR's analysis of environmental impacts, mitigation measures, or alternatives. However, for informational purposes, the Project Description identifies a maximum gross floor area of 30,000 to 50,000 square feet for the Country Inn use. Accordingly, the gross floor area range is not intended solely as an illustrative example, but rather reflects the proposed development standard evaluated in the EIR. The comment regarding the appropriate size and development standards for future Country Inn uses will be forwarded to County decision-makers for consideration.

Comment Response O.5-5

The comment requests revisions to the proposed trail development standards presented in Table 2-7. Specifically, the commenter recommends modifying the siting requirements to provide greater flexibility and discretion in trail placement, asserting that standards directing trails to parcel edges or existing linear features may inadvertently constrain opportunities for regional trail connectivity, trail design, and recreational experiences. These comments do not

directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR.

Comment Response O.5-6

The comment requests revisions to the proposed specific use standards for visitor-serving uses presented in Table 2-11. Specifically, the commenter recommends allowing food service facilities, such as restaurants and cafés, to be open to the general public, asserting that public access to such facilities could enhance the recreational value of RBP projects, expand public enjoyment of rural landscapes, and support local agriculture and wine tourism. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR.

Comment Response O.5-7

The comment requests revisions to the proposed specific use standards for the Country Inn presented in Table 2-11. Specifically, the commenter recommends eliminating or modifying the limitation that restricts guest stays to no more than 30 days within any 90-day period and providing greater discretion for longer-term stays. The commenter asserts that the proposed limitation may unnecessarily constrain visitor-serving lodging opportunities that are compatible with agricultural uses. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR.

August 10, 2026

Santa Barbara County Community Services Department, Parks Division
Attn: Jeff Lindgren, Deputy Director
123 East Anapamu Street, 2nd Floor
Santa Barbara, CA 93101

Re: Draft Program Environmental Impact Report for the Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (SCH No. 2025010342)

Dear Deputy Director Lindgren,

On behalf of the Grower-Shipper Association of Santa Barbara and San Luis Obispo Counties (Grower-Shipper) we appreciate the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the Santa Barbara County Recreation Master Plan (Project). Grower-Shipper represents more than 150 growers, shippers, farm labor contractors, and supporting agribusinesses throughout Santa Barbara and San Luis Obispo counties, many of whom farm on lands adjacent to or within areas addressed by the Project, producing a diverse range of crops including broccoli, strawberries, wine grapes, vegetable transplants, flowers, and tree fruit. We commend the County for its continued commitment to parks and recreation and share its interest in enhancing the quality of life for the many County residents who depend on the agricultural economy. For these reasons, we generally support the Project's stated goal: "to enhance the quality of life and leisure experience for Santa Barbara County residents of all ages."

However, having reviewed the DEIR, Grower-Shipper remains greatly concerned that the County has continued to disregard significant concerns we raised in our previous comments on the Project. Our principal concerns include the adequacy of the DEIR's project description, impact analysis, and consistency findings; the proposed Recreation Benefit Program (RBP); the cumulative effects of the Agricultural Enterprise Ordinance (AEO), the proposed Project, and the RBP on agricultural lands and operations; and several proposed projects on or adjacent to agricultural land that require further environmental, economic, and legal evaluation.

We encourage the County to focus its efforts on recreational projects that are compatible with existing agricultural operations and consistent with longstanding County agricultural policies. We respectfully request that the County carefully consider our letters dated March 11, 2025 and February 9, 2026 (attached), as many of the concerns raised therein remain unresolved. This letter summarizes our principal comments on the DEIR.

O.6-1

1. The DEIR Does Not Provide the Accurate, Stable Project Description and Impact Analysis CEQA Requires

The DEIR does not satisfy CEQA's basic informational requirements. As the Association explained in its comments on the Draft EIR for the Santa Maria Levee Trail Extension, submitted July 14, 2026, "'An accurate, stable and finite project description is the sine qua non of an informative and legally sufficient EIR.' (*Stopthemillenniumhollywood.com v. City of Los Angeles* (2019) 39 Cal.App.5th 1, 17-18, citing *County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 139 (*Inyo*), internal quotations omitted;

O.6-1 cont.

see also *City of Santee v. County of San Diego* (1989) 214 Cal.App.3d 1438, 1454 ['only through an accurate view of the project may the public and interested parties and public agencies balance the proposed project's benefits against its environmental cost, consider appropriate mitigation measures, assess the advantages of terminating the proposal and properly weigh other alternatives'].) An accurate and stable project description is necessary to allow the lead agency and public enough information to 'ascertain the project's environmentally significant effects, assess ways of mitigating them, and consider project alternatives.' *(Sierra Club v. City of Orange* (2008) 163 Cal.App.4th 523, 533.) Conversely, when a project description obscures or misrepresents a fundamental aspect of the project, an EIR fails as an informational document. (See, e.g., *Communities for a Better Environment v. City of Richmond* (2010) 184 Cal.App.4th 70, 88-89.) Further, an inconsistent project description prevents an EIR from serving 'as a vehicle for intelligent participation.' (*County of Inyo v. City of Los Angeles* (1977) 71 Cal.App.3d 185, 197.)"

This DEIR falls short of that standard with respect to agricultural resources. The DEIR cannot foresee the amount of farmland that would be impacted and/or lost to the proposed Comprehensive Plan and Zoning Ordinance amendments, future RBPs, and/or the Recreation Master Plan's many listed projects, or whether mitigation would be sufficient to mitigate these losses. At the same time, Agricultural Resources is one of only two environmental resource areas, aside from Vehicle Miles Traveled (VMT), for which impacts are determined to be significant and unavoidable, yet the DEIR concludes that no feasible mitigation exists for the conversion of Prime Farmland, Unique Farmland, Farmland of Statewide or Local Importance, or agriculturally zoned land. CEQA requires mitigation to the maximum extent feasible, and without a quantified impact to a resource area, the public and decision-makers cannot meaningfully evaluate the adequacy of the alternatives or determine whether further mitigation is truly infeasible, as the DEIR claims. Proceeding with zoning and Comprehensive Plan amendments under these circumstances would commit the County to a program whose impacts remain both significant and not completely understood, much less mitigated. Given these acknowledged uncertainties and significant impacts, the County must revise the DEIR to include an accurate and complete Project description and implement all feasible mitigation measures, as required by CEQA.

Finally, the noted uncertainty is compounded by the sheer scope of this document: the DEIR bundles capital park projects, trail alignments, the RBP Program, and amendments to the Comprehensive Plan, Land Use Element, Agricultural Element, and County zoning ordinances into a single, nearly 950-page programmatic document. We recognize the efficiency rationale for a Programmatic EIR, but the breadth and generality of the project descriptions for individual components make it exceedingly difficult for affected stakeholders to understand the individual and cumulative impacts of the Project components.

O.6-2

2. The DEIR's Comprehensive Plan Consistency Findings Are Not Adequately Supported

The DEIR concludes that the Project is consistent with the Santa Barbara County Comprehensive Plan. However, the DEIR does not adequately explain how that conclusion can be reconciled with several policies of the Agricultural Element and Comprehensive Plan. For example, Agricultural Element Policy I.A. is intended to ensure that new development does not impair the integrity of agricultural operations, yet the DEIR simultaneously concludes that the Project would result in significant and unavoidable impacts to both farmland (Impact AG-1) and agriculturally zoned land (Impact AG-2), including the conversion of agricultural land, impairment of agricultural productivity, and conflicts with existing agricultural zoning. Without sufficient project definition and mitigation, the DEIR cannot substantiate its overall finding of consistency with the Comprehensive Plan, and cannot reconcile these acknowledged agricultural impacts and the Agricultural Element's policies intended to protect the long-term viability of agricultural operations.

Importantly, the Project proposes to amend the Agricultural Element itself to allow outdoor recreation, trails, and related uses within agricultural areas where such uses are determined to, "complement farming

O.6-2 cont.

operations, maintain rural character, and preserve agricultural productivity," through siting, buffer, and access-control standards. While well-meaning, the proposed framework appears to be based more on wishful thinking than on the practical realities of intensive agricultural production in Santa Barbara County, where food safety compliance, restrictions on the use of essential plant protection materials near areas of public access, and daily agricultural operations can all create conflicts that siting and buffer standards alone may not resolve. We have similar concerns regarding the Project's inconsistencies with Agricultural Element Policy II.B, which directs the County to give high priority to protecting agricultural lands from trespass, theft, vandalism, and roaming pets. Several of the proposed project components appear likely to increase precisely these types of conflicts for adjacent agricultural operations, and the DEIR does not clearly explain how those potential conflicts were analyzed and fully mitigated to be reconciled with its broader finding of consistency with the Comprehensive Plan.

As presented, the framework used for the DEIR's policy consistency analysis is fatally flawed and cannot be substantiated with fact. The Project proposes to amend the very Agricultural Element policies against which its consistency is evaluated. The DEIR cannot determine policy consistency when the Project itself redefines the applicable policy framework.

O.6-3

3. The DEIR Fails to Adequately Analyze and Mitigate Traffic Safety and Emergency Access Impacts

The DEIR concludes that the proposed Project could result in potentially significant and unavoidable impacts to Vehicle Miles Traveled (VMT) within the County (Impact T-2), acknowledging that "no viable mitigation strategies exist to reduce Project impacts." Yet when the DEIR turns to traffic safety (Impact T-3), it reverses course, characterizing the same increase in recreational traffic as "insignificant" because farm equipment and trailers are "generally considered compatible with the existing roadway network." This conclusion is unsupported. The DEIR does not identify which roadways will see increased conflict, nor does it explain how thousands of additional annual vehicle trips, including RVs, horse trailers, and out-of-area drivers unfamiliar with rural driving conditions, can be reconciled with a finding of no significant impact on roads the DEIR itself describes as "lightly maintained," having "limited line-of-sight," and "substandard road width or geometrics for turning movements." This compounds the Comprehensive Plan inconsistencies raised in Section 2 above, as increased recreational traffic on narrow agricultural roads threatens growers' ability to safely move labor crews, harvest equipment, and product trucks during time-sensitive field operations.

The DEIR's treatment of emergency access and response is similarly deficient. CEQA Appendix G, Sections IX(f) and XVII(d), directs project proponents to assess whether a project will interfere with adopted emergency response or evacuation plans or result in inadequate emergency access. The DEIR's own analysis (Impact HAZ-4) acknowledges that Project components sited "in more remote areas of the county" could "increase difficulty with emergency evacuations, particularly within areas with narrow rural roads and limited access," and that concentrating transient recreational populations in such areas could "impair implementation of or physical interference with" the County's emergency response plans. Despite these admissions, the DEIR concludes the impact is insignificant based solely on generalized compliance with existing fire and building codes, without any site-specific analysis of evacuation capacity on the same narrow agricultural roads discussed above. Given that these roads must simultaneously accommodate farmworker and agricultural vehicle evacuation during wildfire or other emergencies, the DEIR's failure to analyze cumulative demand on this limited rural road network is a significant gap that must be corrected before the County can adopt a finding of insignificance under Impact HAZ-4 or Impact T-3.

O.6-4

4. The DEIR Does Not Evaluate a Reasonable Range of Feasible Project Alternatives

The DEIR fails to evaluate a reasonable range of feasible alternatives that could avoid or substantially lessen a project's significant environmental effects while still meeting most of the project's basic

O.6-4 cont.

objectives, as required by CEQA. Beyond the "No Project Alternative," it presents only two actionable alternatives: Alternative 1 – "Reduced Eligibility of RBPs," and Alternative 2 – "Increased Agricultural Buffers," neither of which substantially reduce the Project's significant impacts, nor adequately respond to issues timely raised by Grower-Shipper and others during the Project development and CEQA scoping process. The County failed to develop an alternative that better reconciles agricultural needs with recreational interests.

The DEIR identifies Alternative 2 – "Increased Agricultural Buffers" as the Environmentally Superior Alternative yet fails to adequately address the significant impacts the Project would have on adjacent agricultural operations. While we recognize the effort to increase agricultural buffer zones as a means of reducing impacts to agricultural resources, the proposed increase to 500 feet for limited land uses remains woefully inadequate. Grower-Shipper maintains, as it did in its February 9, 2026 letter, that buffers from adjacent active agriculture should be expanded to a minimum of 1,000 feet from row crops and 400-600 feet from orchards and vineyards, in recognition of the differing needs of different production environments. Alternative 2 fails to respond to the numerous suggested mitigation measures detailed in our previous comment letter, and does not adequately protect agricultural resources. More fundamentally, the DEIR does not appear to have genuinely evaluated Alternative 2 as a viable path forward. Rather than developing an alternative capable of meaningfully mitigating the Project's significant and unavoidable impacts to agricultural resources, the DEIR analyzes Alternative 2 in a manner that presumes its inadequacy from the outset and summarily dismissing it, while still designating it the Environmentally Superior Alternative. This internal inconsistency undermines the DEIR's alternatives analysis: an alternative cannot simultaneously be characterized as environmentally superior and dismissed as ineffective at addressing the Project's core impacts. In light of these deficiencies, the County must either revise the Project to incorporate feasible mitigation measures that would reduce significant impacts to agricultural resources or develop and analyze a more protective alternative that satisfies CEQA's requirements.

O.6-5

5. The Recreation Benefit Project Program Should Be Removed from the EIR and Considered Through a Separate Process and EIR

Our concerns from our letter dated March 11, 2025 remain.

The Recreation Benefit Project Program (RBP) remains too conceptual and insufficiently defined to warrant adoption alongside the Recreation Master Plan through this DEIR. The document explains that it is a program-level, rather than project-level, EIR because the RBP's site-specific details remain conceptual, allowing the analysis to avoid evaluating impacts on individual properties. The agricultural resources section goes further, stating that it is not possible to predict the amount or location of farmland that could ultimately be converted through future RBPs, or whether mitigation would be sufficient to offset those losses. If the County's DEIR cannot determine the scope of the program's agricultural impacts, the RBP has not yet been developed to a level that supports adoption through this process.

The significance of that uncertainty is amplified by the scale of development the RBP could authorize. Under the DEIR's reasonable worst-case assumptions, an eligible RBP could include a campground or RV park of up to 160 sites on a minimum 20-acre parcel or a country inn of up to 120 guest rooms on a minimum 5-acre parcel within AG-I and AG-II zoning districts — uses that are not currently permitted in these zones due to potential land use conflicts. In exchange, applicants could receive ill-defined incentives including increased density, reduced setbacks, waived development standards, and reduced fees which could individually and collectively amplify potential land use conflicts and impacts to agricultural and environmental resources. These are substantial policy changes whose long-term effects cannot yet be fully evaluated because the locations and cumulative extent of future projects remain unknown.

O.6-5 cont.

Recent adoption of the Agricultural Enterprise Ordinance (AEO) complicates matters further. The DEIR itself identifies the AEO as a related program in its cumulative impacts analysis, recognizing that both initiatives affect the same agricultural lands. However, the DEIR does not appear to evaluate how the new uses and development flexibility authorized by the AEO on AG-II parcels would interact with the additional uses, density incentives, and setback modifications proposed through the RBP. Because the full effects of the AEO on AG-zoned lands are not yet understood, evaluating and adopting the RBP now risks an incomplete cumulative impacts analysis under CEQA and could result in overlapping or conflicting land use policies and impacts that are difficult to reconcile once both programs are in effect.

For these reasons, we request that the Recreation Benefit Program is developed through a separate planning process and environmental review to ensure the RBP complements, rather than duplicates or conflicts with, the recently adopted ordinance, in ways that are irreversibly damaging to agriculture and the environment. Given the acknowledged uncertainty regarding its implementation, the inability to quantify its agricultural impacts, the finding of significant and unavoidable effects, and the County's own recognition that stronger standards may be superior (increased setbacks in Alternative 2), it is premature to adopt the RBP as part of the current Recreation Master Plan and DEIR.

O.6-6

6. Site-Specific Project Concerns

Based on the information available at this time, we remain opposed to the following specific projects envisioned in the Recreation Master Plan and DEIR as currently proposed, and ask that the County address the concerns below before moving forward.

Guadalupe Community Park & Campground.

We understand this campground would be sited adjacent to LeRoy Park along the Santa Maria River, on a site that is partially zoned Agriculture I and partially zoned Agriculture II and is surrounded by active agricultural operations in both Santa Barbara and San Luis Obispo Counties. As detailed extensively in our previous comments, this same area experienced significant flooding and damage during the 2023 storm events, including emergency rescues. While we are generally supportive of sports fields in appropriate locations, we are concerned about siting them in this location because of its flood history, as well as the potential for the proposed hours and intensity of use to create conflicts with surrounding agricultural operations. The DEIR describes a stormwater buffer and habitat swale area between the site and the river, with a river-side trail for bikers and pedestrians, but does not provide the level of detail needed to evaluate whether this buffer would adequately address flood safety for campground occupants. We ask that the County provide a more detailed flood and drainage analysis for this specific site before proceeding.

Guadalupe to the Dunes Trail ("River Trail" alignment).

For the reasons above, we continue to strongly oppose the River Trail alignment, given the risk of flooding, food safety concerns for adjacent crops, the potential for increased theft, trespass, and vandalism on surrounding farmland, and the overall potential for disruption of agricultural operations. We would be willing to discuss alternative alignments that avoid these conflicts — for example, widening the portion of West Main Street between the City of Guadalupe and the Dunes and providing a separated bike path immediately adjacent to West Main Street within the existing right-of-way.

O.6-7

Foxen Canyon Winery Trail and Los Olivos to Los Alamos (LOLA) Trail.

We have heard concerns from members with diverse agricultural operations along these corridors. Depending on the final alignment, design, and site-specific circumstances, we share the concerns raised throughout this letter regarding disruption to operations and impacts to landowners and operators who do not wish to voluntarily participate in trail siting. We ask that the County work directly with individual affected landowners on alignment and design before finalizing these trails.

Santa Ynez Valley Sports Complex.

We oppose siting this complex west of Buellton. We generally support sports fields in appropriate locations and would not oppose this complex if it were sited in a location that would not create conflicts with agricultural operations. O.6-8

7. Requested Action

For the reasons above, we respectfully request that the County: O.6-9

1. Provide more accurate, quantified project descriptions for the proposed projects and impact analysis for agricultural resources for the sweeping and amorphous suite of changes proposed, consistent with CEQA's informational requirements, and recirculate an EIR that complies with the basic requirements of CEQA; O.6-10
2. Remove the DEIR's policy consistency findings as it cannot be reconciled with its own "significant and unavoidable" impact conclusions O.6-11
3. Remove the proposed amendments to the Agricultural Element itself, which would greatly undermine the intent and integrity of the Element and result in unforeseen negative consequences; O.6-12
4. Revise the Project to incorporate feasible mitigation measures that would reduce significant impacts to agricultural resources and develop and analyze a more protective alternative that satisfies CEQA's requirements; and O.6-13
5. Remove the RBP from the Recreation Master Plan and this DEIR at this time, and evaluate the RBP through a separate, dedicated process and EIR once the Agricultural Enterprise Ordinance's implementation and effects on AG-zoned land are better understood, and once agricultural buffer and eligibility standards reflect the realities of intensive agricultural operations.

More broadly, we continue to encourage the County to commit to streamlining and facilitating the overall cost, time, and difficulty of bringing well-designed recreation projects forward in Santa Barbara County. We believe that effort would advance many of the Plan's positive goals more effectively than folding every project and program into a single, broad programmatic approval. O.6-14

Finally, given the sheer scale of the Draft EIR and the limited time and resources available to review it, Grower-Shipper may continue to submit written comments through the final project approval hearing. Consistent with Public Resources Code Sections 21177 and 21167.6, Grower-Shipper respectfully requests that the County accept and include such comments in the administrative record, while recognizing that CEQA does not require a formal response to comments submitted after the close of the designated public review period.

We appreciate the County's consideration of these comments and welcome the opportunity to work with County Parks and Planning and Development Staff on both the Recreation Master Plan and the future RBP process.

Respectfully submitted,

Claire Wineman

Megan Widle
Policy and Communications Manager

Claire Wineman
President

Attachment:
Comment Letter Dated February 9, 2026, Re: 2.11.2026 Item X.2: Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zone Ordinances

February 9, 2026

County of Santa Barbara
Planning Commission
c/o dvillalo@countyofsb.org

Re: 2.11.2026 Item X.2:
Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances

Dear Chair Reed and Planning Commissioners:

The Grower-Shipper Association of Santa Barbara and San Luis Obispo Counties represents growers, shippers, farm labor contractors, and supporting agribusinesses. Our members grow diverse field and nursery crops such as broccoli, strawberries, wine grapes, vegetable transplants, flowers, and tree fruit. As stated previously, we commend the County for its dedication to parks and recreation throughout the County. We recognize the importance of opportunities for individuals and families to enjoy a variety of individual, team, and family-oriented spaces and activities. We share the County's interest in enhancing the quality of life for the tens of thousands of County residents employed both directly and indirectly by the County's vibrant agricultural sector. For these reasons, we generally support the Recreation Master Plan's stated goal: "to enhance the quality of life and leisure experience for Santa Barbara County residents of all ages."

We urge careful review of our letter dated March 11, 2025 (attached); many of our concerns remain and have not been adequately addressed. In this letter, we will briefly highlight several new concerns.

LUDC Amendments

1. AG Additional Allowed Uses. We recommend additional protective standards for uses that could create foreseeable conflict with continued agricultural operations, most especially "Trails for hiking, biking, and riding;" and "Parks, Playgrounds."
2. Development Standards for Trails. The trail standards should also consider potential impacts to agriculture, such as the following:
    a. We seek an agricultural setback of 1,000 feet from row crops and 400 to 600 feet from orchards and vineyards; both should allow for a mechanism to reduce or eliminate these setbacks if the neighbor voluntarily agrees to the reduction.
    b. Chain link fences should be allowed to protect agricultural operations.
    c. Agriculture should be added to the list of use types with high-security needs. Smooth wire fences are not adequate to protect agriculture. Concrete privacy fences are also appropriate for agricultural operations where security is also critical.
    d. A closing time for parking and trails should be added.
    e. These standards should also be included in a section to specifically protect Agricultural Resources.

Recreation Master Plan Projects

1. Guadalupe Campground. We encourage the County to work with the City of Guadalupe to utilize Jack O'Connell Park to the fullest extent possible. We are concerned with the possibility of catastrophic flooding at the currently proposed site near LeRoy Park. For additional information, please see the maps and photos at the end of this letter.
2. Santa Maria Rim Trails. We would like additional information on what is proposed. We would support some rim trail alignments but have concerns with the impacts to private lands and trails located on the valley floor.

Recreation Benefit Project (RBP) Program

Our concerns from our letter dated March 11, 2025 remain.

Thank you for your consideration and we look forward to continuing to engage in this important process.

Sincerely,

Claire Wineman

Claire Wineman
President

Enclosure:
FEMA Flood Zone Map for Guadalupe and Pictures of 2023 Guadalupe Area Storm Damage Compared to Proposed Location of Recreation Benefits Project

Attachment:
Comment Letter Dated March 11, 2025, Re: Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances and Environmental Scoping with **Attachment 1:** Comment Letter Dated April 12, 2022, Re: Draft Santa Maria River Levee Trail Study-Winter 2022 With Attachment A and Exhibit A

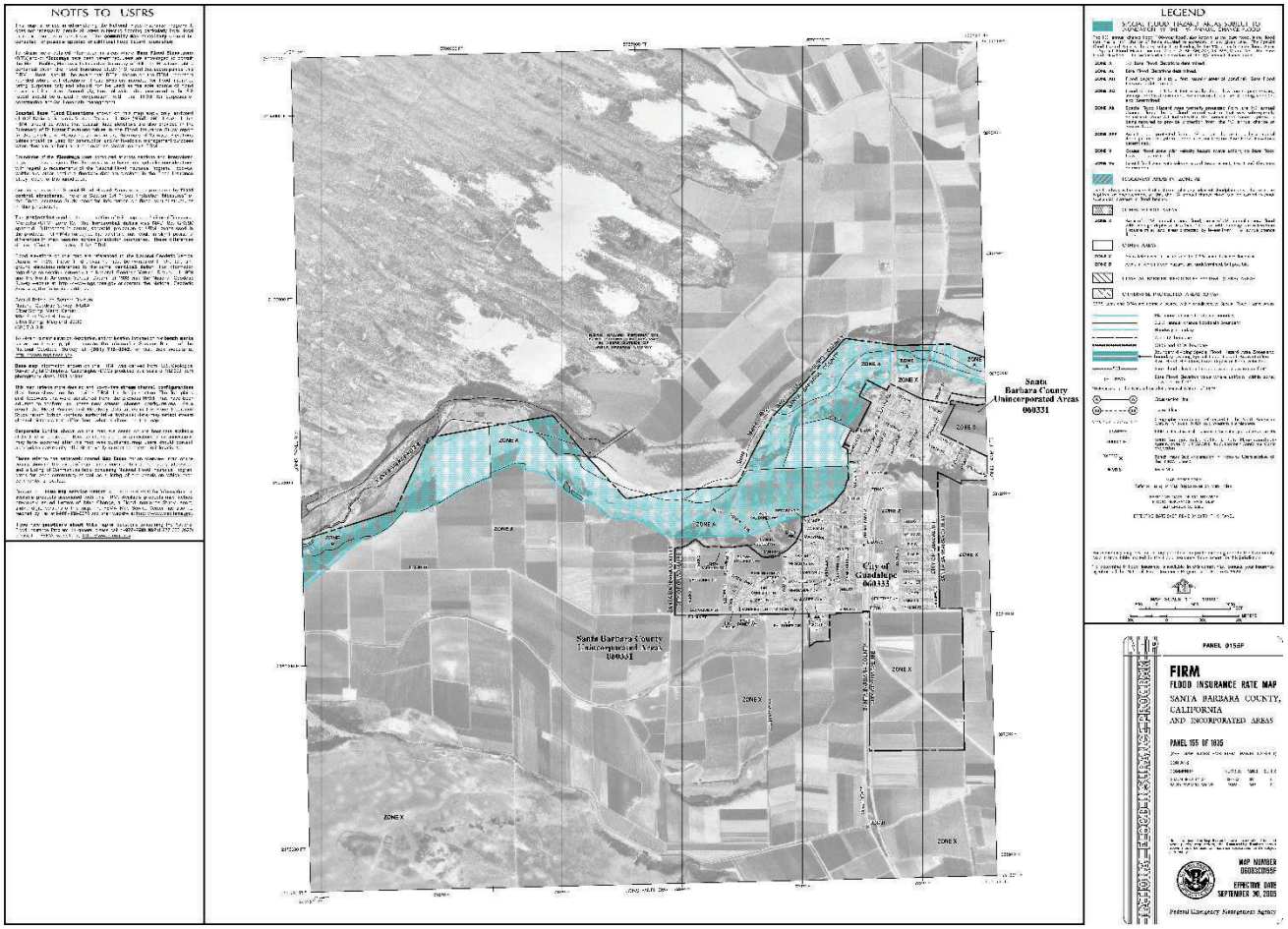
Examples of 2023 Storm Damage in the Guadalupe Area

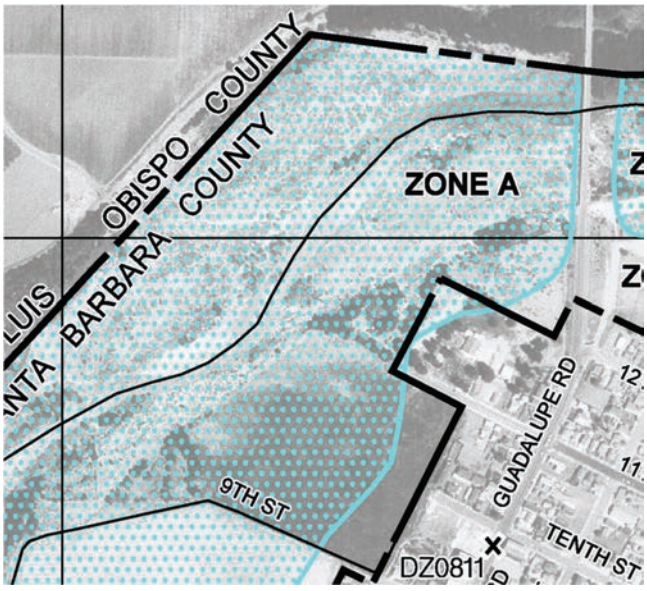
Damage to Main Street to Guadalupe Beach highlighting concerns with "River Trail" Alignment and placing public facilities, including a campground, in a flood zone



Equipment swept away and moved downriver after flooding events highlighting concerns with "River Trail" Alignment and placing public facilities, including a campground, in a flood zone









Left: Close-up of FEMA Flood Map for vicinity of LeRoy Park
Right: 1.14.26 Staff Presentation showing proposed location of RBP Guadalupe Community Park & Campground

March 11, 2025

Jeff Lindgren
Community Services Department
Parks Division
RecPlan@countyofsb.org

Re: Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances and Environmental Scoping

Dear Mr. Lindgren:

The Grower-Shipper Association of Santa Barbara and San Luis Obispo Counties represents over 150 growers, shippers, farm labor contractors, and supporting agribusinesses. Our members grow diverse field and nursery crops such as broccoli, strawberries, wine grapes, vegetable transplants, flowers, and tree fruit. We commend the County for its dedication to parks and recreation throughout the County. We recognize the importance of opportunities for individuals and families to enjoy a variety of individual, team, and family-oriented spaces and activities. We share the County's interest in enhancing the quality of life for the tens of thousands of County residents employed both directly and indirectly by the County's vibrant agricultural sector. For these reasons, we generally support the Recreation Master Plan's stated goal: "to enhance the quality of life and leisure experience for Santa Barbara County residents of all ages."

At the same time, we have concerns about including certain potentially sensitive projects in the Programmatic EIR and broad policy changes, when the specific facts and circumstances of a project must be individually considered. We further raise concerns about the cumulative effect of potential changes to zoning and agricultural lands and operations between the Ag Enterprise Ordinance and the Recreation Master Plan/Recreation Benefits Projects Program.

We urge the County to focus its resources on projects that are truly compatible with existing agricultural operations and are consistent with County policies. Some of the initial projects presented for inclusion have unique environmental, economic, and legal challenges that require detailed study and consideration, which we will detail below.

The complexity of these projects should not impede efforts to proceed with the Recreation Master Plan. To maximize benefits to the community, we urge the County to instead focus efforts on needed services and projects that are compatible with surrounding land uses and protective of food safety and public safety and that can be implemented without significant impediments and opposition.

We have attached our letter dated April 12, 2022 (Attachment 1) regarding the "Draft Santa Maria River Levee Trail Study-Winter 2022." We would like to hereby include the issues addressed in the letter as they pertain to both the projects envisioned by the Recreation Master Plan, as well as environmental review process. Additional comments are as follows.

Recreation Master Plan

We further would like to call for additional discussion on the intersectionality between: future changes in cities, such as the City of Santa Maria General Plan Update and planned sports complex; role of State and

Federal Lands, given that "Los Padres National Forest contributes over 630,000 acres of public wilderness and backcountry with over 770 miles of trails;" and other cross-jurisdictional relationships, such as the Guadalupe-Nipomo Dunes National Wildlife Refuge and Oso Flaco Lake /Oceano Dunes SVRA, in assessing whether to revise the Level of Service and/or need for additional County-initiated infrastructure.

We would like to call into question the methodology used in the Public Park Level of Service (LOS) analysis, which appears to serve as the foundation for a significant component of the Recreation Master Plan as follows: "The Recreation Master Plan compares current and future park count LOS to national benchmarks as goals for long-term planning." We are unclear for the exact basis for the following statement: "To achieve the Recreation Master Plan's Parkland LOS goals for each region, the county needs over 3,300 additional acres of public parkland over the next 20 to 30 years." For example, the Draft Plan states that the County's adopted standard is 4.7 acres per 1,000 people, and the County had 2,287 people per public park in 2023. It goes on to identify and use a national benchmark of 10.8 acres per 1,000 people from the National Recreation and Parks Association (NRPA). However, NRPA's 2024 data[1] shows that for the Pacific Southwest Region, which is more similarly situated to Santa Barbara County than the national average, the median values are 3.5 acres per 1,000 residents and 4,641 residents per park. On both counts, Santa Barbara County is well ahead of the regional medians, calling into question some of the fundamental premises of the draft, and how the County can best support future recreation needs.

Based on the information available at this time, the Association opposes the following projects envisioned in the Recreation Master Plan and Programmatic EIR:

1. Guadalupe Campground. We understand the campground would be sited adjacent to LeRoy Park. This was the location of significant flooding and damage during the 2023 storm events, including emergency rescues. While we are generally supportive of sportsfields in appropriate locations, we would have concern about the specific location of sportsfields in the unincorporated portion of the County adjacent to Guadalupe, as the hours and intensity of utilization could create conflicts with surrounding agricultural operations. Currently, these lands are zoned for agriculture, have a land use designation of agriculture, are in active agricultural cultivation, and are surrounded by active agricultural operations in both Santa Barbara and San Luis Obispo Counties.
2. Guadalupe to the Dunes Trail. For the same reasons listed above, we strongly oppose the "River Trail" alignment due to the risk of flooding, food safety concerns, induction of theft/trespass/vandalism, and overall significant potential for disruption of agricultural operations. If the County were to widen the portion of West Main Street from the City of Guadalupe to the Dunes and provide a separated bike path immediately adjacent to West Main Street within the existing right of way, we would be willing to discuss project designs that could be less in conflict with surrounding agricultural uses.
3. Foxen Canyon Winery Trail and Los Olivos to Los Alamos (LOLA) Trail. We have received concerns from members with diverse agricultural operations in these areas. Depending on the locations and final designs and circumstances, we are concerned with a variety of issues identified throughout this letter, including disruptions to operations, impacts to landowners/operators who do not wish to voluntarily participate, among others.
4. Santa Ynez Valley Sports Complex. We oppose this complex being located west of Buellton. We generally support sportsfields in appropriate locations, and would not oppose the Complex if located in a way that would not create conflicts with agricultural operations.
5. Santa Maria Levee Trail from Santa Maria to Guadalupe. We support the exclusion of the extension in the Recreation Master Plan and EIR. We oppose the reference to this trail as a foregone conclusion in the Guadalupe to the Dunes Trail project description.

[1] https://www.nrpa.org/publications-research/research-papers/agency-performance-review/

At this time, the Association has not heard opposition to the following projects envisioned by the Recreation Master Plan:

1. Los Alamos Community Plaza, Vandenberg Village Park or Trail, Lompoc (Bodger) Trails, (Lompoc) Mission Hills Trail or Bike Park, Waller Park Sportsfields, Orcutt Area Parks and Trails, Point Sal Trails and Access.
2. We have also heard preliminary support from various stakeholders for a Drum Canyon Trail if the road is widened and the road condition is improved.

Recreation Benefit Projects Program

The Association understands the positive results desired from the public-private partnerships envisioned under the Recreation Benefit Projects Program. However, with the information available at this time, the Association has grave concerns that include, but are not limited to, the following:

1. Lack of overall information about the program and implementation
2. Potential to fundamentally undermine orderly land use planning and zoning, resulting in significant conflicts with continued agricultural operations
3. Lack of objectivity and predictability
4. Potential for preferential treatment and encouraging inappropriate *quid pro quo* expectations
5. Potential for unequal protections
6. Additional steps required, capacity, and appropriateness of County Parks Staff to be placed in a quasi-judicial role, in addition to the regular Planning process
7. Potential for exactions, conflict, and condemnations—both for potential voluntary RBP applicants, as well as surrounding owners and operators who do *not* wish to participate—such as those applied by the Coastal Commission in the Avila Beach/Ontario Ridge Trail and what is currently being experienced related to the Bob Jones Bike Trail extension in San Luis Obispo County.

We do not believe the uncertainty and lack of definition surrounding the RBP should hinder the forward progress and positive aspects of the Recreation Master Plan. For these reasons, we believe it is premature to include the Recreation Benefit Program in the EIR and Recreation Master Plan at this time, and should be considered through a separate process and EIR.

The issues in the Recreation Benefit Program are further complicated by the newly adopted Agricultural Enterprise Ordinance. The County has already made significant changes to AG-II zoning, and we are concerned that the cumulative impacts of the Ag Enterprise Ordinance and Recreation Master Plan could be significant to AG zones in the County. Considering the Recreation Benefit Program separately would allow for additional time to better understand the implementation of the Ag Enterprise Ordinance to address additional needs as envisioned under the Recreation Benefit Program.

Environmental Impact Report Scoping

In addition to the issues raised in the letter dated April 12, 2022 (Attachment 1), we would like to further raise the following issues with potentially significant impact related to improper siting of several of the proposed potential projects, and/or introducing new, incompatible recreational land use and activities and creating new "sensitive sites."

1. Air Quality. "Expose sensitive receptors to substantial pollutant concentrations." "Result in other emissions (such as those leading to odors) adversely affecting a substantial number of people."

2. Geology and Soils. "Directly or indirectly cause potential substantial adverse effects, including the risk of loss, injury, or death involving: Landslides." "Result in substantial soil erosion or the loss of topsoil."
3. Greehouse Gas Emissions. We urge the County to conform with its own Greenhouse Gas Emissions policies that would be required of those subject to the County's jurisdiction.
4. Hazards and Hazardous Materials. "Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan."
5. Hydrology and Water Quality. "Substantially alter the existing drainage pattern of the site or area… in a manner which would… substantially increase the rate or amount of surface runoff in a manner which would result in flooding on- or offsite; create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff; or impede or redirect flood flows."
6. Population and Housing. "Induce substantial unplanned population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?"
7. Recreation. "Would the project increase the use of existing neighborhood and regional parks or other recreational facilities such that substantial physical deterioration of the facility would occur or be accelerated." We are concerned with potential lack of maintenance and service quality of new and existing facilities, especially if new facilities are added beyond the County's maintenance abilities.
8. Utilities and Service Systems. "Require or result in the relocation or construction of new or expanded water, wastewater treatment or storm water drainage, electric power, natural gas, or telecommunications facilities, the construction or relocation of which could cause significant environmental effects."
9. Wildfire. "Expose people or structures to significant risks, including downslope or downstream flooding or landslides, as a result of runoff, post-fire slope instability, or drainage changes?"
10. Mandatory Findings of Significance. "Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)"

We further suggest that the County commit to streamlining and facilitating the overall cost, time, and difficulty of bringing good projects forward in Santa Barbara County in general at all levels, which would be another way to achieve some of the positive goals envisioned under the Plan.

Thank you for your consideration and we look forward to continuing to engage in this important process.

Sincerely,

Claire Wineman

Claire Wineman
President

Attachment 1:
Comment Letter Dated April 12, 2022, Re: Draft Santa Maria River Levee Trail Study-Winter 2022
With Attachment A and Exhibit A

Grower Shipper ASSOCIATION
of Santa Barbara and San Luis Obispo Counties

April 12, 2022

Via electronic mail only

Mark Friedlander
Project Manager, Santa Maria River Levee Trail Study
mkfriedlander@countyofsb.org

Re: Draft Santa Maria River Levee Trail Study-Winter 2022

Dear Mr. Friedlander:

Thank you for your extensive outreach efforts and the opportunity to comment on the Winter 2022 Draft Santa Maria River Levee Trail Study.

General Comments

1. We encourage the study to reference the "Santa Maria River Levee Trail Extension Study" to differentiate between the existing Tom Urbanske Multipurpose Trail in Santa Maria.
2. The comments in this letter are directed toward a contemplated bicycle and pedestrian pathway. Multiple public survey responses requested equestrian access. The addition of an equestrian access component would create additional land use conflicts and safety concerns that we did not address in the letter but would like to establish as an additional area of concern if this direction changes in the future.
3. We are aware of and sensitive to the distinctions and weight of the word homeless as compared to houseless, unhoused, or person experiencing homelessness. To be consistent with the feasibility study and resources referenced, in this letter we will respectfully use the term homeless.
4. Throughout the draft, there is inconsistent treatment about the project's purpose and the corresponding necessary design elements. For example, a recreational trail might have different community needs from one intended to primarily serve as an active transportation commuting corridor. To accurately evaluate the feasibility of either, an accurate description of the intended purpose and unique design needs and constraints must be included, as outlined throughout these comments.
5. In several places we comment on specific design features and other issues specific to the proposed project if it were to proceed; these comments in no way lessen our broader concerns about fundamental land use compatibility and legal issues, as well as the importance of preventing predictable land use conflicts through thoughtful planning and siting of projects in compatible locations.
6. We believe it is an overstatement to call the study a "comprehensive feasibility study." As also stated in the Executive Summary, "the purpose of the Study is not to design and engineer a trail." The document as presented is predominantly a public outreach and public sentiment document with some light conceptual drawings. Important technical and financial details, such as the permits that are actually needed and feasibility and cost of obtaining those permits; level and cost of environmental review and mitigation; licensor (operator) responsible for operating, patrolling, cleaning, repairing, and maintaining the trail; feasibility of ingress/egress from the levee to Guadalupe; and fundamental design incompatibilities on whether or not to include fencing and toilets have not been addressed.

Many details are missing that would be included in a true feasibility study and allow for informed decision-making on whether to proceed with the proposed trail extension.

7. We also urge careful consideration of the opportunity cost of proceeding with this particular project instead of pursuing other transportation, active transportation, and recreation projects in Santa Barbara County. Unfortunately, the information necessary to assess the project's costs, benefits, and overall community value proposition are lacking from the current draft of the feasibility study for the reasons outlined in greater detail in these comments.

ES 1. Executive Summary/Introduction

1. As mentioned previously, it is a dramatic overstatement to call the study a "comprehensive feasibility study." The study does "Summarize the input from the community engagement efforts" but in no way addresses the individual facts and circumstances, including factual constraints, needed to actually "determine the feasibility of the project overall."

ES 2. Executive Summary/Project Overview

1. What documentation is available to substantiate the following statement: "The trail would complete a major gap in the active transportation network by providing a trail separated from vehicle traffic between the cities of Guadalupe and Santa Maria"? Although we are aware of interest in the potential recreational use of the trail, we do not see substantiation of the notion that the trail extension would fill a "major gap" in an existing "active transportation network."
2. We agree and appreciate that the study recognizes that "The proposed trail is a complicated project that will require continued discussions and further analysis from key stakeholders…"

Chapter 1

1.1 History and Planning Context

1. As mentioned previously, this study is still woefully inadequate in fulfilling the "needed further study" prior to pursuing a grant for full implementation.

1.2 Related Studies

1. The Guadalupe to Beach Multi-Use Trail Feasibility Study is also an initial, conceptual exercise that looks at theoretically potential alignments but falls short of addressing significant technical and financial facts and circumstances.
2. We oppose using Peralta Street in Guadalupe as the main point of ingress and egress to the proposed extension. A portion of Peralta Street is zoned Industrial by the City of Guadalupe and is an essential access point for established Industrial use. We are concerned for the safety and order of all involved that would result from inducing high-traffic, mixed bicycle and pedestrian use into an area that encompasses semi truck traffic on a daily basis.

1.4 Santa Maria River Levee

1. We absolutely agree with Flood Control's concern with impacts to "the Maintenance team's ability to operate the levee and keep the facility in good standing with USACE." The levee's primary purpose is to protect life and property from catastrophic flooding; it must remain intact.
2. While we agree with the need to maintain the levee's function, fencing is an essential design element in the concerning event that the levee trail extension does move forward. The food safety, theft, vandalism, and trespass concerns from not having fencing separating fresh produce cultivation from

the proposed trail are in direct conflict with Flood Control's concerns about the impacts of fencing to its operations and wildlife; these are critical irreconcilable differences.

3. We agree with Flood Control's concerns: "Maintaining access is another key issue for Flood Control. Flood Control cautioned that it may be challenging to maintain existing legal access for agricultural use while also restricting the public and unauthorized vehicles and equipment from accessing the levee and surrounding area."
4. If the trail does move forward, discussions surrounding license agreements must also include liability and damage protections for growers and landowners from the extensive problems outlined in this letter. Food safety and illegal trespass are a few examples of the issues prompting these concerns.
5. The experience reported by the City of Santa Maria is inconsistent with the lived experiences of our members operating along the existing trail, especially near Blosser Road in Santa Maria. Our members have repeatedly reported theft and vandalism along the existing trail, including the portion north of the levee and east of Blosser Road. Reports on crime and calls for service for both the City and County jurisdictions should be included as part of the feasibility study's due diligence.
6. In addition to the private crossings identified in the study, the County's crossings at "Main Street Canal" and Bonita School Road must also be considered and addressed to prevent unauthorized access and safety threats to agricultural employees and operations.

1.5 Existing Issues Along the Levee

1. This topic merits a standalone chapter in the study that should include readily accessible public information on calls for emergency service, reported theft and vandalism, riverbed fires, plant protection materials use restrictions, and food safety requirements for produce safety. The level of detail and quantification of this study section compared to other study sections is woefully inadequate. The selective fulfillment of due diligence to complete the feasibility study is concerning, especially when issues like domestic pets and trespassing/theft were identified as top concerns in outreach meetings across multiple stakeholder groups.
2. We agree emphatically with the characterization of existing issues.
3. We would like to highlight the following points that are consistent with the lived experiences of our members and their employees on a daily basis:
   - "…staff witnessed people bypassing the denial fencing at the terminus of the Tom Urbanske multi-purpose trail at North Blosser Road."
   - "Most of the users of the trail appeared to be residents recreating, exercising, or walking dogs. Staff also noticed people letting their dogs off-leash despite posted notices saying leashes are required at all times."
   - "Theft, including stolen vehicles and farm equipment, is common along the Santa Maria River according to the officers [Sheriff officers from both Santa Barbara and San Luis Obispo counties]."
   - "Santa Barbara Sheriff officers also stated that there is more foot traffic than expected along the levee between Guadalupe and Santa Maria. Encampments are more concentrated near Guadalupe and Santa Maria, however, the sheriff's [sic] also receive calls about fires and encampments in the area between the cities as well."
4. The statement "Operators typically provide porta-potties for the farmworkers" understates both the regulatory requirements and the fulfillment of the requirements to provide employee access to field sanitation. More accurate information regarding the provision of portable field toilets can be found in the references noted below.[1] Generally, an agricultural employer must provide toilet facilities within a five-minute walk or quarter mile; in general, there are a few very limited exceptions to this

[1] https://leginfo.legislature.ca.gov/faces/codes_displayText.xhtml?lawCode=HSC&division=104.&title=&part=6.&chapter=11.&article=4 and https://www.dir.ca.gov/title8/3457.html.

requirement related to field topography/access and alternative means of compliance via transportation to toilet and handwashing facilities if there are fewer than five employees or less than two hours of field work to be performed.

Chapter 2

2.1 Demographics & Socioeconomic Profile

The following comments pertain to the chart on page 17:

1. What is the source of the information?
2. To increase transparency and clarity, the charts should be updated to also include the numbers corresponding to each percentage.
3. What is the total commuting population in terms of numbers of individuals and vehicles?
4. What is included in "other means" of commuting?
5. Do the numbers in the charts include individuals commuting both within and beyond City limits? What is the number of commuters and mode of transportation for each of these respective categories?

2.2 Commute Summary

Guadalupe to Santa Maria

1. The sources of information for this section must be clearly cited and the way the information is presented in this section is very confusing.
2. While it is true that "…commute times can be significantly lengthened in the early morning and afternoon due to high traffic volumes…" residents of Guadalupe typically experience "reverse commute" traffic patterns from those who reside in the City of Santa Maria. See comments in the following section for additional details.
3. The draft states "Over 48% of workers have access to three or more vehicles" and that "When looking at these findings it is interesting to see how many residents own multiple vehicles, yet travel alone to work." There are multiple reasons why multiple vehicles might be available. This study does not include average or median household size, but potential reasons for access to multiple vehicles include: having multiple individuals in the household that are of driving age; different family transportation needs in terms of timing and destination; personal enjoyment of different styles of vehicles, recreational vehicles, and automotive projects; access to company-provided vehicles for work purposes; and various limitations of vehicles and their automotive capacities.
4. As mentioned previously, to be relevant to this study, the study should differentiate between those commuting within and beyond the City limits and include the numerical breakdown for each category.
5. What is the source of information in assessing occupation? NAICS classification codes clearly differentiate Farm and Nonfarm employment.
6. The "assumptions" are deeply flawed.
    a. The study states "With the influence agriculture has on the community, workers also use their personal vehicles at their jobs." There is no basis for this statement and it does not make sense. However, there are company-provided vehicles for certain occupations within agriculture. Individuals might use their personal vehicles for personal commute needs, like any other resident, and for private rideshare and carpool agreements. These factors are not unique to agriculture.
    b. The study also states "A safe connection between Guadalupe and Santa Maria may help to eliminate the need to own multiple vehicles and mitigate the impact that not owning a vehicle would have on an individual or family." See previous comments about the irrelevance of ownership of multiple vehicles. The problem of arriving at a specific time and destination still remains a challenge, especially in the agricultural zones between Guadalupe and Santa Maria, as does issues of transporting personal items needed throughout the day and "last mile" commute issues. There are also other ways to better address this need, such as more reliable and frequent

public transportation options and increased carpool and vanpool participation. Finally, the study should be consistent and transparent in whether the proposed trail extension should realistically be categorized as an alternative transportation project or a recreational project.

7. Although the sources of information were not clearly stated in this section, the 2020 American Community Survey Table S0801 for Guadalupe[2] included some interesting information that is relevant and should be included in the feasibility study. More specifically, the table estimated 3,225 "Workers 16 years and over who did not work from home." Of that, only 0.9% walked and 0.0% bicycled, resulting in a total commuting population of 30 individuals that walked or bicycled; whether their destination was within or beyond City limits was not available in the data table. Furthermore, the survey estimated that over 75% of commuters had a "time of departure to go to work" before 7:59 am, which would severely limit the utility of the proposed levee trail extension as an active transportation commute alternative. This information should be included to be transparent and accurate.
8. Additionally, the 2020 American Community Survey Table S0802 for Guadalupe[3] shows a breakdown of "Car, truck, or van-carpooled" and shows both higher levels for carpool participation for the Industry "Agriculture, forestry, fishing and hunting, and mining" and that 0% of those who carpooled had "No vehicle available."
9. Additional findings contained in a recent traffic study that are also relevant to this section can be found below.

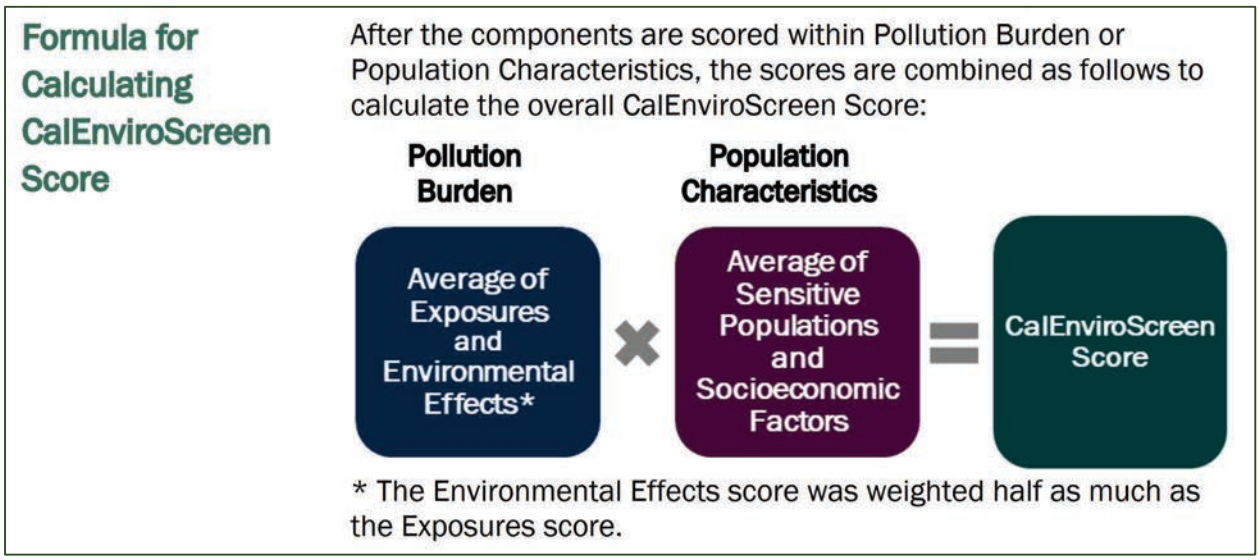
Santa Maria to Guadalupe

1. See previous comments about the need for consistency in describing the purpose of the proposed trail extension. It is somewhat possible that a limited number of individuals could potentially use the trail for active transportation/commuting purposes, but this is highly unlikely due to work schedules, "last mile" and access issues to arrive on time at a specific worksite, and different bicycle needs to navigate the different surfaces (e.g. road bike versus mountain bike). Additionally, the area can be subject to very dense fog and windy conditions, especially during commute hours, which could limit the desirability of the use of the proposed trail extension as a bicycle commuter route.
2. Realistically, there will be more individuals who have the available time and walking/bicycle resources to enjoy a shorter, round-trip outing along a portion of the levee, such as the existing Tom Urbanske Multipurpose Trail bordering the City of Santa Maria, rather than making a 26-mile round trip outing to the ocean. This will be made more difficult by needing a bicycle that can withstand the uneven surface of the levee rather than a road bike better suited to longer distances.
3. What are the actual commute or use patterns at the Guadalupe Amtrak station? How many of these are overnight trips that require luggage that might not be readily transportable on a bicycle? Like much of this section, assumptions about the potential trail use in connection with the Amtrak station appear to be based on conjecture, rather than probable scenarios.
4. A memo regarding a revised traffic analysis conducted on June 1, 2017 at Black Rd/SR 166 in preparation for intersection improvements contemplated by CalTrans and SBCAG found the following: "The counts show that the AM peak hour occurs from 5:15-6:15 – which is prior to the typical 7-9 AM commuter peak period." Additionally, "…traffic is predominately westbound during the AM peak hour (from Santa Maria toward the west via westbound SR 166 and via northbound Black Rd)…" Furthermore, the traffic counts show 0 pedestrians or bicycles in the AM or PM traffic counts. For comparison, the traffic count showed that 82% of traffic passed through the intersection prior to 8:00 am.[4]

[2] https://data.census.gov/cedsci/table?q=commute%20guadalupe,%20ca&tid=ACSST5Y2019.S0801
[3] https://data.census.gov/cedsci/table?q=guadalupe,%20ca%20commute&tid=ACSST5Y2020.S0802
[4] Memo Re: Black Road/SR 166 – Supplemental Analysis, Associated Transportation Engineers, ATE 1107602M08 dated August 29, 2017.

2.3 CalEnviroscreen 4.0

1. It is not accurate to conclude that "The CalEnviroscreen results show that the census tract Guadalupe falls into is more likely to be burdened by negative environmental effects than Santa Maria. This could be due to the proximity of agricultural fields and the spraying of pesticides." According to the October 2021 CalEnviroscreen Report[5], scores are calculated as follows:



Therefore, it is also inaccurate to state that "The tool depicts the area's scores: a high score means higher pollution and environmental burden compared to areas with lower scores."

In fact, a closer examination[6] of Census Tract 6083002502 data used to generate the CalEnviroscreen 4.0 map shows that the Population Characteristics actually have a higher score than the total estimated Pollution Burden. In Santa Barbara County, three of the top five "Pollution Burden" scores are actually located in Santa Barbara and Goleta: Census Tract 6083000804 (#1 pollution burden score in Santa Barbara County); 6083001206 (#3); and 6083003001 (#5). However, these three census tracts are offset by comparatively lower "Population Characteristics" resulting in lower overall CalEnviroScreen scores/percentiles. Notably, Census Tract 6083002502 does not appear in the top 5 Pollution Burden scores for Santa Barbara County.

2.5 Chapter Summary

We agree that a snapshot of demographic information can be helpful in planning. We restate our concerns about confounding the purpose of the trail for recreation versus active transportation, as both have different needs, target audiences, and implementation considerations. We have also previously outlined data gaps that would be more pertinent to the issue at hand.

[5] https://oehha.ca.gov/media/downloads/calenviroscreen/report/calenviroscreen40reportf2021.pdf
[6] https://oehha.ca.gov/calenviroscreen/maps-data; CalEnviroScreen_4.0Excel_ADA_D1_2021.xlsx

Chapter 3

1. We commend the study's comprehensive outreach efforts and adaptability through the COVID pandemic.
2. We would like to highlight the survey findings regarding safety and security concerns preventing use, along with the importance of maintenance and cleanliness. Additionally, the numbers regarding the primary use for biking between the Promotores survey and the Community survey are significantly different and worth noting (36% versus 71%, respectively); the Community survey seemed to have a large number of respondents who did not report zip codes such as 93434, 93458, and 93454, which could be quantified and useful context to the survey responses. Additionally, recreation was viewed as the primary benefit and the majority of respondents envisioned weekend-only use, which could create greater issues with trespass into agricultural fields, theft, and vandalism, as well as conflicts with plant protection materials applications since fewer workers would be in the fields during the weekend compared to weekdays.
3. The following statement is inconsistent with the Option 1-Selected design of a DG surface: "One of the main conclusions we can draw is that this path will be utilized for recreation and bicycling, which emphasizes the need for a paved path along the levee."

Chapter 4

4.1 Permitting

1. Although we understand the reasons behind the exemption in LUDC Section 35.10.040.G, we ask that the spirit of the LUDC be applied and consistent with the standards that others would be held to if bringing forward the project as any of the County's constituents, whether a private party or a nonprofit organization. Furthermore, even if the County is exempt from its own permitting and land use standards, it must be consistent with applicable plans and policies, including the Comprehensive (General) Plan. The Association's legal counsel submitted extensive comments on the proposed Santa Maria Levee Trail Extension in a letter dated January 26, 2022, which further details some of the County's applicable plans and policies and is included as Attachment A to this letter.
2. The unique facts and circumstances of the project warrant a complete Environmental Impact Report, not an Initial Study-Mitigated Negative Declaration. We will provide additional detail on this in response to Section 4.7 Environmental Review Process.
3. In addition to the Santa Maria River, we are under the impression that both Main Street Canal and Blosser Channel are also 303(d) listed waterbodies that would be within the project area.

4.2 Maintenance

1. A major question is how the proposed trail extension will be administered and maintained in perpetuity, especially in such a way that would address the unique challenges of operating next to an important industrial workplace responsible for producing fresh produce and feeding families worldwide. It is very concerning that a feasibility study would not be able to identify a licensor and that "A Licensor has not been identified for the proposed trail at this time." This is yet another major hole in the feasibility study and limitation to a realistic assessment of the feasibility and desirability of the project moving forward.
2. Table 4-1. Broad liability protections must extend to nearby agricultural operations and landowners and should be a topic of additional discussion and assessment of feasibility. Furthermore, future discussions should include the County and Licensor developing a significant restitution fund due to the induction of urban uses into active farming areas.
3. Table 4-1. Maintenance and litter removal must include regular removal of human feces and dog feces.

4.3 Connections to Guadalupe

1. In addition to the legal access constraints identified in the study, we further restate the concern about the industrial nature of Peralta Street and use compatibility: We oppose using Peralta Street in Guadalupe as the main point of ingress and egress to the proposed extension. A portion of Peralta Street is zoned Industrial by the City of Guadalupe and is an essential access point for established Industrial use. We are concerned for the safety and order of all involved that would result from inducing high-traffic, mixed bicycle and pedestrian use into an area that encompasses semi truck traffic on a daily basis.
2. The issue of connecting the proposed levee trail to Guadalupe is another example of a glaring hole in making an informed assessment of the feasibility of proceeding with the proposed extension.
3. Additional legal and technical issues are further addressed in Attachment A.

4.4 Bonita School Road Crossing

Although the Santa Maria River serves as a jurisdictional and geographical division, the agricultural lands on the Santa Maria Valley floor north of the Santa Maria River in San Luis Obispo County are very closely connected to their counterparts in Santa Barbara County. If it moves forward, the project would likely induce the same land use conflicts and urban activities into agricultural zones in San Luis Obispo County, especially via the new Bonita School Road crossing, which would further impact agricultural resources. Furthermore, impacts to agricultural activities and lands in San Luis Obispo County would impact agribusinesses, employees, and value-added opportunities for citizens and businesses located in Santa Barbara County.

4.5 Access-Emergency Access and Farm Access

1. We share the concerns expressed regarding emergency access.
2. We would like to highlight the following irreconcilable incompatibilities between different stakeholder needs as captured in the study:
   a. "The Sheriff's Office agreed that access to the trail will be challenging for law enforcement. The Sheriff's Office could patrol the trail by car, foot, quad, or helicopter. Each mode presents challenges, however, as not all Sheriff officers are trained and certified to use quads and the nearest helicopter is based in Santa Ynez."
   b. "If fencing or barriers are installed, the Sheriff's Office will request additional emergency access points to the trail so there's redundancy. According to the Sheriff's Office, Bonita School Road would not be sufficient as the only access point to the trail if the rest of the trail is fenced." Additional access points will only further complicate the project design and facilitate trespass into adjacent farm fields. What is the legal feasibility and practicality of securing additional access locations? Furthermore, fencing is essential to limiting the movement of dogs and people into fresh produce farm fields to protect food safety and safe work environments for employees.
   c. "The Sheriff's Office currently responds to calls about trespassing in the study area because there's no public access to the area. The Sheriff's office was also concerned about the proposed hours for the trail. According to a Lieutenant, the County Sheriffs would have difficulty responding to complaints about homeless encampments along the levee trail if the trail is open 24 hours a day. If the trail is closed during certain hours, County Sheriff can respond to calls about loitering or encampments during the hours the trail is closed to the public." Inducing regular public use will complicate enforcement and compete for limited law enforcement resources. Additionally, as mentioned in response to the Commute Summary Section, limited trail hours might result in limited utility as an active transportation commuting alternative due to the typical times of departure for commuting individuals, which is a further irreconcilable incompatibility of the project.

d. "County Fire did not think the proposed trail presented challenges for fire protection. The trail is not located in a high or very high fire hazard area that is prone to wildfires." We are surprised that fires starting from riverbed encampments were not mentioned here, as there have been several instances in recent years of fires that started due to homeless activity in the riverbed and quickly spread and caused closures to Highway 101 and Highway 166. This is a danger to life and property and these public and media records are readily accessible.[7]

e. "County Fire and the Sheriff's Office both advised against building restrooms, hydration stations, or other amenities as they could unintentionally increase the homeless presence along the trail and would present maintenance issues." We vehemently oppose the proposed absence of restrooms at the proposed trailhead and along a nearly 7-mile stretch (each way) adjacent to fields growing fresh produce for human consumption. We agree that there will be issues with maintenance and vandalism, which our members already experience on a regular basis. Additionally, the City of Santa Maria has experienced vandalism and arson in its toilet facilities,[8] and we understand that there was an arson incident in the Preisker Park toilets that coincided with the most recent 2022 riverbed cleanup efforts. At the same time, the concern of human excrement contaminating fresh produce fields and soil is a greater concern and must be addressed satisfactorily. Additionally, lack of hydration stations, especially without areas of shade, could induce individuals to seek water from farms and farm facilities or exacerbate the need for emergency services if heat illness or other dehydration emergencies arise. National Parks like Yosemite and the Grand Canyon regularly experience such issues despite prolific signage regarding water requirements and the need for individual preparedness.

f. Farm access crossings across the levee must provide for the safe movement of equipment, vehicles, and people. Additionally, the crossings must also prevent people from using these points to illegally access the farms on both sides of the levee. The design must not impede movement or induce trespass onto farms or fields on either side of the levee. The crossings must be accessible to the types of field equipment pictured below:



[7] https://www.ksby.com/news/fire-watch/2019/07/24/fire-breaks-out-near-santa-maria-riverbed?msclkid=221a75c7b6a611ecbbeaee75da0a2787; https://www.ksby.com/weather/fire-watch/fire-in-santa-maria-riverbed-impacts-highway-101-traffic; https://www.ksby.com/weather/fire-watch/fire-crews-respond-to-report-of-brush-fire-near-santa-maria-river

[8] https://keyt.com/video/2021/10/11/santa-maria-rec-and-parks-department-public-restrooms-at-preisker-park-to-close-indefinitely-if-vandalism-continues/



Examples of agricultural field equipment that must be able to safely and efficiently cross the levee.

4.6 Farming Operations & Considerations

1. We appreciate the study's nuanced discussion of key issues in this section, especially surrounding the need and regulatory oversight of plant protection materials.
2. A discussion of food safety regulatory (e.g. US FDA FSMA) and market requirements (e.g. LGMA, private buyer inspections and certifications) must be included in this section (see comments on Case Studies for additional information on these requirements).
3. Information on regulations surrounding restricted materials and permitting in agriculture should be included in the feasibility study. Regulatory requirements surrounding the application of plant protection materials have changed dramatically in recent years. Buffers and application exclusion zones have now been implemented in new ways that were never requirements in the past and have only continued to expand. Currently, some products essential to crop cultivation such as strawberries have buffer zones prohibiting entry of most individuals of several hundred feet;[9] if the buffer cannot be obtained due to the introduction of the proposed levee trail and public presence, then the application cannot move forward, which could result in reduced productivity of a significant acreage of Prime and Unique agricultural lands. To provide just one limited example of a much larger issue, depending on several factors, several essential products and applications can require a buffer zone of more than 300 feet;[10] if a 300 foot buffer is extended across the 6.7 mile trail, then approximately 250 acres of Prime and Unique agricultural lands would experience a significant loss of productivity under the current use restrictions, with an associated reduction in property and business value. Agricultural lands in the Santa Maria Valley of similar productivity to those along the proposed trail are currently valued at up to $64,000+/- per acre;[11] the costs from loss of use or diminished productivity in a required buffer zone would be substantial and must be considered in assessing the proposed project's feasibility. These materials use restrictions will likely only continue to expand and are just one example of many different restrictions related to plant protection, food safety, and other operational limitations that would be incurred by proceeding with the trail extension. Furthermore, the study cannot predict the ways in which new requirements will be applied in the future. At a minimum, inducing an intensive, urban, public use in an established agricultural production area that is an industrial place of work, the proposed levee trail extension will subject current and future growers and landowners to significant uncertainty on their ability to protect plants and food safety and fulfill regulatory and market

[9] https://www.cdpr.ca.gov/docs/enforce/compend/vol_3/rstrct_mat.htm; https://www.cdpr.ca.gov/docs/enforce/compend/vol_3/append_k.pdf

[10] *Ibid*

[11] *2021 TRENDS® in Agricultural Lease & Land Values*, California Chapter of the American Society of Farm Managers and Rural Appraisers

requirements in perpetuity. Furthermore, the study itself has documented the failure of signage to deter illegal access to the proposed levee trail. Will the County assume the risk and liability of the public's failure to abide by posted signage and indemnify growers and applicators who make a reasonable effort to comply in perpetuity?

4. If the proposed trail moves forward, the agricultural restrictions imposed by the necessary buffer zones will result in a regulatory taking of private property through inverse condemnation, requiring just compensation. The cost to compensate affected landowners for the land alone will be significant, not to mention legal costs, which dramatically impacts the feasibility and cost-benefit considerations of the project. It also does not capture the direct and indirect economic impact and opportunity cost to employees, agribusinesses, and multitude of other businesses such as restaurants and service providers that are interdependent with the County's vibrant agricultural economy.
5. In our comments regarding Section 5.1, we will outline in greater detail the limitations of the trail case studies utilized and how the trails referenced are not similarly situated.
6. We agree with the concerns characterizing trespassing from domestic pets and trail users. Additionally, impacts from a food safety incident can impact our entire society, not just local farmworkers, farmers, and supporting agribusinesses. For example, a UC Davis study on *"E. coli* in the Romaine Lettuce Industry: Economic Impacts from the November 2018 Outbreak" found that "We estimate that societal losses from the Fall 2018 incident were in the range of $280 to $350 million."[12] Relevant excerpts from the study include the following:

> The net loss to society from the E. coli incident involves more than the leafy-green supply-chain participants. It also involves consumers who were unable to access romaine products during the early weeks of the incident and in the later weeks due to unfounded fears regarding product safety. Losses were also incurred by suppliers of inputs, such as labor and materials, to the industry who lost employment and sales due to the incident. We developed a methodology to estimate the societal loss from the incident based on reduced sales of romaine through the advisory period and relevant aftermath. Our estimates indicate a total social loss in the range of $280 to $350 million.
>
> Ultimately it was determined that the entire Fall 2018 E. coli incident was due to contaminated romaine emanating from a single farm. Yet it resulted in widespread unavailability of romaine product, long-lasting fears among some consumers about the safety of eating this healthy product, and significant economic losses incurred by a wide range of participants in the leafy-greens industries and beyond. The magnitude and breadth of losses from this single incident indicates the importance for the industry to adopt universal food-safety standards that can either prevent, or, at worst, sharply reduce the likelihood of such incidents occurring in the future.

7. We have consistently detailed our concerns with potential food safety issues with dogs, both in terms of direct contamination of the field with urine and feces; soil contamination; and contaminated runoff moving from the trail to fields. Other potential concerns include employee safety from off-leash dogs entering farming areas. According to the U.S. Centers for Disease Control and Prevention (CDC):

> Dogs can have many positive effects on the lives of their owners… Although dogs can be beneficial to the health and wellbeing of their owners, people should be aware that dogs of any age, including puppies, can sometimes carry harmful germs that can make people sick. Germs from dogs can cause a variety of illnesses, from minor skin infections to serious illnesses.[13]

The CDC website includes a list of 18 selected diseases which can be spread by dogs. Examples include:[14]

- *Campylobacter*

[12] https://kiesel.ucdavis.edu/Full%20Report.pdf
[13] https://www.cdc.gov/healthypets/pets/dogs.html
[14] *Ibid*

- *Cryptosporidium*
- *Giardia*
- *Leptospirosis*
- MRSA (Methicillin-Resistant *Staphylococcus aureus*)
- *Salmonella*

Additional information on the diseases, how they spread, and symptoms in humans can be found at the CDC website. It is particularly noteworthy that soil and soil infected by contaminated water can result in pathogens being potentially infectious for a much longer duration than the initial exposure or contamination, which further compounds risks to employees and consumers worldwide.

4.7 Environmental Review Process

1. The feasibility study appropriately recognizes the numerous and reasonably foreseeable land use and agricultural operations conflicts presented by the potential trail extension. These predictable land use conflicts could easily result in the conversion of Prime Farmland and Unique Farmland, most of which are currently contracted under the Agricultural Preserve Program (Williamson Act), to non-agricultural use. The study demonstrates the project may have a significant impact on the environment due to impacts to agricultural land, and thus it is clear an EIR will need to be prepared and adequate mitigation adopted. Maps showing the prevalence of both Prime and Unique Farmlands and contracted Agricultural Preserve Program lands in the study area can be found at the end of this section.
2. In a broader sense, one could argue that some 10,000 acres of Prime and Unique Farmlands in both Santa Barbara and San Luis Obispo Counties could be influenced or impacted by the proposed levee extension due to induction of people, dogs, trash, feces, and direct and water-borne soil microbial contamination into farm fields.[15]
3. Potentially significant impacts of the project that require an EIR include but are not limited to the following:
   a. Aesthetics. "Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area."
   b. Agriculture. "Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance (Farmland), as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use."
   c. Agriculture. "Conflict with existing zoning for agricultural use, or a Williamson Act contract."
   d. Agriculture. "Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland, to non-agricultural use or conversion of forest land to non-forest use."
   e. Hydrology and Water Quality. "Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river or through the addition of impervious surfaces…"
   f. Land Use and Planning. "Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect."
   g. Public Services. "Result in substantial adverse physical impacts associated with the provision of new or physically altered governmental facilities, need for new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times or other performance objectives for any of the public services: …Fire Protection. Police Protection. Other public facilities."

[15] Conservative, approximately estimated acreage roughly south of Division Rd, north of Main Street, west of Blosser Rd and east of Flower Ave/Hwy 1.

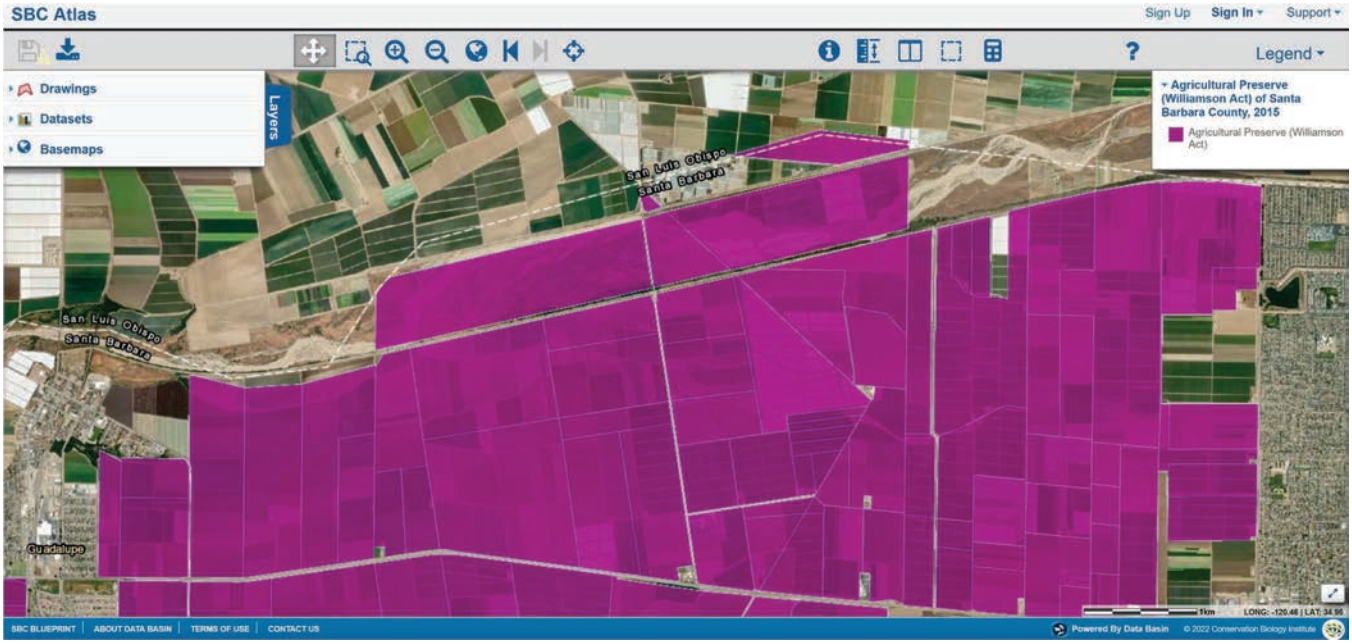
h. Recreation. "Does the project include recreational facilities or require the construction or expansion of recreational facilities which might have an adverse physical effect on the environment?"
i. Transportation. "Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)."
j. Transportation. "Result in inadequate emergency access."
k. Wildfire. "Due to slope, prevailing winds, and other factors, exacerbate wildfire risks, and thereby expose project occupants to pollutant concentrations from a wildfire or the uncontrolled spread of a wildfire."
l. Mandatory Findings of Significance. "Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?"[16]

4. The photo at the end of this section "View of the trail looking at surrounding farmland" is further documentation of the illegal trespass already occurring through crossing locked, closed gates; fences; and signage.



Prime Farmlands and Unique Farmlands are immediately adjacent to the proposed levee trail extension.[17]

[16] http://califaep.org/docs/2019-Appendix_G_Checklist.pdf
[17] https://santabarbaracounty.ca.gov/plndev/maps/zoning.sbc Important Farmland (2018), CA Department of Conservation



Agricultural Preserve (Williamson Act) contracted parcels immediately adjacent to the proposed levee trail extension, 2015[18]



Feasibility Study page 44 "View of the trail looking at surrounding farmland" which also documents illegal trespass through locked gates and signage. See below for actual gates and signage.

[18] https://sbcblueprint.databasin.org/datasets/293bb2006edc4c8986d6b564d4502527/



Locked, closed gate and signage

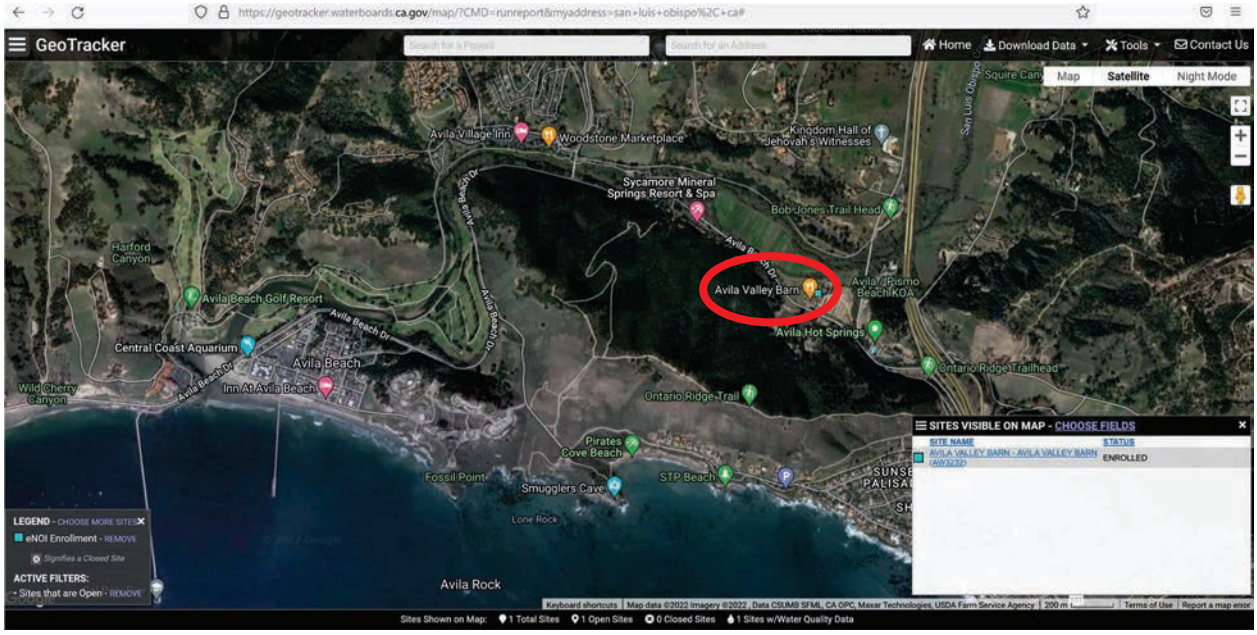
Chapter 5

5.1 Case Studies

In the following section we will detail the reasons why the case studies included in the study are not similarly situated to, or representative of, the contemplated levee extension's unique facts and circumstances. We are not currently aware of successful case studies of active trails and recreation immediately adjacent to fresh produce cultivation for the reasons that we have outlined throughout this letter.

5.1 Case Studies-Bob Jones Bike Trail, San Luis Obispo, CA

It is a stretch to describe the Bob Jones Bike Trail as being "adjacent to agriculture." The Central Coast Regional Water Quality Control Board (Water Board) regulates discharges from irrigated agricultural lands under the Irrigated Lands Regulatory Program (ILRP) or Ag Order. The Ag Order applies to owners and operators of irrigated land used for commercial crop production. According to the Water Board GeoTracker website, the only farm enrolled in the Irrigated Lands Regulatory Program between the Ontario Rd parking area and Avila Beach is Avila Valley Barn. The trail is across San Luis Obispo Creek from Avila Valley Barn and at a distance of approximately 150 to 200+ feet to the trail.



In terms of the bike lanes on roads between the Octagon Barn and the Ontario Rd parking area, there are zero enrolled Irrigated Lands sites along Ontario Rd. Along S Higuera Rd, there are only two sites enrolled, both of which are separated from the road by San Luis Obispo Creek and have a separation of at least 100 to 200 feet.

Additionally, one difference is that San Luis Obispo Creek tends to have flows while the Santa Maria River is generally dry. One similarity is the extensive challenge related to homelessness along the trail, which has been well documented by the media and is a recurring challenge.

5.1 Case Studies-Two Rivers Trail, Sacramento, CA

It appears that the feasibility study is referencing the Two Rivers Trail-Phase II, which appears to still be in the design phase.[19] Therefore, it is inappropriate to look to the success of a project as a case study as an existing trail which has not yet been constructed. Notably, the City of Sacramento's project website does state the following:

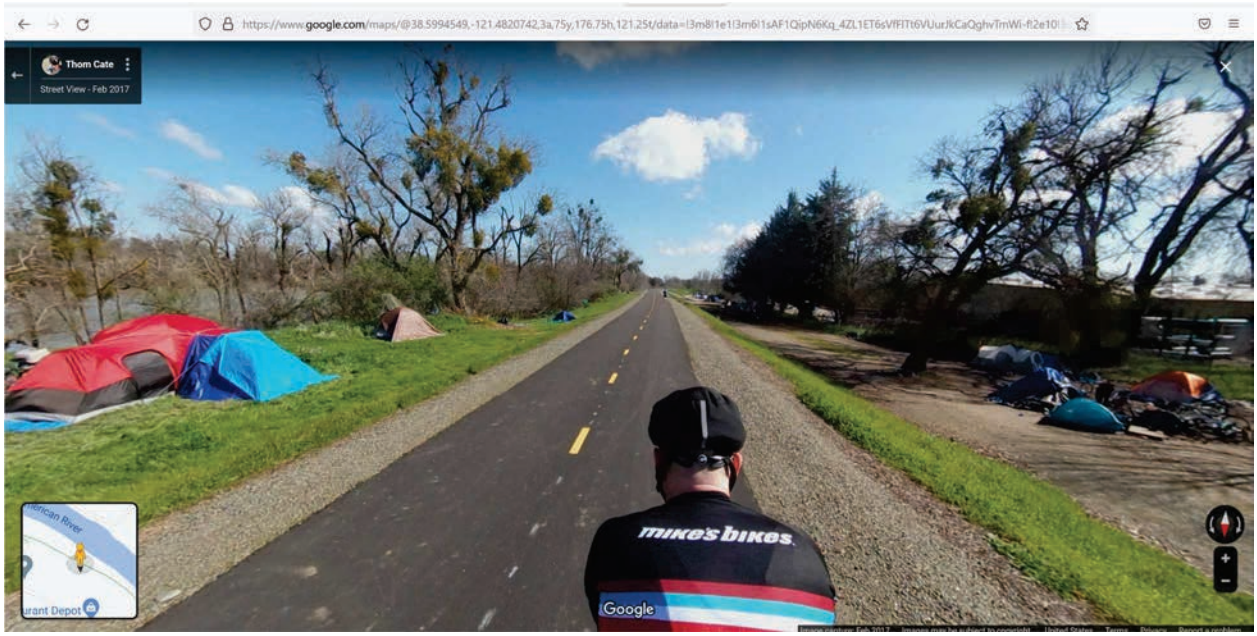
> The City has prepared and circulated an initial study-mitigated negative declaration for the trail project. After receiving and evaluating comments, the City has determined that it is appropriate to upgrade the level of environmental document to an Environmental Impact Report (EIR).[20]

The following comments pertain to the existing Two Rivers Trail. The Two Rivers Trail is not adjacent to agriculture. Additionally, the American River has regular flow, unlike the Santa Maria River. Furthermore, we question the effectiveness of the "crime prevention through environmental design." According to the LexisNexis Crime Map, https://communitycrimemap.com/, as of 3/29/2022 in the past year in Jiboom Park there was 1 case of aggravated assault, 2 thefts, 1 motor vehicle theft, 1 arson, and 1 burglary-commercial. Crime reported in the past year at the Two Rivers Bike Trail and 10th Street include arson, motor vehicle theft, and robbery-individual. This is in addition to a separate case of arson west of the location.

[19] https://www.cityofsacramento.org/Public-Works/Engineering-Services/Projects/Current-Projects/Two-Rivers-Trail-Phase-II

[20] *Ibid*

Additionally, photos from Google Maps Street View/Photo Sphere document extensive encampments in the area.



5.1 Case Studies-Agri-Tourism in the Sacramento Delta

We were unable to find extensive information on the Sacramento River Delta Grown Agri-Tourism Association referenced in the study due to the following:

http://sacriverdeltagrown.org › ...

Home - Sacramento River Delta Farms and Wineries

The Sacramento River Delta Grown Agri-Tourism Association is unfortunately dormant at this time. Please contact farms and wineries directly for updates.

However, from the limited information available it would appear that many of the participants make processed wine or cider. We are also unclear if the growers would be subject to the U.S. Food & Drug Administration (FDA) Food Safety Modernization Act (FSMA) and what type of crops are grown. We are further unclear if there is a bicycle trail component, as that information was not readily available, or if the "trail" is actually intended to be used as a vehicle driving tour, which seems to be the case from cached Google imagery (see following).



Cached Google image for Sacramento River Delta Grown "Trail" Map: "Look for this sign as you **drive** along…" (emphasis added)[21]

5.1 Case Studies-San Pasqual Valley Agricultural Preserve Trail

We understand from our members who have firsthand experience riding the trail that the agriculture near the San Pasqual Valley Agricultural Preserve Trail is not similarly situated to agriculture near the proposed Santa Maria levee trail extension.

More specifically, we understand that crop types grown include agritourism opportunities and hay crops, rather than commercially-focused fresh produce sales. Furthermore, the study states that crop types in the

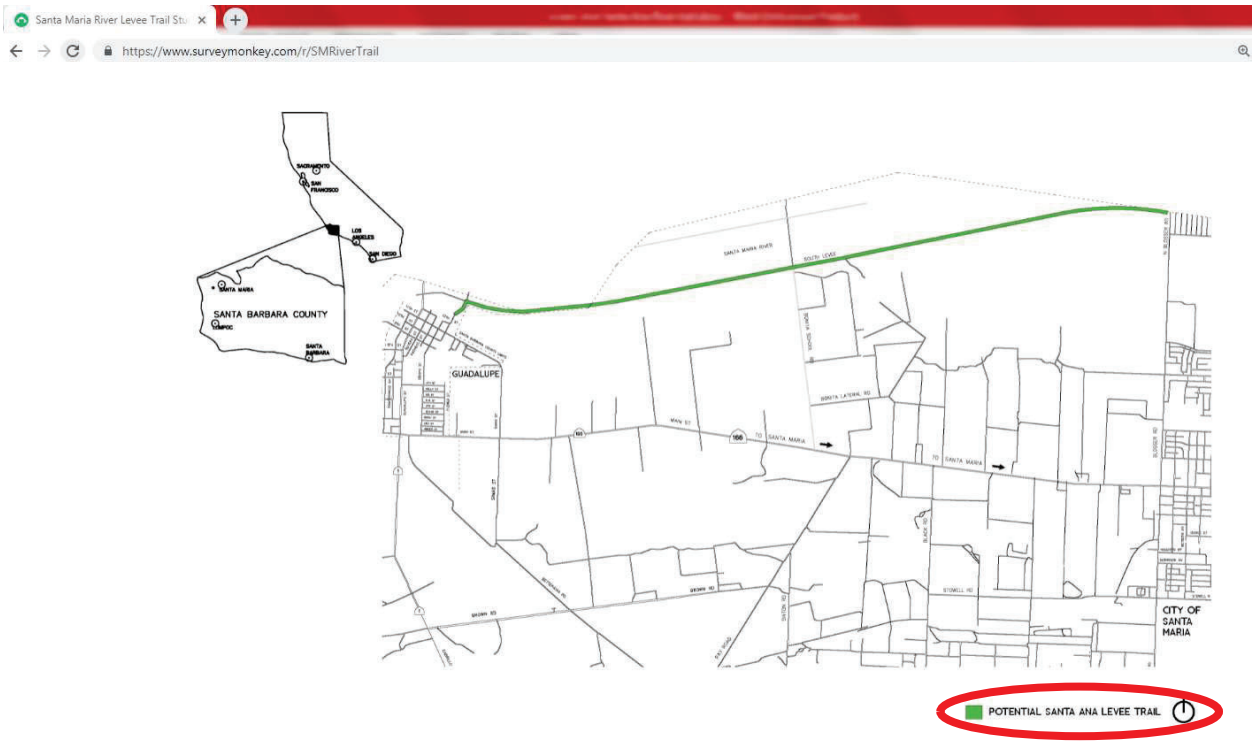
[21] https://imgv2-2-f.scribdassets.com/img/document/249883379/original/1c2485aaa7/1587408002?v=1

area include "asparagus, gourd, squash, and oranges." Notably, these growers might not be subject to the same stringent food safety standards under the U.S. FDA's Food Safety Modernization Act (FSMA) for several reasons. First, "produce that is rarely consumed raw" is not covered by the US FDA FSMA Produce Safety Rule; crop types on this list include asparagus and winter squash.[22] Additionally, depending on the sales and direct to consumer sales of a particular farm, the farm or product might not be covered under the rule or could qualify for a qualified exemption.[23] Most, if not all, of the farms adjacent to the proposed Santa Maria levee trail extension almost certainly are subject to the US FDA FSMA Produce Safety Rule, unlike the farmers in the San Pasqual Valley, due to crop types grown and sales characteristics, so the two are not actually comparable facts and circumstances. Additionally, the shorter ag-trail interface (2.75 miles for San Pasqual one way versus 6.7 miles for the proposed Santa Maria extension) and lower intensity of crop types grown are further differences that do not make for an even comparison.

5.1 Case Studies-Santa Ana River Trail

One case study that would be relevant to include is the Santa Ana River Trail. Although the location is in a more dense urban environment, similarities include the homeless encampment presence, connecting two urban areas (Santa Ana and Orange), and intermittent flows of the river.

Whether intentional or not, the online survey for the Santa Maria River Trail actually mistakenly listed the Santa Maria Levee Trail extension as the Santa Ana Levee Trail:



Additional evidence relevant to the Santa Maria levee trail extension feasibility study includes the following 2018 broadcast from CBS Los Angeles:

https://www.youtube.com/watch?v=nH0OPG-RaJ0

[22] https://www.ecfr.gov/current/title-21/chapter-I/subchapter-B/part-112/subpart-A/section-112.2
[23] https://www.fda.gov/media/94332/download

The broadcast echoes the following 2022 KSBY article on the existing Tom Urbanske Multipurpose Trail in Santa Maria:

https://www.ksby.com/news/local-news/homeless-encampments-are-growing-in-the-santa-maria-riverbed

For these reasons, the Santa Ana Levee Trail would be appropriate to include as a case study demonstrating the challenges with the contemplated project and limitations of use based on real-world challenges to management.

5.1 Case Studies-Santa Barbara County

We have also recently heard descriptions of dramatic conflicts between agriculture and bike paths in Santa Barbara County that would be worth additional investigation. These include the City of Santa Maria Class I Bike Path on the east side of the Santa Maria Airport Property parallel to Broadway/Hwy 135 between Foster Rd and Lakeview Rd as well as the Franklin Trail in Carpinteria.

5.2 Amenities Toolkit

Our concerns about broader land use compatibility and legal issues remain and are in no way lessened by the following specific comments on the proposed design elements:

1. Surface Treatments. If the purpose of the trail is to realistically provide a bicycle commuting route, then a smooth asphalt or concrete surface would likely be necessary. We raise the question of how a surface like asphalt or concrete would impact flows off the levee into the surrounding farm fields or potentially impact the integrity of the levee, especially during higher-intensity rain events.
2. Signage and Wayfinding. Mile markers for emergency response and no trespass signs are absolutely necessary. However, there has been substantial evidence, including in the feasibility study, that current signage is not effective in deterring illegal trespass or criminal activity or prompting compliance with leash laws for dogs.
3. Guardrails. The guardrails on the existing levee trail are consistently bypassed.
4. Fencing.
    a. Option 2 “No fencing is proposed as dog and pedestrian control will be accomplished by the hog wire guardrail” is completely unrealistic and an unacceptable personal safety and food safety risk. Although not specified in this section, the artistic rendering of Option 2 shows a waist-heigh hog wire fence. The low height of the framed hog wire and solid fence top make it easy to climb and bypass. Additionally, the material is subject to vandalism and breakage, allowing dogs and trespass into farm fields.
    b. Although we do not believe it will be successful, a chain link fence or welded wire fence with a minimum height of 8 feet would offer more protection than some of the other, completely unacceptable design alternatives. The addition of vinyl paneling would help to reduce trash blowing into fields and deter climbing. Additional physical deterrents to climbing should be incorporated. Furthermore, regular inspection, repairs, and maintenance must be included to address vandalism and wear.
    c. Adequate fencing must be placed on both sides of the levee (north and south) where there is active farming.
5. Furnishings. Trash receptacles and dog waste stations must be included to reduce impacts to adjacent areas. Benches might encourage illegal overnight stays or other illegal activities, and if included, should be designed to deter such uses. The trash and dog waste stations must be regularly serviced and maintained. Additionally, trash and waste stations must be designed to prevent trash being blown

out by wind and prevent rodents or other pests from accessing waste, infesting the area, or removing trash out of trash receptacles.

6. Staging Areas/Entry Nodes. To help deter human urination and defecation on the levee top or in adjacent farm fields and contaminated runoff into fields and watersheds, toilets must be included at each entry/exit point (three locations) at a minimum. Omitting toilet services would be a further incompatibility with food safety for nearby fresh produce cultivation. The staging areas and parking must be able to restrict access during agricultural and levee operational closures and prevent movement into nearby agricultural fields.
7. Lighting. The hours of operation for the trail must absolutely be limited to allow for law enforcement activities.
8. Security. Patrolling and fencing are two of the most important features for safety. Sporadic cameras will result in blind spots that will be easily known to perpetrators. Images captured from cameras are only useful if individuals are swiftly apprehended and prosecuted, which has not consistently been the case, especially in recent years. More important than a few cameras and call boxes is the question of how will the area be patrolled and rules consistently enforced? What additional burden will the trail place on the Sheriff and nearby farmers and farm employees? What is the opportunity cost to community safety of directing resources towards these enforcement priorities instead of other community needs? What is the legality of drones being used to monitor the area? Will potentially ambiguous jurisdictional issues result in inaction or slowed response to calls for service?
9. Bike parking and placemaking features might be a better fit and more efficient use of finite financial resources for other projects and locations in the County.

5.3 Suggested Trail Design

We agree with the need for proper design, maintenance, and patrol of the proposed extension. In these comments we have pointed out several significant, irreconcilable incompatibilities, including conflicting recommendations from different stakeholders, especially regarding fencing and toilet facilities. Please see previous comments on specific design elements for additional details.

The narrative description in this section regarding chain link fencing could be clarified to be more consistent with the artistic rendering of Option 1. We concur with the description of challenges with fencing included in this section. We will once again raise the need for adequate fencing on both sides of the levee where there is active agricultural production.

As discussed previously, the suggested security measures are inadequate and the focus should instead be on an appropriate location for a trail, appropriate design, and adequate patrolling and enforcement.

Although we agree with law enforcement's concerns about homelessness and vandalism of toilets, restroom facilities are an absolutely essential component should the project move forward. The presence of human urine and feces is both unpleasant and unsanitary for users and nearby lands and also constitutes a significant food safety risk. We also previously called into question the effectiveness of crime prevention through environmental design.

We agree with limited hours of trail operation, although the feasibility study should recognize that this will further limit the viability of the proposed levee extension serving as an active transportation route. Additionally, since almost all County day-use parks and open spaces do not open until 8:00 am and close at sunset,[24] the same hours of operation should be applied to the contemplated levee trail extension. These hours would necessarily limit the trail's utility as an active transportation corridor, given the typical commute patterns noted in the comments regarding the Commute Summary above.

[24] https://countyofsb.org/parks/hours.sbc; Jalama Beach and Cachuma have differing hours of operation.

5.4 Summary of Findings, 5.5 Design Concerns and Solutions
As we have mentioned previously, the estimated costs do not include many important items, such as planning and permitting expenses, including the cost of inverse condemnation and mitigation of significant impacts to agricultural lands; toilets; and levee crossings. Comments specific to the proposed design elements that were selected and omitted can be found above.

As discussed throughout these comments, the current level of detail in the study fails to address several major components and irreconcilable differences and has not been satisfied in a way that decision-makers can make an informed assessment of the feasibility and opportunity cost of proceeding.

6.1 List of Grants, 6.2 Next Steps
We would like to restate our support for recreation and active transportation projects that benefit our community and prevent predictable land use conflicts and conflicts with agricultural operations. As we have previously commented on the Recreation Master Plan, we encourage the County to maximize benefits to the community by focusing efforts on needed services and feasible projects that are consistent with County policies, compatible with surrounding land uses, protective of food safety and public safety, and that can be implemented without significant impediments and opposition.

We also restate the consistent confusion about the true nature and intention of the project and whether it is truly an active transportation project or a recreational project.

Thank you for your attention to these comments and response through significant revisions to the draft prior to docketing the agenda item for Board of Supervisors consideration.

Sincerely,

Claire Wineman

Claire Wineman
President

Attachment A: Letter re. "Countywide Recreation Master Plan/Santa Maria Levee Trail Extension" dated January 26, 2022

cc: Rachel Van Mullem, County Counsel
Rvanmull@co.santa-barbara.ca.us

Scott McGolpin, Public Works Director
mcgolpin@cosbpw.net

Chris Sneddon, Deputy Director, Transportation Division
csneddo@countyofsb.org

Walter Rubalcava, Deputy Director, Water Resources
wrubalc@countyofsb.org

ATTACHMENT A

SOMACH SIMMONS & DUNN
A PROFESSIONAL CORPORATION
ATTORNEYS AT LAW
500 CAPITOL MALL, SUITE 1000, SACRAMENTO, CA 95814
OFFICE: 916-446-7979 FAX: 916-446-8199
SOMACHLAW.COM

January 26, 2022

Via Electronic Mail Only

Jeff Lindgren, Parks Superintendent
Santa Barbara County Community Services
Department – Parks Division
jlindgren@co.santa-barbara.ca.us

Re: Countywide Recreation Master Plan/Santa Maria River Levee Trail Extension

Dear Mr. Lindgren:

This firm represents the Grower-Shipper Association of Santa Barbara and San Luis Obispo Counties,[1] whose members include landowners and agricultural operators along the Santa Maria River Levee in Santa Barbara County (County). The following comments regarding the Countywide Recreation Master Plan (Recreation Master Plan) and the proposed Santa Maria River Levee Trail Extension (Levee Trail Extension Project) are submitted on behalf of the Association and its members, as well as other interested non-member growers and landowners who would be impacted by the Extension Project in both Santa Barbara and San Luis Obispo Counties (collectively, the "Association").

The Association understands that the Board of Supervisors at its February 1, 2022 meeting may be asked to take some action on the Recreation Master Plan. The Association strongly supports the County's efforts to improve recreational opportunities throughout the County. However, such efforts must respect and not conflict with existing agricultural operations and primary County policies for the protection of agriculture. Association members have been active participants as stakeholders in the County Department of Public Works Transportation Division's efforts to study the Levee Trail Extension Project for the recreational trail along the Santa Maria River Levee from Santa Maria to Guadalupe. As articulated in the Levee Trail Extension Project stakeholder process, and discussed further

[1] Association members include over 170 growers, shippers, farm labor contractors, and supporting agribusinesses who grow diverse field and nursery crops such as broccoli, strawberries, wine grapes, vegetable transplants, flowers, and tree fruit.

herein, the Levee Trail Extension Project presents a unique set of environmental, economic, and legal challenges that require further detailed study and consideration. The complexity of the Levee Trail Extension Project should not impede efforts to proceed with the Recreation Master Plan, and the County's efforts to evaluate the Levee Trail Extension Project should remain separate from the Recreation Master Plan process.

I. The Levee Trail Extension Project Threatens Numerous Land Use Conflicts and Impacts to Agricultural Lands and Operations

Association members own property along and immediately adjacent to the proposed Santa Maria River Levee Trail Extension corridor that is under active cultivation for high value crops. Association members also hold easements for access across the Santa Maria River Levee to support their ongoing agricultural operations. The Association and its agricultural operators and landowners members have been actively engaged in the stakeholder process to educate County staff and consultants about the Levee Trail Extension Project's predictable land use conflicts and implementation constraints.

Association farmers are committed to the increasingly challenging task of growing safe, healthy produce to feed families locally and around the world. The Levee Trail Extension Project stakeholder process identified numerous conflicts and impacts to agricultural operations from the existing western end of the Santa Maria River levee trail at Blosser Road in Santa Maria, which has a history of vandalism, trash, homelessness, off-leash dogs, and off-trail humans on both sides of the levee. Extension of the trail through agricultural areas thus presents substantial food safety and other liability concerns resulting from dogs and people traveling off the trail. For example, the federal Food and Drug Administration's Food Safety Modernization Act Standards for Produce Safety Rule includes provisions related to domestic animal intrusion. Similarly, California's Leafy Greens Marketing Agreement requires 100 percent compliance and also outlines the food safety risk from encroachment by animals and urban settings.

The Levee Trail Extension Project stakeholder process identified significant impacts to crops, agricultural operations, food safety, and public safety, including impacts that could lead to the permanent conversion of agricultural lands. Because of these significant impacts, any approvals associated with the Project (including state or local agency grant funding, and license agreements by the County Flood Control & Water Conservation District) will require preparation of a project-specific environmental impact report (EIR) under the California Environmental Quality Act (CEQA). Approvals by the U.S Army Corps of Engineers, and any federal funding for the Levee Trail Extension Project, will require preparation of an environmental impact statement under the National Environmental Policy Act.

The Association urges thoughtful land use planning to prevent predictable land use conflicts. This includes transportation corridors and recreation locations that are compatible with surrounding land uses and protective of food safety and public safety. The existing levee trail follows the footprint of the City of Santa Maria and borders urban and residential uses, which is compatible with a trail. The contemplated Levee Trail Extension Project presents unique and complex facts and circumstances and we urge the Board to further consider the land use planning implications and avoid conflicts.

II. The Levee Trail Extension Project Is Inconsistent with County General Plan Goals and Policies Protecting Agriculture

As recognized by the California Supreme Court, the County's General Plan is the "constitution for all future development." (*Lesher Communications v. City of Walnut Creek* (1990) 52 Cal.3d 531, 540.) Indeed, the general plan is the County's single most important planning document. (*Citizens of Goleta Valley v. Board of Supervisors of Santa Barbara County* (1990) 52 Cal.3d 553, 570-71.) The Recreation Master Plan must be consistent with the County General Plan. (*Friends of Lagoon Valley v. City of Vacaville* (2007) 154 Cal.App.4th 807, 817.) The County's success as one of the most productive agricultural areas in the world is due in no small part to the protections afforded by the County General Plan. The General Plan Agricultural Element acknowledges that "agriculture is a significant and important resource within Santa Barbara County; therefore, the Element has been created to enhance and protect that resource." (General Plan Agricultural Element, p. 13) Further "plan and policies recognize the likelihood that conflicts from trails through agricultural lands can have on agricultural viability and lead to the foreseeable conversion of agricultural lands." (See General Plan Agricultural Element, p. 26.)

County General Plan goals and policies are specifically designed to protect agricultural uses from the types of impacts threatened by the Levee Trail Extension Project. Some of the key General Plan Agricultural Element Goals and Policies relevant to the Levee Trail Extension Project are identified in Exhibit A. Association members have invested in their property and operations along the Santa Maria River Levee in reasonable reliance on the County's continued adherence to its General Plan policies. Due to the numerous land use conflicts, the Levee Trail Extension Project threatens the viability of continued agricultural operations along the nearly 7-mile-long proposed trail extension. Inducing high-intensity public use would be a major impact on agricultural producers in perpetuity, and that impact is certain to increase as production restrictions on agriculturalists expand. Because the Recreation Master Plan must be consistent with the County General Plan, the Levee Trail Extension Project should not be included in the Recreation Master Plan.

III. Levee Trail Extension Project Impacts Will Create Potential Damages and Nuisance Liability for the County, Requiring Adequate Compensation to Affected Property Owners and Agricultural Operators

As recognized in the Levee Trail Extension Project stakeholder process, and in the experience of other similar recreation trails immediately adjacent to cultivated agriculture, the Levee Trail Extension Project likely will result in substantial property damage from trespass by humans and dogs, as well as interference with the landowners' easement rights for access over the levee. Property owners will be entitled to just compensation if their property is damaged by the proposed public use. Project cost estimates will need to account for the County's costs to compensate Property owners for damages, including from inverse condemnation and nuisance. The Association urges the County to focus both its transportation and recreation planning resources on projects that can be accomplished with fewer impacts, at less cost, and without the Levee Trail Extension Project's legal and financial impediments.

IV. Conclusion

The Levee Trail Extension Project stakeholder process has been conducted through the County Department of Public Works Transportation Division and the project has consistently been characterized as a transportation project with recreational benefits, both for planning and funding purposes. Due to the numerous outstanding legal and practical issues with the Levee Trail Extension Project, and project-specific impacts, it would not be appropriate to include the Levee Trail Extension Project in the Recreation Master Plan and Programmatic EIR. The Association respectfully requests that any further efforts related to the Levee Trail Extension Project be considered separate from the Recreation Master Plan. For these reasons and more, the Recreation Master Plan should focus on achievable projects that are compatible with surrounding land uses and protective of food safety and public safety and that can be readily implemented, without the significant environmental and economic impacts and legal impediments of the Levee Trail Extension Project.

Thank you for considering these comments. Please include the Association and this firm on any notice lists for the Recreation Master Plan and Levee Trail Extension projects, including all CEQA notices pursuant to Public Resources Code section 21092.2(a). Please mail notices to my attention at the address on this letterhead, and also email all notices to ktaber@somachlaw.com and claire.wineman@grower-shipper.com. If you have questions

about these comments, please do not hesitate to contact me at (916) 469-3841 or Claire Wineman at (805) 343-2215 to discuss this letter further.

Sincerely,

Kelley M. Taber
Attorney

Exhibit A: County General Plan Agricultural Element Goals and Policies

cc: The Honorable Joan Hartmann, Chair, Santa Barbara County Board of Supervisors
jhartmann@countyofsb.org

The Honorable Das Williams, Vice Chair, Santa Barbara County Board of Supervisors
dwilliams@countyofsb.org

The Honorable Gregg Hart, Supervisor
ghart@countyofsb.org

The Honorable Bob Nelson, Supervisor
bob.nelson@countyofsb.org;

The Honorable Steve Lavagnino, Supervisor
steve.lavagnino@countyofsb.org

Rachel Van Mullem, County Counsel
Rvanmull@co.santa-barbara.ca.us

Chris Sneddon, Deputy Director, Transportation Division
csneddon@co.santa-barbara.ca.us

Mark Friedlander, Project Manager, Santa Maria River Levee Trail
mfriedlander@co-santa-barbara.ca.us

KMT:mb

EXHIBIT A

Exhibit A
Santa Barbara County General Plan
Goals and Policies Relevant to
Santa Maria River Levee Trail Extension
(non exclusive list)

AGRICULTURAL ELEMENT

GOAL I. Santa Barbara County shall assure and enhance the continuation of agriculture as a major viable production industry in Santa Barbara Country. Agriculture shall be encouraged. Where conditions allow, (taking into account environmental impacts) expansion and intensification shall be supported.

Policy I.A. The integrity of agricultural operations shall not be violated by recreational or other non-compatible uses.

1. On lands which are in agricultural production and have a zoning or Comprehensive Plan designation for agriculture, provisions for recreational trails or other recreational easements defined in the Comprehensive Plan may be imposed by the County as a condition for a discretionary permit or land division only in the following circumstances:

   a. The area in which the trail is proposed to be located is land which is not under cultivation or being grazed or is not part of a rotation program, or is not an integral part of the agricultural operations on the parcel;

Policy I.F. The quality and availability of water, air, and soil resources shall be protected through provisions including but not limited to, the stability of Urban/Rural Boundary Lines, maintenance of buffer areas around agricultural areas, and the promotion of conservation practices.

GOAL II. Agricultural lands shall be protected from adverse urban influence.

Policy II.B: Santa Barbara County shall recognize, and give high priority to, the need for protection from trespass, thievery, vandalism, roaming dogs, etc., on all agricultural lands.

Comment Letter O.6 – Grower-Shipper Association of Santa Barbara and San Luis Obispo Counties

Comment Response O.6-1

Thank you for your comments. The comment contends that the EIR does not provide a sufficiently accurate and stable project description to support meaningful evaluation of agricultural resource impacts. The comment asserts that uncertainty regarding farmland conversion, mitigation, and the scope of the Program EIR limits the ability to assess individual and cumulative impacts.

This EIR is a program-level environmental review document prepared pursuant to CEQA Guidelines Section 15168. Chapter 2, *Project Description*, of the EIR provides a sufficiently comprehensive, accurate, and stable description of the Recreation Master Plan, including its objectives, a detailed list of proposed recreation improvements, Comprehensive Plan and zoning ordinance amendments, and implementation framework. Based on this information, the EIR identifies the nature, scale, and geographic extent of the Recreation Master Plan and evaluates its potential environmental effects at the level of detail appropriate for a programmatic EIR. As described in Chapter 3, *Environmental Impact Analysis*, under the proposed Project, the planned projects, parks, trails, recreation facilities, and Recreation Benefit Projects would occur on dispersed sites throughout the county. This programmatic EIR considers this distribution and recognizes that planned projects would generally not overlap with one another. The programmatic EIR also recognizes that planned projects would be located generally within the five recreation planning areas. RBPs may result in impacts from both private development and the development of planned public recreation facilities. For example, a RBP proposing a public trail or park would be permitted to construct a country inn or trailside café as an incentive of the public-private partnership agreement. Because the details of future projects, such as location, mix of uses, development specifications, or recreation benefits, are unknown and speculative at this point, this programmatic EIR considers the reasonably foreseeable worst-case scenario for the proposed Project's components in the analysis. This approach allows the programmatic impact analysis to anticipate the potential for significant impacts and mitigate for the reasonable worst-case scenario, in compliance with CEQA. “An EIR is not required to engage in speculative analysis,” and this is the “core principle” that is “well established in the Guidelines and case law. While a lead agency must use its ‘best efforts’ to evaluate environmental effects... ‘foreseeing the unforeseeable’ is not required, nor is predicting the unpredictable or quantifying the unquantifiable.” (*Citizens for a Sustainable Treasure Island v. City and County of San Francisco* (2014) 227 Cal.App.4th 1036, 1060-1061; CEQA Guidelines Section 15145.)

With respect to impacts to agricultural resources, impacts are extensively analyzed in Section 3.2, *Agricultural Resources.* While it is true that the EIR cannot accurately predict the location and scale of each future project enabled by the Recreation Master Plan, the analysis broadly considers the type and scale of impacts these projects may have on agricultural resources, accounting for the fact that future privately-proposed parks, recreation, and trails and RBPs

must comply with the existing and proposed goals and policies of the Land Use Element and Agricultural Element of the County's Comprehensive Plan that prioritize the protection and preservation of agricultural resources. The Project's proposed zoning ordinance amendments promote agricultural viability on future parks and trails projects and encourage the siting of development within previously disturbed areas to the maximum extent feasible. This provision would ensure impacts to agricultural resources associated with privately-proposed development and RBPs are largely avoided countywide.

However, as described in Impact AG-1, the EIR recognizes that it is also impossible to foresee the amount or location of farmland lost to future recreation development projects or RBPs and whether mitigation would be sufficient to offset the potential loss. The EIR also identifies the Project's potential to directly convert or enable the conversion of existing agricultural lands to new outdoor recreational uses in the Goleta, Guadalupe, and Lompoc areas. Mitigating the direct loss of agriculture typically involves offsetting the loss with conservation of agricultural land off-site, but given the location of these three planned parks within urbanized areas, and the uncertainty of mitigation options for future RBPs that have impacts to agriculture, there are no suitable sites to preserve that would match the existing conditions. Impacts are therefore determined to be significant and unavoidable.

Comment Response O.6-2

The comment contends that the EIR does not adequately support its conclusion that the Project is consistent with the Comprehensive Plan and Agricultural Element. The comment also asserts that significant and unavoidable agricultural impacts, potential conflicts between recreation and agricultural operations, and proposed amendments to agricultural policies undermine the policy consistency analysis.

The EIR's policy consistency analysis and agricultural impact analysis evaluate different issues under CEQA. Section 3.2, *Agricultural Resources*, evaluates whether implementation of the Recreation Master Plan could result in physical impacts to agricultural resources, including the conversion of Important Farmland, impairment of agricultural productivity, and conversion of agriculturally zoned land. Based on the uncertainty associated with the location and extent of future recreation development and RBPs, the EIR conservatively concludes that impacts to Important Farmland and agriculturally zoned land would be significant and unavoidable. These significance determinations do not, by themselves, establish that the Project is inconsistent with the Comprehensive Plan or Agricultural Element, and the Project does not eliminate or diminish the County's existing commitment to agricultural resource protection.

Rather than modifying existing Agricultural Element goals and policies intended to protect agricultural resources and foster the thriving agricultural industry in the county, the Project proposes the addition of Goal VII and associated policies addressing the integration of outdoor recreation within agricultural areas while preserving agricultural viability. As summarized in Table 2-5, *Summary of Proposed Recreation Goals & Policies in the Agricultural Element of the County Comprehensive Plan*, proposed Goal VII would allow outdoor recreation in agricultural areas only where recreation remains compatible with agriculture and does not interfere with

agricultural productivity or operations. The proposed policies would recognize public recreation and trails as compatible uses where agricultural viability is preserved and would require recreation facilities, trails, and related uses to avoid fragmenting agricultural fields by siting them in disturbed areas, along parcel edges, or on existing linear features where feasible. The proposed policies would also require crop and livestock buffers, controlled public access, consistency with Williamson Act contracts and County Uniform Rules, and operational measures such as fencing, gates, signage, sanitation, and seasonal or time-of-day restrictions intended to protect agricultural operations and public safety.

In addition, the proposed zoning ordinance amendments would include agricultural viability standards applicable to development within the REC Zone. As summarized in Table 2-8, *Summary of Proposed Additional Standards in REC Zone*, future recreational development may not impair agricultural viability on productive agricultural land adjacent to a project site and must be sited within disturbed areas of the site to the extent feasible. These standards are intended to avoid or minimize conflicts with adjacent agricultural operations and further reinforce the Project's emphasis on maintaining agricultural productivity and viability, consistent with the existing agricultural resource protection goals and policies of the Agricultural Element.

The Project also includes implementing development standards within the proposed zoning ordinance amendments related to the protection of agricultural resources. As described in Tables 2-7 and 2-11, privately proposed parks, playgrounds, trails, and RBPs would be subject to agricultural viability standards, agricultural buffers, siting requirements, and operational controls intended to minimize conflicts between recreational uses and adjacent agricultural operations. Accordingly, the proposed policy framework extends beyond buffer requirements alone and addresses many of the operational concerns raised in the comment, including public access, trespass, operational compatibility, and protection of agricultural productivity. These proposed standards would also be consistent with existing policies of the Agricultural Element, as well as proposed Goal VII and associated policies.

As discussed in Section 3.11, *Land Use and Planning*, the Recreation Master Plan is a long-term planning and policy framework that includes proposed amendments to the County's Comprehensive Plan, including the Agricultural Element, as well as implementing zoning ordinance amendments. The policy consistency analysis provides a broad overview of the Project's consistency with applicable plans and policies and references specific policies as illustrative examples. As discussed therein, future parks, recreation, and trails projects and RBPs would be subject to mandatory compliance with all applicable policies of the County’s Comprehensive Plan and community and area plans. This also includes mandatory compliance with the additional policies and objective development standards proposed as part of the Project to protect agricultural, cultural, biological, hydrological, and other natural resources. The applicability of and compliance with these policies would be determined on a case-by-case basis during County review of individual permit applications.

Nevertheless, the comment's concerns regarding agricultural resource protection, compatibility between recreational and agricultural uses, and the proposed amendments associated with the

Recreation Master Plan are noted. These concerns will be included in the administrative record for consideration by County decision-makers during review of the Recreation Master Plan and associated amendments.

Comment Response O.6-3

The comment states that the EIR does not adequately analyze traffic safety and emergency access impacts associated with increased recreational development and use. The comment also questions the conclusion that these impacts would be less than significant and cites concerns regarding traffic conflicts on rural roadways, emergency evacuation, and emergency response access.

The EIR appropriately analyzes the potential impacts to transportation safety and roadway hazards at a level of detail appropriate for a programmatic planning document. Section 3.15, *Transportation*, acknowledges that development and operation of the parks, recreational facilities, and trails enabled by the Recreation Master Plan would generate additional vehicle trips and could increase countywide VMT. Impact T-2 conservatively identifies the Project's potential increase in countywide VMT as significant and unavoidable. Transportation safety is evaluated separately under Impact T-3 because additional vehicle trips or VMT do not, by themselves, establish that a project would substantially increase hazards due to geometric roadway design features or incompatible roadway uses. As explained in Impact T-3, the Recreation Master Plan does not approve site-specific roadway designs, circulation systems, driveways, intersections, or access configurations. Instead, it provides a framework for future recreation projects throughout the county. Because the precise design and access characteristics of future projects are not yet known, the EIR evaluates transportation safety at the program level by considering whether implementation of the Recreation Master Plan would create adverse changes to the transportation safety environment.

The analysis recognizes that increased recreational traffic could create potential roadway hazards or conflicts with other traffic, particularly along rural roads that may have narrow widths, limited sight distance, or other operational constraints. In addition, the EIR specifically considers potential conflicts involving farm equipment, agricultural vehicles, trailers, and recreational vehicles. However, recreational facilities located near agricultural areas would generally be served by rural roadways where farm equipment and agricultural vehicles are already common components of the transportation environment and are generally considered compatible with the existing roadway network. Future recreation projects enabled by the Project are also intended to be complementary to existing rural, agricultural, and recreational land uses that currently generate traffic on these roads. Based on the generally low traffic volumes on rural roads and the existing presence of these vehicle types, the EIR concludes that the Recreation Master Plan would not substantially increase the frequency of incompatible traffic of substantially alter existing roadway conditions.

Further, future recreation projects would also be subject to the County's review process and would be required to comply with adopted roadway and access standards. As described in Section 3.15, this includes compliance with the County's standard road improvement details,

standards for driveway and access roads from public rights-of-way, and standard bikeway requirements, which address adequate sight distance, turning movements, safe site access, and other transportation safety considerations. More intensive projects with a greater potential to alter existing transportation conditions, such as larger sports facility development projects, would also be subject to project-specific evaluation of transportation safety impacts, as appropriate. Mandatory compliance with applicable roadway and access standards would ensure that individual projects do not create significant hazards through their site design, access, or circulation improvements.

With respect to emergency access and evacuation, Section 3.17, *Wildfire*, evaluates whether the Project would substantially impair or physically interfere with an adopted emergency response or evacuation plan. As discussed under Impact WF-1, the County does not rely on fixed evacuation routes or a single emergency evacuation plan because emergency response and evacuation procedures are intended to be scalable, adaptable, and responsive to the specific location and conditions of each incident. The Santa Barbara County Fire Department, County Sheriff's Office, California Highway Patrol, County Office of Emergency Management, and other agencies coordinate emergency response and evacuation activities under established emergency management procedures.

The EIR recognizes that emergency access and evacuation may be constrained in some rural and hillside areas where ingress and egress options are limited and where the same roads may be used by evacuees and emergency responders. This existing constraint would encompass all roadway users, including residents, farmworkers, agricultural vehicles, recreational visitors, and emergency personnel. However, implementation of the Recreation Master Plan would not create permanent residential population growth, and visitors to parks, trails, and recreation facilities would constitute temporary and transitory populations. Because all future recreational development would only occur within Santa Barbara County Fire Department, Montecito Fire Protection District, or Carpinteria-Summerland Fire Protection District service areas, the Project would not create a sustained evacuation demand associated with new residential development.

In addition, the cumulative analysis presented in Section 3.17 concludes that cumulative development would remain subject to the California Fire Code, California Building Code, State Fire Safe Regulations, County Fire Department Development Standards, and other applicable requirements for adequate and unobstructed emergency access. These requirements ensure that future recreational development provides adequate emergency access and allows for evacuation through appropriate ingress and egress or other measures determined by the applicable fire protection agency. Thus, the potential for recreational users, farmworkers, agricultural vehicles, and emergency responders to use the same rural road network during an emergency does not establish that new recreational development resulting from the Project would substantially impair an emergency response or evacuation plan.

Development within State Responsibility Areas, Very High Fire Hazard Severity Zones, or other wildfire-prone areas would also be required to comply with applicable Comprehensive Plan policies governing emergency vehicle access, evacuation, defensible space, roadway

standards, and fire protection infrastructure. The proposed development standards further require that site access for parks and playgrounds meet applicable fire agency roadway and access standards. Parks, recreation facilities, and trails may also support emergency response by providing access routes, staging areas, or evacuation locations. Accordingly, the EIR appropriately analyzes and concludes that the Project would not substantially impair emergency response or evacuation and that impacts would be insignificant.

Comment Response O.6-4

The comment states that the EIR does not evaluate a reasonable range of feasible alternatives that would reduce significant agricultural impacts while meeting Project objectives. The comment also expresses concern that Alternative 2 does not provide sufficient protection for agricultural resources. It questions the Draft EIR's conclusion that Alternative 2 is environmentally superior while also asserting it inadequate to address the Project's significant impacts.

The EIR's alternatives analysis was prepared in accordance with CEQA Guidelines Section 15126.6, which requires an EIR to evaluate a reasonable range of feasible alternatives capable of attaining most of the basic objectives of the project while avoiding or substantially lessening significant impacts. CEQA Guidelines Section 15126.6 further states that an EIR need not consider every conceivable alternative or an alternative that eliminates all significant impacts. Rather, the consideration and analysis of alternatives to a project is governed by the "rule of reason" that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice (CEQA Guidelines Section 15126.6[f]) and foster informed decision-making and public participation (CEQA Guidelines Section 15126.6[a]). Consistent with these requirements, Chapter 4, *Alternatives Analysis*, presents consideration of eight separate alternatives to the proposed Project, including a No Project Alternative. Of these eight alternatives, five were discarded from further analysis due to failure to meet Project objectives, and three alternatives were carried forward for full analysis and comparison to the proposed Project. These include the No Project Alternative, Alternative 1 (Reduced Eligibility of Recreation Benefit Projects), and Alternative 2 (Increased Agricultural Buffers).

Alternative 2 was developed specifically to address concerns regarding the potential for conflicts between recreational uses and agricultural operations. As summarized in Table 2-7, *Summary of Proposed Standards for Development of Parks/Playgrounds and Trails*, privately proposed parks, playgrounds, and trails must maintain a minimum 200-foot buffer from active agriculture on adjacent properties and a 1,000-foot buffer within the Limited Agricultural Enterprise Overlay unless located within the Public and Private Park/Recreation Facility Overlay. Alternative 2 would increase these protections by increasing the minimum agricultural buffer for privately proposed recreational uses and RBPs from 200 feet to 500 feet and by prohibiting RBPs within the Limited Agricultural Enterprise Overlay and within 1,000 feet of any mapped Limited Agricultural Enterprise Overlay site. All other elements of the Project would remain unchanged under Alternative 2.

The EIR concludes that Alternative 2 would reduce the potential for conflicts between recreational uses and adjacent agricultural operations relative to the proposed Project and would therefore provide greater protection for agricultural resources. However, Alternative 2 would not eliminate all agricultural impacts because planned recreation projects and future recreational development could still result in the conversion of Important Farmland and agriculturally zoned land. As a result, agricultural impacts would remain significant and unavoidable under Alternative 2. The fact that an alternative reduces impacts but does not eliminate them is not inconsistent with its designation as the Environmentally Superior Alternative. Alternative 2 was identified as environmentally superior because it incorporates more conservative agricultural protection standards than the proposed Project, including expanded agricultural buffers and additional restrictions on the siting of Recreation Benefit Projects in agricultural areas, while continuing to meet all Project objectives.

The comment's recommendations regarding agricultural buffer distances and other agricultural protection measures beyond those evaluated in the EIR are noted. These recommendations concern Project design and implementation and will be included in the administrative record for consideration by County decision-makers.

Comment Response O.6-5

The comment asserts that the RBP Program is too conceptual and lacks sufficient detail to be evaluated and adopted through the Program EIR. The comment also raises concerns regarding uncertainty about future project locations, agricultural impacts, and the cumulative effects of the RBP in combination with the recently adopted Agricultural Enterprise Ordinance. The comment recommends that the RBP Program be evaluated through a separate planning and environmental review process before adoption.

The County acknowledges the Grower-Shipper Associations of Santa Barbara and San Luis Obispo Counties' March 11, 2025 comment letter regarding the RBP Program. Comments received during the public outreach and scoping process, including those concerning the RBP Program and its potential effects on agricultural resources, were considered in the development of the Recreation Master Plan and EIR and form part of the administrative record. A summary of public and agency comments received during project scoping is included in Appendix A, *Public Outreach and Scoping Summary*.

However, as described in Section 2.5.4, *Recreation Benefit Project (RBP) Program*, the RBP Program establishes a framework for future public-private recreation partnerships and identifies the eligibility requirements, permitted uses, incentives, and development standards that would apply to future RBP proposals. As a component of the proposed Project, evaluation and consideration of the programmatic impacts associated with implementation of the RBP Program is appropriate in this Program EIR. Approval of the Recreation Master Plan and Program EIR would not approve, authorize, or entitle any specific RBP project. In addition, eligible RBPs would be subject to specific development standards and use regulations intended to control the scale, size, location, and intensity of development in a manner consistent with the County's Comprehensive Plan and zoning ordinances. Eligible RBPs proposing additional

allowable uses would be processed through the County's discretionary review process, would be required to obtain appropriate permit approvals in compliance with applicable zoning regulations, and may be subject to individual project-specific environmental review depending on the type and scale of the proposed development. All additional allowable uses would remain subject to applicable federal, state, and local requirements, including Public Health Department permits and authorizations, approval by the County Fire Department or applicable fire protection district where required, and business licensing requirements, as applicable.

Consistent with the programmatic nature of the EIR, the environmental analysis evaluates the reasonably foreseeable impacts of future recreation development, including RBPs, based on the eligibility criteria, incentives, and development standards described in the Project Description. As discussed in Section 3.2, *Agricultural Resources*, the EIR acknowledges that the precise location, extent, timing, and characteristics of future RBP proposals cannot be known at this stage and therefore evaluates their potential effects at a programmatic level. Because the location and amount of potential future agricultural land conversion cannot be accurately predicted, the EIR conservatively identifies impacts to Important Farmland and agriculturally zoned land as significant and unavoidable.

With respect to the interaction of the RBP Program and the recently adopted Agricultural Enterprise Ordinance, the cumulative impacts associated with implementation of the Recreation Master Plan, including the RBP Program and associated amendments, are evaluated in Section 3.2.4.3, *Cumulative Impacts*. As identified in Table 3-2, *Cumulative Project List*, the Agricultural Enterprise Ordinance was considered as part of the EIR's cumulative analysis because both programs may affect agricultural lands within Santa Barbara County. The Agricultural Enterprise Ordinance and RBP Program are separate regulatory programs that apply to different project types and are subject to separate eligibility requirements, development standards, and permitting processes. The proposed Project does not authorize a project to avoid applicable regulations or receive duplicative entitlements without County review and discretionary approvals. Any future proposal involving uses or incentives under more than one regulatory program would be reviewed for compliance with all applicable requirements, and the applicable land use permits and environmental review would be determined based on the complete project information and permit applications. Accordingly, the EIR evaluates the cumulative effects of the Recreation Master Plan in combination with the Agricultural Enterprise Ordinance at a level of detail appropriate for a programmatic EIR.

The recommendation that the RBP Program be removed from the Recreation Master Plan and evaluated through a separate planning and environmental review process is a policy recommendation regarding Project implementation rather than a comment on the environmental analysis presented in the EIR. The recommendation is noted and will be forwarded to County decision-makers for their consideration.

Comment Response O.6-6

The comment expresses concerns regarding the Guadalupe Community Park and Campground and the Guadalipe-to-Dunes Trail ("River Trail") projects. The comment also notes potential

flood risks, conflicts with adjacent agricultural operations, and impacts to agricultural resources, and requests additional site-specific analysis and consideration of alternative trail alignments.

As described in Section 2.5.1, *Planned County Parks, Recreation, and Trails Projects under the Recreation Master Plan,* the Guadalupe Community Park & Campground would create a community park and campground on up to 40 acres of currently undeveloped and inactive agricultural land adjacent to the urbanized areas of the City of Guadalupe. The project includes a stormwater management and habitat buffer area between the developed portions of the site and the Santa Maria River. The site is partially designated AG-I and AG-II and is bordered by existing urban development within the City of Guadalupe to the south and east.

The Recreation Master Plan is a long-term planning document and does not include final engineering plans, campground layouts, drainage facilities, or access improvements for the Guadalupe Community Park & Campground. Accordingly, detailed site-specific floodplain, drainage, hydrologic, and engineering analyses have not yet been prepared. Such studies would occur during future project planning, design, permitting, and environmental review, as appropriate, when more detailed project-specific information becomes available. Nevertheless, the commenter's concerns regarding this proposed improvement have been noted and will be forwarded to County decision-makers for their consideration.

With respect to the Guadalupe to the Dunes Trail, this proposed trail improvement project is not a specific proposed improvement included under the Project or in the analysis of impacts in this EIR. The Recreation Master Plan describes that over the course of planning and community outreach for the Recreation Master Plan, County Parks considered several conceptual projects that would help meet recreation needs but are not within the control or agency of County Parks. These project concepts, including the Guadalupe to the Dunes Trail, could be developed and pursued by its proponents, and, accordingly, they are recognized by the Recreation Master Plan. As described in Table 6-1 of the Recreation Master Plan, these projects could benefit from partnering with the County under the RBP Program to realize mutual goals for public recreation and private land development. However, these descriptions are provided for informational and planning purposes only and would require independent project planning and approval processes.

Comment Response O.6-7

The comment raises concerns regarding the Foxen Canyon Winery Trail and Los Olivos to Los Alamos (LOLA) Trail projects. The comment also notes the potential for conflicts with agricultural operations and requests that the County coordinate with affected landowners on trail alignment and design before moving forward with the projects. However, the Foxen Canyon Winery Trail and LOLA Trail projects are not specific proposed improvements included under the Project or in the analysis of impacts in this EIR. The Recreation Master Plan describes that over the course of planning and community outreach for the Recreation Master Plan, County Parks considered several conceptual projects that would help meet recreation needs but are not within the control or agency of County Parks. These project concepts, including the

Foxen Canyon Winery Trail and LOLA Trail projects, could be developed and pursued by proponents, and, accordingly, they are recognized by the Recreation Master Plan. As described in Table 6-1 of the Recreation Master Plan, these projects could benefit from partnering with the County under the RBP Program to realize mutual goals for public recreation and private land development. However, these descriptions are provided for informational and planning purposes only and would require independent project planning and approval processes.

Comment Response O.6-8

The comment expresses opposition to the proposed Santa Ynez Valley Sport Complex location west of Buellton due to concerns regarding potential conflicts with agricultural operations and suggests that the facility be located in an area that would avoid such land use conflicts. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR.

Comment Response O.6-9

The comment requests that the Draft EIR be revised to provide more accurate information and detailed project descriptions and a more robust analysis of agricultural impacts. The comment also requests recirculation of the EIR to address the concerns and comply with CEQA's informational requirements. Please refer to Comment Response O.6-1 above.

Comment Response O.6-10

The comment requests removal of the Draft EIR's policy consistency findings, stating that they are not supported by the Draft EIR's conclusions regarding significant and unavoidable impacts to agricultural resources. Please refer to Comment Response O.6-1 and O.6-2 above.

Comment Response O.6-11

The comment opposes the proposed amendments to the Agricultural Element, stating that they would weaken the existing agricultural protections and could result in unintended adverse effects on agricultural resources and operations. Please refer to Comment Response O.6-2 and O.6-3 above.

Comment Response O.6-12

The comment requests that the Recreation Master Plan be revised to incorporate additional feasible mitigation measures and that the Draft EIR evaluate a more protective alternative that would further reduce significant impacts to agricultural resources while satisfying CEQA requirements. Please refer to Comment Response O.6-4 above.

Comment Response O.6-13

The comment recommends removing the RBP Program from the Recreation Master Plan and Program EIR and instead, conduct its evaluation through a separate planning and environmental review process. The comment also cites concerns regarding uncertainty about the program's impacts, its relationship to the Agricultural Enterprise Ordinance, and the adequacy of proposed standards intended to protect agricultural resources. Please refer to Comment Response O.6-5 above.

Comment Response O.6-14

The comment encourages the County to pursue more efficient approaches to advancing recreational projects and expresses a preference for evaluating projects and programs through more focused planning and environmental review processes. The comment also requests that any additional comments submitted prior to Project approval be included in the administrative record and expresses interest in continued coordination with County staff regarding implementation of the Recreation Master Plan and future RBP Program planning efforts.

The County acknowledges the comment's request that any additional comments submitted prior to final Project consideration be included in the administrative record. The County will maintain the administrative record in accordance with applicable provisions of state law, and continue to solicit comments from the public as part of the decision-maker hearing process for the Project and consideration of the EIR.

The Land Trust
FOR SANTA BARBARA COUNTY

OUR MISSION

THE LAND TRUST FOR SANTA BARBARA COUNTY CONSERVES NATURAL RESOURCES, AGRICULTURAL LAND AND OPEN SPACES FOR THE BENEFIT OF PRESENT AND FUTURE GENERATIONS.

BOARD OF TRUSTEES

Laurel Fisher Perez
President

Emily Cotter
Vice President

Ann Lippincott
Secretary

Joe Weiland
Treasurer

Henry Glasheen
Valerie Hoffman
Bradley Lundgren
Ken Marshall
Ted Mullen
William O'Donnell
James Phillippi
Teresa Romero
Ben Romo
Lynn Scarlett
Jim Selbert
Scott Van Der Kar

August 10, 2026

Jeff Lindgren, Assistant Director
County of Santa Barbara
Community Services Department, Parks Division
123 East Anapamu Street, Second Floor
Santa Barbara, CA 93101

Re: Comments on the Draft Santa Barbara County Recreation Master Plan and Draft Program EIR, SCH No. 2025010342

Dear Mr. Lindgren:

The Land Trust for Santa Barbara County appreciates the opportunity to comment on the Draft Program Environmental Impact Report for the Santa Barbara County Recreation Master Plan and related Comprehensive Plan and ordinance amendments.

The Land Trust supports expanding equitable access to parks, trails, open space, and nature when recreation is thoughtfully integrated with protection of agricultural and natural resources and supported by durable stewardship. We previously submitted comments in March 2025 and January 2026 addressing resource protection, trails and public open space, recreation in agricultural and resource-management areas, sustainable trail design, proportionate permitting, funding, and long-term management. We appreciate the County's responsiveness to several of those recommendations, including clearer trail development standards, increased attention to avoiding cultural and natural resources, and greater emphasis on stewardship and permanence.

These supplemental comments are limited to matters closely related to the Land Trust's mission and experience: compatibility with agricultural, natural, and cultural resources; environmentally appropriate public access; long-term ownership and stewardship; and appropriate treatment of conservation-oriented recreation projects.

1. **Distinguish low-impact public access from more intensive recreation development**

The Draft EIR identifies impacts to agricultural resources from implementation of the Recreation Master Plan as significant and unavoidable. Recreation uses vary substantially in their physical footprint, operational requirements, and compatibility with working lands and sensitive landscapes.

The Land Trust supports the proposed Agricultural Element policies and development standards that maintain agriculture as the primary land-use priority in agricultural areas and address agricultural viability, facility siting, buffers, access controls, and compatibility with ongoing operations. A sustainably designed trail, limited public-access program, or stewardship project may be compatible with an agricultural or conservation property, while a campground, sports complex, large parking area, visitor-serving facility, or associated private development may have substantially different effects.

The final Recreation Master Plan and implementing policies and ordinances should retain these distinctions and protections. The Final EIR and mitigation measures should likewise reflect the substantially different potential effects of low-impact trails, conservation access, restoration, and stewardship activities compared with more intensive recreation facilities and associated development. Agricultural protections should continue to prioritize avoidance of productive agricultural land, minimize interference with active agricultural operations, and allow measures appropriate to the affected property and proposed use. O.7-1

This approach would be consistent with the Land Trust's January 2026 comments supporting facilitation of appropriately designed trails and passive recreation while encouraging closer review of uses involving concentrated activity, specialized facilities, or substantial operational demands.
The Land Trust also supports the standards and EIR mitigation addressing sensitive habitat and cultural resources. Where appropriate, the Recreation Master Plan and subsequent project planning should provide for early coordination with culturally affiliated California Native American Tribes regarding cultural resources, access, trail alignment, interpretation, and stewardship.

2. Establish clear and durable ownership, operations, and stewardship responsibilities

Public access is most successful when responsibility for ownership, operations, maintenance, visitor management, resource protection, emergency response, and long-term funding is clearly established.

The Land Trust supports the Recreation Benefit Project Program's goal of creating permanent public recreation benefits and recognizes that many projects implemented through the program could advance public access and conservation objectives. At the same time, the range and intensity of uses potentially eligible under the program vary substantially, and Land Trust support for individual projects would depend on their location, design, compatibility with agricultural and natural resources, and long-term management arrangements.

For projects approved through the RBP Program, the final Recreation Master Plan and implementing provisions should ensure that each project clearly identifies:

- the long-term owner and recreation operator;
- the legal instrument securing public access;
- responsibility for construction, maintenance, repair, and replacement;
- operating and stewardship funding;
- visitor management and emergency response responsibilities;
- resource monitoring, compliance, and enforcement responsibilities; and
- coordination with culturally affiliated California Native American Tribes where appropriate.

O.7-2

We also support the Plan's emphasis on developing a diversified funding toolbox. As individual recreation projects move forward, capital funding should be paired with an identified source of ongoing operations, maintenance, and stewardship funding appropriate to the facility. This is particularly important for trails, open spaces, and other public recreation resources that may provide substantial community benefit but generate limited direct operating revenue.

The Final EIR should recognize, as part of its analysis of Recreation Benefit Projects and other recreation facilities, that environmental outcomes can depend on how a facility is operated and maintained over time. The Recreation Master Plan and RBP implementing provisions should ensure that approved projects have capable operators and dependable funding sufficient to avoid degradation of habitat, conflicts with agricultural operations or

neighboring properties, public-safety concerns, and deterioration of the recreation resource itself.

The Land Trust welcomes early coordination with the County, landowners, and project partners regarding conservation purpose, public access, and long-term stewardship. Such coordination should not, however, create a presumption that the Land Trust or another conservation organization will accept an easement or assume ownership, operations, maintenance, visitor management, emergency response, or other recreation responsibilities. Any such role should be established through a separate, voluntary agreement consistent with the organization's mission, capacity, and stewardship requirements.

O.7-2 cont)

The Draft EIR explains that the proposed zoning standards would not apply directly to County projects but are consistent with County Parks' design and development standards. We support that approach and recommend that the final Plan and EIR clearly identify how comparable environmental and stewardship protections will be implemented for County-sponsored projects.

3. Provide proportionate pathways for conservation and stewardship work

The Land Trust supports the County's proposed policies and ordinance amendments distinguishing lower-impact trails and conservation-oriented projects from more intensive recreation development. The final policies and ordinances should preserve and, where appropriate, extend this proportionate approach to recurring conservation and stewardship activities.

A new campground, sports complex, major parking area, visitor-serving facility, or regional recreation complex presents different environmental and operational considerations from activities such as routine trail maintenance, minor reroutes, erosion-control repairs, habitat restoration, invasive-species management, replacement of existing facilities, fencing, fire-prevention work, and accessibility improvements.

O.7-3

The Final EIR should preserve this distinction so that its impact conclusions and mitigation framework appropriately reflect the differing scale and potential effects of these activities. The implementing policies and ordinances should likewise provide proportionate review pathways. Recognized best management practices, objective standards, and administrative review may be suitable for recurring categories of low-impact work.

The Land Trust's January 2026 comments supported predictable permitting pathways for nonprofit-led, conservation-oriented recreation projects and stewardship improvements that are not associated with development incentives or intensive visitor-serving uses. We encourage the County to preserve that approach in the final policies and regulations.

O.7-3 cont)

This approach would maintain appropriate environmental safeguards while allowing beneficial restoration, repair, accessibility, and stewardship work to proceed efficiently and directing greater review attention to projects with greater potential consequences.

Conclusion

The Recreation Master Plan is an important opportunity to expand appropriate public recreation while protecting Santa Barbara County's agricultural lands, natural resources, cultural resources, and open spaces.

The Land Trust encourages the County to distinguish low-impact access and stewardship from more intensive recreation development, maintain meaningful protections for working lands and natural and cultural resources, require clearly assigned and adequately funded ownership and management responsibilities, and provide proportionate pathways for beneficial conservation and stewardship work.

O.7-4

With these refinements, the Recreation Master Plan can support expanded access to nature while remaining compatible with the County's conservation priorities, working landscapes, and long-term stewardship capacity.

Thank you for considering our comments. The Land Trust looks forward to continuing to work with the County and its partners as the Recreation Master Plan moves toward adoption and implementation.

Sincerely,



Daniel Gullett
Land Use Planner
The Land Trust for Santa Barbara County

Comment Letter O.7 – Land Trust for Santa Barbara County

Comment Response O.7-1

Thank you for your comments. The comment requests that the EIR should distinguish impacts and mitigation measures between lower-impact and more intensive, impactful recreational improvements. While the EIR does not include separate impact statements and residual impact classifications to separate between lower-impact and more intensive, impactful recreation improvements, where applicable to the discussion and analysis of potential environmental impacts, the EIR does distinguish between the types and degree of impacts resulting from the types of improvements proposed or facilitated by the Project.

Comment Response O.7-2

The comment states that the RBP Program should ensure that each eligible RBP clearly identifies and establishes ownership, operations, and stewardship responsibilities to facilitate successful public access and recreation benefits. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR.

The comment also states that the EIR should identify how environmental and stewardship protections comparable to the proposed zoning standards would be implemented for County-proposed or -sponsored projects. Just as is required for privately-proposed parks, recreation, and trails projects and RBPs, County-proposed or -sponsored projects would be implemented by County Parks and as such are subject to mandatory compliance with all applicable policies of the County's Comprehensive Plan and community and area plans, as well as the Coastal Land Use Plan and coastal zoning ordinances. All proposals would be subject to internal review and analysis of consistency with applicable plans and policies and where appropriate, subject to subsequent environmental analysis under CEQA and NEPA, County decision-maker approvals, and regulatory agency permitting requirements.

Comment Response O.7-3

The comment recommends that the final policies and ordinance amendments proposed by the Project should preserve conservation and stewardship activities, and extend the Recreation Master Plan's distinction between low-impact trails and more intensive recreation development to recurring conservation and stewardship activities. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR. Comments recommending or expressing support for specific recreational improvements will be considered by County Park.

Comment Response O.7-4

The comment expresses support for the Project and recommended changes to the Recreation Master Plan provided in the above comments. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR.

August 10, 2026

County of Santa Barbara
Community Services Department, Parks Division
123 E. Anapamu Street, 2nd Floor
Santa Barbara, CA 93101

Chumash Homeland

Via Email: sbcrecplan@gmail.com and RecPlan@countyofsb.org

RE: Santa Barbara County Recreation Master Plan and Related Recreation Draft EIR Comments

Dear Mr. Lindgren:

Thank you once again for this opportunity to comment on the Draft Santa Barbara County Recreation Master Plan (Plan). Coastal Ranches Conservancy (CRC) was founded in 2003 to support nature conservation, restoration, and education on the Gaviota Coast by working with landowners, public agencies, and other non-profit organizations. CRC's 2025-2030 Strategic Plan identifies that it aligns with the State of California's Access for All policy. While we recognize the importance of equitable access to open space to foster our next generation of stewards in our educational programming, recreation can impact environments, economies, and cultures, and too often to their detriment. The final Santa Barbara County Recreation Master Plan still offers a unique opportunity to strike the right balance for our communities and biodiversity.

Room to Roam

The Room to Roam Act, Assembly Bill 1889 was signed into law on September 27, 2024. The Act requires cities and counties to update their general plans to include considerations for wildlife connectivity and movement within and around proposed projects. The Plan is such a project, with multiple programmatic elements including: a new Recreation Benefit Project program; proposed General Plan Amendments for public parks, recreation, and trails; Zoning Ordinance amendments; and targeted REC zoning map updates. The programmatic EIR also includes 40 different planned park and trail projects requiring site-specific analysis. The bill require updates to the conservation element of a general plan to "consider the most appropriately scaled scientific information" relevant to the habitat connectivity. These wildlife connectivity considerations are required to be incorporated to the "extent feasible". Furthermore, the County's current Open Space element requires "rewilding" too. The County would be remiss not to incorporate the wildlife connectivity and rewilding needs in the Master Plan as the science shows human usage impacts wildlife usage on the landscape. This remains considerably lacking in the current draft. Room to Roam aims to identify and analyze connectivity, permeability, and natural landscapes and habitat within the County's jurisdiction, and considers impacts of wildlife barriers caused by development and avoidance, minimization, and mitigation of these impacts. In the summer of 2024 CRC supported UC Santa Barbara Bren School students in kicking off their *Evaluating Ecological Conservation Gaps Across the Proposed Sentinel Landscape*[1] around Vandenberg Spaceforce Base study. The *Connect and Conserve* report was finalized in March 2025 and is available at this link. Furthermore, as a land holder and trustee of open space, the County should consider incorporating future acquisitions connecting and/or expansions of park land which meet both wildlife and recreation

O.8-1

[1] https://bren.ucsb.edu/projects/evaluating-ecological-conservation-gaps-across-proposed-sentinel-landscape

needs, as these assets provide the very areas where many of the recreational opportunities identified, particularly as they pertain to trails. Operations and maintenance are ongoing limiting factors in how aggressively the County can pursue acquisitions and land expansions to meet California's 30x30 targets.[2] Is the County exploring an Open Space District to help fund and maintain the 40 proposed projects and long term acquisition needs? O.8-1 Cont.

Proper Impact Evaluation and Alternatives Analysis

To meaningfully analyze the EIR, avoid and mitigate the environmental impacts, it is crucial that the EIR include an accurate and sufficiently detailed description of each Project element. The Project Descriptions *still do not clearly explain how programmatic Project elements coordinate with one another*. Particularly, the Plan must fully evaluate impacts and consider alternatives for the trail system and recreational development proposed for the Gaviota Coast. The 30 miles of the Gaviota Coast between Ellwood and point Conception is the largest wild coast left in Southern California. The coast of Southern California is approximately 420 miles long and intensely developed to support beach recreation almost everywhere except for this 30-mile portion. The value to humans of maintaining this last wild coast for scientific research, nature education, and California heritage, far exceeds whatever economic value that might be achieved by developing more intense beach recreation which is already widely available elsewhere. The Gaviota Coast Plan has already established protections, policies, and development standards that oversee development in this unique coastal area and environmentally sensitive habitat area (ESHA), and need to be adequately incorporated into this Gaviota specific area of the Plan and EIR. By doing so, the County can offset any unnecessary inconsistencies between the Recreation Plan and the Gaviota Coast Plan, such as the proposals at Gaviota Terminal Property, Baron Ranch, and Jalama Beach Point Conception Trail. O.8-2

Particularly, water for these recreational amenities is already at issue. As part of our work to protect imperiled species in the Gaviota Creek watershed and estuary, CRC filed a petition with the State Water Resources Control Board last year about State Parks' unauthorized water diversions from the creek. Parks has been diverting water from Las Cruces Spring for decades, which we argued causes a reduction in flow in Gaviota Creek. This flow reduction harms Public Trust resources, specifically, southern steelhead, California red-legged frogs, and other sensitive wildlife species. The Water Board has now ruled in our favor on this issue, acknowledging the connection between the spring and water flows in the creek. State Parks now must conduct additional analysis and file for a right to divert and use water from Las Cruces Spring. As a result, the Caltrans rest stop on Highway 101 is routinely closed over the summer to protect instream flows for public trust resources, and Caltrans and Parks are both seeking a water resolution in this vicinity of Gaviota Coast. Gaviota State Park loses over $1 million per year in direct and overhead costs. It warrants a thorough benefit cost analysis of whether an investment in new water supply and a park in this location is well thought out, and will ever generate funds for the County. Both the desalination plant rehabilitation, terminal restoration and construction will be expensive to ensure reliability. O.8-3

Furthermore, the recent approval of the Chumash Heritage Marine Sanctuary, adjacent to the Gaviota Coast, increases the potential for exploring further the ecological importance of the land-sea connections. There are very few places in the world where a wild coast and an ocean sanctuary coexist, making protecting the Gaviota Coast from development even more important. Nowhere else in Southern California can a child view black abalone in a tidepool, tidewater gobies and red legged frogs in a nearby estuary, and snowy plovers, all on one beach. All these species are listed as threatened or endangered, largely due to human disturbance or land-use change, habitat destruction, and/or development. The intent of the Endangered Species Act and efforts to protect and restore remaining populations of endangered species such as steelhead, snowy plovers, and burrowing owls must not be threatened by unsustainable recreational use. There O.8-4

[2] 30% of California's lands and coastal waters by 2030.

is no cost-effective way to police this wild coast so it remains protected. While new trails in the Plan offer recreational opportunities, those along the Gaviota Coast require thorough analysis and scrutiny for their impacts, to ensure ongoing restoration and recovery efforts succeed and state investments are not undermined. In its current iteraction, that scrutiny is sorely lacking.

Recreation Ecology

We wish to reiterate our statements from our prior March 2025 letter on the Plan amendments, as these have not been adequately incorporated in the Draft EIR:

"The impacts of outdoor recreation on wildlife are an emerging new branch of science called recreation ecology. While there is still much to learn about these impacts, the EIR must evaluate the Plan in light of the current state of knowledge. Introduction of humans into wild areas by trails and other recreational development displaces sensitive wildlife and disrupts their life patterns, often forcing them to become nocturnal to avoid humans. Artificial light and nighttime human noise further negatively impact this shift to nocturnal habits. Many of the trails proposed by the Plan would likely fragment wildlife habitat by reducing connectivity. For example, research has shown how important access to the intertidal zone is for certain species of wildlife. A coastal trail would impact this important connection. Trails have been shown to displace wildlife up to a half mile in each direction. This footprint needs to be considered in measuring impacts. Whether dogs or e-bikes will be allowed on trails is a big issue. Both dramatically increase trail impacts on wildlife. Unless there is enforcement, any limitations will be useless. Displacement of sensitive species, such as mountain lions and bears, by introducing humans into wild areas has top down negative effects since these species are important regulators of ecological integrity. For example, mountain lions help control meso-carnivores like skunks and raccoons. This prevents what is called a trophic cascade that can reduce populations of things like frogs that are preyed upon by skunks and raccoons.

O.8-4 Cont.

The Gaviota Coast was once home to a large population of Chumash who had many villages. Virtually every creek mouth had at one time or another, Chumash residents. As a result there are numerous cultural relics scattered across these locations. Bluff top trails will make these relics more visible and accessible and result in their plunder and loss. We have already seen this happen when wildfires burned off chaparral, exposing relics on State Park property that then disappeared. Again, there is no feasible way to police this. Parks is aware of this issue and has in the past declined to allow a coastal trail to be built east of Gaviota State Park for just this reason."

O.8-5

Ecotourism Versus Nature-Based Tourism

It is essential to differentiate nature-based tourism and recreation from ecotourism and recreation. The former is simply tourism and recreation centered within a natural landscape and environment where ecotourism has an emphasis on environmental conservation and responsible practices, actively supporting local wildlife and welfare of local communities. The County of Santa Barbara is home to the Gaviota Coast, a crown jewel of Coastal California biodiversity and heritage, and one of the last stretches wild coastline along the Golden Coast, spanning 76 miles. Balancing recreation and environmental needs in this Recreation Master Plan is essential for a Wild Gaviota Coast and that very ethos of wildness to persist for generations to come. The Plan should align with sustainable recreation, which does not jeopardize our local biodiversity, sensitive landscapes and ecosystem processes, while uplifting our local and impacted communities. While recreation in nature is the attraction in both instances, ecotourism imbeds conservation and biodiversity in the management of facilities, support 30x30 targets and climate resiliency but also the open space heritage that makes Santa Barbara County a desirable place to live and recreate. As written the Draft EIR lacks the necessary project level analysis to safeguard sensitive public trust resources.

O.8-6

Gaviota Terminal Property

CRC maintains that the cost of investment in the facilities and water supply at the Gaviota Terminal, coupled with the use of this location by local wildlife connecting to the coast in this vicinity, warrants a less invasive and/or costly alternative, such as a marine science research center or a nature-based education for youth. Already CIMWI's nearby presence offers the potential for some sort of marine mammal focused development. These uses would be of lower impact than the 1000 visitors per day that has been mentioned as desirable for the Terminal property. Camping use here does not necessarily provide the most public benefits and is an example of the repeated bias for recreational development that the Plan's authors exhibit. The Plan fails to examine other way (i.e., day use, or other) s to increase recreational use of the Gaviota coast. O.8-7

For example, the three State Parks are undergoing a new general planning process which could result in their expansion. Parks too is considering relocating its campground at Gaviota State Park to another location. This would have less impact than a new development but the County would not be in control or receive Transient Occupancy Tax. El Capitan Canyon is currently expanding and would be a serious competitor for a new similar development at the Terminal property.

Baron Ranch Trails and Campground

Baron Ranch is a buffer and mitigation site for the Tajiguas Landfill and hosts designated critical habitat for the federally listed California Red-legged Frog. Riparian habitats and species are protected under the Gaviota Coast Plan and various state and federal statutes. From gray fox, yellow warbler, Western pond turtle, Scarlett Larkspur, Golden Yarrow and Mule Deer, Baron Ranch is home to sensitive habitat and species and Quemado Creek, and any recreational development or uses that harm or degrade these environmental resources should be avoided. The proposals for a mountain bike pump track, campground with picnic areas, bathrooms, and store will vastly transform the passive recreational uses currently available. While active recreation is touted throughout the Plan, passive recreation such as hiking, birding, and general quietude in nature must not be forgotten nor understated. Many seek out connection and quietude in nature, over other activities. These recreational users and uses are uniquely undeveloped and too have their place in a Recreation Plan. While we noted that multi-use trails is not appropriate in all locations, it appears to remain so in the Draft EIR despite stakeholder input. O.8-8

Jalama Beach Point Conception Trail and Ocean Beach Park

These adverse impacts from recreation activities are markedly severe in coastal areas. [3] We appreciate the County removing the Jalama Beach Point Trail that went through private Dangermond Preserve and Point Conception Institute property, where research is underway on a host of sensitive species and habitats. Not unique to Jalama, areas with sensitive species are not generally compatible with intensive use.

Beach access had notable impacts on breeding success of Snowy Plovers in the dunes at the Santa Ynez River Estuary (*pers.comm. Darryl York*). Further analysis of the impacts is certainly warranted along the Gaviota Coast, and particularly Surf Beach. Furthermore, CRC recently attended the design charette for the Surf Beach Bridge, where stakeholder discussed the replacement of the Union Pacific Railroad Bridge, and complementary potential of the estuary restoration O.8-9

[3] *California's Undisturbed Gaviota Coast Draws a Shocking Range of Wildlife* (https://hakaimagazine.com/news/californias-undisturbed-gaviota-coast-draws-a-shocking-range-of-wildlife/).

in and around the Ocean Beach County Park, and whether this area could be altogether assumed by estuary restoration. While California hosts less than 10% of its historical wetlands, this poses a unique opportunity for the County to offlay a park for wetland protection into perpetuity, while affording alternative water-based recreation opportunities. O.8-9 Cont.

General comments

The Plan should include a Project that assesses opportunities to create new or connect existing park land through acquisitions and/or protecting open space through joint management structure such a Parkways or Open Space Districts. Millions are raised privately to purchase and protect Gaviota coast properties, and the County can leverage this support to save open space and agricultural resources, and provide recreational opportunities through collaborative management and acquisition pathways. For our local economy, increasingly dependent on visitors who come to enjoy the uncrowded beaches and backcountry, it's unwise not to invest in open space and the very culture that makes Santa Barbara attractive. The public is voting with their donations to protect diminishing natural lands, which was clear with the passage of Prop 4. The County can be a key player to ensure existing facilities aren't overtaxed, and leverage Prop 4 funding through local initiatives. O.8-10

The Agricultural Enterprise Ordinance tailored uses to safeguard agriculture as the primary land use. To avoid inconsistencies with the Ordinance, the County Recreation Plan should not incentivize the conversion of agricultural land to non-agricultural uses, particularly if lodging is being prioritized over much needed farm worker housing. O.8-11

Conclusion

The scientific record[4] shows that recreation results in persistent adverse impacts to natural resources that the Draft EIR still does not address adequately. This scientific record together with Room to Roam, the Conservation Element Update incorporating rewilding, and SALC analysis via LAFCo, must be incorporated in the final EIR for the Plan/Project to be consistent with the best available science, and State 30x30 goals[5].

The objective of the Master Recreation Plan is *to **enhance the quality of life and leisure experience** for Santa Barbara County residents of all ages. The Recreation Master Plan will guide recreation planning in the county toward the following outcomes: 1.)Establish a long-range vision; 2.) Assess current and future recreation needs of the community; 3.) Promote new ideas and partnerships; 4.) Establish a strong foundation for funding pursuits; 5.) Create recreational value within existing public lands; 6.) Plan for sustainable recreation; and, 6.) Build community engagement, education, and support.* O.8-12

[4] https://yellowstonian.org/wreckreation-and-our-national-obsession-to-love-wild-places-to-death/
A Meta-Analysis of Recreation Effects on Vertebrate Species Richness and Abundance (https://conbio.onlinelibrary.wiley.com/doi/10.1111/csp2.93)
Don't Hike So Close to Me: How the Presence of Humans Can Disturb Wildlife Up to Half a Mile Away (https://theconversation.com/dont-hike-so-close-to-me-how-the-presence-of-humans-can-disturb-wildlife-up-to-half-a-mile-away-162223)
Study: Mountain Bikes Disturb Wildlife More Than Previously Thought (https://www.mensjournal.com/travel/study-mountain-bikes-disturb-wildlife-more-than-previously-thought)
California Fish and Wildlife Journal, Special Issue, *Effects of Non-Consumptive Recreation on Wildlife in California* (https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=178943&inline).
[5] https://storymaps.arcgis.com/stories/234458d16fdb4e4d805d7751e941ceb5

Nature is the backdrop to Santa Barbara's recreation opportunities. We cannot only think of recreation as the act, but must protect place, and ensure that the biodiversity and community both thrive in place. The Gaviota Coast is one of the rare places in California where that remains true. In its current iteration the Draft EIR weakens biodiversity resilience and must ensure access, but only if sustainably and equitably managed to reflect the needs and interests of the local communities.

O.8-12 Cont.

Thank you for this opportunity to provide input and comment on the Draft EIR and CRC looks forward to continuing engagement and collaboration as the Plan progresses to a final iteration. Thank you for considering our comments. We do believe that Santa Barbara can find the balance that protects our unique biodiversity for future generations, by providing truly sustainable recreation opportunities.

Sincerely,



Candice Meneghin

Executive Director

Coastal Ranches Conservancy

(310)890-2834

cmeneghin@coastalranchesconservancy.org

Comment Letter O.8 – Coastal Ranches Conservancy

Comment Response O.8-1

Thank you for your comments. The comment asserts that the Program EIR does not adequately evaluate the proposed Project's potential effects on wildlife connectivity, habitat linkages, and broader rewilding objectives. The commenter contends that recent State legislation, including Assembly Bill 1889 (Room to Roam Act) and Senate Bill 1425, requires local jurisdictions to consider wildlife movement and connectivity in planning decisions and General Plan updates.

AB 1889 and SB 1425 do not apply to the proposed Project. As described by the commenter, AB 1889 requires a local jurisdiction, upon the next update of one or more elements of the agency's comprehensive general plan on or after January 1, 2028, to, among other things, identify and analyze connectivity areas, permeability, and natural landscape areas within the jurisdiction, identify and analyze existing or planned wildlife passage features, and consider the impacts of development and the barriers caused by development to wildlife, as defined, and habitat connectivity. SB 1425 requires that every city and county to review and update its local open space plan by January 1, 2026 to address access to open space, consider climate resilience and other co-benefits of open space, and consider opportunities for rewilding of lands, among other things. The proposed Recreation Master Plan does not constitute a comprehensive update to those Comprehensive Plan elements; therefore, implementation of those statutory requirements is not part of the proposed Project and is not the subject of this EIR. As of August 2026, the County is undertaking the process of updating the Open Space Element of the Comprehensive Plan in response to SB 1425. Updates to the Conservation Element in response to AB 1889 will occur at a future time, consistent with the requirements of AB 1889.

The comment further requests information regarding whether the County is pursuing the establishment of an Open Space District to support the acquisition, maintenance, and operation of planned and future recreation facilities. This comment does not pertain to the adequacy of the EIR's analysis of environmental impacts, mitigation measures, or alternatives. However, for informational purposes, as described in Chapter 6 of the Recreation Master Plan, the acquisition, development, operation, and maintenance of future County parks and recreational facilities may be supported through a variety of tools and strategies. One such strategy identified and described in the Recreation Master Plan includes potential establishment of a Parks and Recreation District, which would be required to be initiated by resolution of the County Board of Supervisors, and then subject to an election by voters within the proposed district. However, at the time of writing of this EIR, no resolution has been initiated by the County Board of Supervisors, and establishment of such a district has not been formally proposed.

Comment Response O.8-2

The comment asserts that the Program EIR does not adequately evaluate the impacts associated with future park and trail development along the Gaviota Coast and expresses concern regarding potential effects on natural resources, research opportunities, nature

education, and cultural heritage resources. The commenter also requests clarifications regarding the Recreation Master Plan's relationship with the Gaviota Coast Plan, which consists of existing policies and development standards.

The County acknowledges that the Recreation Master Plan identifies future County Park projects, including the Gaviota Marine Terminal Recreation Area. However, these projects are conceptual in nature and are intended to inform the County's long-term recreation planning framework. Because site-specific information, such as project design, layout, extent of disturbance, construction methods, and operational characteristics, is not known at this time, the EIR appropriately evaluates potential impacts at a programmatic level based on the information currently available. Future park and trail projects would be subject to project-level discretionary and environmental review, during which the County would evaluate site-specific conditions and may require the preparation of focused resource assessments and technical studies to support project design and inform detailed impact analyses.

With regard to the commenter's questions concerning the Gaviota Coast Plan, future projects proposed within the Gaviota Coast planning area would be subject to the regulatory requirements in effect at the time of project review, including relevant Comprehensive Plan policies, zoning regulations, and Community or Area Plan provisions, as applicable. As proposed County-sponsored project, the proposed plans and improvements must, at a minimum, comply with all adopted plans and policies, including applicable policies of the County's Comprehensive Plan and Community or Area Plan provisions. Nevertheless, because the proposed Project does not have site-specific plans or details for many of these long-term planning improvements, consistency with these requirements would be evaluated during subsequent discretionary review of individual projects as site-specific details are developed.

Comment Response O.8-3

The comment expresses concern regarding the availability of water supplies to serve future recreation facilities within the Gaviota watershed. The commenter cites existing water supply constraints in the area, including those affecting Caltrans and California State Parks operations, and references historical effects on biological resources associated with reduced flows in Gaviota Creek. The comment also recommends that the County prepare a benefit-cost analysis to evaluate the feasibility and viability of providing water service to future recreation facilities along the Gaviota Coast.

Section 3.16, *Utilities and Water Supply*, evaluates potential water supply impacts associated with implementation of the proposed Project. As described therein, the analysis considers the anticipated water demand associated with future park, trail, and recreation facilities at a programmatic level, recognizing that water demand would vary depending on the type and intensity of the recreational amenities provided. Because site-specific project details have not been developed, detailed water demand and water supply information is not available at this time. Accordingly, future projects would be subject to project-level planning and environmental review, during which the project proponent would be required to identify a water supply source and demonstrate the availability of adequate water service, infrastructure capacity, and

related utilities necessary to support the proposed project, consistent with existing and proposed policies and development standards. Depending on the specific recreation improvement, a detailed benefit-cost analysis may be required at a future date to inform site-specific planning and design.

Comment Response O.8-4

The comment asserts that the EIR does not adequately evaluate impacts to biological resources along the Gaviota Coast and emphasizes the presence of threatened and endangered species and rare habitat in the area. The commenter further contends that the analysis does not provide sufficient scrutiny of these sensitive resources and reiterates a statement from March 2025 that request the EIR to evaluate the impacts of recreational activities on ecological systems.

The EIR appropriately analyzes the potential impacts to species and ecological communities of particular value at a level of detail appropriate for a programmatic EIR. Section 3.4, *Biological Resources*, acknowledges that development and operation of the parks, recreation, and trails enabled by the Project could have a substantial adverse effect, either directly or indirectly 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 USFWS. As described in Section 3.4, *Biological Resources*, future recreational development enabled under the Recreation Master Plan would be subject to would be subject to the wide range of existing federal, state, and county policies, and development standards proposed under the Project that would avoid or minimize impacts. This would include the proposed development standards for trails for hiking and riding requiring that trails be sited in disturbed or developed areas and comply with habitat and cultural resource protection standards. The EIR also identifies several mitigation measures to reduce impacts. These include **MM BIO-1 (Tree Protection Plan)** and **MM BIO-2 (Habitat Protection Plan)** that would be applicable to all permitted uses in Recreation zones, permitted parks and trails, and RBPs, and would require site-specific surveys of protected biological resources and the avoidance, minimization, or compensatory replacement of affected resources. With mandatory compliance with existing policies and proposed development standards, as well as with implementation of identified mitigation measures, Project impacts were determined to be significant but mitigable.

Comment Response O.8-5

The comment expresses concern that implementation of the proposed Project, particularly along the Gaviota Coast, could result in the disturbance, damage, or loss of cultural and tribal cultural resources associated with the Chumash people. The commenter also states that comments previously submitted in March 2025 were not incorporated into the Draft EIR.

Section 3.5, *Cultural and Tribal Cultural Resources*, adequately evaluates the proposed Project's potential impacts on cultural and tribal cultural resources at a programmatic level. As described therein, future trail, park, recreation, and Recreation Benefit Project development facilitated by the Project would be required to comply with applicable federal, state, and County regulations protecting archaeological, historical, and tribal cultural resources. Proposed

zoning ordinance amendments include development standards requiring avoidance or minimization of impacts to known archaeological and historic resources, and trail projects would be designed and constructed in accordance with County and U.S. Forest Service standards intended to minimize ground disturbance. However, the analysis recognizes that future recreational development could result in potential impacts, such as the disturbance or destruction of previously unknown archaeological, historical, or tribal cultural resources during ground-disturbing activities. To address potentially significant impacts, the EIR identifies mitigation measures, including **MM CTCR-1 (Objective Development Standards for Addressing Historic and Archaeological Resources)** and **MM CTCR-5 (Post-Discovery Tribal Consultation)**, which require procedures for identifying, evaluating, and appropriately treating cultural and tribal cultural resources that may be encountered during future project implementation. Accordingly, the EIR concludes that impacts to cultural and tribal cultural resources can be reduced to a significant but mitigable level. Furthermore, as previously described, future projects enabled by the proposed Project would be subject to project-level review, during which site-specific cultural and tribal cultural resource investigations and tribal consultation would be conducted, as appropriate.

Comment Response O.8-6

The comment expresses concern that the Recreation Master Plan does not sufficiently emphasize ecological conservation, biodiversity protection, and sustainable recreation practices, particularly along the Gaviota Coast. The commenter further contends that the EIR lacks the project-level analysis necessary to ensure protection of sensitive natural resources.

The County acknowledges the importance of protecting biological resources, scenic landscapes, and other environmental resources within the Gaviota Coast region and throughout the county, and protection and preservation of these resources is emphasized in the Recreation Master Plan and related amendments. For instance, under the proposed Comprehensive Plan amendments, the Project would establish new goals and policies requiring that parks, recreation facilities, and trails incorporate interpretation of local history, culture, and natural features, minimize impacts in environmentally sensitive habitat areas, and integrate facilities with natural and agricultural resources where feasible. The proposed zoning ordinance amendments would also include the establishment of new development standards applicable to privately-proposed parks, recreation, trails, and RBPs. These new development standards would require structures and trails to be sited in existing disturbed areas, minimize impacts to native habitats, and preserve natural features and native vegetation to the extent feasible. With respect to the EIR's analysis of biological impacts, please refer to Comment Response O.8-4 above.

Comment Response O.8-7

The comment requests the County to consider lower-intensity alternatives, such as marine science research center, nature-based education facilities, or expanded day-use amenities, for the proposed Gaviota Marine Terminal Recreation Area. The commenter questions the need for additional camping facilities given future campground expansions at nearby facilities and that campgrounds may not provide the most public benefit.

Pursuant to CEQA Guidelines Section 15126.6(c), Chapter 4, *Alternatives Analysis*, discloses alternatives that were considered but ultimately rejected, as well as provides a brief explanation as to why such alternatives were not fully considered in the EIR. Section 4.2.2, *Elimination of Campground Projects*, adequately explains that reducing or eliminating camping opportunities would lessen impacts associated with the development and operation of campgrounds which are often located in rural areas. However, this alternative was not identified as a preferred alternative because they would substantially reduce the Project's ability to meet key Recreation Master Plan objectives, including addressing the demand for camping facilities as identified in the comprehensive Recreation Needs Assessment (Chapter 4 of the Recreation Master Plan). The EIR further notes that camping facilities represent an important source of revenue that supports park operations, maintenance, and future recreational improvements.

Nevertheless, the commenter's recommendations for specific improvements and alternative use of the Gaviota Marine Terminal property will be considered by County Parks and forwarded to County decision-makers for their consideration.

Comment Response O.8-8

The comment expresses concern regarding the potential effects of future recreational development at Baron Ranch on sensitive biological resources, including designated critical habitat, special-status species, and habitat associated with Quemado Creek. The commenter asserts that recreational improvements, including camping facilities, mountain biking amenities, and other supporting infrastructure, could adversely affect these resources. The commenter further recommends prioritizing passive recreational uses, such as hiking and wildlife observation, over more intensive recreational development.

As discussed in Comment Response O.8-5 above, Section 3.4, *Biological Resources*, adequately evaluates the proposed Project's potential impacts on biological resources at the programmatic level. The analysis considers direct and indirect impacts that could result from future recreational development, including habitat disturbance and removal, impacts to special-status species, disruption of wildlife movement, and recreation-related effects such as increased human activity, lighting, and noise. The analysis also incorporates applicable federal, state, and local regulations, as well as mitigation measures designed to avoid, minimize, or reduce impacts to biological resources.

As previously discussed, the recreation opportunities identified for Baron Ranch are conceptual in nature and are intended to inform the County's long-term recreation planning framework. Because site-specific information, such as facility locations, project design, the extent of disturbance, and operational characteristics, is not currently known, the EIR appropriately evaluates impacts at a programmatic level based on the information available at this time. Future projects proposed at Baron Ranch would be subject to project-level discretionary and environmental review, during which site-specific impacts to sensitive habitats, special-status species, riparian resources, and other environmental resources would be evaluated in greater detail and any necessary avoidance, minimization, or mitigation measures would be identified.

With regard to the comment that expresses a preference for passive recreation over active recreational uses, the comment pertains to recreation planning and policy considerations rather than the adequacy of the EIR's environmental analysis. The comment will be forwarded to County decision-makers for their consideration.

Comment Response O.8-9

The comment expresses appreciation for the County's removal of the Jalama Beach Point Trail from the Recreation Master Plan. The commenter reiterates the need for additional analysis of potential impacts to sensitive biological resources along the Gaviota Coast, particularly in the vicinity of Surf Beach and the Santa Ynez River Estuary dunes. The commenter also identifies opportunities for the County to support estuary restoration efforts at Ocean Beach County Park.

The County acknowledges the commenter's concern that detailed evaluation of site-specific impacts will be necessary for future projects along the Gaviota Coast. As discussed previously, future recreational projects identified in the Recreation Master Plan are conceptual in nature and do not currently include sufficient site-specific information for detailed environmental analysis. Accordingly, future projects proposed along the Gaviota Coast would be subject to project-level discretionary review and any additional environmental review required under CEQA, during which site-specific biological resources, wetlands, special-status species, and other environmental resources would be evaluated in greater detail.

With regard to the comment concerning estuarine restoration opportunities at Ocean Beach County Park, the comment does not pertain to the adequacy of the EIR's analysis of environmental impacts, mitigation measures, or alternatives. Nevertheless, the comment will be forwarded to County decision-makers for their consideration.

Comment Response O.8-10

The comment recommends that the County explore opportunities to expand parks, open space, and recreational opportunities through land acquisition, conservation partnerships, joint management strategies, and the potential establishment of an Open Space District or similar program. The commenter further encourages the County to leverage public and private funding sources to support open-space protection and recreation improvements. The comment does not pertain to the adequacy of the EIR's analysis of environmental impacts, mitigation measures, or alternatives. Nevertheless, the comment will be forwarded to County decision-makers for their consideration.

Comment Response O.8-11

The comment asserts that the Recreation Master Plan should not incentivize the conversion of agricultural land to non-agricultural uses, considering that the Agricultural Enterprise Ordinance intended to preserve agriculture. The commenter also expresses concern that the Recreation Master Plan prioritizes visitor-serving lodging uses over farmworker housing. The comment pertains to the EIR Project Description and proposed policy framework rather than the adequacy of the EIR's analysis of environmental impacts, mitigation measures, or

alternatives. Nevertheless, the comment will be forwarded to County decision-makers for their consideration.

With respect to the interaction of the RBP Program and the recently adopted Agricultural Enterprise Ordinance, the cumulative impacts associated with implementation of the Recreation Master Plan, including the RBP Program and associated amendments, are evaluated in Section 3.2.4.3, *Cumulative Impacts*. As identified in Table 3-2, *Cumulative Project List*, the Agricultural Enterprise Ordinance was considered as part of the EIR's cumulative analysis because both programs may affect agricultural lands within Santa Barbara County. The Agricultural Enterprise Ordinance and RBP Program are separate regulatory programs that apply to different project types and are subject to separate eligibility requirements, development standards, and permitting processes. The proposed Project does not authorize a project to avoid applicable regulations or receive duplicative entitlements without County review and discretionary approvals. Any future proposal involving uses or incentives under more than one regulatory program would be reviewed for compliance with all applicable requirements, and the applicable land use permits and environmental review would be determined based on the complete project information and permit applications. Accordingly, the EIR evaluates the cumulative effects of the Recreation Master Plan in combination with the Agricultural Enterprise Ordinance at a level of detail appropriate for a programmatic EIR.

Comment Response O.8-12

The commenter concludes the letter by reiterating that the Draft EIR does not adequately address the effects of recreation on natural resources and recommends incorporating additional information regarding wildlife connectivity, rewilding, State 30x30 objectives, and related planning efforts. Please refer to Comment Responses O.8-1 through O.8-11 above for detailed response to individual comments.

8.4.4 Individuals

Outlook

Rec Master Plan

From Timothy Mahoney <4tjmahoney@gmail.com>
Date Fri 7/10/2026 8:59 AM
To Countywide Recreation Master Plan <RecPlan@countyofsb.org>

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I.1-1

The Recreation Master Plan and Environmental Impact Report (EIR) must focus on active recreation and public auto, road, parking access and other family amenities such as clean restrooms, security/police, night lighting, bike paths, walking trails, overnight camp sites, day camping, picnic areas, fishfing, boating, swimming and concessions.

In parks and beaches no gangs, graffiti, trash, homeless, etc. Soccer fields, baseball fields, volleyball courts, pickleball/tennis courts, basketball courts, horseshoe pits and other sports facilities are key.

I'm available for consultation. THAnks, TIm Mahoney, 805-689-3033.

Comment Letter I.1 – Tim Mahoney

Comment Response I.1-1

Thank you for your comments. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR. Comments recommending or expressing support for specific recreational improvements will be considered by County Park.

Outlook

FW: Dark Sky International Sports Lighting Standards

From Mitchell, Tina <tmitchell@countyofsb.org>
Date Wed 8/5/2026 8:15 AM
To Countywide Recreation Master Plan <RecPlan@countyofsb.org>

1 attachment (19 KB)
DSISportsLighting22026.docx;

FYI – Comment on the EIR.

Tina Mitchell
Planner
Development Review Division
Planning & Development Department
County of Santa Barbara
624 W. Foster Road, Suite C
Santa Maria, CA 93455
805-934-6289
tmitchell@countyofsb.org
https://www.countyofsb.org/160/Planning-Development

From: Singer, Ben <bsinger@countyofsb.org>
Sent: Monday, August 3, 2026 9:55 AM
To: Mitchell, Tina <tmitchell@countyofsb.org>
Subject: FW: Dark Sky International Sports Lighting Standards

Hey Tina,

This is an email from Nancy Emerson about dark sky compliant sports lighting. If you don't know her, Nancy is one of the members of WeWatch, and we worked with her while putting together the outdoor lighting ordinance. I also directed her to the Rec Master Plan webpage, so she might send this to you/the Rec Master Plan general email again.

Thanks,
Ben

From: Nancy Emerson <nancyfemerson52@gmail.com>
Sent: Monday, August 3, 2026 9:42 AM
To: Tuttle, Alex <Atuttle@countyofsb.org>; Singer, Ben <bsinger@countyofsb.org>
Subject: Dark Sky International Sports Lighting Standards

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Alex and Ben,

When reading the Draft EIR for the Master Recreation Plan, I noted that the outdoor lighting section, which utilized E.1.c., was written before Dark Sky International updated its standards for Sports Lighting in 2026.

I have attached the new information from Dark Sky International in the hope it can be incorporated into the Master Recreation Plan to assure that sports lighting in the county meets the standards that reflect the technology in sports lighting currently available. It enables sports lighting, particularly near residential areas, to be very unobtrusive, unlike most existing sports lighting in our county, which causes extensive light pollution problems.

I.2-1

I could not find an email for Tina Mitchell. Would you please forward this information to her?

Nancy Emerson

2.3 Sports Lighting

A. The following requirements are supplementary to the General Outdoor Lighting Requirements
(**Section 2.1** and its subsections) and shall further regulate outdoor sport and recreational lighting.

1. *Residential* Use: *[Allowing Residential sport court lighting at night is a choice. Many benchmark communities do not allow the illumination of sport courts when located on Residential property to avoid neighborhood complaints.]*

a) Unless otherwise approved by permit, lighting installed for *Residential* sport and recreational courts shall not exceed 300 *Lux* illuminance average, or 10% more than the *Light Level* recommended by ANSI/IES RP-6 Class 4 "Class of Play" as published by [date].

b) Lighting for sport and recreational play on *Residential* property shall be extinguished during *Nighttime Curfew.*

2. Park, Amateur, Collegiate, Professional, and Outdoor Entertainment Facility: *[The following requirements are a subset of the DarkSky Approved Outdoor Sports Lighting Facilities program. These criteria have been proven to create safe playing fields while also mitigating problematic light pollution. DarkSky Approved Sports Lighting Facilities would meet these requirements.]*

a) Eighty-five percent (85%) of the lumens generated by sports lighting luminaires shall be confined to within 10 meters (33 feet) or a distance equal to one pole height, whichever is greater, beyond the playing field, spectator track or bleacher area, whichever is greater.

b) Lighting installations for aerial sports are allowed a maximum of 8% of the total lumen output to be emitted above 80 degrees from *Nadir*.

c) The maximum *Light Level* shall not exceed 10% more than the *Light Level* recommended for the "Class of Play" by the referable *Lighting Standard*.

d) The maximum *CCT* for outdoor sports lighting should be the lowest possible for the sport, class of play, and viewing audience as defined by the relevant *Lighting Standard*, while never exceeding 5700 K.

e) The maximum luminous intensity from any *Luminaire* lighting a sports field shall not exceed 10,000 *candelas* (cd) as calculated using computer software or measured along a perimeter that is 46 meters (150 feet) from the edge of the field, at 1.5 meters (5 feet) above grade. *[This requirement is considered the minimum guideline for glare reduction because sports lighting can be 85% contained, meet light trespass illuminance requirements, and still produce obtrusive brightness in the surrounding properties that cause an individual to uncomfortably squint or turn away. There are many LED products with shielding and optical control that can meet this requirement. The design process and installation crews can validate this measurement on behalf of the municipality. When post-installation measurement is difficult, third party sources can take these measurements.]*

Comment Letter I.2 – Nancy Emerson

Comment Response I.2-1

Thank you for your comments. Potential impacts related to outdoor lighting associated with implementation of the Recreation Master Plan are included in Section 3.1, *Aesthetics*. The EIR acknowledges that future recreational development could increase nighttime light and glare in the Urban and Rural areas as a result of additional public recreational facilities. Future site-specific recreational improvements would be subject to existing plans and policies addressing lighting and protection of night skies. These include policies and standards governing lighting, including Dev Std VIS-SYV-3.1 of the Santa Ynez Valley Community Plan and outdoor lighting regulations of the County's LUDC (Section 35.30.120), MLUDC (Section 35.430.120), and coastal zoning ordinances (Section 35-139) that were recently updated and modernized by the Board in 2025.. As described in Section 3.1.4.2, *Project Impacts*, impacts related to lighting and glare were determined to be insignificant. Implementation of additional lighting standards into the EIR would not substantially alter impact findings related to implementation of the Project.

Outlook

Feedback on Parks plans

From beth dipietro <bdipietro823@gmail.com>
Date Tue 8/4/2026 11:24 AM
To Countywide Recreation Master Plan <RecPlan@countyofsb.org>

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hello,

I.3-1

Could the City of Santa Maria please consider putting in lights at Preisker Park?

It's such a beautiful park. It's well used for soccer games, dog walkers and family time. But for 4-5 months out of the year, the park can't be used after 5 or 6pm (after work hours) due to darkness.

With so many problems in our community - crime and drugs - it's a wonderful thing to see kids and adults engaged in healthy outdoor activities.

Can lighting be considered so this beautiful park can be used throughout the year? (Plus, we live in California and have beautiful weather even in the winter. Let's enjoy it year round!)

Thank you,
Beth Dipietro, LCSW

Comment Letter I.3 – Beth Dipietro

Comment Response I.3-1

Thank you for your comments. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR. Comments recommending or expressing support for specific recreational improvements will be considered by County Park.

Outlook

South Coast Aquatic Center: Recreation Master Plan Draft

From Pam Tanase <pam.tanase@gmail.com>
Date Thu 8/6/2026 9:47 AM
To Countywide Recreation Master Plan <RecPlan@countyofsb.org>

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Attn: Jeff Lindgren, Assistant Director, County Parks, Community Services Department, Parks Division

I.4-1

I am extremely pleased to see that the South Coast Aquatic Center is a priority highlighted on the Recreation Master Plan Draft. I strongly encourage a partnership with UCSB Athletics to fast track the timeline to get the pool built and to work with Lynette Spivak's Central Coast Aquatics non-profit. Our community deserves state-of-the-art aquatics complex to support youth and adult recreation, fitness and competition.

Looking forward to seeing the pool come to life.

Pam Tanase
105 W De La Guerra St, Unit P
SB, CA 93101

Comment Letter I.4 – Pam Tanase

Comment Response I.4-1

Thank you for your comments. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR. Comments recommending or expressing support for specific recreational improvements will be considered by County Park.

Outlook

County trail update

From Gail Ward <lindagailward@gmail.com>
Date Thu 8/6/2026 2:27 PM
To Countywide Recreation Master Plan <RecPlan@countyofsb.org>

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I.5-1

Hello,
I love to hike on our local trails. Now that I am older, I am daunted crossing the creeks. I no longer have the agility I had in the past. Updating trail crossings on our creeks, as they do in Europe, would be so helpful to many of us. Not big, elaborate bridges or wheelchair access, just less wobbly boulder placement. What do you think?
Thank you for allowing me to give my input!
Gail Ward

Comment Letter I.5 – Gail Ward

Comment Response I.5-1

Thank you for your comments. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR. Comments recommending or expressing support for specific recreational improvements will be considered by County Park.

Outlook

Gaviota wildlife

From scott putnam <sbripman@hotmail.com>
Date Sat 8/8/2026 12:44 PM
To Countywide Recreation Master Plan <RecPlan@countyofsb.org>

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I.6-1

As a long-time resident of Gaviota I can vouch for the toll taken on wildlife by Highway 101. The State of California has a huge budget and surely it can find funding to create a wildlife crossings/corridors in the area and thereby reduce the carnage.
Thank you,
Scott Putnam

Comment Letter I.6 – Scott Putnam

Comment Response I.6-1

Thank you for your comments. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR.

Outlook

Comments on the Recreation Master Plan

From Doug Campbell <dcampbellhr68@gmail.com>
Date Sun 8/9/2026 3:34 PM
To Countywide Recreation Master Plan <RecPlan@countyofsb.org>

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

I am disappointed to see that the revised Recreation Master Plan does not reflect the negative input many people made about placing a new County campground at the Gaviota Marine Terminal property. Allow me to list the reasons that this project should not be included in the Master Plan:

NEED and COST

1. We already have three state parks and a private campground (El Capitan Canyon) along the eastern-most 20 miles of the Gaviota Coast. No amount of camping facilities will ever meet the demands of the 28 million people living south of us. These existing facilities, combined with day trippers, result in approximately one million visitors per year to this end of the Gaviota Coast. I can think of no compelling argument why we should increase this number and suffer the resulting impacts with no benefit to the residents of the County.
2. The Master Plan exhibits an inherent bias; that more recreation is always a good thing, and fails to consider the downside. The proposed Gaviota campground will almost exclusively serve people who are not from this area. This means their impacts are greater; traffic congestion, air pollution, lack of local knowledge, etc. The Plan seems to only consider the economic benefits of camping tourists to increase the County's income at the expense of local residents diminished quality of life. I.7-1
3. The economics of the future campground are terrible. Nearby Gaviota State Park loses well over $1 million per year in direct and overhead costs. Plus the new campground is infeasible without the desalination plant (currently onsite) to provide drinking water. That plant is likely to be very expensive to operate and probably requires major rehabilitation before it can operate reliably.
4. I can't imagine the County will fund the development of this campground with taxpayer money. A private company is more typically brought in to develop and operate a facility like this. This will likely put the cost of staying here out of reach of the average person and cedes control to a for-profit operator. It also creates an incentive to increase the size and intensity of the development to "make the numbers work".
5. The Gaviota Coast is well known for its high biodiversity, as habitat for a large number of threatened and endangered species, and as a place where, with a little extra effort, one can find solitude in nature. Validating its conservation value are the investments being made to acquire Gaviota properties by local and national conservation nonprofits, projected to be in the hundreds of millions of dollars over the next five to ten years. Increased recreational use directly impacts the vegetation and wildlife that attract these investments. I.7-2
6. Receiving less attention perhaps is that conservation efforts are being made both offshore, in marine protected areas, as well as onshore. Scientists are just beginning to learn about the linkages between these two environments and how vegetation and wildlife benefit from connectivity between the two. This connection found here between large scale, protected wildlands and an adjacent protected ocean is unique, particularly for Southern California.

AN ALTERNATIVE FUTURE

The Gaviota Coast cannot accommodate additional recreation without diminishing the things that make it so special. Out of the 420 mile long Southern California coastline, the 30 miles of coast between Ellwood and Point Conception is the only coastline left that is not intensely developed and completely given over to beach recreation. Nowhere else in Southern California will you find black bear, mountain lions, and bobcats hunting along the beaches every night. As a result, significant investments are being made to acquire and conserve a large share of the properties still in private ownership. These properties will be managed primarily for their conservation values, not for recreation.

I.7-3

The most valuable public benefit that can be derived from the Gaviota Coast is to use it for scientific research and nature education. It is a living laboratory and is already providing new insights into near-shore marine life with research being conducted by scientists under the purview of the Dangermond Preserve, the Point Conception Institute, and the Hollister Ranch Shoreline Preserve.

These same entities, as well as the Vista de Las Cruces school, offer excellent nature education programs that expose thousands of school age kids each year to what a wild coast looks like and how it functions. The Gaviota Marine Terminal property should be developed more in line with this vision. It could be, for example, the location for a summer science camp, or a UCSB marine lab, or some combination of the two. It already has an ocean water intake system and a development of this type would not require funding by local taxpayers. The benefits of increased scientific knowledge and exposing youth to wild nature would be of far greater value to society than that provided by another campground and the expansion of human disturbance that comes with it.

Sincerely, Doug Campbell
Gaviota

Comment Letter I.7 – Doug Campbell

Comment Response I.7-1 I

Thank you for your comments. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR. Comments recommending project-specific recreational improvements will be considered by County Park.

Comment Response I.7-2

The comment expresses that the Gaviota Coast exhibits a high degree of biological and natural resource value and is being prioritized for conservation. The comment goes on to state that increased recreational use along the Gaviota Coast will directly impact biological resources of the area. The EIR includes comprehensive analysis of the potential impacts the Project may have on biological resources. These impacts are evaluated in Section 3.4, *Biological Resources*. As presented therein, the Program EIR recognizes that Santa Barbara County includes extensive biological habitats and natural communities, and that the Recreation Master Plan could impact sensitive habitats, special-status species, and wildlife corridors, including those within the Gaviota Coast. However, as presented in the analysis, future recreational development enabled under the Recreation Master Plan would be subject to would be subject to the wide range of existing federal, state, and county policies, and development standards proposed under the Project that would avoid or minimize impacts. This includes applicable policies of the Gaviota Coast Plan, including those requiring the protection of Environmentally Sensitive Habitat (ESH) and providing guidelines for responsible development related to these areas. The EIR also identifies several mitigation measures to reduce impacts. These include **MM BIO-1 (Tree Protection Plan)** and **MM BIO-2 (Habitat Protection Plan)** that would be applicable to all permitted uses in Recreation zones, permitted parks and trails, and RBPs, and would require site-specific surveys of protected biological resources and the avoidance, minimization, or compensatory replacement of affected resources. With mandatory compliance with existing policies and proposed development standards, as well as with implementation of identified mitigation measures, Project impacts were determined to be significant but mitigable.

Comment Response I.7-3

The comment expresses the importance of preservation of the Gaviota Coast and preference for prioritizing use of the Gaviota Coast for scientific research and nature education. The comment suggests that the Gaviota Marine Terminal property should be developed for a summer science camp or marine lab, rather than a campground. This comment will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR. Comments recommending project-specific recreational improvements will be considered by County Park.

Brownstein Hyatt Farber Schreck, LLP
805.963.7000 main
1020 State Street
Santa Barbara, California 93101

August 10, 2026

Matthew L. Hofer
Attorney at Law
805.882.1464 direct
mhofer@bhfs.com

VIA EMAIL:

County of Santa Barbara Community Services Department
C/O Jeff Lindgren
123 East Anapamu Street, 2nd Floor
Santa Barbara, California 93101
RecPlan@countyofsb.org

RE: Draft Program Environmental Impact Report for the County Recreation Master Plan (SCH No. 2025010342)

This office represents Suzanne Duca, a Santa Barbara County resident and strong advocate for the local equestrian community. Ms. Duca is one of many local equestrians, including Kathleen Rosenthal, members of the Santa Ynez Valley Riders, and members of the SAVE Santa Barbara County Equestrian Trails Coalition, that have expressed their concerns to the County regarding preservation of the Live Oak Trail ("Trail") at Cachuma Lake.

On February 6, 2026, we submitted a detailed comment letter to the Santa Barbara County Planning Commission regarding the draft Recreation Master Plan ("Plan"), which identified a number of legal and factual issues pertaining to the Plan's proposals for the north shore of Cachuma Lake and the Trail. We now submit this letter as formal comments on the Draft Program Environmental Impact Report ("Draft EIR" or "EIR") for the Plan (SCH No. 2025010342), published in June 2026, during the public review and comment period that runs from June 26, 2026 to August 10, 2026. 1.8-1

As discussed in our prior letter and detailed further below, the Draft EIR contemplates significant new development on the north shore of Cachuma Lake—including up to 15 miles of additional trails, additional types of uses on the north shore trails beyond the historic equestrian-only use, and a primitive campground—yet provides only programmatic-level analysis with no site-specific biological surveys or environmental review. This is particularly concerning given that a binding State Court Judgment and Writ of Mandate (the "Duca Judgment") specifically requires project-specific environmental review under CEQA before the Trail and north shore can be opened to additional recreational uses.

We respectfully urge the County to ensure that the Final EIR and all subsequent planning documents fully acknowledge the binding legal constraints on north shore development, commit to project-specific CEQA review before any of the proposed actions are implemented, and address the specific deficiencies identified in this letter.

1.8-2

I. Legal and Factual Background

As detailed in our February 6, 2026 letter, the north shore of Cachuma Lake is subject to a unique set of binding legal requirements that distinguish it from other County recreational facilities. We briefly summarize these authorities here, which are attached as Exhibits 1 through 4.

A. The Federal RMP/EIS (2010)

The Cachuma Recreation Area is owned by the federal government and managed by the County through the Bureau of Reclamation ("BOR"). In 2010, BOR published a Resource Management Plan/Environmental Impact Statement ("RMP/EIS") under the National Environmental Protection Act ("NEPA"). After selecting Alternative 2 (Enhanced Recreation) as its preferred alternative, the RMP/EIS stated that BOR "will require site-specific environmental analysis and appropriate mitigation for all proposed actions under Alternative 2." (Exh. 1 at pp. 6–7.) The RMP/EIS further stated:

> "Under alternatives 2 and 3, expansion of facilities, including camping, recreation, and parking, would include site-specific environmental studies to assess biological impacts and determine mitigation measures that will reduce these impacts. More detailed surveys should be conducted to determine the presence or absence and breeding of special-status species with potential to occur in the Plan Area."

(*Id.* at p. 11.) The RMP/EIS also found that trail conflicts among different user groups could constitute "major" impacts requiring mitigation. (*Id.* at pp. 9, 12.)

B. The 2011 Management Agreement

The County manages Cachuma under a Management Agreement with BOR, the most recent of which was approved in 2011. The County adopted a CEQA exemption for the Management Agreement, which expressly acknowledged that the agreement "does not require or commit the County, as managing partner, to construct any specific project set forth in the [RMP], or to implement, facilitate or encourage any of the allowable uses designated in the RMP." (Exh. 2 at p. 3.) The CEQA exemption further states:

> "[I]f the County subsequently seeks to construct any specific project set forth in the RMP, or enhance recreational opportunities within the recreation area, these shall only occur after any necessary environmental review required by NEPA and CEQA."

(*Id.* at pp. 2–3.)

C. The Duca Judgment and Writ of Mandate

In 2021, the County approved a project to open the Trail to pedestrians and bicyclists without conducting the site-specific environmental review required by the RMP/EIS, the Management Agreement, and

1.8-2 cont.

CEQA. Ms. Duca and other equestrians filed a petition in Santa Barbara Superior Court, and Judge Thomas Anderle ruled in their favor, specifically finding:

- The RMP/EIS and the County's CEQA exemption for the Management Agreement both require further site-specific environmental review before the Trail can be opened to pedestrians and bicyclists. (Exh. 3 at pp. 17–18.)
- A project-specific EIR must be prepared under CEQA because there is substantial evidence that the Project may have a significant impact on the environment due to conflicting land uses on the proposed Trail. (*Id.* at pp. 19–22.)

The Court issued a Writ of Mandate compelling the County to set aside its approval of the project and suspend all recreational activity on the Trail other than horseback riding until the County demonstrated full CEQA compliance. (Exh. 4.) The Court of Appeal affirmed in all material respects. (See Exh. 3 at pp. 35–55 [*Duca v. County of Santa Barbara* (2024) 2024 WL 2169056].)

II. The Program EIR's Analysis of the North Shore Is Inadequate Under CEQA to Approve the Changes Described in the Plan

1.8-3

The Draft EIR contemplates significant new development on the north shore of Cachuma Lake, including the "Lake Cachuma North Shore Trails & Recreation Facilities Management Plan," described as a long-term (10–20 year) project that would include a public equestrian facility near Live Oak Campground, a primitive pack-in/pack-out campground, and an expanded trail network with "separate segments and facilities for other non-motorized users"—comprising up to 15 miles of additional trails. (EIR pp. 119–120.) Yet the EIR provides only a programmatic analysis of these proposals, with critical deficiencies:

A. The EIR Does Not Include Site-Specific Biological Surveys

The EIR itself acknowledges that "no site-specific biological surveys have been conducted. Rather, the description of the environmental setting is based on information provided in previous long-range planning documents, recent EIRs prepared by the County, and associated technical studies." (EIR p. 299.) The available data "is presented countywide and regionally, rather than relative to potential individual projects planned by the Project." (*Ibid.*) This is precisely the kind of inadequate analysis that Judge Anderle found insufficient to support CEQA compliance for the Trail. To our knowledge, the biological surveys that have been done for the north shore, which identified critical habitat and endangered species, are now approximately 40 years old and are not a rational basis to make substantive judgments about current conditions there.

B. The EIR's Description for North Shore Trails is Ambiguous

1.8-4

As we noted in our prior comment letter, the nature of the proposed trail changes remains unclear. The EIR states that the equestrian trail network "would be improved and expanded to support equestrians with separate segments and facilities for other non-motorized users" and that "[n]on-equestrian trails would

1.8-4 cont.

support hiking and non-motorized biking." (EIR p. 120.) It further provides that "[w]here trail conflicts could arise with other recreational users, horse-only bypasses would be integrated into the trail design." (*Ibid.*) But it remains unclear whether the existing Live Oak Trail will itself become a multi-use trail with "bypasses" for horses, or whether equestrian use will be preserved on the existing Trail while entirely separate trails are built for other users. This ambiguity in the scope of the actual development covered by the EIR must be resolved before the environmental impacts can be adequately analyzed. (*Washoe Meadows Community v. Department of Parks & Recreation* (2017) 17 Cal.App.5th 277, 287 ["An accurate, stable and finite project description is the *sine qua non* of an informative and legally sufficient EIR"] [cleaned up].)

1.8-5

C. The EIR's Generic and Deferred Mitigation Measures Fail to Adequately Address Unique Impacts to the North Shore

The biological resources impacts are classified as "significant but mitigable" with generic mitigation measures (MM BIO-1 through BIO-4) that apply countywide. These generic measures are insufficient to address the unique conditions on the north shore, where Judge Anderle found that the trail passes "near or through a number of special-status plant and bird locations," including crucial bird habitat for bald eagles. (Exh. 3 at p. 21.) The RMP/EIS itself acknowledged that "[t]he north shore of Cachuma Lake is a valuable natural resource . . . . It is the general consensus that public access to the north shore should continue to be carefully managed." (*Ibid.*) Despite this, the EIR does not include any site-specific mitigation to address the impacts to the north shore's unique resources.

Furthermore, the only mitigation measure that does appear to be tailored to site-specific impacts—MM BIO-2, which requires Habitat Protection Plans for permitted trails—impermissibly defers mitigation by requiring future project applicants to prepare a plan that will, at some unspecified future date, "first determine the presence of sensitive biological resources at a project site" and then "determine whether avoidance, minimization, or compensatory measures are necessary." In other words, the EIR does not itself identify the biological resources present on the North Shore, assess the significance of impacts to those resources, or commit to specific mitigation; it delegates all of those critical steps to a future plan prepared by future applicants. This is precisely the kind of deferred mitigation that CEQA prohibits. (*See Sundstrom v. County of Mendocino* (1988) 202 Cal.App.3d 296, 306–307 [holding that a lead agency may not improperly defer environmental assessment to a future date or delegate the agency's legal responsibility to assess environmental impacts to an applicant].)

1.8-6

III. The EIR Fails to Address Binding Legal Constraints on North Shore Development

Remarkably, the Draft EIR contains no discussion whatsoever of the Duca Judgment and Writ of Mandate. The Writ requires the County to suspend all recreational activity on the Trail other than horseback riding until the County has fully complied with CEQA. (Exh. 4.) Any proposal to expand recreation on the north shore must be evaluated in light of this binding legal constraint.

1.8-6 cont.

Similarly, the EIR does not analyze how the proposed North Shore development relates to the requirements of the RMP/EIS and Management Agreement for site-specific environmental review. As noted above, both documents expressly require that further environmental studies be conducted before any expansion of facilities or recreational activities at Cachuma. The EIR's failure to acknowledge these requirements is a significant omission.

The Final EIR must identify and address these binding legal constraints, including: (1) the Duca Judgment and Writ of Mandate, which remain in full force and effect; (2) the RMP/EIS requirement for "site-specific environmental analysis and appropriate mitigation for all proposed actions;" and (3) the Management Agreement's requirement that any new recreational projects "shall only occur after any necessary environmental review required by NEPA and CEQA."

1.8-7

IV. The EIR's Tiering Provisions Could Be Used to Circumvent the Requirement for Site-Specific Review

The Draft EIR is prepared under CEQA Guidelines section 15168 as a Program EIR. It expressly acknowledges that "site-level details are conceptual, rendering analysis too speculative for detailed evaluation" and that "some future projects pursued as implementation of the Project may require more detailed environmental review under CEQA." (EIR p. 84.) However, the EIR also states:

> "Per CEQA Guidelines Section 15168, the programmatic analysis and findings of this Program EIR may be incorporated by reference in subsequent environmental documents" and "if a subsequent activity is within the scope of this Program EIR and no new effects would occur or no new mitigation measures would be required, additional environmental documents may not be required."

(EIR p. 84.) This language creates the risk that the County will use this Program EIR as a basis to avoid further site-specific environmental review for the North Shore proposals.

Judge Anderle squarely rejected this approach. The Court found that the County could not rely on a programmatic document (the RMP/EIS) to avoid project-specific review due to the unique nature of the site. (Exh. 3 at pp. 17–18.) The North Shore proposals which would involve 15 miles of trails through sensitive habitat, conflicts among multiple user groups, and areas with known cultural resources cannot, therefore, be adequately covered by this Program EIR alone. The Final EIR must make clear that project-level CEQA review will be required before any of the proposed North Shore activities are implemented.

V. The EIR's Finding of "Insignificant" Recreation Impacts Is Unsupported by Substantial Evidence

1.8-8

The Draft EIR acknowledges the potential for user conflicts on the North Shore, stating:

1.8-8 cont.

> "The Project also proposes future expansion of recreational opportunities at Lake Cachuma's north shore and Live Oak Campground, including a potential new campground, equestrian facilities, and potentially new trails for hiking, mountain biking, and horseback riding. These improvements could result in conflicts between existing recreational use of the area, which is currently limited to horseback riding, particularly with the addition of trails for mountain biking."

(EIR p. 721.) Yet despite acknowledging these conflicts, the EIR concludes that recreation impacts are "insignificant" based solely on proposed development standards and trail policies that would "require the public trail network to accommodate pedestrians, equestrians, bicyclists, and other trail user groups wherever feasible." (EIR pp. 721–722.) This conclusion is unsupported by substantial evidence and is contradicted by the existing record:

- The RMP/EIS found that trail conflicts among different user groups could be "major" impacts (Impact R-3), requiring specific mitigation. (Exh. 1 at pp. 9, 12.)
- Judge Anderle found substantial evidence of a significant impact on human health and safety (due to conflicts among trail users) on the Trail. (Exh. 3 at pp. 20–22.)
- The EIR itself identifies "User safety on trails and in public parks, including equestrian users" as an area of known public controversy. (EIR p. 88.)
- Horses are fundamentally prey animals that frighten easily. The risks inherent in putting equestrians, mountain bikers, hikers, and dogs in close proximity on narrow trails far into the wilderness are well documented in the Duca litigation record.

The EIR's conclusion that recreation impacts are "insignificant" based on development standards alone, without site-specific analysis, is inconsistent with the findings of both the RMP/EIS and the Superior Court. This conclusion must be revisited in the Final EIR.

VI. Other Environmental Concerns Regarding North Shore Development

In addition to the issues described above, the Draft EIR raises several other environmental concerns regarding the proposed North Shore development that warrant close attention:

1.8-9

Wildfire risk. The areas surrounding Lake Cachuma, including the proposed North Shore trail network, fall within High and Very High Fire Hazard Severity Zones in State Responsibility Areas. Expanded recreational access increases ignition risk in an area that is already highly vulnerable to catastrophic wildfire.

1.8-10

Erosion and water quality. The EIR itself notes that the "Cachuma Equestrian Trails Project would expand the trail network on the north side of Lake Cachuma to support equestrians, which could increase erosion and pollute runoff." (EIR p. 588.) The north shore terrain is steep and erosion-prone, and Cachuma Lake serves as a critical drinking water reservoir. The potential for trail construction and

1.8-10

increased traffic by new users to contribute sediment and pollutants to the reservoir must be carefully evaluated on a site-specific basis.

1.8-11

Cultural resources. The EIR acknowledges that "changes or expansion of the trail system with the addition of a rustic pack-in/pack-out campground on the North Shore of Lake Cachuma could encounter cultural resources due to known cultural resource values in the area, based on the 2011 Cachuma Resource Management Plan and Programmatic Environmental Impact Statement." (EIR p. 397.) This further underscores the need for site-specific surveys before any ground-disturbing activities on the North Shore.

1.8-12

Vehicle miles traveled. The EIR identifies significant and unavoidable transportation impacts related to vehicle miles traveled ("VMT"), and specifically calls out the Lake Cachuma North Shore Trails project as a "destination-based recreational trail" that would generate new VMT. This finding further supports the need for project-specific review of the North Shore proposals.

1.8-13

VII. Trail Permitting Should Require a Conditional Use Permit with a Public Hearing

As we raised in our prior comment letter, the Draft EIR proposes zoning amendments that would allow trails for hiking and riding as permitted uses in agricultural zones (AG-I, AG-II) and other zones, with changes to trail usage approved via a Land Use Permit or Zoning Clearance rather than a Conditional Use Permit. The EIR further proposes that Recreation Benefit Projects could receive "simplified permit processing as a Land Use Permit."

A Land Use Permit does not require a noticed public hearing under County Land Use and Development Code section 35.82.110. As the Trail's recent history illustrates, significant changes to the allowed uses of a public trail may implicate a variety of public interests in ways that the County may not have anticipated. Stakeholders, including groups associated with particular recreational users, advocates for the natural environment, neighboring landowners, and others, all deserve to be informed about proposed changes and to have their voices heard before such changes are made. Moreover, allowing significant changes to trail usage without adequate public notice, with the potential for significant environmental effects to result, risks subverting CEQA's core purposes of disclosing and informing the public about such changes before they occur.

We respectfully request that the County modify this proposal to require a Conditional Use Permit, or at a minimum, a noticed public hearing, before significant changes are made to allowed trail uses. This is particularly important for the North Shore, where any changes must comply with the Duca Judgment and where the RMP/EIS itself identified trail user conflicts as potentially "major" impacts.

I.8-14

We greatly appreciate the County's attention to these matters. As stated in our prior letter, the Recreation Master Plan represents a tremendous opportunity to survey and enhance the County's recreational

I.8-14 cont.

resources. However, the unique factual and legal circumstances relating to the north shore of Cachuma Lake and the Live Oak Trail require particular care in the EIR process.

Based on the foregoing, we respectfully request that:

1. The Final EIR acknowledge and address the Duca Judgment and Writ of Mandate, the RMP/EIS requirements, and the Management Agreement's conditions on new recreational development; I.8-15
2. The County commit to conducting project-specific CEQA review—including site-specific biological and cultural resource surveys—before implementing any of the proposed North Shore activities; I.8-16`
3. The County clarify the scope of proposed trail changes on the North Shore, specifically whether the existing Live Oak Trail will remain equestrian-only or will become multi-use; I.8-17
4. The EIR's finding of "insignificant" recreation impacts be revisited in light of the substantial evidence of potentially significant impacts from trail user conflicts; and
5. Significant changes to trail usage require a Conditional Use Permit with at least one noticed public hearing. I.8-18

If you would like to discuss any of these issues or request additional information, please do not hesitate to contact me.

Sincerely,

Matthew L. Hofer

Enclosures:

- Exhibit 1: Selected pages from the 2010 Resource Management Plan/Environmental Impact Statement adopted by the United States Bureau of Reclamation.
- Exhibit 2: County's Notice of Exemption for 2011 Management Agreement with United States Bureau of Reclamation.
- Exhibit 3: Amended Judgment Granting Peremptory Writ of Mandate, *Duca v. County of Santa Barbara*, Superior Court Case No. 21CV02683; with Exhibit A, Court's Statement of Decision; and Exhibit B, Court of Appeal's Decision.

- Exhibit 4: Second Amended Writ of Mandate, *Duca v. County of Santa Barbara*, Superior Court Case No. 21CV02685 (Exhibits A and B omitted for length).

EXHIBIT 1

RECLAMATION
Managing Water in the West

RECORD OF DECISION

Cachuma Lake Resource Management Plan

ROD 10-112

Recommended by:

Michael P. Jackson
Area Manager
South-Central California Area Office

Date: 5/20/2011

Concurred by:

Anastasia Leigh
Acting Regional Environmental Officer
Mid-Pacific Regional Office

Date: 5/24/2011

Approved by:

FOR Donald R. Glaser
Regional Director
Mid-Pacific Regional Office

Date: 5/27/11

U.S. Department of the Interior
Bureau of Reclamation
South-Central California Area Office

April 2011

Introduction

Cachuma Lake is a reservoir formed by Bradbury Dam, which was completed in 1956 as part of the Cachuma Project. Located approximately 11 miles northwest of the City of Goleta in Santa Barbara County, Cachuma Lake provides water to the City of Santa Barbara, Goleta Water District, Montecito Water District, Carpinteria Valley Water District, and Santa Ynez River Water Conservation District–Improvement District #1. Cachuma Lake provides water storage for the delivery of irrigation, municipal, and industrial water supplies, as well as recreation opportunities and fish and wildlife habitat.

The Cachuma Lake Resource Management Plan (RMP) addresses resource management alternatives for the Plan Area as appropriate for water quality, recreation, natural resource, and cultural resource management opportunities. The Plan Area encompasses approximately 9,250 acres, including Cachuma Lake (3,043 acres at full level) and the surrounding shores and rugged hillsides. All recreational uses and improvements at the lake must be consistent with the authorized purposes of the Cachuma Project and should not interfere with lake operations, which are focused on providing a reliable annual yield of high-quality water. The guidance provided in the RMP will help Cachuma Lake managers fulfill Reclamation's mission, which is "to manage, develop, and protect water and related resources in an environmentally and economically sound manner in the interest of the American public." The RMP will also provide the framework for establishing a new management agreement with a managing partner. As such, there is no site-specific analysis associated with any of the alternatives. The associated Environmental Impact Statement (EIS) describes only the magnitude and direction of impacts associated with the alternatives addressed in the EIS.

This Record of Decision (ROD) documents Reclamation's decision to follow a specific direction for resource management provided in the alternative selected for the Plan Area. This ROD has been prepared in accordance with the National Environmental Policy Act [NEPA] (42 USC 4321 et seq.) and the Council on Environmental Quality's NEPA implementing regulations (40 CFR 1500-1508). The decision made herein is based on the information and analysis contained within the Final EIS (FEIS) for the Cachuma Lake RMP, which is incorporated by reference and was published on May 28, 2010. Reclamation has considered all comments received on the Proposed Action in developing this ROD.

Decision

Reclamation's decision is to implement Alternative 2, the Enhanced Recreation Alternative, as described in the FEIS. Implementing this alternative would allow some enhancement of current recreational uses and public access while protecting water quality, natural resources, and cultural resources. Several actions contained in this alternative will depend on site-specific environmental analysis as described within the Environmental Commitments.

Alternatives Considered in the Final EIS

Three management alternatives were developed to address the major planning issues. Each alternative provided direction for resource programs based on the development of specific goals and management actions. Each alternative described specific issues influencing land management, and each emphasized a different combination of resource uses, allocations, and restoration measures to address issues and resolve conflicts among users. None of the alternatives include site-specific actions, and the analysis is representative of the kinds of impacts expected to occur.

Alternative 1 (No Action)

For the No Action Alternative, the current resource and recreation management direction and practices at Cachuma Lake would continue unchanged. The description of the No Action Alternative on FEIS page 2-15 reflects the current management direction and level of management intensity for the Plan Area. The activities described are existing and ongoing, and represent the expected future condition if the RMP were not implemented. None of the physical actions that are expected to occur have been analyzed previously; rather, the current direction was used for comparative purposes. Alternative 1, No Action, provides the benchmark for making comparisons in the EIS among possible future changes under Alternatives 2 and 3.

Alternative 2 (Enhanced Recreation)

Alternative 2 emphasizes enhancement of current recreational uses and public access at Cachuma Lake, while protecting water quality, natural resources, and cultural resources. Management actions include upgrades and improvements for many of the County Park's existing facilities and utilities, as well as infrastructure improvements. Recreational enhancements would include the expansion of camping, hiking, bicycling, and day use opportunities, as well as the addition of a water park depending on funding and public demand. Alternative 2 also includes the development and implementation of focused management plans for boating, fisheries, trails, and vegetation.

Alternative 3 (Expanded Recreation)

Alternative 3 would expand recreational uses and public access, while protecting water quality, natural resources, and cultural resources. This alternative was included to demonstrate a scenario in which recreational uses at Cachuma Lake are substantially expanded while meeting the RMP goals related to protection of resources to the extent feasible. Alternative 3 builds upon and is in addition to the management actions listed under Alternative 2 with key additions that would allow body-contact water sports including windsurfing and swim beaches, as well as development of resort-like accommodations at the County Park. As with all alternatives, no personal watercraft use or waterskiing will be permitted. The same focused management plans as proposed under Alternative 2 would be developed and implemented.

Basis of Decision, Issues Evaluated, and Factors Considered

Reclamation evaluated the effects of the proposed alternatives on aesthetics/visual resources, agricultural resources, air quality/global climate change, biological resources, cultural resources, environmental justice, geology, soils, hazards and hazardous materials, hydrology and water quality, Indian Trust Assets, Indian Sacred Sites, land use, mineral resources, noise, public services, recreation, socioeconomics, transportation/circulation, utilities/service systems and cumulative impacts. This analysis was programmatic in nature as no site-specific analysis was conducted. Further site-specific analysis will be required to implement the preferred alternative.

There will be no impacts to Indian Trust Assets as there are none in the Proposed Action area. The nearest Indian Trust Asset is approximately 6 miles southwest of the Plan Area.

Alternative 1 would continue the management actions identified in FEIS Sections 2.5 and 2.6 on a project-by-project basis with no overall coordinated direction, and no recreation facility enhancements would take place. Alternative 1 does not increase recreation opportunities that many user groups have requested in public meetings and written comments (see the Public Scoping Report [URS 2006a] and Appendix B of the FEIS). The No Action Alternative would not provide additional measures for future protection of water, biological, and recreational resources because of the lack of management plans for boating, fisheries, trails, and vegetation.

Alternative 3 provides more infrastructure and service support to accommodate potential recreation demand, but the density of boat usage and users allowed in natural areas could compromise the quality of experience for many recreationists. Recreationists seeking a tranquil and serene setting would have limited opportunities under this alternative. Natural resources would be more affected than with Alternative 2, and water quality impacts could result from body contact in the Lake.

Reclamation has selected Alternative 2 based on interdisciplinary team recommendations, environmental analysis of the alternatives, and public input. Alternative 2 provides the most reasonable and practical approach to managing the Plan Area, while addressing the relevant issues and purpose and need. Alternative 2 places more emphasis on resource protection and limits some recreation opportunities compared to Alternative 3. Alternative 2 would minimize potential effects to water quality, vegetation, special-status species, visual resources, and land use compared with Alternative 3, and would include specific management plans. Alternative 2 balances project lands management and emphasizes a level of protection, enhancement, and use of the resources into the future.

The management elements of the Cachuma Lake RMP Preferred Alternative (Alternative 2) are detailed below.

Physical Resources

- Phase out non-conformant boat engines beginning within two years of the Managing Agreement approval date between Reclamation and Santa Barbara County Parks Department. This phase out would be completed within five years of the Managing

Agreement approval date unless the testing for contaminates described in Appendix A of the Cachuma RMP/FEIS are found to exceed state maximum contaminate levels, in which case the phase out would be completed within six months;

- Protect water quality by ensuring proper waste disposal, supervising cattle grazing practices through lease agreement terms, preventing containment release into the Lake, and continuing water quality testing practices in Cachuma Lake and at treatment plants;
- Continue implementation of the vessel inspection and quarantine program to protect against introduction of invasive mussels, and augment the program as new information becomes available;
- Update campgrounds and associated facilities to comply with the American Disabilities Act, security and law enforcement;
- Manage recreation facilities to protect visual and aesthetic resources.

Natural Resources

- Protect native and unique plant communities and fish and wildlife habitat and eradicate weeds for long-term sustainability and viability;
- Continue to manage Storke Flats and Johnson Canyon as designated watershed areas with no public access;
- Focus habitat enhancement and preservation on the east end of the lake, past the log boom;
- Develop and implement focused management plans for boating, fisheries, trails, and vegetation;
- Continue grazing on the North Shore and update the Rangeland Assessment and Grazing Management Plan; and
- Set up educational displays, interpretive signs and programs around the Plan Area to emphasize water quality and the natural resource environment.

Lands, Transportation, and Access

- Improve the entrance/exit road at Live Oak Camp to accommodate increased use;
- Fix stretches of roads prone to flooding; and
- Implement a new design and relocation plan for the Park entrance.

Cultural and Social Resources

- Continue and improve public education concerning sensitive cultural resources in the Plan Area.

Recreation

- Allow day use and full public access on the South Shore;
- Improve operations, overall appearance, and facilities at the County Park;
- Consider addition of a water park facility;

- Upgrade marine docks and allow kayak and canoe use on the Lake;
- Provide full range of camping opportunities and day-use activities in the County Park, including yurts, RVs, cabins, marina, shoreline access, shoreline fishing, hiking, and bicycling;
- Allow full-day use and full camping facilities at Live Oak and develop playing fields, a nature center, a pool, an amphitheater, and shoreline fishing areas;
- Allow full day use and public access on Arrowhead Island, in accordance with restrictions;
- Allow limited hiking and bicycling with permit on primitive trails and self-contained camping on the North Shore, and continue equestrian use;
- Allow guided group day use on the Santa Ynez Peninsula;
- Develop a Park trail system management and monitoring plan for hikers, horseback riders, and mountain biking;
- Explore and support, where appropriate, concessionaire agreements with private enterprises and managing partner agreements with public agencies;
- Continue to allow radio-controlled airplane "Float/Fly" events in coordination with the local managing partner;
- Continue to operate, manage, update, and modernize campgrounds and day-use facilities; and
- Designate boat density zones to encourage environmental protection and facilitate use of the lake.

Environmentally Preferable Alternative

Alternative 2 is identified as the environmentally preferable alternative because it places more emphasis on resource protection and limits some recreation opportunities compared to Alternatives 1 and 3. Fewer recreational facilities would be added with Alternative 2 than with Alternative 3.

Additionally, as compared with Alternative 1, Alternative 2 would minimize potential effects to water quality, vegetation, special-status species, and fisheries because it would include preparation of specific management plans whereas the current management practice does not.

Implementing the Decision and Environmental Commitments

Reclamation will enter into a management agreement with the Santa Barbara County Parks Department, which will provide for the implementation of the RMP/EIS and ROD. Reclamation will require site-specific environmental analysis and appropriate mitigation for all proposed

actions under Alternative 2. Reclamation will serve as project lead for implementation of laws to protect water quality, natural resources and cultural resources including but not limited to the:

- National Environmental Policy Act
- Endangered Species Act
- National Historic Preservation Act
- Archaeological Resources Protection Act
- Native American Graves Protection and Repatriation Act

Comments on the Final Environmental Impact Statement/Final Environmental Impact Report

Reclamation's Notice of Availability of the FEIS was published on May 19, 2010, and the U.S. Environmental Protection Agency's (EPA's) Notice of Availability was published on May 28, 2010. Copies of the FEIS were distributed to those who requested a copy. A press release was issued on May 20, 2010, and sent to the recipients on the Cachuma Lake RMP/EIS mailing list. The FEIS was also made available on Reclamation's Cachuma Lake RMP/EIS website at http://www.usbr.gov/mp/nepa/nepa_projdetails.cfm?Project_ID=283.

One comment letter on the FEIS was submitted after issuance of the Notice of Availability. The substantive issues in the comment letter and Reclamation's responses are summarized as follows.

Kathleen M. Goforth, U.S. Environmental Protection Agency, June 28, 2010

1. The EPA encourages Reclamation to consider the impacts of all activities, including vegetation management and recreation, on bald eagle nesting activities, which encompass breeding, feeding, and roosting. The EPA defers to the U.S. Fish and Wildlife Service on the adequacy of 1.35 miles from the documented bald eagle nest to the Plan boundary.

   Response: The FEIS includes measures to monitor for and minimize and/or mitigate potential effects to bald eagles from Plan implementation (Section 4.4.7). If the documented breeding pair rebuilds their nest within the Plan Area, appropriate buffers and restrictions will be enforced to avoid disturbance to the nesting pair. The same course of action will be taken if a new bald eagle pair takes residency within the Plan Area. The FEIS analysis of impacts from potential management actions is programmatic, as stated in Section 1.2, and therefore any future actions that would result in new facilities, ground disturbances, or environmental impacts beyond the programmatic analysis would be subject to subsequent environmental review and special-status species consultation as appropriate.

2. The EPA recommends a firm commitment in the Record of Decision to project-specific NEPA analyses.

   Response: This ROD makes clear the intention to prepare site-specific analysis for actions required to implement Alternative 2.

CACHUMA LAKE

Final Resource Management Plan / Environmental Impact Statement

May 2010



United States Department of the Interior
Bureau of Reclamation
Mid-Pacific Region
South-Central California Office

RECLAMATION
Managing Water in the West

Table S-1
Impacts Summary

Impacts to Resources	Alternative 1	Alternative 2		Alternative 3	
	Impact Magnitude	Impact Magnitude	Impact After Mit.	Impact Magnitude	Impact After Mit.
LU-3: Increased use of the trail system by multiple users	Minor	Minor	No Impact	Minor	No Impact
RECREATION					
R-1: Temporary construction activities at camping and recreation facilities	Minor	Minor	Minor	Minor	Minor
R-2: Management of BAOT levels to preserve WROS management zones	Minor	Minor	Minor/ No Impact	Minor	Minor/No Impact
R-3: Conflicts on trails	Major	Major	Minor	Major	Minor
R-4: Addition of new recreation activities	No Impact	Beneficial	N/A	Beneficial	N/A
R-5: Noise from RC airplanes	N/A	N/A	N/A	Major	Minor
R-6: Air quality and visibility impacts from prescribed burns	Minor	Minor	Minor	Minor	Minor
R-7: Safety issues from mixing swimmers with boaters and other recreational users	N/A	N/A	N/A	Major	Minor
VISITOR ACCESS AND CIRCULATION					
TR-1: Construction and maintenance activities	Minor	Minor	Minor	Minor	Minor
UTILITIES					
U-1: Demand on utilities/Water Supply	No Impact	Minor	Minor	Major	Minor

The level of detail presented in this section to describe the affected environment is commensurate with the programmatic/planning nature of this document. Therefore, resources are described at a regional and management zone level of detail. Project-level environmental documents will be required for any projects developed under the alternatives.

This section emphasizes describing resources and features that could be affected by the alternatives. Other topics such as climate and air quality are addressed to provide context, but less detail is provided because impacts to these resources would be less noticeable.

Much of the data collected to describe the existing environment are included in GIS format. Figures show areas with sensitive resources (i.e., biology, cultural, land use) and potential hazards (i.e., erosion, geological hazards). These maps and the impact analyses provided in Section 4 would be the basis of constraint analysis that would guide any plans for future development within the planning horizon.

In this section as others, County Park refers to the 375-acre area on Tequepis Peninsula (south shore of Cachuma Lake) occupied by major facilities such as campsites, RV campsites, marina and boat ramp, amphitheater, swimming pools, ranger station, general store, snake shop, and Nature Center.

Biology, Cultural Resources, and Land Use/Fire Management technical reports have been prepared to support inventory information presented in this section (URS 2006b, c, d) and are incorporated by reference.

- If native grassland were destroyed, a suitable mitigation site is the native grassland south of the park entrance. This existing grassland would be enhanced through weed management and planting and/or seeding of native plants.
- Implement intensive weed control and habitat restoration in areas where grazing is removed on the north shore.
- Map and eradicate invasive species around existing campgrounds.
- Include options in the Vegetation Management plan that would help control establishment of invasive species when high water recedes around the lake shore.
- Replace oak trees at a ratio that assures a 2:1 target replacement. The County of Santa Barbara Deciduous Oak Tree Protection and Regeneration Ordinance (adopted by the Santa Barbara County Board of Supervisors as Ordinance No.4490 on April 15, 2003) includes a higher replacement ratio (10:1 for evergreen and 15:1 for deciduous trees), although it does not apply to oak removal by the Federal Government on leased or federally owned property. Higher replacement ratios can be considered as appropriate during environmental analysis for specific projects implemented under the RMP.

(2) Implement additional patrols in new camping and day use areas to ensure that visitors comply with park regulations under all alternatives. Also increase signage and public education to reduce potential for poaching.

(3) Concession stands will be operated so that trash and food products are inaccessible to animals at all times under all alternatives.

(4) Mitigation for impacts to grebe breeding habitat or bald eagle foraging habitat include:

- Placement of barriers to only allow boats in the upper end of Cachuma Bay during the nonbreeding season under Alternatives 2 and 3.
- Monitor bald eagle perches to determine if increased human activity is impacting their activities under all alternatives. If impacts are noticeable, measures will be taken to reduce human activities in the vicinity of the bald eagle perch sites. Studies show that a buffer of a 0.25-mile radius around a bald eagle nest should be free of human activities and sometimes up to 0.5-mile radius depending on topography (Watson and Rodrick 2000). A known nest location lies approximately 1.35 miles outside of the Plan Area on private property; therefore, avoidance measures will not be necessary since the distance from any potential recreational disturbance is over twice the recommended distance from the nesting site.

(5) Under Alternatives 2 and 3, expansion of facilities, including camping, recreation, and parking, would include site-specific environmental studies to assess biological impacts and determine mitigation measures that will reduce these impacts. More detailed surveys should be conducted to determine the presence or absence and breeding of special-status species with potential to occur in the Plan Area during the environmental review process for new facilities.

Impact BI-2

Under Alternative 3, the RC airplane strip could impact breeding raptors and foraging bald eagles. Impacts could be major.

days when capacity is exceeded. During holidays and other peak recreation use weekends, managers could relax or waive permit requirements and WROS management zones. These management goals will be developed within the Boating Management Plan. Residual impacts would be minor or no impact if anticipated demand does not occur.

Impact R-3

Potential conflicts would occur between users on trails that are shared among different user groups including hikers, mountain bikers, and horseback riders. This impact is considered to be a potentially major adverse impact.

Mitigation R-3

A Trail System Management Plan would be developed under Alternatives 2 and 3. The plan would include provisions for management of trails. An education program would also be implemented to solve trail conflicts. Trail rules can be established for different users. It would be the management's and visitors' collective responsibility to find and uphold solutions that allow multiple use trails to work. Cyclists must be safe and conscientious riders and should follow some general rules that respect hikers and horses and their riders. Equestrians must also be safe and conscientious riders; they should only ride horses that are well trained and capable to withstand sharing multiple use public trails. Therefore, residual impacts would be minor. However, no Trail System Management Plan is proposed for the No Action Alternative; therefore, impacts could be major under this alternative as future demand grows.

Impact R-4

The action alternatives would introduce new recreation activities including biking, hiking, and new trails, camping, and water based activities such as kayaking. This impact is considered beneficial. No mitigation is proposed.

Impact R-5

Under Alternative 3, the noise pollution inherent in RC airplanes could adversely impact other recreationists who specifically use the area for peace and serenity. This impact is considered major.

Mitigation R-5

The RC airplane landing strip and designated use area would be located at a site that is not only safe for the airplanes, but also away from campsites and serene areas popular to birdwatchers and other visitors. Hours and days of use could be restricted. Residual impacts would be minor.

Impact R-6

Prescribed burns under all alternatives would have minor adverse air quality and visibility impacts on recreationists.

- Helping to develop background information for the EIS and reviewing environmental analyses, including portions of the EIS for which County Parks has special expertise; and
- Making staff support available at the lead agency's request to enhance the lead agency's interdisciplinary capabilities.

County Parks also reviewed and commented on the Administrative and Public Draft RMP/EIS. Comments on the Draft RMP/EIS provided by County Parks are presented in Comment R-3; Reclamation's responses follow the letter.

The comments about potential inconsistencies with existing land uses and failure to consider state law are addressed in the responses to Comments R-1-6 and R-1-7, respectively.

R-1-6
Section 3.8.1.1 of the Final RMP/EIS has been revised to include details about applicable land use and zoning policies, including the AG-100 zone referenced in the comment. This zone (designated in current Santa Barbara County mapping as "100-AG") has been replaced in other parts of the county with the newer designations of AG-I, AG-II, AG-III, etc. under the Ordinance 661 Consistency Rezone Project. While the residual 100-AG zoning designation does not include recreational uses other than riding, the current equivalent agricultural zone (AG-II-100) allows for a greater range of rural recreation with a Conditional Use Permit (such as recreational camps, hostels, campgrounds, retreats, guest ranches, trout farms, rifle ranges, and duck shooting farms, for example). The Plan Area is composed of federal lands that are not subject to county regulations (personal communication with Derek Johnson, Santa Barbara County Planning & Development, Long Range Planning Division). However, proposed RMP management actions are consistent with applicable Santa Barbara County planning policies and reinforce county goals for land use and preservation.

R-1-7
The proposed action is implementation of the RMP, not a local management contract. Therefore, CEQA analysis is not required. This EIS deals only with federal actions, not County of Santa Barbara actions should the County become the local managing partner. As stated in EIS Section 2.4.2.2, depending on the potential for significant impacts, the local managing partner will likely to have to conduct CEQA analysis for new activities or facilities that would be implemented under the RMP.

The reference to CEQA in the public notice was an editorial error that was corrected in subsequent notice materials.

R-1-8
The EIS is a programmatic document, as specified in Section 1.3 and elsewhere. The environmental analysis of potential future activities and facilities is specific where possible and where a project footprint has been identified. Where the exact footprint of an activity or facility has not been determined, the EIS makes informed projections about what types of effects could result from construction and operation of an action. For example, the exact location of one or more new trails has not been determined, but in Section 4.4.7, Impact BI-3 identifies the

EXHIBIT 2

NOTICE OF EXEMPTION

TO: Santa Barbara County Clerk of the Board of Supervisors

FROM: Santa Barbara County Parks

Based on a preliminary review of the project the following activity is determined to be exempt from further environmental review requirements of the California Environmental Quality Act (CEQA) of 1970, as defined in the State and County Guidelines for the implementation of CEQA.

APN(s): 145-160-072 & 145-160-075 **Case No.:** N/A

Location: Cachuma Lake recreation Area

Project Title: Cachuma Resource Management Plan (RMP)

Project Description: Execute a Management Agreement with the United States Bureau of Reclamation authorizing the Parks Department to continue to operate and maintain Cachuma Lake Recreation Area for a period of twenty–five (25) years.

COUNTY OF SANTA BARBARA
CLERK OF THE
BOARD OF SUPERVISORS
2011 JUL 29 AM 8:23

Exempt Status: (Check one)

- ☐ Ministerial
- ☒ Statutory
- ☐ Categorical Exemption
- ☐ Emergency Project
- ☐ No Possibility of Significant Effect [§15061(b,3)]

Cite specific CEQA Guideline Section: 15301 Class 1 – Normal operation, repair, maintenance, permitting, leasing, licensing, or minoralteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use.

Reasons to support exemption findings: Class 1 consists of the operation, repair, maintenance, permitting, leasing, licensing, or minor alteration of existing public or private structures, facilities, mechanical equipment, or topographical features, involving negligible or no expansion of use beyond that existing at the time of the lead agency's determination.

Department/Division Representative — Date: 7/28/2011

Note: A copy must be filed with the County Clerk of the Board after project approval and posted by the Clerk of the Board for a period of 30 days to begin a 35 day statute of limitations on legal challenges.

Distribution: Richard Corral
Project file (when P&D permit is required)

Date File of Counter Clerk

NOTICE OF EXEMPTION

TO: Santa Barbara County Clerk of the Board of Supervisors

FROM: Community Services/County Parks

The activity identified below is not the approval of a project that is subject to environmental review under the California Environmental Quality Act (CEQA).

APN(s): 145-160-072; 141-029-054 **Case No.:** N/A

Location: Lake Cachuma Recreation Area

Project Title: United States Bureau of Reclamation Management Agreement with County of Santa Barbara for Operation of Lake Cachuma Recreation Area

Project Description: This action is the Board of Supervisors' approval to renew an existing long term Management Agreement for the Lake Cachuma Recreation Area for a period of twenty five (25) years from the date of approval of this action, renewable, between the County of Santa Barbara and the Department of Interior - Bureau of Reclamation.

Name of Public Agency Approving Project: County of Santa Barbara

Name of Person or Agency Carrying Out Project: County of Santa Barbara

Exempt Status: (Check one)

- ☐ Ministerial
- ☐ Statutory
- ☐ Categorical Exemption
- ☐ Emergency Project
- ☒ Not a Project

Cite specific CEQA Guideline Section: §15352(a) and 15378

Reasons to support exemption findings:

As the managing partner for the agreement, the County of Santa Barbara, via the Management Agreement, accepts responsibility for the management of the recreation area and recreational facilities for the purposes of recreation and natural and cultural resource enhancement. The County is required to coordinate with the Bureau of Reclamation ("BOR") on any activities pursuant to the agreement that could impact the Cachuma Project works, water management and operations of activities of the facility. In addition, all activities undertaken by the County must be consistent with the BOR approved and certified Cachuma Lake Resource Management Plan ("RMP"), which designates allowable recreational uses in different geographic units in the plan area.

Approval of the Management Agreement does not require or commit the County, as managing partner, to construct any specific project set forth in the RMP, or to implement, facilitate or encourage any of the allowable recreational uses designated in the RMP. However, if the County subsequently seeks to construct any specific project set forth in the RMP, or enhance recreational

opportunities within the recreation area, these shall only occur after any necessary environmental review required by NEPA and CEQA.

The agreement further requires the County to develop and implement and maintain various plans including but not limited to Fire Management, Integrated Pest Management, Waste Recycling and Reduction, Boating Capacity and Safety, Grazing and Erosion Control that meet Federal Standards. These plans are subject to any necessary NEPA and CEQA review and shall be completed no more than three years from the signing of the agreement.

Approval of the Management Agreement does not:

- Commit the County to carrying out, funding, or issuing a permit for any project;
- Require the County to construct any specific project set forth in the Cachuma Lake Resource Management Plan ("RMP"), or to implement, facilitate or encourage any of the allowable recreational uses designated in the RMP; or
- Remove any permit requirement, environmental review requirement, or other legal requirement applicable to projects in either private lands or public lands.

Lead Agency Contact Person: Juan Beltranena Phone: (805) 568-2470

Department/Division Representative (CEQA):_____Date:_____

Acceptance Date:_____

Date Filed by County Clerk:_____

Distribution: Hearing Support Staff
Project file (when P&D permit is required)

EXHIBIT 3

SS Pursuant to CRC 2.259 this document has been electronically filed by the Superior Court of California, County of Santa Barbara, on 9/13/2024

BROWNSTEIN HYATT FARBER SCHRECK, LLP
SUSAN F. PETROVICH (State Bar No. 065634)
spetrovich@bhfs.com
MATTHEW L. HOFER (State Bar No. 307055)
mhofer@bhfs.com
PAIGE E. SAMBLANET (State Bar No. 333112)
psamblanet@bhfs.com
1021 Anacapa Street, 2nd Floor
Santa Barbara, California 93101
Telephone: 805.963.7000
Facsimile: 805.965.4333

Attorneys for Petitioners
SUZANNE DUCA, AMALIA COFFEY and DALE OBERN HOEFFLIGER

FILED
SUPERIOR COURT of CALIFORNIA
COUNTY of SANTA BARBARA
10/16/2024
Darrel E. Parker, Executive Officer
BY Chavez, Terri
Deputy Clerk

BROWNSTEIN HYATT FARBER SCHRECK, LLP
Attorneys at Law
1021 Anacapa Street, 2nd Floor
Santa Barbara, CA 93101

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA BARBARA

SUZANNE DUCA, an individual; AMALIA COFFEY, an individual; and DALE OBERN HOEFFLIGER, an individual,

Petitioners and Plaintiffs,

v.

COUNTY OF SANTA BARBARA, a political subdivision of the State of California; SANTA BARBARA COUNTY BOARD OF SUPERVISORS, a governing body; and DOES 1 through 20, inclusive,

Respondents and Defendants.

Case No. 21CV02683

Assigned for All Purposes to Honorable Thomas P. Anderle, Dept. 3

[~~PROPOSED~~] AMENDED JUDGMENT GRANTING PEREMPTORY WRIT OF MANDATE

Action Filed: July 8, 2021
Trial Date: December 7, 2022

BROWNSTEIN HYATT FARBER SCHRECK, LLP
Attorneys at Law
1021 Anacapa Street, 2nd Floor
Santa Barbara, CA 93101

This matter was scheduled to come for hearing on the operative Petition for Writ of Mandate on December 7, 2022, at 10:00 AM, in Department 3 of the Superior Court for the State of California, County of Santa Barbara, the Honorable Thomas P. Anderle presiding. The Court circulated a Proposed Statement of Decision on this matter on December 5, 2022. The parties met and conferred and agreed that no oral argument was requested.

The Court having reviewed the briefs and other submitted papers, relevant portions of the Administrative Record, and other documents comprising the record before the Court in this matter; the matter having been submitted for decision; the Court having issued the Statement of Decision, entered judgment, and issued a writ of mandate; Respondent County of Santa Barbara having timely filed an appeal of the judgment and writ; and the Court of Appeal having issued its Opinion affirming the Court's finding that the writ petition was timely and ordering the Court to strike portions of the writ that exceeded the Court's authority; and good cause appearing,

IT IS ORDERED that:

1. The Petition for Writ of Mandate is GRANTED in its entirety. Judgment is entered in favor of Petitioners Suzanne Duca, Amalia Coffey, and Dale Hoeffliger on the First Cause of Action alleged in the operative First Amended Petition for Writ of Mandate. This constitutes the Court's final judgment.

2. A peremptory Writ of Mandate directed to Respondents shall issue under seal of this Court, ordering Respondents to: (1) set aside their decision making a determination of exemption under the California Environmental Quality Act ("CEQA"), Public Resources Code section 21000 et seq, and vacate all approvals, actions, and activities related to the change of use of Live Oak Trail from equestrian-only use to the addition of mixed hiking, running, and biking ("Project") because such decisions are contrary to CEQA; and (2) suspend any and all activities undertaken and implemented pursuant to the challenged Project decisions, determinations, activities, actions, and approvals that potentially could result in any change or alteration to the physical environment until Respondents have taken all actions necessary to bring the Project's environmental review, decisions, and determinations into full compliance with CEQA and the CEQA Guidelines (Cal. Code of Regulations, title 14, §§ 15000 et seq.), the Court's Statement of Decision (attached hereto

as Exhibit A, the contents of which are hereby incorporated by reference as if fully set forth herein), and the Court of Appeal's Opinion (attached hereto as Exhibit B, the contents of which are hereby incorporated by reference as if fully set forth herein); and (3) file an initial return to the Writ of Mandate within 30 days of service of the Writ of Mandate, stating what actions Respondents have taken or intend to take to comply with the Writ, and to make and file a supplemental return to the Writ of Mandate if and when they reapprove the Project within 30 days of said reapproval.

3. Petitioners Suzanne Duca, Amalia Coffey, and Dale Hoeffliger are the prevailing parties in this action and are entitled to recover their costs of suit. Petitioners previously filed and served a memorandum of costs dated February 3, 2023, identifying $14,852.39 in recoverable costs, and no motion to tax those costs was timely filed. Accordingly, Petitioners shall recover their reasonable costs incurred in this matter through February 3, 2023 in the amount of $14,852.39. Subject to a subsequent memorandum of costs and any motion to strike or tax costs filed in accordance with Code of Civil Procedure section 1032 and California Rules of Court, rule 3.1700, Petitioners shall recover their reasonable trial court costs incurred in this matter since February 3, 2023 in the amount of $_____.

4. Petitioners Suzanne Duca, Amalia Coffey, and Dale Hoeffliger also shall recover their reasonable attorneys' fees in this matter pursuant to Code of Civil Procedure section 1021.5 in the sum of $405,000.00. The attorneys' fees are to be paid by Respondents on or before 12/18/2024.

5. Under Public Resources Code section 21168.9, subdivision (b), this Court will retain jurisdiction over Respondents' proceedings by way of a return to the peremptory Writ of Mandate until the Court has determined that Respondents have fully complied with the provisions of CEQA, the CEQA Guidelines; the Court's peremptory Writ of Mandate, Judgment, and Statement of Decision; and the Court of Appeal's Opinion.

Dated: ~~September __, 2024~~ 10/16/2024

Thomas P. Anderle

The Honorable Thomas P. Anderle
JUDGE OF THE SUPERIOR COURT

BROWNSTEIN HYATT FARBER SCHRECK, LLP
Attorneys at Law
1021 Anacapa Street, 2nd Floor
Santa Barbara, CA 93101

Exhibit A

FILED
SUPERIOR COURT of CALIFORNIA
COUNTY of SANTA BARBARA
12/09/2022
Darrel E. Parker, Executive Officer
BY Chavez, Terri
Deputy Clerk

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF SANTA BARBARA

SUZANNE DUCA; AMALIA COFFEY; DALE OBERN HOEFFLIGER **Petitioners and Plaintiffs** **vs** **COUNTY OF SANTA BARBARA; SANTA BARBARA COUNTY BOARD OF SUPERVISORS** **Respondents and Defendants**	**21CV02683** **~~[Proposed]~~ Statement of Decision**

ATTORNEYS

Plaintiffs Suzanne Duca, Amelia Coffey and Dale Hoeffliger ["Petitioners"]: Susan F. Petrovich; Matthew Hofer.

Respondents County of Santa Barbara and Santa Barbara County Board of Supervisors [collectively "Respondents" or "County"]: Lina Somit.

Emails: spetrovich@bhfs.com; mhofer@bhfs.com; lsomait@countyofsb.org; plee@countyofsb.org;

Acknowledgements

The Court acknowledges and appreciates the professional work done by counsel in the case.[1] The case has been contentious; acrimonious at times.

[1] The Court apologizes for any grammatical and typographical errors in this decision.

BACKGROUND

Petitioners filed their verified petition for writ of mandate and complaint for declarative and injunctive relief ("Petition") on July 8, 2021. The Petition relates to the Live Oak Trail ("Trail"), located on the north side of Lake Cachuma, which until early 2021 was the only publicly accessible trail in Santa Barbara County limited to equestrian trail riding and prohibiting hikers, dogs, trail runners, and bikers. The Petition challenges the County's adoption of a Notice of Exemption ("NOE") on January 12, 2021, at the height of the COVID-19 lockdown, under the California Environmental Quality Act ("CEQA") for a Project to open the Trail to hikers, trail runners, and bikers without restriction.

Specifically, the Petition alleges that the County's adoption of the NOE violated CEQA because substantial evidence supports a fair argument that the Project may have a significant effect on the environment. The Petition alleges that the County prejudicially abused its discretion by failing to proceed in the manner required by law and by making findings unsupported by substantial evidence. (Code Civ. Proc., § 1094.5, subd. (b).) The County in its Answer denies these allegations and asserts affirmative defenses.

Petitioners' Opening Brief contends that the Petition was timely filed under the longer 180-day limitations period provided by Public Resources Code section 21167, subdivision (d), which applies because the County failed to post the NOE in a manner that was "available for public inspection" as required by CEQA.

The County could have complied with the alternative noticing procedures enacted under the Governor's Executive Order N-80-20 in response to the COVID-19 pandemic, but the County chose not to do so. Instead, the County posted the NOE in the County Administration Building located at 105 E. Anapamu Street ("Administration Building"). Petitioners argue this was insufficient because (1) the doors of the Administration Building were locked during business hours at the time the NOE was posted and could only be opened by a County employee inside, (2) the County advertised to the general public that the Administration Building was closed to the public, and (3) the County gave no notice that the public could gain access to the building to view CEQA notices.

Petitioners contend that the County could not rely on the Federal Bureau of Reclamation's 2010 Resource Management Plan/Environmental Impact Statement ("RMP/EIS") as the basis for the NOE because (1) the RMP/EIS provides a programmatic

analysis only, and (2) the RMP/EIS requires the County to conduct site-specific environmental review for the Project.

Petitioners further argue that there is substantial evidence supporting a fair argument that the Project may have a significant effect on the environment, precluding the use of a NOE under CEQA. This evidence includes the Trail's remote, rural setting and history of limited human presence (equestrians, ranch lessees, and government employees only); the sensitive biological resources that the Trail passes near or through, including important sites for special-status birds and plants; a study indicating that bald eagles are less disturbed by equestrians than humans on foot; initial data showing the Project has increased the Trail's use by several orders of magnitude; and the increased risk of harm to Trail users resulting from conflicts between equestrians, hikers, and bikers.

Petitioners also contend that these facts establish "unusual circumstances" within the meaning of California Code of Regulations, title 14 ("CEQA Guidelines") section 15300.2, subdivision (c), which bars use of a CEQA Categorical Exemption for the Project.

The Opposition

The County in its Opposition Brief argues that the Petition is untimely because (1) the Bureau of Reclamation approved the Project in the 2010 RMP/EIS, (2) the County approved the Project when it adopted a NOE in 2011 for its Management Plan pursuant to the RMP/EIS, and (3) the County posted the NOE in a manner that satisfied CEQA, triggering the shorter 35-day limitations period under Public Resources Code section 21167, subdivision (d). Regarding (3), the County contends that (a) it posted the NOE in the lobby of the Administration Building, (b) the lobby doors were not "locked" and the lobby was open to the public from 8 a.m. to 5 p.m. daily because a County staff member was assigned to open the doors for members of the public who knocked on the lobby door, (c) a document posted on the County's website stated that the public could submit documents through a physical drop box in the lobby of the Administration Building, and (d) the Clerk of the Board made the NOE available upon request.

The County argues that it was not required to post notices online or on the Administration Building exterior advising the public that it could review CEQA notices inside, and that Petitioners seek to impose additional procedural requirements on the County that are not required by CEQA.

The County further contends that even if the Petition was timely, the Project is within the scope of the 2010 RMP/EIS programmatic analysis and therefore no further environmental review is necessary under CEQA.

The County also argues that substantial evidence supports its use of a Categorical Exemption, including (1) the Project does not include widening the Trail or creating new trails, (2) existing trails are among the list of existing facilities in Guidelines section 15301, subdivision (c), and (3) section 15301 lists "operation" as an exempt activity related to existing facilities.

The County says that use of Lake Cachuma's trails is a matter within the expertise of its Parks staff, so their finding that the Project does not involve an expansion of use amounts to substantial evidence.

The County argues that Parks staff expect the Trail to attract few mountain bikers due to its gradual slope and open terrain, and that the initial Trail use figures for the Project amount to a negligible increase. The County contends that Petitioners have not set forth the evidence supporting the County's determination.

The County also claims there are no unusual circumstances because (1) the Trail does not pass through sensitive habitat or near important birds or plants; (2) the area around the Trail is comparable to the rest of the Lake Cachuma Plan Area and to other lakes with recreation areas within 200 miles of Lake Cachuma; (3) the eagle study notes that the Trail is not associated with bald eagle use areas, and the study is unsupported by facts; and (4) evidence that plants and animals surround a trail does not show there will be impacts on those plants and animals.

The County contends that the 2010 RMP/EIS and the Trail's existing conditions demonstrate that the "common sense exception" applies to the Project. (CEQA Guidelines, § 15061, subd. (b)(3).)

The County argues that Petitioners' declaratory relief claim is not appropriate because Petitioners do not challenge a policy or practice by the County, and because it is wholly derivative of Petitioners' CEQA claim.

The County also claims that Petitioners are barred from relief by the doctrine of unclean hands because (1) they submitted "false evidence" with the Petition; (2) Petitioners excluded documents from the initial administrative record they prepared; (3) Petitioners

failed to disclose a relationship between themselves, their counsel, and project opponent Jessica Schley while relying on an email from Ms. Schley in the record; and (4) Petitioners' assertion that they had no notice of the NOE is contradicted by evidence in the record and several news articles relating to the Project, of which the County requests the Court take judicial notice.

Finally, the County says that Petitioners are barred from relief by the doctrine of laches, saying they were prejudiced by Petitioners' filing of the Petition on July 8, 2021, because the County could no longer take photos of the Administration Building to show how it was set up.

Petitioner's Reply

In their Reply, Petitioners contend that the Bureau of Reclamation could not have approved the Project to start the CEQA statute of limitations because, as the County admits, the Bureau is not subject to CEQA, the County is the lead agency charged with CEQA compliance, and the RMP/EIS provided only a programmatic analysis and required additional site-specific review for future projects.

Petitioners argue that the County's adoption of an NOE in 2011 for the Management Plan also did not approve the Project because it stated the County was not required to implement any of the activities described in the RMP/EIS, and further stated that the County would have to conduct site-specific CEQA review for any such activities that the County did decide to implement.

Petitioners contend the County cannot change the manner in which it posts NOEs for public inspection, advertise that the Administration Building was closed and make the building inaccessible unless a County employee lets the public in, provide no information regarding how the public may inspect NOEs under this new arrangement, and then take advantage of a 35-day limitations period that applies only if the NOE is available for public inspection for the entire time period.

Petitioners observe that the articles for which the County requests judicial notice do not provide the public with notice that an NOE was adopted or the date of adoption, any notice the articles or the County did give are not substitutes for the notice the County is required to provide by statute, and there is no evidence to suggest that any Petitioners had actual knowledge that the NOE was adopted before the 35-day period expired.

Regarding the County's reliance on the RMP/EIS, Petitioners emphasize the document's programmatic nature and requirement of site-specific review, especially more detailed surveys to determine impacts of expanded recreation on sensitive species; the County's statement in the 2011 NOE that site-specific CEQA review would be required; and the fact that the RMP/EIS's information on existing conditions is decades old and likely has changed.

Petitioners argue that the County Parks staff are not experts on environmental impacts of trail use, and that it defies reality to say that bringing hundreds of new bikers and hikers per month into an environmentally sensitive area is a "negligible" expansion with no significant environmental impacts.

Petitioners cite the record to show that (1) the Trail is not uniformly evenly sloped on open terrain, so the County's claim it will not attract bikers is unsupported; (2) Trail users will not be spread over its entire expanse but concentrated on the first few miles near the Santa Ynez River and sensitive bird habitat; (3) the County overstates the extent that the Trail passes through the grazing lease and the existing use of the area by cattle, horses, and vehicles; (4) smaller numbers of hikers and equestrians in the summer months is the result of heat and the current pilot project with little publicity, not lack of interest in the Trail; and (5) the initial use figures show the Project has caused a large increase in the Trail's use.

Petitioners contradict the County's claim that the Trail does not pass near special status bird and plant habitat by pointing to maps of such resources in the record, further noting that the County previously found that the Park Naturalist was concerned about increased human activity on the Trail and thought further study was needed.

Petitioners note that the County previously opposed expanded recreation on the north shore of the lake due to potential impacts on birds, and that the north shore does not have similar resources to the rest of the Cachuma Plan area.

Petitioners state that the County cites no evidence that other lakes within 200 miles have similar resources or facilities, and that lakes 200 miles away are not in the "immediate area" of the Trail in any event.

Petitioners contend that they did set forth much of the same evidence that the County cites, but they disagree with the interpretation and weight of that evidence.

Petitioners argue that the Project's impacts—introducing significant numbers of humans into the pristine area—may be felt outside the physical track of the Trail itself, so the fact that the Trail is surrounded by sensitive plants and animals shows there may be a significant impact.

Petitioners observe that the bald eagle study was commissioned by the County and conducted by a qualified biologist with the assistance of the Park Naturalist, so its findings are credible and substantial evidence.

Petitioners also argue that the health and safety impacts of the Project, which the RMP/EIS found may be "major," are a type of impact that is subject to CEQA.

Petitioners contend that the evidence shows it is not "certain" there is "no possibility" the Project may cause significant environmental impacts, so the County's reliance on the "common sense exemption" is unsupported.

Petitioners contend there was no unclean hands because the supposedly "false evidence" was merely a draft document mis-identified as a final document, which Petitioners moved expeditiously to correct once notified of the issue, and that any omission of materials from the administrative record was an honest oversight.

Petitioners further note that they, their counsel, and Ms. Schley are acquainted with one another as fellow equestrians, and there is nothing wrong with Ms. Schley providing them with an email of mutual interest.

Petitioners state that none of the County's references to the record or extra-record articles show that Petitioners were aware of the NOE before the 35-day period elapsed, and that the County has not cited any cases where a Court denied relief under similar facts. Finally, Petitioners contend there was no unreasonable delay to justify laches, nor was the County prejudiced by its alleged inability to take photos of the Administration Building, given that the actual physical conditions on site are not in dispute.

Petitioners oppose the County's request for judicial notice.

<u>Judicial Notice</u>

Judicial notice is the recognition and acceptance by the court, for use by the trier of fact or by the court, of the existence of a matter of law or fact that is relevant to an issue in the action without requiring formal proof of the matter. Judicial notice may not be taken of any matter unless authorized or required by law. Matters that are subject to judicial notice

are listed in Evid. Code §§ 451 and 452. A matter ordinarily is subject to judicial notice only if the matter is reasonably beyond dispute. Taking judicial notice of a document is not the same as accepting the truth of its contents or accepting a particular interpretation of its meaning. While courts take judicial notice of public records, they do not take notice of the truth of matters stated therein. When judicial notice is taken of a document, the truthfulness and proper interpretation of the document are disputable. *Herrera v. Deutsche Bank National Trust Co.*, (2011) 196 Cal. App. 4th 1366.)

The County requests that the Court take judicial notice of Exhibits 5, 6, and 7 to the Declaration of Lina Somait under Evidence Code section 452, subdivision (h), which provides that the Court may take judicial notice of "[f]acts and propositions that are not reasonably subject to dispute and are capable of immediate and accurate determination by resort to sources of reasonably indisputable accuracy." The County states that these exhibits are relevant to the County's unclean hands defense, arguing that the exhibits "show that at least three local news sources reported on the Project in January of 2021." (RJN p. 3.)

The Court DENIES the request for judicial notice.

The County has not provided the Court with information sufficient to enable it to take judicial notice of the matter, including identifying the "facts or propositions" within the exhibits that are to be noticed (Evid. Code, § 452, subd. (h)), and that the sources of the exhibits are of "reasonably indisputable accuracy." (*Voris v. Lampert* (2019) 7 Cal.5th 1141, 1147 [denying request for judicial notice of newspaper articles because they "are not proper authorities to establish the truth of the matters asserted therein"].)

The Court further finds that the referenced exhibits are not necessary to the resolution of any issues in this case because they do not establish that any of Petitioners had notice that the NOE was adopted, or that the NOE was made available for public inspection. (*Sanchez v. Kern Emergency Med. Transp. Corp.* (2017) 8 Cal.App.5th 146, 154 [denying request for judicial notice where matter was "not necessary to the resolution of this appeal"].)

ANALYSIS

Standard of Review

A petition alleging that a public agency has violated CEQA is reviewed for abuse of discretion under Code of Civil Procedure section 1094.5. (Pub. Resources Code § 21168.) "Abuse of discretion means the agency failed to proceed in a manner required by law or there was no substantial evidence to support its decision." (*Ballona Wetlands Land Trust v. City of Los Angeles* (2011) 201 Cal.App.4th 455, 467-468.) "Whether the agency failed to proceed in a manner required by law is a question of law. A court determines de novo whether the agency complied with CEQA's procedural requirements, scrupulously enforce[ing] all legislatively mandated CEQA requirements." (*Id.* at p. 468, internal quotes omitted.) Courts "interpret CEQA to afford the most thorough possible protection to the environment that fits reasonably within the scope of its text." (*California Bldg. Industry Assn. v. Bay Area Air Quality Management Dist.* (2015) 62 Cal.4th 369, 381.)

CEQA Background

CEQA requires an Environmental Impact Report as the primary means to ensure public agencies "take all action necessary to protect, rehabilitate, and enhance the environmental quality of the state." (Pub. Resources Code, § 21001, subd. (a).) CEQA's purpose is to identify the significant environmental effects of a proposed project and evaluate ways of avoiding or minimizing those effects. (*Id.* at §§ 21002; 21002.1, subd. (a); 21061.) The lead agency must adopt feasible mitigation measures or alternatives that substantially lessen the project's significant environmental impacts or provide overriding considerations. (*Id.* at § 21002; CEQA Guidelines, § 15002, subd. (a)(3).) CEQA applies to both public agency and private projects. (*Friends of Mammoth v. Board of Supervisors of Mono County* (1972) 8 Cal.3d 247.) When launching a new project that has any potential for significant environmental impacts, an agency is obligated to conduct environmental review. (*California Bldg. Industry Assn.*, *supra*, 62 Cal.4th at pp. 382-383.)

As explained in *California Bldg. Industry Assn.*, *supra*, 62 Cal.4th at pp. 382-383, CEQA requires a three-step process:

First, the public agency must determine whether a proposed activity is a "project," and "may cause either a direct physical change in the environment, or a reasonably foreseeable indirect physical change in the environment.

Second, the agency must next decide whether the project is exempt from the CEQA review process . . . . If the agency determines the project is not exempt, it must then decide whether the project may have a significant environmental effect.

Third, if the agency finds the project may have a significant effect on the environment, it must prepare an EIR before approving the project. Given the statute's text, and its purpose of informing the public about potential environmental consequences, . . . an EIR is required even if the project's ultimate effect on the environment is far from certain. . . . [An] EIR is required whenever it can be fairly argued on the basis of substantial evidence that the project may have significant environmental impact, regardless of whether other substantial evidence supports the opposite conclusion.

The Statute of Limitations

CEQA provides two limitations periods for a challenge to an agency's adoption of a NOE: If the NOE is filed with the County Clerk, 35 days from the date of filing; or if the NOE is not filed, 180 days from the date the agency either approves the project or the project commences (the latter applies only if the project is undertaken without a formal decision by the agency). (Pub. Resources Code, § 21167, subd. (d).) If the NOE is filed, it must be posted in the office of the County Clerk and made "available for public inspection." (*Id.* at § 21152, subd. (c); CEQA Guidelines, § 15062, subd. (c)(2).)

As interpreted by case law, the 180-day period applies if there is a defect in the manner the NOE is posted. (See *Lewis v. Seventeenth Dist. Agricultural Ass.* (1985) 165 Cal.App.3d 823, 831-832; *Latinos Unidos de Napa v. City of Napa* (2011) 196 Cal.App.4th 1154, 1167.)

The County initially argues that this action is time-barred because the Project was approved either by the 2010 RMP/EIS or the County's adoption of a 2011 NOE for its Management Plan under the RMP/EIS. Neither contention has merit.

As the County admits, the Bureau of Reclamation is a federal agency that is not subject to CEQA, and the RMP/EIS did not purport to comply with CEQA—that is the County's responsibility as lead agency. (See CEQA Guidelines, § 15020 ["A public agency must meet its own responsibilities under CEQA and shall not rely on comments from other public agencies or private citizens as a substitute for work CEQA requires the lead agency to accomplish"].) In any event, neither the RMP/EIS nor the 2011 NOE committed the County "to a definite course of action" to implement the Project, so the statute of

limitations could not be triggered by either act. (CEQA Guidelines, § 15352, subd. (a); *Cty. of Amador v. El Dorado Cty. Wat. Agency* (1999) 76 Cal.App.4th 931, 965.)

Turning to the NOE adopted on January 12, 2021, the County concedes that it did not follow the alternative posting methods provided by E.O. N-80-20 in response to the COVID-19 pandemic. Instead, the County contends that it made the NOE available in the lobby of the Administration Building on January 12, 2021, and for 35 days thereafter, and that these actions satisfied the "available for public inspection" requirement. County employees explained in their deposition testimony that this was not the County's usual method of posting NOEs but was rather a new procedure the County adopted in response to COVID-19. (Exhibit E to Declaration of Susan Petrovich, Deposition of County employee Phung Loman, at p. 8:14-17 ["Q: And at some point, were you told to change the manner in which people entered the county administrative building as a result of COVID? A: Right."].)

In its briefing, the County does not contest that it did not post any notices online or elsewhere to inform the public of this change. (County Opposition Brief at p. 11.) The evidence also shows the County advertised on its website that the Administration Building and the clerk's office were closed to the public, and that the doors to the Administration Building would not open for members of the public unless a County employee opened them. (Petrovich Exhs A-B; Exh. E at pp. 8:24-9:11, 10:20-11:20; AR:30-31, 1213.)

Petitioners' position is that, under these circumstances, the NOE was not available for public inspection within the meaning of CEQA.

The Court agrees with Petitioners.

The purpose of a NOE is to inform the public of the agency's action and that the time to challenge that action is running. (*Stockton Citizens for Sensible Plan. v. City of Stockton* (2010) 48 Cal.4th 481, 501 ["CEQA establishes and emphasizes public notification of an agency's action or decision as the event triggering the shortest applicable limitations periods for lawsuits alleging noncompliance with the statute"].)

Having elected not to comply with the alternative noticing procedures under E.O. N-80-20, intended to advise the public of the revised NOE protocol made necessary by the pandemic lockdown, it was incumbent upon the County to make the NOE available for public inspection in the manner it normally did prior to the pandemic.

Instead, the County erected barriers to public inspection through statements on its public-facing website that the Administration Building was closed to the public and by making the doors inaccessible without the assistance of a County employee. The County nowhere provided information for the public to understand these new procedures, or how they might inspect CEQA notices. Even a County Planner was unaware that NOEs were placed in the lobby. (AR:1213 ["I was curious where NODs are being posted now that the offices are closed to the public"].)

The County's arguments in response are not persuasive. **It says the doors were not "locked" because that is not a setting the automatic doors possess, but that is a distinction without a difference. The salient fact is that a member of the public could not open the doors from the outside—they had to be opened from inside the lobby by a County employee.**

The County also argues that an employee was stationed in the lobby to open the doors for the public, and that a clipboard lying flat on a lobby table was labelled "Notice of Exemptions."

But the public's right to challenge an action under CEQA cannot depend on their ability to peer through a closed glass door to read a clipboard lying flat on a table, or their ability to get the attention of a County employee inside to open the door—especially in light of the County's representations on its website and elsewhere that the Administration Building was closed to the public. Likewise, the fact that a document posted on the County's website contained a sentence advising that there was a drop box in the Administration Building lobby *to submit documents* is not adequate to inform the public that, notwithstanding the building's closure, CEQA notices could be inspected in the lobby if a County employee opened the door.

It is the policy of CEQA that "[i]f reasonable minds may differ on meaning of a CEQA [limitation] provision or its application in light of other statutory provisions, any such conflicts or questions should be resolved in a manner which permits the challenge under CEQA to proceed." (*Board of Supervisors v. Superior Court* (1994) 23 Cal.App.4th 830, 839; see also *Citizens of Lake Murray Area Assn. v. City Council* (1982) 129 Cal.App.3d 436, 441 ["The potentiality of the period of limitation running, absent even constructive notice because of the county clerk's failure to perform his/her mandatory duty to post the notice,

runs contrary to the legislative intent to encourage public participation and to afford the fullest possible protection to the environment. Further, it offends not only the basic notion of fair play, but also the basic tenets of due process"].)

Under the circumstances presented here, the Court finds that the NOE was not "available for public inspection" within the meaning of CEQA, and therefore the 180-day limitations period applies. The Petition was timely filed.

The 2010 RMP/EIS

The County argues that the Project is within the programmatic analysis of the 2010 RMP/EIS and therefore no further County review is required under CEQA. To support this position, the County references two statements in the RMP/EIS's Section 1 (Introduction) and Section 2.4 (description of planning influences). (AR:82 ["Any future actions that would result in new facilities, ground disturbances, or environmental impacts beyond the programmatic analysis provided would be subject to subsequent environmental review"]; 93 ["Some of the new recreational uses and most of the natural resource management actions identified in the RMP may not require additional environmental review because (1) the environmental analyses of the these actions are adequately addressed in this EIS, or (2) such actions are exempt from environmental review"].)

The RMP/EIS does discuss the possibility of opening the Trail to hikers and bikers and states that the impacts of this action are expected to be minor, *with the exception of impacts due to conflicts among Trail users.* (AR:67.)

Petitioners respond that the RMP/EIS required the County to conduct site-specific environmental review for new or expanded recreational actions described in the RMP/EIS, citing a number of statements to that effect in the document. (AR:82; 93; 118; 260; 835-836.) The County does not address this language regarding site-specific review in its briefing or explain how it can be reconciled with the County's position.

The RMP/EIS is not entirely clear as to which activities would require further environmental review and which would not. As a comprehensive document addressing a vast number of possible actions for the entire Lake Cachuma Recreation Area over a 20-year period, it is at least possible that some activities described in the RMP/EIS are so obviously unlikely to have a significant impact that no further analysis is required.

However, the Court is persuaded that the Project is not such an activity.

As the statement cited by the County notes, only "[s]ome of the new recreational uses" (AR:93) would require no further environmental review, which implies that most new or expanded recreational uses *would* require such review. The paragraph immediately above confirms this point. (*Ibid.* ["It should be noted that the local managing partner will be required to conduct an appropriate site-specific environmental review (including analysis of potential water quality impacts) for most of the new or expanded recreational activities identified in the RMP such as new day use or camping facilities at Live Oak Camp or new boat launches"].)

The Court's conclusion that the Project requires site-specific review beyond the programmatic RMP/EIS is bolstered by the following language from RMP/EIS Section 4, which discusses the environmental consequences of Alternative 2 (the alternative selected by the Bureau of Reclamation for implementation):

Under alternatives 2 and 3, expansion of facilities, including camping, recreation, and parking, would include site-specific environmental studies to assess biological impacts and determine mitigation measures that will reduce these impacts. More detailed surveys should be conducted to determine the presence or absence and breeding of special-status species with potential to occur in the Plan Area. (AR:260.)

The Court also finds significant the County's statement in the 2011 NOE for its Management Plan that if the County "subsequently seeks to construct any specific project set forth in the RMP, or enhance recreational opportunities within the recreation area, these shall only occur after any necessary environmental review required by NEPA and CEQA." (AR:47-48.) In light of these requirements in the RMP/EIS and the County's prior commitment to conduct site-specific review for "any specific project set forth in the RMP," the County could not point to the RMP/EIS as a basis for avoiding environmental review for the Project.

<u>Whether the Project May Have a Significant Effect on the Environment</u>

Initially, the Court notes that the RMP/EIS's requirement of site-specific environmental review for new or expanded recreational activities would seem to preclude the use of a CEQA categorical exemption for the Project, which involves expanding the use of the Trail and adding new types of uses to it.

But even in the absence of that requirement in the RMP/EIS, *the Court finds there is substantial evidence*[2] *to support a fair argument that the Project may have a significant impact on the environment that renders the use of a categorical exemption inappropriate.* (*Dunn-Edwards Corp. v. Bay Area Air Quality Management District* (1992) 9 Cal.App.4th 644, 655, disapproved on other grounds by *Western States Petroleum Assn. v. Superior Court* (1995) 9 Cal.4th 559 [applying fair argument test to finding of categorical exemption].) CEQA "requires the preparation of an EIR whenever it can be fairly argued on the basis of substantial evidence that the project may have significant environmental impact." (*No Oil, Inc. v. City of Los Angeles* (1974) 13 Cal.3d 68, 75.)

To determine whether a lead agency correctly applied a categorical exemption, the court "must first determine as a matter of law the scope of the exemption and then determine if substantial evidence supports the agency's factual finding that the project fell within the exemption." (*California Farm Bureau Federation v. California Wildlife Conservation Bd.* (2006) 143 Cal.App.4th 173, 185.) "The lead agency has the burden to demonstrate such substantial evidence." (*Ibid.*) "[E]xemptions are construed narrowly and will not be unreasonably expanded beyond their terms.

Strict construction allows CEQA to be interpreted in a manner affording the fullest possible environmental protections within the reasonable scope of statutory language." (*County of Amador v. El Dorado County Water Agency* (1999) 76 Cal.App.4th 931, 966, internal cites omitted.) This rule "comports with the statutory directive that exemptions may be provided only for projects which have been determined not to have a significant environmental effect." (*Ibid.*) Here, the County applied the "Existing Facilities" categorical exemption to the Project, for which "[t]he key consideration is whether the project involves negligible or no expansion of existing use." (CEQA Guidelines, § 15301.)

The Project involves an expansion of use because it introduces entirely new types of uses—hiking/trail running and biking—where those uses have never occurred previously. (See

---

[2] The County briefly argues that Petitioners have not set forth the evidence supporting the County's determination nor discussed how it is lacking, citing *Tracy First v. City of Tracy* (2009) 177 Cal.App.4th 912, 934.) The Court notes that Petitioner's Opening Brief does set forth much of the evidence the County relies on for its decision, and Petitioners explain why that evidence (such as findings in the RMP/EIS regarding environmental resources near the Trail) supports their position and not the County's. Petitioners' Reply Brief also extensively discusses the County's evidence and explains why it is lacking. The Court finds that

AR:4544.) The initial Trail use figures for the Project also suggest that it will result in a significant increase in the number of persons using the Trail. The County estimated prior Trail use was approximately 2.5 equestrians per day, or 75 per month. (AR:4545.) After the Trail was opened to hikers only in April 2021 as part of a pilot project (that later would include bikers) by the County, there were approximately 200 hikers per month in the first two months (AR:1158)—an increase of 266% above prior use. That is not a "negligible" expansion of use. And there is substantial evidence to support an inference that the actual use figures will be even higher in the future, given the County's stated plan to introduce biking in the future. (AR:1410.) The initial figures were also in the late spring and early summer, when a study commissioned by the County found that potential use of the Trail is much lower. (AR:3302.) Moreover, the County is currently conducting a pilot project, and once that ends the Trail will likely be better-publicized, leading to greater numbers of users. (AR:1324.)

That there may have been larger group rides of equestrians in the past, or that cattle, horses, and authorized vehicles use portions of the Trail does not alter this conclusion. The County has not identified any evidence in the record as to the frequency of large group rides, or that the number of cattle, horses, or authorized vehicles that use the Trail areas significantly increase the "baseline" of Trail use. Without such evidence, the Court cannot simply assume that they have had any meaningful impact on the baseline.

In a footnote, the County concedes that the RMP/EIS found the Project may cause major impacts due to health and safety conflicts among equestrians, hikers/trail runners, and bikers (AR:67, 293), but the County asserts that CEQA does not address such impacts, citing *California Building Industry Assn.*, *supra*, 62 Cal.4th at p. 387. But that is not what the California Supreme Court held in that case. The case actually holds that "CEQA generally does not require an analysis of how existing environmental conditions will impact a project's future users or residents" (*id.* at p. 386)—it did not hold the reverse, that CEQA ignores a Project's impacts on future users by worsening current conditions. Rather, CEQA "call[s] for evaluating a project's potentially significant exacerbating effects on existing environmental hazards—effects that arise because the project brings 'development

---

Petitioners have satisfied their obligation to discuss the evidence that the County contends supports its decision.

and people into the area affected.'" (*Id.* at p. 388, emphasis in original.) Thus, CEQA requires analysis of the impacts to human health and safety resulting from bringing many more people and new uses onto a Trail historically used solely by equestrians. (See also *id.* at p. 386 ["The District emphasizes, correctly, that CEQA addresses human health and safety"].) ***The RMP/EIS's finding is substantial evidence that the Project may have a significant impact on human health and safety under CEQA.***

There is also substantial evidence that the Project may have a significant impact on the environment. According to a Management Plan prepared at the County's direction in 1989, the Trail passes through "sensitive areas," and it would have been better to obtain the input of the Park Naturalist before developing the Trail. (AR:3299.) If there was concern about introducing equestrians into this area, it follows that the same concerns would apply to introduction of hikers and bikers into that area. The Management Plan notes that the Park Naturalist "is concerned about human presence in the areas of the lake now accessed by the trail and feels that this issue should be investigated and evaluated further." (AR:3303.) The Plan also notes Trail users could access eagle sites, and archeological resources can be accessed adjacent to the Trail. (*Ibid.*) It is reasonable to conclude that increased numbers and types of Trail users resulting from the Project could also impact these resources.

Contrary to the County's statement in its briefing, the Trail does appear to pass near or through a number of special-status plant and bird locations. (Compare AR:675-676 [maps of special-status plants and birds] with AR:689 [map of Trail]; see AR:146 [RMP/EIS describes Santa Cruz Bay and the Lake's east end as "crucial" bird habitat].) The County previously opposed increasing recreation on the north shore of Lake Cachuma due to the potential for impacts on birds. (AR:496.) The RMP/EIS states that "[t]he north shore of Cachuma Lake is a valuable natural resource. . . . It is the general consensus that public access to the north shore should continue to be carefully managed." (AR:199.) The RMP/EIS also cites an unpublished 1989 bald eagle study commissioned by the County's Parks Department (AR:308), conducted by "one of California's most experienced Bald Eagle biologists," assisted by the Park Naturalist. (AR:3345.) The study notes that "[h]uman disturbance presents the greatest potential threat to Bald Eagles at Lake Cachuma" (AR:3350), and "[i]n general, eagles are less disturbed by people on horseback

than by people on foot." (AR:3353.) The County's 1989 Management Plan for the Trail (which cites the same bald eagle study, AR:3320) states that Trail users could gain access to bald eagle locations by trespassing (AR:3303), and maps in the RMP/EIS show that the Trail passes near eagle perch sites. (AR:675 [map showing "Preferred Bald Eagle Perch/Snags" along Santa Cruz Bay and the east end of the lake]; 689 [map of Trail]; 158 ["Eagles use a number of favored perching sites around the lake, many of which are in the restricted areas of Santa Cruz Bay and the east end"].)

The Court finds that the above facts are substantial evidence supporting a fair argument that sensitive biological resources may be impacted by the Project. **Thus, the County's adoption of a categorical exemption for the Project cannot be sustained. This finding also disposes of the County's claim that the "common sense" exception applies to the Project. (*California Farm Bureau Federation*, *supra*, 143 Cal.App.4th at p. 195 [a party challenging agency's claim of the common-sense exception "need only make a 'slight' showing of a reasonable possibility of a significant environmental impact"].)**

For the same reasons, the Court finds that the use of a categorical exemption for the Project is barred by the "unusual circumstances" exception. **(CEQA Guidelines, § 15300.2, subd. (c) [categorical exemptions do not apply "where there is a reasonable possibility that the activity will have a significant impact on the environment due to unusual circumstances"].) The "unusual circumstances" exception can be satisfied by one of two evidentiary showings: (1) "evidence that the project will have a significant environmental effect," or (2) "showing that the project has some feature that distinguishes it from others in the exempt class, such as its size or location. . . . [and] a reasonable possibility of a significant effect due to that unusual circumstance. (*Berkeley Hillside Preservation v. City of Berkeley* (2015) 60 Cal.4th 1086, 1105.) "[W]hether a particular circumstance exists would normally be a factual issue, whereas the question whether that circumstance is 'unusual' . . . would normally be an issue of law . . . review[ed] de novo." (*San Francisco Beautiful v. City and County of San Francisco* (2014) 226 Cal.App.4th 1012, 1023.)**

The first test has been satisfied **by the Court's finding above that there is substantial evidence that the Project will have a significant impact on the environment, due to the Trail's proximity to sensitive biological resources, the Project's substantial increase in the Trail's use, and the introduction of new types of uses. (See Kostka & Zischke, Practice**

Under the California Environmental Quality Act (Cont.Ed.Bar 2d ed. 2022) § 5.74, p.5-70 [questioning the need for exception in CEQA Guidelines section 15300.2, subdivision (a) because "[a]ny impact on a resource in a sensitive environment ordinarily would give rise to a reasonable possibility of a significant impact due to unusual circumstances"].)

Under the second test, the Court finds that the Project's proximity to sensitive environmental resources constitutes unusual circumstances. **(See *Azusa Land Reclamation Co. v. Main San Gabriel Basin Watermaster* (1997) 52 Cal.App.4th 1165, 1208 [unusual circumstance and environmental risk existed due to project in environmentally sensitive location and risk of impacts to groundwater]; *Lewis, supra*, 165 Cal.App.3d at p. 829 ["no question of the existence of unusual circumstances" where residential areas adjacent to a racetrack].) By the same token, there is a reasonable possibility of significant adverse impacts on those unusual circumstances/resources because they are sensitive, surround the Trail, and are likely to be impacted by greatly increased numbers and types of Trail users.**

The County's claim that there are no unusual circumstances due to the "presence of comparable facilities in the immediate area" (Walters v. City of Redondo Beach (2016) 1 Cal.App.5th 809, 821) is unpersuasive. **As discussed above, there are sensitive resources in the vicinity of the Trail that are not present in the rest of the 9,000-acre Cachuma Plan Area. (E.g., AR:146 [RMP/EIS describes Santa Cruz Bay and the Lake's east end as "crucial" bird habitat].)**

The County's references to the entire Santa Ynez Recreation Area and other lakes with recreation areas within 200 miles of Lake Cachuma are not relevant to the inquiry because they are not in the "immediate area" of the Trail. None of the cases the County cites look so far afield for comparable facilities. (See *Berkeley Hillside Pres. v. City of Berkeley* (2015) 60 Cal.4th 1086, 1118 ["one particular neighborhood"]; *Walters, supra*, 1 Cal.App.5th at p. 821 [a 10-minute drive]; *Bloom v. McGurk* (1994) 26 Cal.App.4th 1307, 1315-1316 [immediately neighboring/nearby uses].) And there is no evidence the other facilities are comparable to the Trail—that they pass through sensitive biological and cultural resources, that trail conditions are similar, or that they have similar levels of use. The other Cachuma trails already have greater human disturbance and fewer sensitive resources. (See AR:675-676, AR:688.)

The County has failed to meet its burden to show by substantial evidence that the Project falls within a categorical exemption. **(*California Farm Bureau Federation*, *supra*, 143 Cal.App.4th at p. 190.)**

Unclean Hands

The County's unclean hands defense does not establish any misconduct by Petitioners and therefore must fail.

As explained in the briefing for Petitioners' Motion for Leave to File First Amended Petition, what the County characterizes as "false evidence" (Exhibit 5 to the original Petition) was merely a draft document that was mis-identified as a final document. Petitioners sought and obtained the Court's leave to correct the error after they became aware of it, and there was no impact to the primary issues in the case, nor prejudice to the County. That Petitioners did not include meeting materials from a meeting by the County's Trails Advisory Committee in the initial administrative record also appears to be a simple mistake and does not justify denying Petitioners relief. Petitioners note that the County itself excised 19 messages from the record, many of which supported Petitioners' arguments, and the record later had to be supplemented to include those messages.

Likewise, the County has not demonstrated wrongful conduct because Petitioners relied on emails in the administrative record from Jessica Schley, a member of the public opposed to the Project. The County vaguely says there is an undisclosed "relationship" between Ms. Schley, Petitioner Suzanne Duca, and Petitioners' counsel Susan Petrovich, but fails to explain the nature of this relationship or why it should warrant such an extreme result as denying the Petition. Petitioners state that "Ms. Schley, Ms. Duca, and Ms. Petrovich are all equestrians, and are acquainted with one another through that shared interest. There is nothing nefarious about Ms. Schley copying other potentially interested persons on emails with County officials." (Reply at pp. 10-11.) The Court agrees with Petitioners.

The County also argues that Petitioners must have had knowledge of the NOE for the Project, pointing to evidence that Petitioner Dale Obern Hoeffliger sent an email objecting to the Project on January 12, 2021, the Project was announced at a public meeting, several published internet articles mention the Project, and other members of the public sent messages to the County regarding the Project or the NOE.

The problem with the County's argument is that none of these references provide evidence that Petitioners were aware of the NOE during the 35-day limitations period that ran from the day it was filed. There is no evidence that Petitioners read these articles (which do not mention the NOE or its date of adoption), and the message copying Ms. Duca and her counsel is from April 2021, long after the shorter limitations period had expired.

The message from Petitioner Hoeffliger, the same day the NOE was adopted, plainly shows a lack of awareness that the County had already adopted the NOE. The County did not provide preponderating evidence that Petitioners had actual knowledge that the shorter limitations period was running. The fact that some other members of the public may have had actual knowledge of it is irrelevant. The statute of limitations runs from the time the NOE is filed with the County Clerk, if posted where it is available for public inspection—the statute does not provide that any other form of notice suffices to start the limitations period. (Pub. Resources Code, §§ 21167, subd. (d); 21152, subd. (c).) An awareness that the County is considering a Project does not equate to knowledge that the County has actually taken that action and has posted a NOE.

Finally, the County does not cite any CEQA cases where a court denied relief on an unclean hands theory, or any case that applied the doctrine to facts at all similar to those in this case. A much stronger showing is required to deny relief to Petitioners, especially where the Petitioners brings suit to vindicate a public right.

Laches

The defense of laches requires "a showing of unreasonable delay plus either acquiescence or prejudice." (*People v. Dep't of Hous. & Cmty. Dev.* (1975) 45 Cal.App.3d 185, 195.) The County argues Petitioners unreasonably delayed because one of them knew about the Project by April 6, 2021, and the Petition was not filed until July 8, 2021. The County claims it was prejudiced by this delay because, by the time the Petition was filed, the County had ended its COVID-19 restrictions and could no longer take photographs of how the Administration Building was set up during the pandemic.

Petitioners respond that they did not unreasonably delay, given the County's lack of public notice for the NOE, and that photographs would add nothing to the Court's analysis because the actual physical conditions on site are not in dispute.

The Court agrees with Petitioners—the parties do not dispute how the Administration Building was set up, but instead whether those conditions satisfied the requirement that the NOE be "available for public inspection." The County has not demonstrated prejudice sufficient to sustain a laches defense.

Furthermore, the only case cited by the County is distinguishable on its facts. In *Dep't of Hous. & Cmty. Dev., supra*, the Court sustained a laches defense where the project proponent spent $40,000 in reliance on a project approval. (*Id.* at p. 197.) The County does not claim it suffered financial prejudice. Petitioners also cite authority from that case that "[t]he strong public interest in ecology preservation has prompted both federal and state courts to reject assertions of laches [in environmental lawsuits]. . . . consistent with the general principle that equitable defenses will rarely be invoked to defeat a policy adopted for the public preservation." (*Id.* at p. 196.) The Court finds that policy here weighs against applying laches.

Finally, courts may also consider "a vast disparity in the population, staff, budget and research and planning resources available" between the parties in weighing the equities. (*Cnty. of Inyo v. Yorty* (1973) 32 Cal.App.3d 795, 813.) Petitioners are private individuals challenging the County, a subdivision of the State with a very large staff and budget.

Because the County suffered nothing from the alleged delay, and Petitioners "acted with reasonable dispatch" once they were aware of the County's action, the Court will not sustain the laches defense.

Declaratory Relief

Declaratory relief is an appropriate form of action under CEQA where the action challenges an agency's policy or practice, as opposed to a specific decision or project approval. (*Californians for Native Salmon & Steelhead Assn. v. Department of Forestry* (1990) 221 Cal.App.3d 1419, 1428.)

Because Petitioners do not challenge a policy or practice by the County, the Court denies the claim for declaratory relief.

Attorney Fees

Code of Civil Procedure § 1021.5 codifies the "Private Attorney General Doctrine." The statute allows trial courts discretion to award attorney's fees to a successful party in an action "which has resulted in the enforcement of an important right affecting the public

interest if: (a) a significant benefit, whether pecuniary or nonpecuniary, has been conferred on the general public or a large class of persons, (b) the necessity and financial burden of private enforcement ... are such as to make the award appropriate, and (c) such fees should not in the interest of justice be paid out of the recovery, if any."

The definition of successful party is pragmatic and broad and doesn't require success on all claims or final judgment in the parties' favor. *La Mirada Avenue Neighborhood Association of Hollywood v. City of Los Angeles, (2018) 22 Cal. App. 5th 1149.*

It is very common for the declarations for attorney fees to be filed post trial; often at the same time as a cost bill is submitted. But this Court has typically asked for the issue of attorneys' fees to be addressed at the time of the trial. This Court has found that the declarations filed by the competing parties are helpful in determining what the award should be. Sometimes a prevailing party may be inclined to embellish their request after the decision. That is not done when counsel who are submitting their request concurrently before a decision is made. Finally, this Court is never in a better position to weigh all the nuances required in making an important decision as this is at the same time the trial decision is made. Making such decisions weeks or sometimes months later is not inviting to this Court and the Court has found it decidedly not productive.

The major factors to be considered by a court in fixing reasonable attorney fees include the nature of the litigation and its difficulty; the skill required and the skill employed in handling the litigation; the attention given; the success of the attorney's efforts and his or her learning, age, and experience in the particular type of work demanded; the intricacies and importance of the litigation; the labor and the necessity for skilled legal training and ability in trying the cause; and the time consumed. When the trial court is informed of the extent and nature of the services rendered, it may rely on its own experience and knowledge in determining their reasonable value. The exercise of sound discretion by the trial court in the matter of attorney fees includes a judicial evaluation of whether counsel's skill and effort were wisely devoted to the expeditious disposition of the case.

Counsel in this case filed their declarations related to the issue concurrently prior to the decision being issued. Petitioners contend that a fee award should be granted them pursuant to section 1021.5 is calculated using a "lodestar," a figure generated by multiplying the reasonable hours spent on the litigation by "the hourly prevailing rate for

private attorneys in the community conducting noncontingent litigation of the same type." (*Ketchum v. Moses* (2011) 24 Cal.4th 1122, 1133.) Petitioners request an award of fees in the amount of at least $328,156.27 (plus any multiplier determined by the Court), reflecting both time reasonably spent to date on this matter and a reasonable estimate of additional hours each for Ms. Petrovich and for Mr. Hofer to attend the merits hearing, draft a proposed writ of mandate and judgment, and attend a subsequent hearing on the writ and judgment.

Petitioners submitted a pocket brief in support of their request. They report Code of Civil Procedure section 1021.5 provides an award of attorneys' fees be made to a "successful party." A successful party is entitled to attorneys' fees if it can show that the litigation: (1) served to vindicate an important public right; (2) conferred a significant benefit on the general public or a large class of persons; and (3) was necessary and imposed a financial burden on plaintiffs which was out of proportion to their individual stake in the matter. . . . The decision whether to award attorneys' fees under section 1021.5 rests initially with the trial court.

Utilizing its traditional equitable discretion, that court must realistically assess the litigation and determine, from a practical perspective, whether or not the statutory criteria have been met. That Petitioner's enforced several important public rights. Here, Petitioners brought this action to enforce CEQA's requirements, to ensure that any significant impacts related to the Project are adequately studied and mitigated and sensitive habitats and cultural sites are identified and protected, and to ensure that the County follows the law and its commitments under the RMP/EIS and related Management Plan.

The cases uniformly hold that such purposes satisfy the first element of section 1021.5. The fact that the County may have (incorrectly) believed that its actions did not violate CEQA is irrelevant: "Whether or not the County acted in good faith is irrelevant; Code of Civil Procedure section 1021.5 was intended to encourage public interest litigation by providing compensation to successful counsel." (*San Bernardino Valley Audubon Society*, *supra*, 155 Cal.App.3d at p. 754.)

Here, Petitioners have achieved a significant benefit by effectuating CEQA's fundamental purpose to analyze the potentially significant environmental impacts of new

activities. There is also a significant benefit derived from requiring the County to follow the letter of the law, and the deterrent effect that this case will have against future violations by the County. These benefits inure to the public at large. Petitioners have more than satisfied section 1021.5's second element. Petitioners expect the County to argue that a significant benefit was not obtained here because the ultimate outcome of the Project is yet unknown—that is, the County may yet approve the Project in some form in the future.

That argument was rejected in (*La Mirada Avenue Neighborhood Assn. of Hollywood v. City of Los Angeles* (2018) 22 Cal.App.5th 1149. Petitioners filed this action solely to protect the pristine nature of the Live Oak Trail and its environs. Petitioners are equestrians who have enjoyed riding the Live Oak Trail and becoming acquainted with its uniquely pristine and undisturbed condition, including a wide range of sensitive species and abundant wildlife. In short, they gain nothing financially from this litigation; they acted solely on behalf of the public and the environment. The County may argue that Petitioners should be denied a recovery because they are equestrians and may have some speculative interest in limiting expansion of the Live Oak Trail to other users. Any such argument would be misguided—for purposes of section 1021.5's third factor, only *monetary* and *non-speculative* interests are relevant.

Here, the cost of Petitioners' victory was very high; they spent over $328,156.27 to litigate the case and win an attorney fees award, necessitated in no small part by the County's aggressive and uncompromising strategy. Given this significant expense incurred in the public interest, and Petitioners' lack of any non-speculative pecuniary interest in the outcome, section 1021.5's third element is satisfied.

Petitioner's request that the Court award fees in excess of the base amount; that it is customary for non-governmental petitioners who have filed a CEQA challenge to be extended a multiplier of the actual fees sought for reimbursement. The Court may award a multiplier based on a number of factors, including but not limited to those set forth in *Serrano v. Priest* (1977) 20 Cal.3d 25, 49.) Of course, determination of the multiplier is entirely in the Court's jurisdiction.

The County's Brief

The Court has read the County's Opposition Brief to an award of attorney fees and the four Declarations in Support regarding Attorney's Fees.

At the outset the County objects to any award of attorney fees under Code Civ. Proc., § 1021.5 without a noticed motion after the court's decision on the merits. The County requests an opportunity to take discovery related to any request for attorney fees under Code Civ. Proc., § 1021.5. "The burden is on the claimant to establish each prerequisite to an award of attorney fees under section 1021.5." (*Ebbetts Pass Forest Watch v. Department of Forestry & Fire Protection* (2010) 187 Cal.App.4th 376, 381.) For example, the party seeking an award under Code Civ. Proc., § 1021.5 bears the burden of establishing that its litigation costs transcend its personal interest. (*Beach Colony II v. California Coastal Com.* (1985) 166 Cal.App.3d 106, 113.)

Given the evidence in the administrative record regarding Petitioner Duca's and counsel Susan Petrovich's relationship with the Santa Ynez Valley Riders, the County should be allowed discovery into who funded the litigation. If Petitioners bear no financial burden, then an award of attorney's fees under Code Civ. Proc., § 1021.5 is inappropriate and County refers the Court to *Torres v. City of Montebello* (2015) 234 Cal.App.4th 382, 407–408; and *Save Open Space Santa Monica Mountains v. Superior Court* (2000) 84 Cal.App.4th 235, 247 (what kinds of discovery are permissible where a party is opposing a Code Civ. Proc., § 1021.5 motion is decided on a case-by-case basis) (disapproved on other grounds by *Williams v. Superior Court* (2017) 3 Cal.5th 531).)

But the Court finds *Torres* is not persuasive here. It is distinctively different on the law and the facts. In that case a city resident filed petition for writ of mandate, seeking to invalidate waste hauling contract which was signed by mayor pro tempore rather than by mayor, who had refused to sign the contract. The Court, issued the writ, denied the resident's request for private attorney general fees, and sustained city's demurrer to waste hauler's subsequent complaint for writ of mandate directing mayor to execute the contract. Waste hauler appealed, and resident cross-appealed. The Court of Appeal denied the request for an injunction and did not compel a finding that delay in seeking writ of mandate was unreasonable and thus barred by laches; that the statute required waste hauling contract to be signed by mayor in order to be valid; that the mayor's refusal to sign waste hauling contract was not an "absence" which authorized mayor pro tempore to execute contract; that the city was not estopped from denying validity of contract; that the council member did not have a "remote" financial interest in contract and thus could

participate in the vote to approve the contract; that the court could not compel mayor to comply with ministerial duty to sign contract in light of subsequent initiative requiring competitive bidding process; and the resident was not entitled to award of private attorney general fees.

Torres held an award of attorney's fees on the private attorney general theory is appropriate when the cost of the claimant's legal victory transcends his personal interest, that is, when the necessity for pursuing the lawsuit placed a burden on the plaintiff out of proportion to his individual stake in the matter. **When considering whether an award of private attorney general fees is necessary, the court is required to realistically assess the litigation and determine, from a practical perspective, whether or not the statutory requirements have been met. The court considering an award of private attorney general fees may consider evidence that the named plaintiff is litigating the action primarily for the benefit of nonlitigants with a financial interest in the outcome.** ***City resident who successfully challenged city waste hauling contract was not entitled to award of private attorney general fees, although he had no financial interest in the outcome, where resident's attorneys' fees were paid by an organization of trash hauler competitors, who sought to obscure their own financial interest in the litigation by choosing to fund resident, who bore no financial burden in bringing the action.***

Save Open Space the Court is also not applicable here. **That case held that in order to establish the private attorney general statute's prerequisite that necessity and financial burden of private enforcement makes award of attorney fees appropriate, the party seeking an award on the private attorney general theory bears the burden of establishing that its litigation costs transcend its personal interest; in deciding whether this burden has been met, a trial court is required to make a comparison of the litigant's private interests with the anticipated costs of suit. In that case the Court said information regarding contributors to nonprofit organization's litigation fund was relevant to organization's request for attorney fees under private attorney general statute, and was potentially discoverable by county after organization prevailed in its action against county, challenging proposed real estate development; although organization did not have a stake in the outcome of the litigation, record evidence suggested that case was litigated by and for benefit of neighbors living in the vicinity of the affected subdivisions.** ***Where the party***

opposing attorney fee award under private attorney general statute has produced evidence suggesting that a public interest organization is litigating an action primarily for the benefit of nonlitigants, the court should, in order to resolve the issue, allow the opposing party to conduct limited discovery; what kinds of discovery will be permissible is to be decided on a case-by-case basis. **Before a trial court orders discovery on issue of *whether public interest organization is litigating an action primarily for the benefit of nonlitigants*, so as to preclude attorney fee award under private attorney general statute, it must first determine whether the discovery ordered impermissibly infringes upon important associational privacy rights of third parties. When ruling on a motion for attorney fees under section private attorney statute, the court is required to realistically assess the litigation and determine, from a practical perspective, whether or not the statutory requirements have been met.**

The Court's Decision on the Issue of Attorney Fees

The Court has read the applicable law. Each case should be decided on its own merits. This Court has realistically assessed the litigation and determined, from a practical perspective, whether or not the statutory requirements have been met. The Court finds the Petitioner has carried their burden of establishing that its litigation costs transcend their personal interests. Moreover, this Court has weighed all the issues required by the applicable law. Discovery is not called for here. It would only delay a decision. In addition to the underlying facts that discovery is not appropriate the Court is also hesitant to allow discovery because it would raise constitutional issues related to association privacy rights. There is clearly no need or benefit in delaying a decision in this case based upon the facts. Indeed, such a delay and additional "discovery" that has been suggested will only add to the attorney fees requested and may very well impact a decision on the application of a multiplier; something the Court is not willing to do now. The decision can and should be made now.

Petitioner is awarded $300,000 in attorney fees. The application of a multiplier is not appropriate under the facts. The fees are to be paid by 3/1/2023.

Statement of Decision

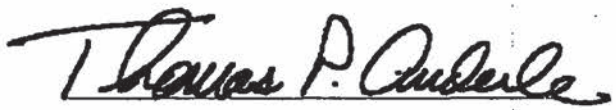
This is the Court's Proposed Statement of Decision. This Proposed Statement of Decision was announced and signed on December 7, 2022. Pursuant to California Rules of Court Rule 3.1590, either party may, within 15 days after the proposed statement of decision has been served [to wit on or before 12/22/22], serve and file objections to the proposed

statement of decision. The Court will, after consideration of any objections, prepare and serve a Final Statement of Decision on the parties who appeared at the trial. The court will not order a hearing on proposals or objections to a proposed statement of decision. (Please send courtesy copies of any objections via email to the Court's chambers when filed.)

Judgment

The Court will enter judgment for Petitioners and against Respondents and will further issue a writ of mandate ordering Respondents to reconsider their adoption of the NOE in accordance with the law and with this decision. Petitioners are ordered to file a proposed form of Judgment and Writ of Mandate by January 6, 2023. Petitioners are invited to submit the Judgment to the Respondents counsel for counsel to approve *as to form* and then submit it to the Court for signature. If there is no agreement to approve "as to form" then the proposed Judgment shall be submitted to the Court and within 10 days after service of the proposed judgment, Respondents may serve and file objections thereto. The court will not order a hearing on proposals or objections to a proposed judgment. (Please send courtesy copies of any objections via email to the Court's chambers when filed.)

Dated: 12/7/22



Thomas P. Anderle, Judge

Exhibit B

NOT TO BE PUBLISHED IN THE OFFICIAL REPORTS

California Rules of Court, rule 8.1115(a), prohibits courts and parties from citing or relying on opinions not certified for publication or ordered published, except as specified by rule 8.1115(b). This opinion has not been certified for publication or ordered published for purposes of rule 8.1115.

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA

SECOND APPELLATE DISTRICT

DIVISION SIX

SUZANNE DUCA, et al., Plaintiffs and Respondents, v. COUNTY OF SANTA BARBARA, et al., Defendants and Appellants.	2d Civil No. B325999 (Super. Ct. No. 21CV02683) (Santa Barbara County)

COURT OF APPEAL – SECOND DIST.
FILED
May 15, 2024
EVA McCLINTOCK, Clerk
Adriana Winters Deputy Clerk

The Live Oak Trail, located in the Cachuma Lake Recreation Area, has been reserved for the exclusive use of equestrians since the late 1980s. In January 2021, the County of Santa Barbara (County) approved a multi-use trail management plan that would allow hikers and bikers to also use the trail. Petitioners obtained a writ of mandate from the superior court directing the County to vacate its approval of that project and return the trail to exclusive equestrian use on the ground that

the County's approval process violated the California Environmental Quality Act (CEQA). (Pub. Res. § 21000, et seq.)[1]

The County contends that the petition is time barred because it was filed more than 35 days after the County filed a Notice of Exemption (NOE) relating to the project. (§21167, subd. (d).) It further contends the trial court abused its discretion in mandating that the County comply with the National Environmental Policy Act ("NEPA"), 42 USC § 4332, et seq., and in directing the County to suspend activities that are not part of the project described in the County's notice of exemption (NOE). We affirm the trial court's finding that the writ petition was timely. We conclude portions of the Amended Writ of Mandate exceed the trial court's authority under section 21168.9, subdivision (c) and will therefore order the trial court to strike from the writ any reference to NEPA and paragraph 3 in its entirety.

Facts

Santa Barbara County manages the Cachuma Lake Recreation Area under a management contract with the United States Bureau of Reclamation. One of the trails in the recreation area, the Live Oak Trail, has historically been reserved for the exclusive use of equestrians. In 2011, the Bureau of Reclamation adopted a resource management plan that would allow for use of the trail by hikers and mountain bikers. In January 2021, the County announced the Live Oak Trail multi-use program, opening the trail to hikers and mountain bikers.

On January 12, 2021, the County posted a Notice of Exemption (NOE) for the program. At that time, the COVID-19

[1] All statutory references are to the Public Resources Code unless otherwise stated.

state of emergency was in effect. The County's website informed the public that, "County public counters are closed until further notice." Members of the public were advised to visit the website of each county department to obtain more specific information about accessing that department's services during the state of emergency.[2]

The County's CEQA notices are handled by the office of the Clerk of the Board of Supervisors. That office's website stated, "The Clerk of the Board's public counter is closed until further notice. The public can submit claims, assessment appeals, and other documents electronically[,] via regular mail (with postmark) or through a physical drop box in the lobby of the County Administration Building. Please enter from the main doors at 105 E. Anapamu."

Angelica Ramirez, the deputy clerk, was responsible for filing and posting NOEs in 2021. During the pandemic, NOEs were posted on a bulletin board in the clerk's office and on a clipboard kept in the first floor lobby of the county administration building. Ramirez explained that a table labeled "'Clerk of the Board'" was placed in front of the main sliding glass doors in the lobby. A clipboard labeled "'Notice of Exemptions'" was lying flat on that table. NOEs were removed from the clipboard after 30 days.

---

[2] The County chose not to avail itself of executive orders adopted by the Judicial Council in response to the pandemic which allowed agencies to satisfy CEQA's public filing, posting, notice and public access requirements by, among other things, posting notices and other materials on the relevant agency's public-facing website. (Governor's Exec. Order Nos. N-54-20, ¶ 8 (April 22, 2020); N-80-20, ¶ 6 (Sept. 23, 2020).)

The County's chief procurement officer, Phung Loman, was responsible for scheduling staff to work in the lobby during the pandemic. Members of the public could access the county administration building through sliding glass doors on Anapamu Street and Anacapa Street. A staff member was sitting in front of each sliding glass door at all times during business hours. If a member of the public wanted access to the building, the staff member would walk to the door and let them in. Loman testified, "The building is always locked because of the sliding door, but we walk – we sitting in front of it." If a member of the public came to the building and wanted access to it, "we would get up and walk towards the door and let them in."

The County did not post CEQA notices on any public-facing website during the pandemic. It did not post signs on the sliding glass doors indicating that CEQA notices were available for review upon entry to the building. None of the County's public-facing websites informed members of the public that CEQA notices were available for review upon entry to the administration building. However, the County maintains that the Clerk of the Board table and the NOE clipboard were visible to any member of the public who approached the doors to the administration building. NOEs were also available upon request from the clerk's office. Members of the public could call or email the clerk's office to request a document.

At a public meeting on January 11, 2021, the County Parks department announced that the Live Oak Trail would be opened to hikers and mountain bikers. A Notice of Exemption describing that project was posted on the Notice of Exemptions clipboard in the lobby of the county administration building on January 12, 2021. On January 15, 2021, the deputy clerk

emailed a copy of the NOE to the Santa Ynez Valley Riders. A representative of the Santa Ynez Valley Riders sent a lengthy written objection to the project to the County's community services department on January 31, 2021. In July 2021, petitioners filed their petition for writ of mandate.

After a hearing, the trial court issued its statement of decision concluding the petition was timely because the County did not make the NOE available for public inspection. It further concluded that the project to open the Live Oak Trail to hikers and bikers is not categorically exempt from CEQA review because there is a fair argument that it might have a significant impact on the environment. The trial court issued a writ of mandate directing the County to set aside its approval of the project and suspend all activity on the trail other than horseback riding until the County has "taken all actions necessary to bring the Project's environmental review, decisions, and determinations into full compliance with CEQA, the CEQA Guidelines . . . , [NEPA] and the Court's Statement of Decision." The trial court further mandated that the County "restore any and all measures used to control access to Live Oak Trail that were removed or modified to support the Project in lieu of the former equestrian-only usage . . . ." The County was directed to file an initial return to the writ within 21 days describing the actions taken to comply with the trial court's directives. Finally, the trial court retained jurisdiction over the matter "until the Court has determined that [the County] has complied with the provisions of CEQA, the CEQA Guidelines, NEPA and the Court's Statement of Decision."

Respondents' first amended petition for writ of mandate was accompanied by a complaint for declaratory and injunctive relief. They sought a declaration that the County had

no right to change the use of the trail until it complied with CEQA, NEPA and other applicable laws. The trial court found in favor of the County and against respondents on this cause of action. It found in favor the County on the cause of action for declaratory relief.

Contentions

The County's appeal raises only two issues. First, the County contends the trial court erred when it concluded the petition was timely filed because CEQA's 180-day statute of limitations applied rather than the statute's alternate 35-day statute of limitations. Second, the County contends the trial court abused its discretion when it mandated compliance with NEPA, required the County to suspend activities that are not part of the project and when it retained jurisdiction if the County reapproves the project.

Standard of Review

In determining which CEQA limitations period applies, and whether the County complied with applicable public notice provisions of the statute, we "review the record de novo and are not bound by the trial court's conclusions." (*Environmental Protection Information Center v. California Department of Forestry & Fire Protection* (2008) 44 Cal.4th 459, 479.) "Questions concerning the interpretation or application of CEQA, and the consistency of local regulations with CEQA, are matters of law subject to de novo or independent review." (*California Building Industry Association v. Bay Area Air Quality Management District* (2016) 2 Cal.App.5th 1067, 1081.)

Where a trial court determines that a public agency has made a decision or taken an action without complying with CEQA, section 21168.9 authorizes the trial court to issue a

peremptory writ of mandate addressing that noncompliance. "In deciding which mandates to include in its order, a trial court relies on equitable principles." (*Preserve Wild Santee v. City of Santee* (2012) 210 Cal.App.4th 260, 287 (*Preserve Wild Santee*).) We review the trial court's exercise of its equitable power for abuse of discretion. (*Ibid.*)

Discussion

Statute of Limitations

In deciding whether to approve a project that may cause a direct or reasonably foreseeable indirect physical change in the environment, a local public agency must decide whether the project is exempt from CEQA review under a statutory or categorical exemption. (§§ 21065, 21080, 21084; Cal. Code Regs., tit. 14, § 15300 et seq. ("Guidelines").) If the agency determines that the project is exempt, it may file a notice of exemption NOE documenting that determination. (§ 21152, subd. (b).) The NOE must include, among other things, a brief description of the project and the agency's reasons for declaring it exempt from environmental review. (§§ 21108, subd. (b); 21152, subd. (b); Guidelines, § 15062, subd. (a).) It must be filed with the county clerk and "shall be available for public inspection, and shall be posted within 24 hours of receipt in the office . . . of the county clerk." (§ 21152, subd. (c).) The CEQA Guidelines similarly provide that the NOE "shall be filed with the county clerk" and that copies of the NOE "will be available for public inspection and . . . shall be posted within 24 hours of receipt in the office of the county clerk." (Guidelines, § 15062, subd. (c)(2).)

CEQA provides different statutes of limitations depending upon whether the public agency filed an NOE for the project. (§ 21167, subd. (d).) "An action or proceeding alleging

that a public agency has improperly determined that a project is [exempt from CEQA review] shall be commenced within 35 days from the date of the filing by the public agency . . . of the [NOE] . . . ." (*Ibid*.; Guidelines, §§ 15062, subd. (d), 15112, subd. (c)(2).) If the public agency does not file a NOE, "the action or proceeding shall be commenced within 180 days from the date of the public agency's decision to carry out or approve the project . . . ." (§ 21167, subd. (d); Guidelines, § 15112, subd. (c)(5).)

As our Supreme Court has explained, "CEQA establishes and emphasizes *public notification* of an agency's action or decision as the event triggering the shortest applicable limitations period for lawsuits alleging noncompliance with the statute. [¶] The reasons for this approach are clear. Public notification serves the public's right, under CEQA, to be informed of, and to have a voice in, the process of evaluating the environmental issues surrounding a contemplated action or decision." (*Stockton Citizens for Sensible Planning v. City of Stockton* (2010) 48 Cal.4th 481, 501-502 (*Stocken Citizens for Sensible Planning*).)

Here, the trial court found that the 180-day statute of limitations applied because the County did not make the NOE available for public inspection as required by sections 21152, subdivision (c)(1) and 21167, subdivision (d). The County contends the trial court erred because the NOE was posted in the clerk's office and on the clipboard in the lobby of the county administration building. Like the trial court, we are not persuaded. Posting an NOE in an office that is closed to the public, or in a location unknown to the public is not sufficient to make the NOE available for public inspection within the meaning of the statute.

Sierra Watch v. Placer County (2021) 69 Cal.App.5th 1 (*Sierra Watch*), is instructive. There, the court of appeal considered whether a document was "available for public inspection" within the meaning of the Brown Act (Gov. Code, § 54950 et seq.) when it was placed in a county clerk's office after business hours. Government Code section 54957.5 requires that every document distributed to members of a county board of supervisors less than 72 hours before a scheduled board meeting be "available for public inspection" at a county office "at the time the writing is distributed" to the board members. (*Id.*, subd. (b).) In that case, a document was distributed to board members and placed in the county clerk's office after business hours, when the office was closed to the public. The court of appeal held that, under these circumstances, the document had not been made "'available for public inspection'" within the meaning of the statute. (*Sierra Watch, supra*, at pp. 10-11.) "[The Brown Act] is not . . . merely concerned with the time a record is *placed* in a location allowing for public inspection; it is instead principally concerned with the time a record is actually *available* for public inspection. . . . No document at the County clerk's office . . . was 'available for public inspection' at . . . a time when the clerk's office was closed." (*Ibid.*)

A similar analysis applies here. Like the Brown Act, CEQA is designed to encourage "'full public participation throughout the environmental review process . . . .'" (*Citizens of Lake Murray Area Assn. v. City Council* (1982) 129 Cal.App.3d 436, 440.) To that end, the statute prioritizes public notice of local agency actions that may impact the environment, including the determination that a project will have no such impact. (*Committee for Green Foothills v. Santa Clara County Board of*

Supervisors (2010) 48 Cal.4th 32, 43; see also *Committee to Relocate Marilyn v. City of Palm Springs* (2023) 88 Cal.App.5th 607, 629-630 [‘“basic purposes”’ of CEQA include informing the public about potential environmental effects of proposed activities and disclosing to the public the reasons why a local agency approved a project].) While the statute features unusually short statutes of limitation, it “establishes and emphasizes *public notification* of an agency’s action or decision” to trigger those time limits. (*Stockton Citizens for Sensible Planning, supra*, 48 Cal.4th at p. 501.) A notice placed in a building that is closed to the public is not available for public inspection and does not provide the required public notice. (See, e.g., *Sierra Watch, supra*, 69 Cal.App.5th at pp. 10-11.)

Here, the County informed the public that its “public counters” were “closed until further notice.” The Clerk of the Board similarly informed the public that its counters were closed until further notice, but that documents could be *submitted* to the clerk by various means. The Clerk took no action to inform the public that County-generated documents, such as CEQA NOEs, could be *accessed* and reviewed in the lobby of the county administration building, even though the office where those notices were usually posted was closed to the public. This information was not placed on the Clerk’s website, or on any public-facing County website. No signs containing this information were posted on the entry doors to the administration building. Under these circumstances, members of the public had no reason to believe they could access the county administration building or review NOEs in the lobby of that building. The trial court properly concluded that the NOE was not “available for

public inspection" within the meaning of section 21152, subdivision (c).

The County contends notices were publicly accessible because staff was available during business hours to open the doors to the administration building and direct members of the public to the table that held the NOE clipboard. This was not sufficient to make the notices available for public inspection for the reasons we have already stated. The County advised that its public counters were closed until further notice and never informed the public that CEQA notices were available for review in the lobby of the administration building. (*Sierra Watch, supra*, 69 Cal.App.5th at pp. 10-11.)

The County contends the shorter limitations period should apply because interested members of the public had actual knowledge of the NOE and the County's approval of the project. The County is incorrect. "The adequacy of a notice to trigger commencement of the short 35-day statute of limitations of section 21167, subdivision (d) should not turn on whether a party had actual knowledge of the board's action." (*International Longshoremen's & Warehousemen's Union v. Board of Supervisors* (1981) 116 Cal.App.3d 265, 274.) Instead, "public notice" of a local agency action is the "dispositive event" in determining which CEQA limitations period applies. (*Stockton Citizens for Sensible Planning, supra*, 48 Cal.4th at pp. 502-503.)

Finally, the County contends that CEQA itself requires only that an NOE be filed with the county clerk to trigger the statute of limitations. Guidelines sections 15062 and 15112 add the requirement that the NOE be posted and available for public inspection to the statutory filing requirement. The County urges us to find the Guidelines are unenforceable because

the posting and public inspection requirements exceed the statutory mandate. But the statute itself requires an NOE be filed with the county clerk and "available for public inspection . . . ." (§ 21152, subd. (c)(1).) The Guidelines are consistent with this statutory mandate and further CEQA's policy to notify the public of government decisions that may impact the environment.

Scope of Writ

The County next contends that the mandates included in the trial court's writ were an abuse of discretion because they exceeded the remedies authorized by section 21168.9. "In deciding which mandates to include in its order, a trial court relies on equitable principles." (*Preserve Wild Santee, supra,* 210 Cal.App.4th at p. 287.) The specific remedies available to address violations of CEQA, however, are governed by section 21168.9. (*Preserve Wild Santee,* at p. 286.) The statute requires that the trial court include in its order only those mandates necessary to achieve compliance with CEQA. (§ 21168.9, subd. (b).) Additionally, a trial court may not "direct any public agency to exercise its discretion in any particular way." (*Id*., subd. (c).)

The "corrective power" granted to a trial court in section 21168.9 is "distinctly limited – and essentially negative. . . . A public agency may be directed to comply with CEQA, or to exercise its discretion on a particular subject, but a court will not order that discretion to be exercised in a particular fashion, or to produce a particular result." (*Schellinger Brothers v. City of Sebastopol* (2023) 179 Cal.App.4th 1245, 1266 (*Schellinger Brothers*).) We review the trial court's interpretation of the statute de novo. We review for abuse of discretion the trial

court's exercise of its equitable powers. (*Preserve Wild Santee, supra,* 210 Cal.App.4th at p. 287.)

In this context, the trial court is required to exercise its discretion within the limits imposed by section 21168.9. (*John R. Lawson Rock & Oil, Inc. v. State Air Resources Board* (2018) 20 Cal.App.5th 77, 102 (*John R. Lawson Rock & Oil*) [§ 21168.9 "controls the court's authority when crafting a remedy for CEQA violations"].) It has no discretion to act in a manner that "'transgresses the confines of the applicable principles of law . . . .'" (*Sargon Enterprises, Inc. v. University of Southern California* (2012) 55 Cal.4th 747, 773.) "In other words, judicial discretion must be measured against the general rules of law and, in the case of a statutory grant of discretion, against the specific law that grants the discretion." (*Horsford v. Board of Trustees of California State University* (2005) 132 Cal.App.4th 359, 393.)

When an agency's determination, finding or decision does not comply with CEQA, section 21168.9 requires the trial court to enter an order, in the form of a peremptory writ of mandate, containing one or more of three specified mandates. (*Id.*, subds. (a), (b).) First, the agency may be directed to void the noncompliant determination, finding or decision in whole or in part. (*Id.*, subd. (a)(1).) Second, if the trial court finds that specific project activities related to the noncompliant determination, finding or decision "will prejudice the consideration or implementation of particular mitigation measures or alternatives to the project," it may direct the agency to suspend activities "that could result in an adverse change or alteration to the physical environment," until the agency takes the actions necessary to comply with CEQA. (*Id.*, subd. (a)(2).)

Third, the trial court may mandate that the agency "take specific action as may be necessary to bring the determination, finding, or decision into compliance" with CEQA. (*Id*., subd. (a)(3).) Regardless of which mandates the trial court includes in its order, it may not "direct any public agency to exercise its discretion in any particular way," and it may only include the mandates necessary to achieve compliance with CEQA. (*Id*., subds. (b), (c); *Preserve Wild Santee, supra*, 210 Cal.App.4th at p. 287.)

The trial court's writ of mandate requires the County to set aside the NOE and vacate "all approvals, actions, and activities adopted and implemented as part of the change of use of Live Oak Trail from equestrian-only use of the Live Oak Trail to mixed hiking and mountain biking . . . ." It further requires the County to "suspend all Live Oak Trail recreational activity other than horseback riding and any and all other activities pursuant to the challenged Project decisions, determinations, and approvals that could result in any change or alteration to the physical environment" until the County takes all actions necessary to comply with CEQA, the CEQA Guidelines, NEPA and the trial court's statement of decision.

The trial court's third mandate requires the County to restore "any and all measures used to control access" to the trail that were removed to support its use by hikers and bikers. This mandate includes, but is not limited to, restoration of: (a) the security gate at the entrance to the trail's parking area and gates at the trail head and along the trail that are secured with combination locks; (b) signs at the trail entrance and along the trail; (c) "trail segments formerly available to equestrians but locked as part of the Project;" (d) the prior permit and user fee

system requiring equestrians to check in with the Lake Cachuma Campground, pay an entrance fee for a day-use pass, provide identification and agree to contact Campground staff upon exiting the trail; (e) a similar system for trail access by annual pass holders; (f) the trail's parking area to allow parking of horse trailers. Finally, the County was ordered to "restore the pre-existing parking enforcement process by patrolling the parking area daily and ticketing any vehicle not displaying the user pass."

The County contends the trial court abused its discretion when it included these mandates in its order because section 21168.9 does not authorize the trial court to mandate compliance with NEPA. It further contends the trial court abused its discretion when it ordered the County to suspend specific activities because the trial court did not find that those activities would "prejudice the consideration or implementation of particular mitigation measures or alternatives to the project," as required by section 21168.9, subdivision (a)(2). Finally, the County contends the trial court abused its discretion when it mandated that the County take specific actions, including those listed in paragraph 3 of the writ, because those mandates are not limited to actions that could result in adverse changes or alterations to the physical environment and because they direct the County to exercise its discretion to manage the trail in particular ways.

Respondents contend the trial court did not abuse its discretion because section 21168.9 allows it to mandate specific actions necessary to achieve compliance with CEQA. We are persuaded, however, that portions of the trial court's order exceed its authority under subdivision (c) of section 21168.9.

"Our analysis of which 'mandates' listed in subdivision (a) of section 21168.9 should be included in the writ issued to [the County] begins with the basic proposition that the purpose of the 'mandates' is to achieve compliance with CEQA. . . . [¶] To achieve the remedial goal of compliance with CEQA, we must identify and address each failure to comply. Restated in statutory terms, we must identify the 'determination, finding or decision [the County] . . . made without compliance with [CEQA].' [Citation.] Once a failure to comply with CEQA has been identified, we will consider which mandate (or mandates) is 'necessary to achieve compliance with [CEQA].' [Citation.]" (*POET, LLC v. State Air Resources Bd.* (2013) 218 Cal.App.4th 681, 758.) A local agency may be ordered to comply with CEQA, but the manner in which it achieves compliance "is a matter first left to the agency's discretion." (*Voices for Rural Living v. El Dorado Irrigation Dist.* (2012) 209 Cal.App.4th 1096, 1113.)

Here, the trial court found the County did not comply with CEQA when it adopted an NOE for its decision to open use of the Live Oak Trail to hikers and bikers. The court found there was substantial evidence supporting a fair argument that opening the trail to multiple uses may have a significant impact on the environment. As a result, the determination to allow multiple uses of the trail was not exempt from CEQA review, making the County's adoption of an NOE inappropriate. To address that lack of compliance with CEQA, the trial court ordered the County to set aside its decision "making a determination of exemption" and to vacate "all approvals, actions, and activities adopted and implement as part of the change of use of Live Oak Trail from equestrian-only use of the Live Oak Trail

to mixed hiking and mountain biking . . . ." It remanded the matter to the County for reconsideration. This portion of the writ falls squarely within the trial court's discretion under section 21168.9, subdivision (a)(1) because it requires the County to set aside the determination that the trial court found to be in violation of CEQA. (*John R. Lawson Rock & Oil, supra,* 20 Cal.App.5th at p. 102.)

The trial court's second mandate, in paragraph 2 of the writ, requires the County to "suspend" all "recreational activity" on the trail other than horseback riding until the County has "taken all actions necessary to bring the Project's environmental review, decisions and determinations into full compliance with CEQA, the CEQA Guidelines . . . the [NEPA] and the Court's Statement of Decision." To the extent this mandate requires the County to comply with NEPA, we conclude it exceeds the trial court's authority under section 21168.9, subdivision (a). The statute authorizes the trial court to mandate compliance with CEQA. It says nothing whatsoever about mandating compliance with other statutes. Moreover, the record indicates that the parties did not litigate the question whether County's actions violated the federal statute and the trial court's statement of decision includes no specific findings to that effect. The trial court abused its discretion when it included a mandate to comply with NEPA.

Paragraph 3 of the writ requires the County to take a series of very specific actions to "restore any and all measures used to control access to Live Oak Trail that were removed or modified to support the Project in lieu of the former equestrian-only usage . . . ." We conclude this mandate is an abuse of the trial court's discretion because it purports to direct the County to

comply with CEQA in particular ways. (§ 21168.9, subd. (c).) For example, the trial court has ordered the County not simply to void its approval of the multi-use plan, but to restore equestrian-only access to the trail. Further, the trial court's order mandates that the County achieve that result by installing or restoring particular gates, a specific type of lock on those gates, a specific means of accessing the combination to those locks and the precise location where day use permits and lock combinations may be distributed. The trial court has also mandated that the County exercise its police powers in a specific way by patrolling a parking lot "daily and ticketing any vehicle not displaying the user pass."

Section 21168.9 allows the trial court to direct the County to comply with CEQA. It does not authorize the trial court to mandate specific actions the County must undertake, or precise regulations it must adopt to achieve that compliance. (*Schellinger Brothers, supra,* 179 Cal.App.4th at p. 1266; *Preserve Wild Santee, supra*, 210 Cal.App.4th at p. 287.) The trial court had discretion to mandate that the County vacate the NOE, and with it the authorization for hikers and bikers to use the Live Oak Trail, until the County complied with CEQA. It lacked discretion, however, to mandate that the County take any specific action to achieve compliance. Thus, paragraph 3 of the writ exceeds the trial court's authority under section 21168.9, subdivision (c).

Conclusion

The trial court correctly determined the writ petition to be timely under section 21167, subdivision (d). It erred, however, in mandating that the County comply with NEPA and in including paragraph 3 in its order. The trial court is ordered on remand to strike from its Amended Writ of Mandate the

directive to comply with NEPA and paragraph 3 in its entirety. In all other respects, the judgment is affirmed. The parties shall bear their own costs on appeal.

NOT TO BE PUBLISHED.

YEGAN, Acting P. J.

We concur:

BALTODANO, J.

CODY, J.

Thomas P. Anderle, Judge

Superior Court County of Santa Barbara

Rachel Van Mullen, County Counsel, Lina Somait, Sr. Deputy, Callie Patton Kim, for Defendants and Appellants.

Brownstein Hyatt Farber Schreck and Susan F. Petrovick, Matthew L. Hofer and Paige E. Samblanet, for Plaintiffs and Respondents.

BROWNSTEIN HYATT FARBER SCHRECK, LLP
Attorneys at Law
1021 Anacapa Street, 2nd Floor
Santa Barbara, CA 93101

PROOF OF SERVICE

I, Caitlin Malone, declare:

I am a citizen of the United States and employed in Santa Barbara County, California. I am over the age of eighteen years and not a party to the within-entitled action. My business address is 1021 Anacapa Street, 2nd Floor, Santa Barbara, California 93101. On September 13, 2024, I served a copy of the within document(s):

[PROPOSED] AMENDED JUDGMENT GRANTING PEREMPTORY WRIT OF MANDATE

☐ by enclosing the documents in an envelope and placing the envelope for collection and mailing following our ordinary business practices.

☐ by placing the document(s) listed above in a sealed envelope and affixing a pre-paid air bill, and causing the envelope to be delivered to an agent for delivery.

☐ by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.

☒ by transmitting via e-mail or electronic transmission the document(s) listed above to the person(s) at the e-mail address(es) set forth below.

SANTA BARBARA COUNTY COUNSEL
RACHEL VAN MULLEM, County Counsel
CALLIE KIM, Deputy County Counsel
105 East Anapamu Street, Suite 201
Santa Barbara, California 93101
Telephone (805) 568-2950 / Fax (805) 568-2982
E-mail: ckim@countyofsb.org
mheuvel@countyofsb.org

Attorneys for Respondents and Defendants
COUNTY OF SANTA BARBARA and SANTA BARBARA COUNTY BOARD OF SUPERVISORS

I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on September 13, 2024, at Santa Barbara, California.

Caitlin K. Malone

Caitlin K. Malone

EXHIBIT 4

SS Pursuant to CRC 2.259 this document has been electronically filed by the Superior Court of California, County of Santa Barbara, on 9/13/2024

BROWNSTEIN HYATT FARBER SCHRECK, LLP
SUSAN F. PETROVICH (State Bar No. 065634)
spetrovich@bhfs.com
MATTHEW L. HOFER (State Bar No. 307055)
mhofer@bhfs.com
PAIGE E. SAMBLANET (State Bar No. 333112)
psamblanet@bhfs.com
1021 Anacapa Street, 2nd Floor
Santa Barbara, California 93101
Telephone: 805.963.7000
Facsimile: 805.965.4333

Attorneys for Petitioners
SUZANNE DUCA, AMALIA COFFEY and DALE OBERN HOEFFLIGER

BROWNSTEIN HYATT FARBER SCHRECK, LLP
Attorneys at Law
1021 Anacapa Street, 2nd Floor
Santa Barbara, CA 93101

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SANTA BARBARA

SUZANNE DUCA, an individual; AMALIA COFFEY, an individual; and DALE OBERN HOEFFLIGER, an individual,

Petitioners and Plaintiffs,

v.

COUNTY OF SANTA BARBARA, a political subdivision of the State of California; SANTA BARBARA COUNTY BOARD OF SUPERVISORS, a governing body; and DOES 1 through 20, inclusive,

Respondents and Defendants.

Case No. 21CV02683

Assigned for All Purposes to Honorable Thomas P. Anderle, Dept. 3

~~[PROPOSED]~~ SECOND AMENDED WRIT OF MANDATE

Action Filed: July 8, 2021
Trial Date: December 7, 2022

TO RESPONDENTS COUNTY OF SANTA BARBARA AND SANTA BARBARA COUNTY BOARD OF SUPERVISORS:

Judgment having been entered in this proceeding, ordering that a Peremptory Writ of Mandate be issued from this Court,

IT IS ORDERED that, immediately on service of this Writ, Respondents County of Santa Barbara and Santa Barbara County of Supervisors shall:

1. SET ASIDE their decision making a determination of exemption, including any findings made in connection with such decision, and VACATE all approvals, actions, and activities adopted and implemented as part of the change of use of Live Oak Trail from equestrian-only use of the Live Oak Trail to mixed hiking and mountain biking ("Project") because such approvals, actions, and activities are contrary to the California Environmental Quality Act ("CEQA"), Public Resources Code section 21000 et seq. These approvals, actions, and activities are remanded to Respondents for reconsideration consistent with the law, with this Court's Statement of Decision (Exhibit A hereto), and with the Court of Appeal's Opinion (Exhibit B hereto). The contents of Exhibits A and B hereto are hereby incorporated by reference as if fully set forth herein.

2. Respondents are further ordered to suspend all Live Oak Trail recreational activity other than horseback riding and any and all other activities pursuant to the challenged Project decisions, determinations, and approvals that could result in any change or alteration to the physical environment until Respondents have taken all actions necessary to bring the Project's environmental review, decisions, and determinations into full compliance with CEQA, the CEQA Guidelines (Cal. Code of Regulations, title 14, §§ 15000 et seq.), the Court's Statement of Decision, and the Court of Appeal's Opinion.

3. Respondents are further ordered to file an initial return to this Writ of Mandate within 30 days of service of this Writ of Mandate, stating what actions they have taken and intend to take to comply with this Writ, and to make and file a supplemental return to this Writ of Mandate if and when they reapprove the Project within 30 days of the reapproval.

4. Under Public Resources Code section 21168.9, subdivision (c), this Court does not direct Respondents to exercise their lawful discretion in any particular way.

BROWNSTEIN HYATT FARBER SCHRECK, LLP
Attorneys at Law
1021 Anacapa Street, 2nd Floor
Santa Barbara, CA 93101

5. Under Public Resources Code section 21168.9, subdivision (b), this Court will retain jurisdiction over Respondents' proceedings by way of a return to this peremptory Writ of Mandate until the Court has determined that Respondents have complied with the provisions of CEQA, the CEQA Guidelines, the Court's Statement of Decision, and the Court of Appeal's Opinion.

Dated: ~~September __, 2024~~ **10/16/2024**

The Honorable Thomas P. Anderle
JUDGE OF THE SUPERIOR COURT

BROWNSTEIN HYATT FARBER SCHRECK, LLP
Attorneys at Law
1021 Anacapa Street, 2nd Floor
Santa Barbara, CA 93101

Comment Letter I.8 – Brownstein Hyatt Farber Schreck, LLP

Comment Response I.8-1

Thank you for your comments. The comment asserts that the EIR does not provide sufficient site-specific analysis of potential future recreational uses and facilities on the north shore of Lake Cachuma. The comment further requests that the County acknowledge the "Duca Judgment" and require project-specific CEQA review before implementation of future Lake Cachuma north shore projects. However, the EIR provides a sufficient level of description and environmental review appropriate for a program EIR. As stated in Chapter 1, *Introduction,* this EIR is a program-level environmental review document prepared pursuant to CEQA Guidelines Section 15168 and evaluates the reasonably foreseeable environmental effects of implementing the Recreation Master Plan, including the planned County parks, recreation, and trails projects, potential future recreational development enabled by proposed Comprehensive Plan and zoning ordinance amendments, and potential future development enabled under the proposed RBP Program. Accordingly, it is intended to evaluate broad programmatic effects and identify mitigation and development standards that would apply to future implementing projects, while recognizing that the precise location, design, extent, timing, and operational characteristics of many future recreational improvements are not yet known.

As described in Section 2.5.1 under the discussion of Lake Cachuma North Shore Trails & Recreation Facilities Management Plan, the Recreation Master Plan does not propose or approve specific development projects or recreational improvements on the north shore of Lake Cachuma. Rather, adoption of the Recreation Master Plan would empower County Parks, in partnership with the U.S. Bureau of Reclamation, to prepare a Cachuma North Shore Trail System & Recreation Facility Management Plan to provide public recreational access while protecting natural resources, including water quality, biological resources, geology and soils, agricultural resources, and public recreation. The identification of this improvement plan is not a new improvement project proposed as part of the Recreation Master Plan, but instead reflects the existing management strategy and improvement program originally identified and described as part of Alternative 2 in the Cachuma Lake Final Resource Management Plan/EIS, which was selected and approved by the U.S. Bureau of Reclamation as part of its Record of Decision (ROD 10-112).

For recreation planning and programmatic environmental review purposes, the Recreation Master Plan describes the types of facilities that could be considered under the future management plan. However, approval of the Recreation Master Plan and related amendments would not constitute approval of any specific north shore improvements. The EIR explains that the Lake Cachuma North Shore Trail System & Recreation Facilities Management Plan would be prepared through a public process involving community and stakeholder input and subsequent environmental review in compliance with CEQA and NEPA. The Lake Cachuma North Shore Trail System & Recreation Facilities Management Plan is an existing planning effort and recreational project that is recognized as potentially contributing to recreation needs over

the lifespan of the Recreation Master Plan. Adoption of the Recreation Master Plan does not approve or permit any project included in the plan.

The County acknowledges the "Duca Judgment" and Writ of Mandate, and nothing in the Recreation Master Plan and related amendments would contradict or violate the court's Judgment or Writ of Mandate. Rather, as described above, approval of the Recreation Master Plan would empower the County to proceed with coordinating and planning for appropriate improvements to Lake Cachuma's north shore which would be subject to future environmental review under CEQA and NEPA. Nevertheless, the commenter's concerns regarding future environmental review and potential development of north shore recreational facilities will be considered by County decision-makers during consideration of the Recreation Master Plan, related amendments, and EIR.

Comment Response I.8-2

The comment summarizes the history of environmental review and management of the Lake Cachuma Recreation Area and asserts that the Cachuma Lake Final Resource Management Plan/EIS, the Management Agreement between the County and the U.S. Bureau of Reclamation, and the "Duca Judgment" require site-specific environmental review before implementation of future recreational projects or expanded recreational uses on the north shore trails project. The commenter contends that these requirements should guide consideration of future actions under the Recreation Management Plan.

As described in Comment Response I.8-1 above, adoption of the Recreation Master Plan does not approve or permit a specific development project and does not define specific improvements, or determine final trail alignments, facility locations, user assignments, or operational requirements. Instead, the Recreation Master Plan and Chapter 2, *Project Description* of this EIR identify and describe preparation of a future Lake Cachuma North Shore Trails & Recreation Facilities Management Plan, which would be developed through a subsequent planning process and environmental review. Future planning for the north shore would need to account for applicable legal, regulatory, resource management, and land management requirements then in effect, including any requirements arising from federal agency coordination or court judgments.

Comment Response I.8-3

The comment states that the EIR does not provide sufficient site-specific analysis to support the recreational facilities and expanded trail uses contemplated for Lake Cachuma's north shore, including an equestrian facility, a pack-in/pack-out campground, and additional trails for non-motorized users. In particular, the commenter contends that the EIR's biological resources analysis is inadequate because it relies on countywide and regional information rather than current, site-specific biological survey of the north shore area. The commenter further asserts that previously conducted surveys are outdated and do not provide an adequate basis for evaluating current biological conditions or potential impacts.

The EIR appropriately analyzes the potential impacts to species and ecological communities of particular value at a level of detail appropriate for a programmatic EIR. Section 3.4, *Biological Resources*, acknowledges that development and operation of the parks, recreation, and trails enabled by the Project could have a substantial adverse effect, either directly or indirectly 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 USFWS. As described in Section 3.4, *Biological Resources*, future recreational development enabled under the Recreation Master Plan would be subject to would be subject to the wide range of existing federal, state, and county policies, and development standards proposed under the Project that would avoid or minimize impacts. This would include the proposed development standards for trails for hiking and riding requiring that trails be sited in disturbed or developed areas and comply with habitat and cultural resource protection standards. The EIR also identifies several mitigation measures to reduce impacts. These include **MM BIO-1 (Tree Protection Plan)** and **MM BIO-2 (Habitat Protection Plan)** that would be applicable to all permitted uses in Recreation zones, permitted parks and trails, and RBPs, and would require site-specific surveys of protected biological resources and the avoidance, minimization, or compensatory replacement of affected resources. With mandatory compliance with existing policies and proposed development standards, as well as with implementation of identified mitigation measures, Project impacts were determined to be significant but mitigable.

Notably, given that the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan is subject to the Cachuma Lake Final Resource Management Plan/EIS, any future improvements developed under this planned project would be subject to the findings and environmental commitments identified in the EIS and ROD. As specified in the ROD and described in this EIR's description of the proposed Lake Cachuma North Shore Trails & Recreation Facilities Management Plan, development of this proposed plan would require additional planning and subsequent environmental review in compliance with CEQA and NEPA.

With respect to comments asserting a lack of site-specific analysis, please refer to Comment Response I.8-1 above.

Comment Response I.8-4

The comment asserts that the EIR's Project Description does not clearly describe the proposed configuration of future north shore trails and recreational uses. Specifically, the comment states that it is unclear whether the existing North Shore Trail would remain equestrian-only or be converted to a multi-use trail, and contends that this uncertainty limits the adequacy of the environmental analysis.

Please refer to Comment Response I.8-1 above. As described therein, the Recreation Master Plan would facilitate preparation of a future Lake Cachuma North Shore Trails & Recreation Facilities Management Plan, through which such details would be evaluated and developed. Accordingly, the Recreation Master Plan does not determine whether any particular existing trail on the north shore would remain limited to equestrian use, be modified to accommodate additional non-motorized users, be supplemented by new single-use or multi-use trails, or be

subject to trail-specific management requirements. Those determinations would require additional planning, coordination with the U.S. Bureau of Reclamation and other applicable agencies, public input, and subsequent environmental review, as appropriate. Nevertheless, the commenter's concerns regarding trail use designations and preservation of existing equestrian use will be considered by County decision-makers.

Comment Response I.8-5

The comment maintains that the mitigation measures featured in Section 3.4, *Biological Resources,* are too general to adequately address the unique environmental conditions of Lake Cachuma's north shore. The comment further expresses concern that the EIR does not include site-specific mitigation for sensitive biological resources in the north shore area and questions whether MM BIO-2 improperly defers identification of biological resources, impact analysis, and mitigation planning to future project-level review. Please refer to Comment Response I.8-3 above.

Comment Response I.8-6

The comment states that the EIR does not address legal requirements applicable to future recreational development on Lake Cachuma's north shore, including the "Duca Judgment" and Writ of Mandate, the Lake Cachuma Resource Management Plan/EIS, and the County's Management Agreement with the U.S. Bureau of Reclamation. The comment also requests that the Final EIR acknowledge these requirements and clarify that the future north shore recreational projects and expanded trail uses be subject to site-specific environmental review pursuant to CEQA and NEPA. Please refer to Comment Response I.8-1 and Comment Response I.8-2 above.

Comment Response I.8-7

The comment questions whether the Program EIR could be used to avoid future site-specific environmental review for recreational projects on Lake Cachuma's north shore. The commenter maintains that future north shore projects should undergo project-level CEQA review and requests that the Final EIR clarify that the Program EIR does not replace or eliminate the need for subsequent environmental review of those activities. Please refer to Comment Response I.8-1 above.

Comment Response I.8-8

The comment questions the EIR's conclusion that potential recreational impacts associated with expanded uses on Lake Cachuma's north shore would be less than significant. The commenter maintains that conflicts among equestrians, bicyclists, hikers, and other trail users could result in significant safety impacts and requests that the Final EIR reconsider its conclusion based on site-specific analysis.

The EIR appropriately analyzes the potential impacts to recreation at a level of detail appropriate for a programmatic planning document. Section 3.14, *Recreation,* acknowledges

that future expansion of recreational opportunities at Lake Cachuma's north shore and Live Oak Campground could result in conflicts among trail user groups, including potential conflicts between equestrian users, hikers, and mountain bikers. Specifically, the EIR recognizes that mountain biking and equestrian use of single-track trails may raise safety concerns for both user groups in some areas. However, as described in Impact REC-3, implementation of the Recreation Master Plan's proposed policies and development standards are intended to balance the needs of multiple trail user groups, improve trail safety and sustainability, and reduce user conflicts. These policies would require the public trail network to accommodate pedestrians, equestrians, bicyclists, and other trail user groups wherever feasible, and provide separate facilities for unique user groups where needed to enhance safety, sustainability, and user compatibility. Moreover, proposed recreational development at Lake Cachuma's north shore would include improved and expanded equestrian trails, separate segments and facilities for other non-motorized users, and horse-only bypasses where trail conflicts could arise in order to protect rider and horse safety.

Importantly, the commenter omits details regarding the mitigation identified in the Cachuma Lake Final Resource Management Plan/EIS that would address or reduce impacts associated with trail user conflicts to a "minor" level under Alternative 2 identified in the EIS. The EIS identified Mitigation R-3, which would require that a Trail System Management Plan be developed and include provisions for management of trails, along with establishment of trail rules for different users. The proposed Lake Cachuma North Shore Trails & Recreation Facilities Management Plan involves the development of a detailed plan for trails and management of recreational facilities at Lake Cachuma's north shore, and in effect would be consistent with Mitigation R-3 of the EIS.

Please also refer to Comment Response I.8-1 and I.8-2 above for detailed response to comments regarding the need for site-specific analysis of impacts associated with the Lake Cachuma North Shore Trails & Recreational Facilities Management Plan.

Comment Response I.8-9

The comment expresses concern that expanded recreational access and future trail development on Lake Cachuma's north shore could increase wildfire risk. The comment also notes that the area is located within High/Very High FHSZ and contends that additional recreational use could increase the potential for human-caused ignitions.

The EIR appropriately analyzes the potential impacts to wildfire risks at a level of detail appropriate for a programmatic planning document. Section 3.17, *Wildfire*, acknowledges that the County includes extensive areas subject to high wildfire hazards, including WUI areas or High/Very High FHSZ, and that future development and operation of parks, recreation, and trails enabled by the Recreation Master Plan could increase public access or recreational activity in areas vulnerable to wildfire. The EIR provides a detailed impact analysis for such disturbances at a programmatic level. As discussed in Section 3.17.2.5, *Recreation and Wildfire*, the County currently operates parks and recreational facilities in areas subject to high wildfire hazard and implements operational procedures, fuel management practices, and regulatory

requirements designed to reduce wildfire risk. While future recreation projects facilitated by the Project could occur within High/Very High FHSZ, such projects would be required to comply with applicable fire safety regulations, Comprehensive Plan policies, County permitting requirements, and proposed development standards designed to reduce wildfire and post-wildfire hazards. Trail projects would be required to comply with U.S. Forest Service trail design, construction, and maintenance standards adopted by the County and would be subject to operational requirements intended to reduce ignition risk. In addition, by allowing trails as a regulated and permitted use in additional zoning districts, the Project would subject future trail development to established development standards and County oversight. Projects with the potential to exacerbate wildfire risks would be subject to discretionary review and, where appropriate, supplemental environmental review.

Further, with respect to the proposed Lake Cachuma North Shore Trails & Recreation Facilities Management Plan, the Recreation Master Plan and EIR describe that under this proposed plan, County Parks would limit access during severe fire conditions when prolonged high temperatures, winds, or other factors that may prohibit entry occur to minimize the risk of wildfire in the Cachuma Lake Recreation Area. As detailed in Comment Response I.8-1 above, the Lake Cachuma North Shore Trail System & Recreation Facilities Management Plan would be prepared through a public process involving community and stakeholder input and subsequent environmental review in compliance with CEQA and NEPA which would include further consideration of project-specific impacts on wildfire hazards. For these reasons, impacts were determined to be insignificant.

Comment Response I.8-10

The comment expresses concern that future trail construction and expanded recreational use on Lake Cachuma's north shore could increase erosion, sedimentation, and pollutant runoff to Lake Cachuma. The comment also notes the area's steep terrain and the importance of Cachuma Lake as a drinking water reservoir and requests that potential impacts to water quality be evaluated through site-specific environmental review.

The EIR appropriately analyzes the potential impacts to water quality at a level of detail appropriate for a programmatic planning document. Section 3.10, *Hydrology and Water Quality*, acknowledges that future parks, recreation facilities, and trails facilitated by the Recreation Master Plan could result in erosion, sediment transport, and polluted runoff during construction and operation. Specifically, the EIR recognizes that expansion of the trail network at Lake Cachuma could increase erosion and runoff-related impacts. Detailed programmatic analysis of such impacts is provided in Section 3.10, *Hydrology and Water Quality*. As discussed in the Impact HWR-1 and Impact HWR-3, future parks, recreation facilities, trails, and RBPs facilitated by the Project would be required to comply with applicable federal, state, and local water quality regulations, including stormwater management, erosion and sediment control, grading, and discharge requirements. Projects disturbing one acre or more would be required to prepare and implement a SWPPP and incorporate best management practices to minimize erosion, sedimentation, and pollutant runoff. In addition, future recreation and trail projects

would be subject to County development standards and permitting requirements intended to protect surface water and groundwater quality, and projects with the potential for site-specific water quality impacts would undergo additional environmental review, as appropriate.

Further, as discussed in Comment Response I.8-1 above, future recreational access and facilities on the north shore would be further addressed through preparation of the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan, which would be developed through a public planning process and would be subject to subsequent environmental review pursuant to CEQA and NEPA.

Comment Response I.8-11

The comment expresses concern that the future trail expansion and campground development on Lake Cachuma's north shore could adversely affect cultural resources. The comment also notes that the EIR identifies known cultural resource values in the area and requests that site-specific cultural resource investigations be conducted before any ground-disturbing activities are implemented.

The EIR appropriately analyzes the potential impacts to cultural resources at a level of detail appropriate for a programmatic planning document. Section 3.5, *Cultural and Tribal Cultural Resources* acknowledges that trail development in rural and/or undisturbed areas could encounter intact archaeological resources during trail construction and maintenance. Section 3.5 specifically identifies the north shore of Lake Cachuma as an example of an area where changes or expansion of the trail system, including the addition of a rustic pack-in/pack-out campground, could encounter cultural resources due to known cultural resource values in the area, based on the 2011 *Cachuma Resource Management Plan and Programmatic Environmental Impact Statement*. The EIR provides a detailed impact analysis for such disturbances at a programmatic level.

As discussed in Section 3.5, *Cultural Resources*, future trail, park, recreation, and Recreation Benefit Project development facilitated by the Project would be required to comply with applicable federal, state, and County regulations protecting archaeological, historical, and tribal cultural resources. Proposed zoning ordinance amendments include development standards requiring avoidance or minimization of impacts to known archaeological and historic resources, and trail projects would be designed and constructed in accordance with County and U.S. Forest Service standards intended to minimize ground disturbance. In addition, the EIR identifies **MM CTCR-1 (Objective Development Standards for Addressing Historic and Archaeological Resources)** and **MM CTCR-5 (Post-Discovery Tribal Consultation)** which would require protection of historic and archaeological resources, implementation of stop-work procedures in the event of inadvertent discoveries, and consultation with Native American tribes where appropriate.

Further, as discussed in Comment Response I.8-1 above, future recreational access and facilities on the north shore would be further addressed through preparation of the Lake Cachuma North Shore Trails & Recreation Facilities Management Plan, which would be

developed through a public planning process and would be subject to subsequent environmental review pursuant to CEQA and NEPA.

Comment Response I.8-12

The comment notes that the EIR identifies significant and unavoidable VMT impacts associated with implementation of the Recreation Master Plan and references the North Shore Trails Project as a recreational destination that could generate additional vehicle travel. The comment also suggests that this finding supports the need for project-specific environmental review of future north shore recreational projects. Please refer to Comment Response I.8-1 above.

Comment Response I.8-13

The comment expresses concern that the proposed permitting framework for trails and RBPs may not provide adequate public notice or opportunities for public participation. The comment also requests that significant changes to trail uses be subject to a Conditional Use Permit or, at a minimum, a noticed public hearing, and contends that additional public review is particularly important for north shore trail proposals due to potential environmental impacts and user conflicts. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR.

With respect to the proposed Lake Cachuma North Shore Trails & Recreation Facilities Management Plan and compliance with the Cachuma Lake Final Resource Management Plan/EIS and "Duca Judgment," please refer to Comment Response I.8-1 and Comment Response I.8-2 above.

Comment Response I.8-14

The comment expresses support for the Project but emphasizes that future recreational development on Lake Cachuma's north shore warrants additional consideration due to unique legal and environmental circumstances. The commenter requests that the Final EIR acknowledge and addresses the "Duca Judgment" and Writ of Mandate, the U.S. Bureau of Reclamation's Cachuma Lake Final Resource Management Plan/EIS, and the Management Agreement requirements applicable to future recreational development and environmental review on the north shore. Please refer to Comment Response I.8-1 and Comment Response I.8-2 above.

Comment Response I.8-15

The comment requests that the County commit to project-specific environmental review, including biological and cultural resource surveys, before implementing future north shore recreational improvements. Please refer to Comment Responses I.8-1, I.8-3, and I.8-11 above.

Comment Response I.8-16

The comment requests clarification regarding potential future trail use on the north shore of Lake Cachuma, including whether existing trails would remain equestrian-only or accommodate additional recreational users. Please refer to Comment Response I.8-1 and Comment Response I.8-4 above.

Comment Response I.8-17

This comment requests reconsideration of the EIR's recreation impact conclusion related to potential conflicts between trail user groups. Please refer to Comment Response I.8-8 above.

Comment Response I.8-18

This comment recommends that significant trail use changes be subject to a Conditional Use Permit and a noticed public hearing. Please refer to Comment Response I.8-13 above.

Outlook

Recreation Master Plan Draft EIR Comments

From Celeste Andersen <celesteea@hotmail.com>
Date Mon 8/10/2026 1:40 PM
To Countywide Recreation Master Plan <RecPlan@countyofsb.org>

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

August 10, 2026

TO: Jeff Lindgren

From Celeste Andersen, SYV Resident

In general, I support the proposal to improve and develop parks in Santa Barbara County. The EIR is very comprehensive and provides a detailed overview of the proposed plans, options and impacts.

My primary concern is the proposed change in Ag I and Ag II re-zoning to allow Recreation Benefit Projects (RBPs) in the Santa Ynez Valley (SYV). The included projects have the potential to significantly impact the already recreation-filled SYV, but also degrade the natural environment and open space that SYV residents cherish. Once zoning is changed, the first line of protection for these lands is gone. Many of the proposed RBPs should be eliminated from consideration for Ag I and Ag II land, an idea which was proposed and unfortunately discarded, as stated in Section 4.2.5. I recommend an approach similar to what is proposed in the Alternative Proposal 1 (Section 4.3.2), but expanding it to include Ag I and Ag II parcels in the SYV as ineligible for development of RBPs beyond what is already allowed in existing laws and the SYV Community Plan ("reduced eligibility"). I.9-1

- While not all proposed RBPs are significantly impactful, the expansiveness of the RBP definition is shocking. The idea of approving a 160-site campground, 120-room "Country Inn," 2000-seat amphitheater, ATV track, shooting range or golf course on an Ag I site is inconsistent with the standards the County has protected for years. These activities go far beyond recreation and smack of tourism and a way for the County to get around the restrictions communities have put in place through Community Plans for protecting the beauty of this county. (See p. 3.15-50).

- As an example, the idea of a "Country Inn" having up to 120 rooms goes beyond the definition of an "Inn." My Google search showed that a typical inn has 3 to 30 guest rooms, sometimes up to 40. One of the newer SYV hotels, the Inn at Mattei's Tavern, part of the Auberge Collection chain, with 67 rooms, refers to itself as a hotel. By contrast, the Fess Parker Wine Country Inn has 19 rooms, an actual inn. I would not find the idea of a Bed & Breakfast, or a 20-room inn objectionable. But a 120-room hotel, with a heat absorbing parking lot, and related traffic, noise, and a variety of solid and liquid waste should not be included in any rezoning plan. I.9-2

- The Draft EIR at Section 3.2.4.2 recognizes that the proposed Project impacts to Ag I and Ag II land are "potentially significant" and that no mitigation is feasible. The County already is losing substantial acres of Agricultural Land due to the State housing mandates that have reshaped the landscape surrounding the Goleta Valley. I would think that the County would want to preserve as much of its remaining Agricultural land as possible and not look for ways to allow private parties that purchased agricultural land in rural areas

to convert that land to commercial enterprises better suited to urban environments. The EIR acknowledges that "adoption and implementation of the LUDC and zoning ordinance has the potential to encourage future development beyond what is anticipated or projected under the current land use framework." Page 3.4-48. This outcome would be unacceptable. I.9-3

Specific to the SYV, this relatively small section of the county already has numerous forms of recreation: wineries with food and music entertainment throughout the weekends; fruit, nut and flower stands along the roadways; many inns and hotels as well as a casino resort. Also, the amount of parkland available per resident in the SYV is more than double the County's goal of space per resident (Table 3.14, p. 3.14-8). Solvang already receives numerous tourists due to its ranking as one of the most desirable and charming small cities in the U.S. How many more recreation sites does SYV need. Of particular concern with implementing RBP projects in the SYV: I.9-4

- the potential impact on the Biological Resources of the area. A majority of the residents value these resources and want to see them protected. The EIR recognizes that these improvements' impacts could be potentially significant (page 3.4-36). Improvements should not come at the expense of the natural beauty, wildlife, and rural landscape of the SYV.

- the SYV already has a high Vehicle Miles of Travel (VMT) rate, with numerous shorter and frequent trips, as shown in Table 3.15-3. Likely this is due to the high level of tourism drawn to the casino, wineries, and Solvang. Any improvement projects should not add to this already high VMT rate in the region, further burdening the local roads.

I do agree that the addition of a Level 1 bike, pedestrian, equestrian trail connecting Buellton to Santa Ynez would be a benefit to the area. This is beneficial because:

- The effort to improve bike transport in the SYV under the Master Bike Plan has mostly failed. For example, the amount of traffic on Alamo Pintado Road, which is the route for a substantial portion of the Dan Henry Bike Trail, is overburdened with traffic trying to avoid the regularly congested State Route 246 through Solvang. Despite Alamo Pintado being a two-lane "country road" where half of the residents must cross the street to retrieve their mail, and farms, wineries, and fruit and nut stands creating distractions for drivers, cars speed up and down the roadway at all hours of the day and night. Riding a bike along this roadway does not feel safe, with trucks, SUVs and speeding cars spewing diesel and gas exhaust in riders' faces. A Level 1 biking and pedestrian thoroughfare would be a welcome improvement. A safe space for walking and bike riding would be a significant benefit and possibly encourage more people to leave their cars at home. I.9-5

A topic not addressed in this EIR is the impact that recreation has on the amount of garbage thrown on roadways, trails, and waterways. I occasionally volunteer with the SYV Clean Team. The Clean Team is a dedicated group of people who spend several hours of their Saturday mornings cleaning up the trash thrown on SYV roadways. I hate to imagine what the SYV would look like without this level of effort from these caring volunteers. Which entity will be responsible for cleaning up the public roadways and expanded trails, parks, campsites, etc. under this Project? County recreation space becomes less desirable when strewn with garbage. Waste management costs associated with increased recreation should be included in the planning process. I.9-6

Finally, as far as the specific proposals to expand the campground at Jalama Beach and create a new campground at the Guadalupe Dunes, I agree in part. The Jalama Beach Park and Campgrounds needs refreshing and some consideration for making parking more accessible is a worthwhile effort. However, expanding the campsite by 30% to the "upper mesa" goes beyond what would be appropriate for this remote beach park. Jalama Beach has appeal as rugged, untamed coast. Not only is it difficult to reach on the two-lane curvy road, but the beach park is surrounded by undeveloped land. Tearing up this natural landscape, and carving stairs into the side of the cliff face is too extensive a change and threatens the beautiful biological resources of the area. More moderate improvements to the park and campgrounds would be beneficial without causing too much damage to the surrounding area. I.9-7

Similarly, the proposed Guadalupe Dunes Campground is a large project that would expose this sensitive estuary and beach to a significant increase in traffic and use. Not only would a substantial amount of agricultural lands be compromised, but the area would transition from having no camping to a potentially significant amount of camping. It would make more sense to start with a smaller footprint and see how the project goes rather than tearing up open space that may not garner much interest. I.9-8

Thank you for the opportunity to provide comments.

Celeste Andersen

Comment Letter I.9 – Celeste Andersen

Comment Response I.9-1

Thank you for your comments. The comment expresses concern regarding proposed changes to AG-I and AG-II zoning to allow recreational uses and perceived rezoning of AG-I and AG-II lands. As described in Chapter 2, *Project Description*, the Recreation Master Plan does not involve rezoning of any existing zone types in the county. The Project does include proposed zoning ordinance amendments which would involve targeted updates to support permitting of recreational uses in zoning districts where these uses are not currently permitted, but implementation of the Project would not directly proposed or indirectly facilitate the re-zoning of AG-I and AG-II lands. Please refer to Section 2.5.3, *Zoning Ordinance Amendments*, for a detailed description of proposed zoning ordinance amendments.

The comment further recommends consideration of an alternative involving a modified version of Alternative 1, but making agriculture zoned lands in the Santa Ynez Valley ineligible for development of RBPs. Please see Sections 4.2.4, *Elimination of the Recreation Benefit Project (RBP) Program*, and 4.2.5, *Modification of the RBP Program to Prohibit RBPs on Ag-II Zones with Minimum Lot Size 40 Acres or* Less which include discussion of potential alternatives involving the reduced eligibility of RBPs in agriculture zoned lands. As described in Section 4.2.5, elimination of the AG-II zone as an eligible zone for RBPs would eliminate a significant portion of lands from eligibility, reducing the ability for this alternative to support the development of meaningful recreational improvements within the County's predominantly zoned agricultural and residential communities and reducing the ability to achieve key Project Objectives. Expansion of this potential alternative to also make RBPs ineligible on AG-I zones would only further reduce the ability for such an alternative to support meaningful recreational improvements. Therefore, such an alternative was not considered, nor is required to be considered, as part of this EIR. Nevertheless, these comments and recommendations will be forwarded to County decision-makers for their consideration.

Comment Response I.9-2

The comment expresses concern or opposition to some of the types of RBPs that would be allowed under the Project. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR.

Comment Response I.9-3

The comment expresses general agreement with the findings presented in this EIR with respect to impacts on agricultural resources. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR.

Comment Response I.9-4

The comment states that additional recreational improvements, particularly RBPs, are not required for the Santa Ynez Valley area, as the Santa Ynez Valley already contains numerous recreational facilities and the acreage of existing parkland exceeds the County's goal for parkland level of service (LOS). The comment also acknowledges the EIR's conclusions regarding potential impacts to biological resources and on regional VMT, expressing that new recreational improvements in the area should not come at the expense of these impacts. As described in Chapter 2, *Project Description*, the RBP Program would create voluntary opportunities in unincorporated areas for private developers to contribute directly to the County's public recreation system. Incentives would be granted to applicants based on County Park's assessment of RBP eligibility. A project may qualify as a RBP if the public recreation amenity it provides satisfies an existing public need identified by County Parks. The Recreation Master Plan includes a recreation facility needs assessment determined through extensive outreach, surveying, and inventory of existing facilities. The eligibility requirements for RBPs would ensure that projects which are approved and constructed under this program fulfill recreational amenities which are otherwise lacking in a specific area of the county.

The Project Description also includes planned County projects under the Recreation Master Plan in Section 2.5.1, *Planned County Parks, Recreation, and Trails Projects under the Recreation Master Plan*. Projects planned in the Santa Ynez Valley consist of various improvements around Lake Cachuma and the Drum Canyon Trail. No additional parkland is proposed by County Parks in the Santa Ynez Valley under the Recreation Master Plan, due in part to the fact that the acreage of existing parkland in the Santa Ynez Valley already exceeds the County's goal for parkland. However, as described in the Recreation Master Plan, community survey input indicates focused needs for recreational resources and outdoor recreation amenities, such as trails, in the Santa Ynez Valley Recreation Planning Area.

Comment Response I.9-5

The comment expresses support for construction of a new multi-use trail/pathway connecting Buellton and Santa Ynez. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR. Comments recommending or expressing support for specific recreational improvements will be considered by County Park.

Comment Response I.9-6

The comment asserts that the EIR files to evaluate impacts that increased recreational use of an area would have increase potential for littering along roadways, trails, and waterways. However, these impacts are considered and analyzed in the EIR. As analyzed under Impact BIO-1 in Section 3.4, *Biological Resources,* new multi-use recreational trails constructed adjacent to creeks and waterways could generate runoff and pollution (e.g., trash, dog and equestrian waste). As described therein and under Impact HWR-1 in Section 3.10, *Hydrology*

and Water Quality, County Parks is required to design and implement public park and trail improvements consistent with the Comprehensive Plan and all applicable policies and standards, as well as federal and state regulations, to protect biological resources and surface and groundwater quality. As also discussed in Impact UWS-4 in Section 3.15, *Utilities and Water Supply,* public parks and trailheads provide onsite trash management facilities, including trash cans, dumpsters, and recycling facilities, to serve the needs of residents using the public recreation facilities. Similar to other uses and operations in the county, solid waste is collected by contracted waste haulers and transported to the appropriate transfer station and/or landfill. Development enabled by the Project, such as RBPs, would also be subject to applicable regulations and development standards intended to ensure adequate solid waste utilities at each potential project site. This would include the provisions of Chapter 17 of the County's LUDC which govern the management and disposal of solid waste on private property and place owned or maintained by the County.

Comment Response I.9-7

The comment expresses opposition to the extent and scale of proposed improvements to Jalama Beach County Park Campground Expansion & Upgrade Project. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR. Comments recommending or expressing support for specific recreational improvements will be considered by County Park.

Chapter 2, *Project Description*, provides a detailed description and justification of the Jalama Beach Campground Expansion & Upgrade Project. This project has been informed by the existing demand for the Jalama Beach campground and day use area. Jalama Beach County Park is one of only four coastal access points in northern Santa Barbara County, and the only one classified as a Low-Coast Coastal Accommodation. Existing facilities cannot accommodate demand for this resource. Potential impacts related to scenic views and biological resources resulting from implementation of this planned improvement project are analyzed in Section 3.1, *Aesthetics* and Section 3.4, *Biological Resources*, respectively.

Comment Response I.9-8

The comment expresses opposition to the extent and scale of the proposed Guadalupe Community Park & Campground. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR. Comments recommending or expressing support for specific recreational improvements will be considered by County Park.

Chapter 2, *Project Description*, provides a detailed description and justification of the Guadalupe Community Park & Campground Project. This project has been informed by the Recreation Master Plan needs assessment, as the City of Guadalupe is relatively isolated and

lacks recreational facilities. As discussed in the Project Description, the project site would be located on undeveloped, inactive agricultural land, and is not under Williamson Act contract under the County's Agricultural Preserve Program. Potential impacts related to agricultural resources and transportation resulting from implementation of this planned improvement project are analyzed in Section 3.2, *Agricultural Resources*, and Section 3.15, *Transportation*, respectively.

Outlook

Comments on Recreation Master Plan

From Erika Kato <kato.eeb@gmail.com>
Date Mon 8/10/2026 2:08 PM
To Countywide Recreation Master Plan <RecPlan@countyofsb.org>

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Jeff Lindgren & team,

Thank you for opening the Recreation Master Plan to comments from the community. As a resident of SB County, I look forward to continuing to enjoy our parks and open spaces with my family.

I'd like to submit a comment and request for a **footbridge over Atascadero Creek connecting Obern Trail to More Mesa.** Today, there is no access to More Mesa from the Obern Trail that is pedestrian safe. Walking along Patterson is unsafe, as there is no continuous sidewalk, forcing pedestrians to walk along the road while cars speed past over the speed limit. As our "Noleta" population grows with planned new developments, there will be even more pedestrian traffic susceptible to these dangerous conditions. Creating a footbridge will allow pedestrians, those with young children and/or strollers, to safely access More Mesa from an entry point (perhaps the south end of Walnut Avenue?). This would be a great addition and "quick win" for the community. I.10-1

Thank you for your consideration.

Erika Kato
katoeeb@gmail.com
808-741-9802

Comment Letter I.10 – Erika Kato

Comment Response I.10-1

Thank you for your comments. The comment includes a request for consideration of a new footbridge over Atascadero Creek connecting the Obern Trail to More Mesa as an improvement under the Recreation Master Plan. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR. Comments recommending or expressing support for specific recreational improvements will be considered by County Park.

Outlook

Rec plan feedback - Atascadero Creek bridge to More Mesa at Walnut

From Tania Darnton <tdarnton@gmail.com>
Date Mon 8/10/2026 3:12 PM
To Countywide Recreation Master Plan <RecPlan@countyofsb.org>

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Hello,
My name is Tania Wojdak and I am a homeowner in unincorporated Santa Barbara County ("Noleta" - I previously lived in Goleta/El Encanto Heights). My home is directly north of More Mesa and I was surprised to find after moving in 2021 that there is no pedestrian access to the Mesa from the north, as Atascadero Creek is in the way.

I find it troubling that even though my neighborhood is less than 0.5 mi from the public More Mesa trails as the crow flies, one has to walk 2+ miles on some major thoroughfares (i.e. Patterson Ave) to get to a Mesa access point coming in from the east or west.

As there is already a well-maintained pedestrian walking and biking path on the north side of Atascadero Creek, it seems (to an unschooled outsider, of course!) that recreational access to More Mesa could be significantly and easily improved by building a footbridge across the creek at some point in the adjacent neighborhoods. At the south end of Walnut Lane seems a natural choice, as there is already a large laneway segueing onto the walking path that hugs the north side of the creek.

I.11-1

I hope that this feedback can be incorporated into the county's Recreation Master Plan.

Thank you,
Tania Wojdak, Ph.D.

Comment Letter I.11 – Tania Wojdek

Comment Response I.11-1

Thank you for your comments. The comment includes a request for consideration of a new footbridge over Atascadero Creek connecting the Obern Trail to More Mesa as an improvement under the Recreation Master Plan. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR. Comments recommending or expressing support for specific recreational improvements will be considered by County Park.

Outlook

Recreation Master Plan EIR

From Phil Jones <pjones@thegarrettgroup.net>
Date Mon 8/10/2026 3:50 PM
To Countywide Recreation Master Plan <RecPlan@countyofsb.org>
Cc Steinfeld, Amy <asteinfeld@bhfs.com>; Bronstad, Sarah E. <sbronstad@bhfs.com>; Diane Garrett <dgarrett@thegarrettgroup.net>; Martin A Weiss <martinw@theweissgroup.net>; Cari Ann Zamora <czamora@thegarrettgroup.net>; Anthony Zamora <azamora@thegarrettgroup.net>

1 attachment (1,002 KB)
2026.08.10 222 Winchester Canyon - Information for Recreation Master Plan(37736628.1) .pdf;

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear County of Santa Barbara,

Thank you for the opportunity to comment on the Recreation Master Plan EIR and for including Winchester Canyon in the Cumulative Project List. I'm attaching again for your review, our conceptual proposal on our property.

We support the Recreation Master Plan Project (Project) as proposed and respectfully oppose Alternative 2. The proposed requirement for a minimum 500-foot setback between productive agricultural lands and Recreation Benefit Project (RBPs) or privately proposed recreational uses is unnecessarily restrictive and is not supported by a demonstrated need.

The County already has effective tools to address potential compatibility issues between recreation and agriculture through project-level environmental review and site-specific mitigation measures, including fencing, signage, operational restrictions, landscape screening, trail design, and other management practices. These measures can be tailored to actual site conditions and are more appropriate than a blanket setback requirement.

I.12-1

A mandatory 500-foot buffer does not account for the wide range of circumstances that influence compatibility, such as the type of agricultural operation, topography, existing vegetation, circulation patterns, and the nature of the recreational use. Many recreational amenities, including Country Inns, trails, camping, farm-to-table dining, recreation areas, and habitat restoration projects, can successfully coexist adjacent to agricultural operations without impairing agricultural viability.

In addition, the proposed setback is measured from the agricultural parcel boundary rather than the location of active agricultural operations, which may unnecessarily restrict large areas of otherwise suitable land. As a result, the requirement could significantly reduce opportunities to provide public access, trails, educational opportunities, open space amenities, habitat enhancement, and other community benefits without providing meaningful additional protection for agriculture.

For Winchester Canyon and similarly situated properties, the expanded buffer would substantially limit the area available for recreational and public-benefit uses, hindering the implementation of community-serving amenities while providing little demonstrable benefit. The County's existing authority to evaluate projects

on a case-by-case basis and impose appropriate mitigation is sufficient to protect agricultural resources without imposing a rigid, one-size-fits-all standard.

For these reasons, we respectfully request that the County approve the Project as proposed, reject Alternative 2, and retain the more flexible, site-specific approach to addressing agricultural compatibility.

I.12-1 cont)

Thank you for your consideration.

Sincerely,

Phil Jones
President and Co-Trustee
The Paul Garrett 1994 Trust
3594 Via Zara
Fallbrook, CA 92028
760-801-1857
pjones@thegarrettgroup.net

Update Comments on the County of Santa Barbara Recreation Master Plan



Winchester Canyon

By:

Phil Jones
Co-Manager of Hidden Trails, LLC, a California limited liability company
Co-Trustee of Paul Garrett 1994 Trust
Co-Trustee of The BetterWorld Trust, a 501-C3 Non-Profit Trust
Email: pjones@thegarrettgroup.net

August 10, 2026

Property: (see Exhibit A)

Winchester Canyon is located at 222 Winchester Canyon Road, Goleta, Santa Barbara County, California 93117,

- APN's 079-100-004, -008, and -016
- Total area is 486.23+/- Acres
- Property Owner is Hidden Trails, LLC, a California limited liability company with offices located at 3594 Via Vara, Fallbrook CA, 92028
- Current Zoning is AG-II-100, Santa Barbara County

Winchester Canyon is a 487-acre parcel consisting of partially flat agricultural terrain and rolling hills with views of the Pacific Ocean to the south (Subject Property). The property is located within the County of Santa Barbara and approximately one (1) mile northeast of the Coast. The City of Goleta abuts the property southeast property line. The City of Santa Barbara lies about 14 miles to the east of the Subject Property (see Exhibit A & C). The Subject Property has been historically farmed with organic vegetables. The site is currently developed with one single family dwelling, agricultural accessory structures and a bridge over Winchester Canyon Creek, which bisects the property. Winchester Canyon Road is located East and in parallel with the creek. This section of Winchester Canyon road is privately owned and maintained by several adjacent property owners via a recorded agreement.

In 2022, a land use permit for cannabis cultivation was approved by the County. However, the plans to cultivate have been put on hold. In December of 2025, a preliminary housing application was submitted to the County of Santa Barbara for 9 agricultural dwelling units. The proposed development requires grading and retaining walls to widen portions of Winchester Canyon Road to meet the fire department requirements for access.

Project Goals:

Conservation, environmental and habitat preservation: fifty percent (50%+) of the gross property acreage could be committed to *conservation & environmental* designation under the State of California 30x30 Partnership sponsored by Governor Gavin Newsom's 2020 executive order #N-82-20, which shall designate portions of the property as conservation land contributing to California's goal of conserving 30% of lands and coastal waters by 2030. Compliance Qualifying Mechanisms include Conservation easements which permanently restrict development rights), Habitat preservation areas, Wildlife corridors, Riparian buffer zones. Strategic Allocation typically designates 50-65% of total acreage for conservation to demonstrate commitment. In its natural state, the property is now undergoing environmental & biological investigation identifying habitat and environmental restoration as a coastal asset. We are also considering restoration and mitigation bank opportunities with UCSB.

Agriculture: We are exploring cultivating coffee, mushrooms, agave, fruit orchards and organic produce.

Recreational use: Additional uses on agricultural land may include various partnerships with the State of California and Santa Barbara County Parks and Recreational departments designating uses including, **hiking, equestrian & biking trails**, **passive recreation, birding stations, parks & educational conservation centers**. (See Exhibit B.)

Agritourism and Hospitality Uses:

120 unit Boutique Country Inn along with food and beverage service including indoor or outdoor gathering areas, dining areas, lounges, pools, saunas, fitness rooms, meeting rooms, and event lawns, all resort amenities will remain subordinate to the lodging use and are designed and operated to avoid adverse effects on surrounding properties and incompatibility with the rural character of the site and surrounding area.

160 maximum retreat yurt camping and RV camping with a maximum 30 day stay within a 90 day period.

Village local retail center, including artisan crafts and coffee shops,

Trailside Cafés

Farmers market

Farm to table culinary dining,

Zip line

Equestrian center

Education:

UCSB Restoration and Mitigation Bank programs

Universities and Institutes:

The Culinary Institute of America

Agave Spirits Institute,

Coffee Training Institute.

UCSB School of Fine Arts

Exhibit A

Winchester Canyon

222 Winchester Canyon Rd
Santa Barbara, California
Location Map

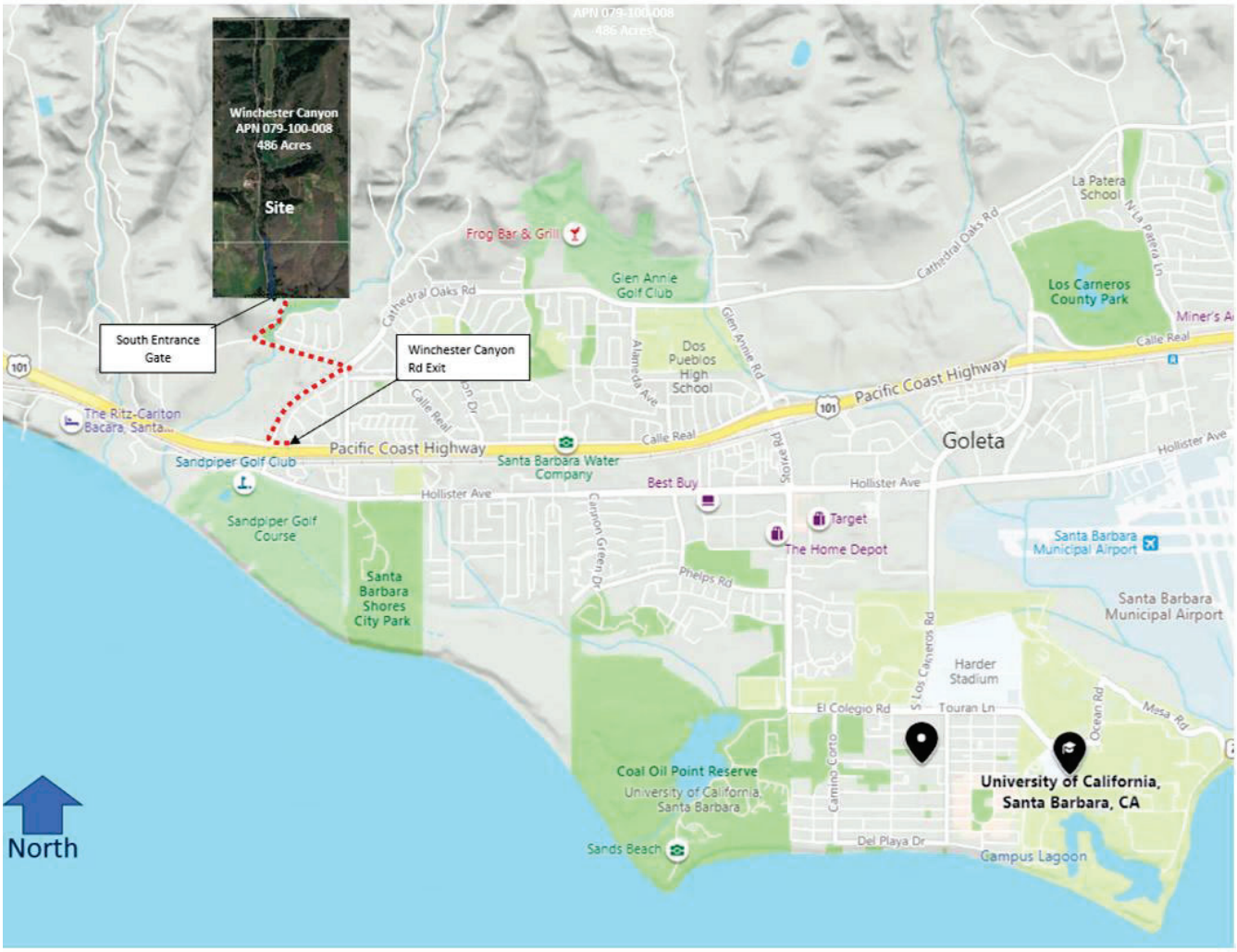
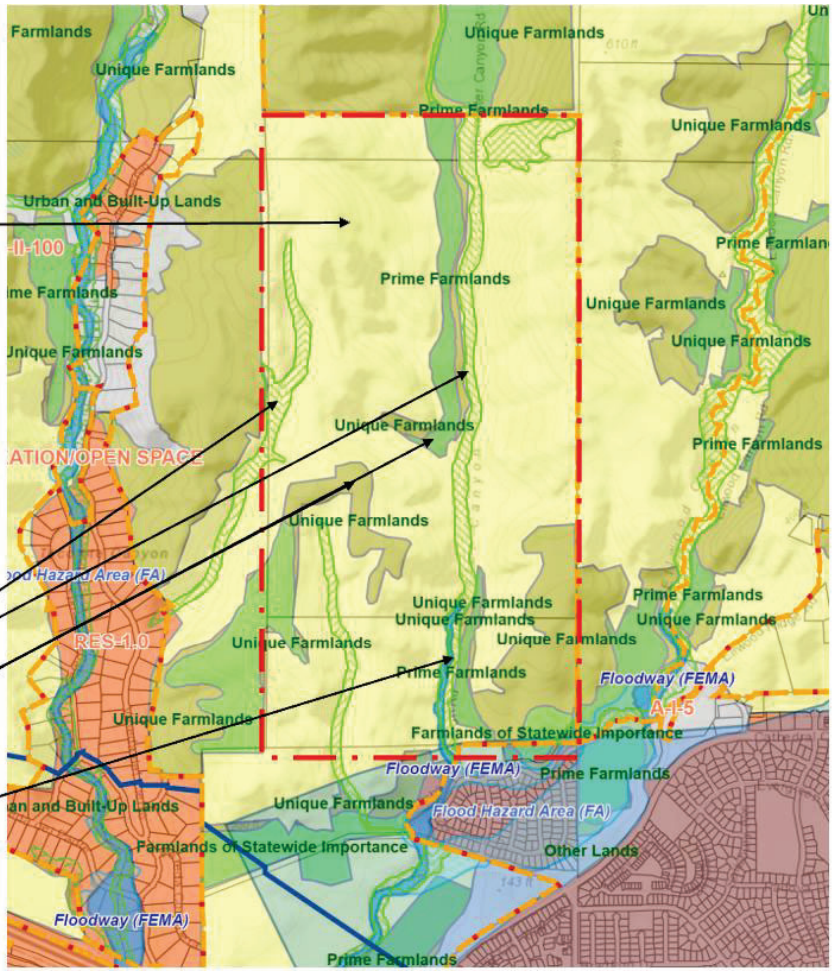


Exhibit B

County of Santa Barbara
Zoning and Land Use Map

Zoning: AG II–100: AG-II (Agricultural II). The AG-II zone is applied to areas that are appropriate for agricultural land uses on prime and non-prime agricultural lands located within the Rural Area as shown on the Santa Barbara County Comprehensive Plan land use maps. The intent of the AG-II zone is to preserve these lands for long-term agricultural use. The AG-II zone also includes a minimum gross lot area designation (shown in the table below) that limits the subdivision potential of land and in some cases affects the range of allowable land uses.

Zoning Map Symbol	Minimum Lot Area
AG-I-5	5 acres
AG-I-10	10 acres
AG-I-20	20 acres
AG-I-40	40 acres
AG-II-40	40 acres
AG-II-100	100 acres
AG-II-320	320 acres



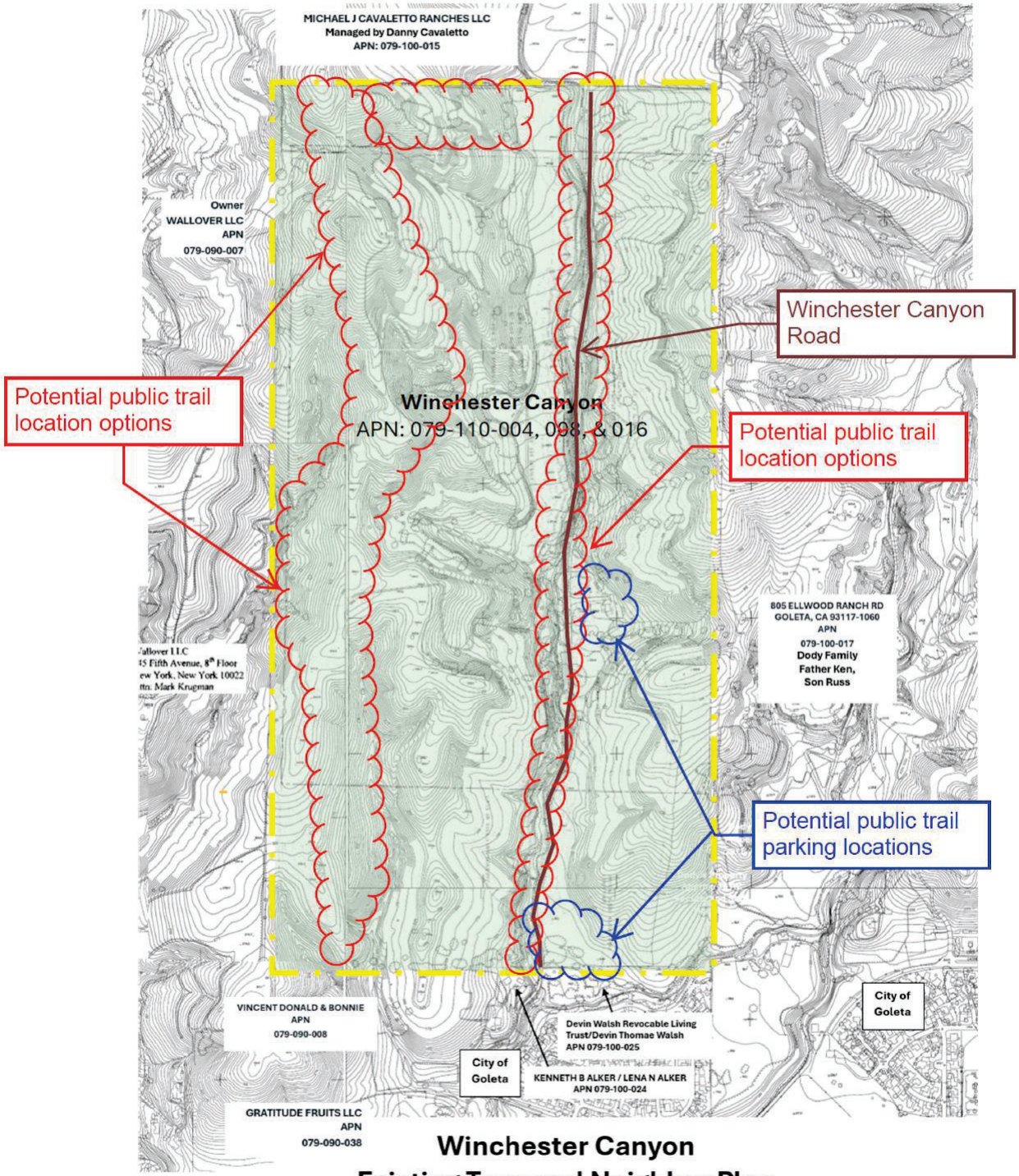
RIPARIAN_CORRIDOR

Important Farmland

Floodway FEMA Jurisdiction

Exhibit C

Topo Plan



Winchester Canyon
Existing Topo and Neighbor Plan
November 11, 2025

Comment Letter I.12 – Phil Jones

Comment Response I.12-1

Thank you for your comments. These comments expressing support for the Project and opposition to Alterative 2 (Increased Agricultural Buffers) will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR.

Outlook

Recreation Master Plan Draft EIR Comments

From Charles R <chaz1biz@gmail.com>
Date Mon 8/10/2026 4:25 PM
To Countywide Recreation Master Plan <RecPlan@countyofsb.org>

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

August 10, 2026

To: Jeff Lindgren

From: Charles Rotbart, SYV

- 1. I support improving and expanding parks in Santa Barbara County. Parks are an important part of any city and offer a much needed respite from the surrounding developed areas and a critical shared space where community can gather and where children can play. I.13-1
- 2. My greatest concern is the destruction of land, environment, beauty, and open space that would result if Recreation Benefit Projects were permitted on Ag I and Ag II land in the Santa Ynez Valley.
- 3. Easing zoning protections invites abuse and a downward deviation on the character and long term value of new developments encouraged by loosened standards. We all have learned that more permissive zoning leads to degradation, and the charm and unique character of the Santa Ynez Valley will be lost forever. No city has ever recovered from this.
- 4. I strongly support a more limited approach, as demonstrated in Alternative Proposal 1, with much stronger protections for Ag I and Ag II parcels in the SYV. I.13-2
- 5. The current RBP definition is fatally flawed because it is overly broad so much so that the expansive projects envisioned are the size and impact of what might be responsive for tourist growth and tax base goals and nothing to do with community recreation. Community recreation should not be used to mask extractive monetization of limited community resources. I.13-3
- 6. Proposed uses like large campgrounds, big hotels, amphitheaters, ATV tracks, shooting ranges, and golf courses are at direct odds with how we might all best use open lands in a manner best suited for the look and feel of a small, charming, community blessed with immense natural beauty in every direction. Such products are the wrong scale and would be a blight on the land. I.13-4
- 7. A 120-room "Country Inn" is really a hotel-scale project and would bring major impacts like traffic, parking, noise, and waste. I know the distinction between an Inn and a Hotel is dying out. Hotels borrow the Inn moniker to indicate that it is quaint and personal and inviting for advertising purposes. Here the "inn" designation is a form of misdirection - we all know 120-rooms is way too big for a family run Inn. This is a bid for national hotel chains to erect cookie cut monstrosities that destroy the skyline and block snow capped mountain vistas. I.13-5
- 8. We already have a great deal of recreation and plenty of tourism. Notably we have already exceeded the County's parkland goal per resident. So, if we do not need more parkland what exactly are we really after here? I.13-6
- 9. It goes without saying that most of these developments result in added stress on biological resources and will contribute directly to increased traffic/VMT on already-burdened local roads. I.13-7
- 10. I am all for a safe Level 1 bike/pedestrian/equestrian trail between Buellton and Santa Ynez. I believe this would be a very beneficial addition to both communities and provide a safe place to ride for everyone. I also support modest small scale improvements at places like Jalama Beach. I.13-8
-

- Thank you for your attention to these comments,
-
- Charles Rotbart

Comment Letter I.13 – Charles Rotbart

Comment Response I.13-1

Thank you for your comments. These comments expressing support for the Project will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR.

Comment Response I.13-2

The comment expresses concern for the potential destruction of resources on AG-I and AG-II zoned lands as a result of RBPs. Impacts associated with implementation of the Project, including the RBP Program, are analyzed in detail throughout this EIR. For instance, potential impacts to the visual character and quality of agricultural lands, impacts to traditional agricultural resources, and impacts to biological resources are discussed in Section 3.1, *Aesthetics and Visual Resources,* Section 3.2, *Agricultural Resources,* and Section 3.4, *Biological Resources,* respectively.

The comment further expresses support for support for Alterative 1 (Reduced Eligibility of RBPs). These comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR.

Comment Response I.13-3

The comment expresses concern over the definition of RBPs, asserting the definition and description presented in this EIR is overly broad. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR.

Comment Response I.13-4

The comment expresses opposition to several of the types of recreational improvements allowed under the RBP Program, particularly those allowed under the Outdoor Amusement and Recreational Uses incentive category. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR. It is worth noting that the proposed RBP Program includes specific use standards applicable to Outdoor Amusement and Recreational Uses which would help to ensure the proposed uses are compatible with the rural character and surrounding area, that the proposed outdoor amusement and recreational uses are subordinate to and supportive of the agricultural use of the property, preserve open space, and maximize the visual compatibility of the development with surrounding areas.

Comment Response I.13-5

The comment expresses opposition to the proposed use standards for Country Inns as an additional allowable land use for RBPs. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR.

Comment Response I.13-6

The comment states that additional recreational improvements, particularly RBPs, are not required for the Santa Ynez Valley area, as the Santa Ynez Valley already contains numerous recreational facilities and the acreage of existing parkland exceeds the County's goal for parkland LOS. As described in Chapter 2, *Project Description*, the RBP Program would create voluntary opportunities in unincorporated areas for private developers to contribute directly to the County's public recreation system. Incentives would be granted to applicants based on County Park's assessment of RBP eligibility. A project may qualify as an RBP if the public recreation amenity it provides satisfies an existing public need. The Recreation Master Plan includes a recreation facility needs assessment determined through extensive outreach, surveying, and inventory of existing facilities. The eligibility requirements for RBPs would ensure that projects which are approved and constructed under this program fulfill recreational amenities which are otherwise lacking in a specific area of the county.

Comment Response I.13-7

The comment states that most of the developments potentially enabled under the RBP Program would impact biological resources and increase VMT. Potential impacts and mitigation measures related to biological resources and transportation impacts associated with implementation of the Recreation Master Plan are evaluated in Section 3.4, *Biological Resources,* and Section 3.15, *Transportation,* respectively. The Program EIR recognizes that Santa Barbara County includes extensive biological habitats and natural communities, and that the Recreation Master Plan could impact sensitive habitats. The Program EIR also recognizes that the Recreation Master Plan could result in potentially significant increases in total VMT within the county.

Comment Response I.13-8

The comment expresses support for construction of a new multi-use trail/pathway connecting Buellton and Santa Ynez, as well as modest small-scale recreational improvements. These comments do not directly pertain to the analysis of environmental impacts, mitigation measures, or Project alternatives presented in the EIR; however, these comments will be forwarded to County decision-makers for their consideration of the Recreation Master Plan, related amendments, and EIR. Comments recommending or expressing support for specific recreational improvements will be considered by County Park.

This page intentionally left blank.

9.0 MITIGATION MONITORING AND REPORTING PROGRAM

9.1 PURPOSE

The following Mitigation Monitoring and Reporting Program (MMRP) provides a summary of the mitigation measures identified to reduce environmental impacts of the proposed Santa Barbara County Recreation Master Plan and Related Recreation Amendments to the Comprehensive Plan and Zoning Ordinances (Project). This MMRP also provides the monitoring implementation responsibility for each measure. The MMRP for the proposed Project will be in place through all phases of the proposed Project.

9.2 RESPONSIBILITIES

The California Environmental Quality Act (CEQA) requires the adoption of feasible mitigation measures to reduce the severity and magnitude of potentially significant environmental impacts associated with Project development.

CEQA Guidelines Section 15091(d) states:

> *"When making the findings required in subdivision (a)(1), the agency shall also adopt a program for reporting on or monitoring the changes which it has either required in the project or made a condition of approval to avoid or substantially lessen significant environmental effects. These measures must be enforceable through permit conditions, agreements, or other measures."*

The Final Environmental Impact Report (EIR) for the proposed Project includes mitigation measures to reduce the potential environmental effects of the Project. Following the County's certification of the Final EIR and approval of the Findings of the Project, including this MMRP, the mitigation measures that are within the jurisdiction and responsibility of the County that have been required in, or incorporated into, the approved Project would be monitored in the manner specified by this MMRP.

9.3 MONITORING TABLE

For each measure, Table 9-1 identifies :1) the full text of the measure; 2) the plan requirements and timing, including the agency which oversees the action; and 3) the monitoring division, including the entity responsible for monitoring the action and verifying compliance.

Table 9-1. Mitigation Monitoring and Reporting Program

Mitigation Measure	Plan Requirements and Timing	Monitoring
Air Quality		
MM AQ-1: PM_{10} and Dust Control. Development of County parks, permitted uses in Recreation zones, permitted parks and trails, and RBPs involving permitted construction activities shall require the following standards: • During construction, use water trucks, sprinkler systems, or dust suppressants in all areas of vehicle movement to prevent dust from leaving the site and from exceeding SBCAPCD's limit of 20 percent opacity for greater than 3 minutes in any 60-minute period. When using water, this includes wetting down areas as needed but at least once in the late morning and after work is completed for the day. Increased watering frequency should be required when sustained wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption. • Onsite vehicle speeds shall be no greater than 15 mph when traveling on unpaved surfaces. • Install and operate a track-out prevention device where vehicles enter and exit unpaved roads onto paved streets. The track-out prevention device can include any device or combination of devices that are effective at preventing track out of dirt such as gravel pads, pipe-grid track-out control devices, rumble strips, or wheel-washing systems. • If importation, exportation, and stockpiling of fill material are involved, soil stockpiled for more than one day shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin. • Minimize the amount of disturbed area. After clearing, grading, earthmoving, or excavation is completed, treat the disturbed area by watering, OR using roll-compaction, OR revegetating, OR by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur. All roadways, driveways, sidewalks, etc. to be paved should be completed as soon as possible. • Schedule clearing, grading, earthmoving, and excavation activities during periods of low wind speed to the extent feasible. During periods of high winds (>25 mph) clearing, grading, earthmoving, and excavation operations	This measure shall apply to applicable projects immediately following the certification of this EIR. These control measures shall be noted on all grading and building plans. The contractor or builder shall provide the County and SBCAPCD with the name and contact information for an assigned onsite dust control monitor(s) who has the responsibility to: • Assure all dust control requirements are complied with, including those covering weekends and holidays. • Order increased water as necessary to prevent the transport of dust offsite. • Attend the pre-construction meeting. The dust monitor shall be designated before the issuance of grading. The dust control components apply to the beginning of any grading or construction throughout all development activities until final inspection and until landscaping is successfully installed.	County Parks or County P&D processing planner(s) shall ensure measures are on the project plan. County grading and building inspectors shall spot-check. Grading and Building shall ensure compliance onsite. SBCAPCD inspectors shall respond to nuisance complaints.

Table 9-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring
shall be minimized to prevent fugitive dust created by onsite operations from becoming a nuisance or hazard. • The contractor or builder shall designate a person or persons to monitor and document the dust control program requirements to ensure any fugitive dust emissions do not result in a nuisance and to enhance the implementation of the mitigation measures as necessary to prevent the transport of dust offsite. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to SBCAPCD before grading/building permit issuance and/or map clearance.		
MM AQ-2: Equipment Exhaust. Development of County parks, permitted uses in Recreation zones, permitted parks and trails, and RBPs involving permitted construction activities shall require the following standards: • Diesel equipment meeting the CARB Tier 3 or higher emission standards for off-road heavy-duty diesel engines should be used to the maximum extent feasible. • On-road heavy-duty equipment with model year 2010 engines or newer should be used to the maximum extent feasible. • Diesel-powered equipment should be replaced by electric equipment whenever feasible. Electric auxiliary power units should be used to the maximum extent feasible. • Equipment/vehicles using alternative fuels, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel, should be used onsite where feasible. • Catalytic converters shall be installed on gasoline-powered equipment, if feasible. • All construction equipment shall be maintained per the manufacturer's specifications. • The engine size of construction equipment shall be the minimum practical size. The number of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time. • Construction worker trips should be minimized by requiring carpooling and by providing lunch onsite.	This measure shall apply to applicable projects immediately following the certification of this EIR. These control measures shall be noted on all grading and building plans.	County Parks or County P&D processing planner(s) shall ensure measures are on the project plan. County grading and building inspectors shall spot-check. Grading and Building shall ensure compliance onsite. SBCAPCD inspectors shall respond to nuisance complaints.

Table 9-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring
• Construction truck trips should be scheduled during non-peak hours to reduce peak-hour emissions whenever feasible. • Proposed truck routes should minimize, to the extent feasible, impacts on residential communities and sensitive receptors. • Construction staging areas should be located away from sensitive receptors such that exhaust and other construction emissions do not enter the fresh air intakes of buildings, air conditioners, and windows.		
Biological Resources		
MM BIO-1: Tree Protection Plan. Development of County parks, permitted uses in Recreation zones, permitted parks and trails, and RBPs shall be sited to prevent the removal or damage to mature trees to the extent feasible. Where development cannot be sited to avoid removal or damage to mature native trees, the County shall require the preparation of a TPP. The TPP shall be prepared by an arborist/biologist approved by County P&D. If the biologist finds that there are no mature native trees that would be adversely affected by the project, they shall submit a memorandum describing these findings to the County . If mature native trees would be adversely affected by the project, the TPP shall determine appropriate avoidance, minimization, or compensatory measures to be implemented to sufficiently mitigate adverse impacts to mature nature trees. The TPP shall include the following components: <u>Site Plan Component</u>: • All mature native trees shall be identified in the site plan. • All ground disturbance and development shall be sited to avoid mature native trees to the maximum extent practicable as determined by the arborist/biologist. • The location of all tree wells or retaining walls shall be located at least 6 feet from the dripline of all protected trees. • The location of all paths (i.e., driveways, sidewalks, etc.) shall be located at least 25 feet from dripline areas. Only pervious paving materials (e.g., gravel, brick without mortar, turf block) shall be located within 6 feet of dripline areas. <u>Construction Component</u>:	The TPP shall be prepared by the applicant and submitted as part of project application materials. For County Parks projects, the TPP shall be prepared prior to preparation of the final site plan. The County shall review and confirm that all recommendations for the protection of mature native trees are reflected in project plans and permit requirements. All site plan components related to earth movement, construction, and temporarily and/or permanently installed protection measures shall be graphically depicted on project plans and submitted to the County for review and approval before the issuance of final approvals or permits by the County. All standards and requirements for the protection of mature native trees shall be printed on all building and grading plans.	County Parks or County P&D processing planner(s) shall ensure that the TPP is included as part of the project plans. County Parks and/or the applicant shall demonstrate to County compliance monitoring staff that protection or other required measures are in place before ground disturbance and that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed as required by the approved TPP.

Table 9-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring
• Fencing of all trees to be protected shall be located at least 6 feet outside the dripline with chain-link (or other material satisfactory to the County) fencing at least 3 feet high, staked to prevent any collapse, and with signs identifying the protection area placed in 15-foot intervals on the fencing. • Fencing/staking/signage shall be maintained throughout all grading and construction activities. • Equipment storage (including construction materials, equipment, fill soil, or rocks), and construction staging and parking areas shall be located outside of the protection area. • All trees located within 25 feet of buildings shall be protected from stucco and/or paint during construction. • No irrigation shall occur within 6 feet of the dripline of any protected tree. • The TPP shall require that the following activities shall be done only by hand: any excavation or trenching required within the dripline or sensitive root zone of any specimen within the habitat; cleanly cutting any roots of 1 inch in diameter or greater within the habitat; and tree removal and trimming within the habitat. • If large rocks or challenging conditions are present onsite, rubber-tired construction equipment weighing 5 tons or less or a small, tracked excavator (i.e., 215 or smaller track hoe) may be used. • Grading shall be designed to avoid ponding and ensure proper drainage within the driplines of oak trees. <u>Tree Replacement Component</u>: • The replacement trees shall be a native species, planted at a 10:1 ratio for oak trees (15:1 for blue oaks or valley oaks), and a 2:1 ratio for other trees. The replanting location shall be shown on site plans. • Species shall be from locally obtained plans and seed stock. • The trees shall be gopher-fenced. • The trees shall be irrigated with drip irrigation on a timer until established. • The trees shall be weaned off of irrigation over a period of 2 to 3 years. • No permanent irrigation shall occur within the dripline of any tree. • If replacement trees cannot all be accommodated onsite, the applicant shall submit a plan for approval by the Planning and Development Department for replacement trees to be planted offsite on lands owned by the property		

Table 9-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring
owner/applicant, on land with which the property owner/applicant has a real interest, or on other approved restoration site(s). • All new and replanted trees shall be protected from predation by wild and domestic animals and from human interference by the use of staked, chain link fencing, and gopher fencing during the maintenance period.		
MM BIO-2: Habitat Protection Plan. Development of County parks, permitted uses in Recreation zones, permitted parks and trails, and RBPs shall be sited to avoid adverse affects to sensitive biological resources to the extent feasible. Where development cannot be sited to avoid adverse affects to sensitive biological resources, the County shall require the preparation of an HPP. The HPP shall be prepared by a biologist approved by County P&D. The 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. If the biologist finds that there are no potential sensitive biological resources at the project site that would be adversely affected by the project, they shall submit a memorandum describing these findings to the County. If resources are present and would be adversely affected by the project, the HPP shall determine appropriate avoidance, minimization, or compensatory measures to be implemented to sufficiently mitigate adverse impacts to sensitive biological resources. The HPP shall include at a minimum the following components: • A description of the location and extent of driplines and sensitive root zones for all vegetation to be preserved, locations of sensitive habitats with a detailed description of allowed disturbance, and depictions of original and new locations for replanted species. • Depiction of approved development envelopes, equipment storage, construction staging, and parking areas. • If sensitive habitats, watercourses, or riparian habitats occur within the project site, to the maximum extent feasible as determined by the biologist, the HPP shall identify a 100-foot buffer for ground disturbance and vegetation removal. The area shall be fenced with a fencing type and in a location acceptable to County P&D. Depiction of the type and location of protective fencing or other barriers to be in place to protect the habitat areas. Protective fencing/staking/barriers shall be maintained throughout all grading and construction activities. To the extent feasible, grading	The HPP shall be prepared by the applicant and submitted as part of project application materials. For County Parks projects, the HPP shall be prepared prior to preparation of the final site plan. The County shall review and confirm that all recommendations for the protection of sensitive biological resources are reflected in project plans and permit requirements. All site plan components related to earth movement, construction, and temporarily and/or permanently installed protection measures shall be graphically depicted on project plans and submitted to the County for review and approval before the issuance of final approvals or permits by the County. All standards and requirements for the protection of sensitive biological resources shall be printed on all building and grading plans.	County Parks or County P&D processing planner(s) shall ensure that the HPP is included as part of the project plans. County Parks and/or the applicant shall demonstrate to County compliance monitoring staff that protection or other required measures are in place before ground disturbance and that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed as required by the approved HPP.

Table 9-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring
activities adjacent to sensitive habitats, watercourses, or riparian habitats shall be timed to avoid wet weather conditions. • If a project site is located adjacent to sensitive habitats, watercourses, or riparian habitats, the project shall be landscaped with only native, non-invasive, or compatible species to the adjacent habitat. • No alteration to stream channels or banks shall be permitted until the applicant demonstrates receipt of all authorizations from USACE, Central Coast RWQCB, and/or CDFW for any planned alteration to stream channels or banks. • If any ground disturbances would occur during the nesting bird season (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 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. • The HPP shall require that the following activities be done only by hand: any excavation or trenching required within the dripline or sensitive root zone of any specimen within the habitat; cleanly cutting any roots of 1 inch in diameter or greater within the habitat; and tree removal and trimming within the habitat. • If large rocks or challenging conditions are present onsite, rubber-tired construction equipment weighing 5 tons or less or a small, tracked excavator (i.e., 215 or smaller track hoe) may be used.		

Table 9-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring
• If it becomes necessary to disturb or remove any plants within the habitat area, or in the event of unexpected damage, specimens shall be boxed and replanted. If it is not feasible to replant, plants shall be replaced at a minimum using the standards from the applicable Community Plan. If no replacement standards are provided in a Community Plan, the project biologist shall determine the appropriate replacement ratio based on existing habitat quality. If replacement plants cannot all be accommodated onsite, a plan must be approved by County P&D for replacement plants to be planted off-site on lands owned by the property owner/applicant, on land with which the property owner/applicant has a real interest, or on other approved restoration site(s). • Grading shall be designed to ensure that habitat areas have proper drainage during and after construction, per biologist recommendations. • Focused surveys for special-status species, and any capture, temporary possession, and relocation of wildlife shall be conducted only by a County-approved biologist(s) with appropriate collection and handling permits from CDFW and USFWS. • Any planting stock brought onto a project site for landscaping or habitat restoration shall be inspected to ensure it is free of pest species that could invade natural areas, including but not limited to Argentine ants. Any planting stock found to be infested with such pests shall be quarantined, treated, or disposed of according to best management practices by qualified personnel, in a manner that precludes invasion into natural habitats.		

Table 9-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring
MM BIO-3: Species-Specific and Sensitive Habitat Avoidance and Minimization Measures. To mitigate impacts to special-status species and sensitive habitats resulting from implementation of the Jalama Beach County Park Expansion and Coastal Access Improvements Project, the County shall implement the following: 1. As recommended by CDFW and USFWS, additional Gaviota tarplant surveys should be conducted by a qualified biologist prior to issuance of any construction permits to continue documentation of the distribution and abundance of Gaviota tarplant populations in the Upper Mesa expansion area. This measure applies only to proposed campground improvements in the Upper Mesa expansion area. 2. Continue consultation with the regulatory agencies concerning the need for an Incidental Take Permit from the USFWS and Consistency Determination from CDFW for impacts to California red-legged frog upland habitat and Gaviota tarplant in the Campground Area and Upper Mesa expansion area. Agency consultation should also include involvement of the USACE for construction of the beach access staircase and drainage crossings for the blufftop trail. This measure applies only to proposed campground improvements in the Upper Mesa expansion area, proposed campground improvements in the existing campground, and proposed Crack stairway improvements. 3. A Gaviota Tarplant Mitigation Plan should be developed for the Project in consultation with CDFW and USFWS that includes a suitable offsite mitigation location that can be preserved in perpetuity. In addition, a Gaviota Tarplant Protection Plan & Weed Management Plan should be prepared for Gaviota tarplant habitat that will remain protected in place. This measure applies only to proposed campground improvements in the Upper Mesa expansion area. 4. A Dune & Riparian Habitat Restoration Plan should be prepared that provides the details of proposed onsite restoration to mitigate impacts to dune mat vegetation and encroachment on the prescribed ESH buffers. The Dune & Riparian Habitat Restoration Plan should identify where along the northern and western perimeters of the campground restoration is to take place and provide details of how restoration would be implemented (e.g., site preparation, planting specifications, planting palette, irrigation, maintenance, monitoring, success criteria, and reporting requirements). The Dune & Riparian Habitat Restoration Plan should also provide details of how	This measure shall apply to implementation of the improvements proposed as part of the Jalama Beach County Park Expansion and Coastal Access Improvements Project. These conditions shall be noted on all grading and construction plans. Species and habitat surveys, agency consultation, mitigation and restoration plan, worker orientation, and construction fencing requirements shall be implemented prior to commencement of grading throughout the year. Construction monitoring activities shall occur throughout the duration of construction.	County Parks staff shall ensure all conditions are reflected on all grading and construction plans, and shall ensure compliance on site during construction through periodic site visits.

Table 9-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring
restored and existing dune habitat will be protected from pedestrians accessing the beach. This measure applies only to proposed campground improvements in the existing campground. 5. An Offsite Habitat Restoration Plan should be prepared to mitigate impacts to purple needlegrass, California brittlebush scrub, and giant coreopsis scrub. If suitable habitat is available, the Offsite Habitat Restoration Plan could also incorporate the offsite Gaviota tarplant mitigation referenced above. The Offsite Habitat Restoration Plan should identify suitable mitigation locations to allow for a minimum 3:1 mitigation of ESH impacted by the Project. Mitigation areas must be in locations that can be preserved in perpetuity. The Offsite Habitat Restoration Plan should provide details of all restoration locations and how restoration would be implemented (e.g., site preparation, planting specifications, planting palette, irrigation, maintenance, monitoring, success criteria, and reporting requirements). This measure applies only to proposed campground improvements in the Upper Mesa expansion area, proposed campground improvements in the existing campground, and proposed blufftop trail improvements. 6. A qualified biologist shall conduct pre-construction surveys of the campground, the Upper Mesa campground expansion area, equipment access routes, proposed trail alignments, parking areas, and surrounding habitats, including the adjacent portions of Jalama Creek, for sensitive plant and wildlife species that may occur in the Survey Area. During pre-construction surveys all sensitive plant populations (i.e., Gaviota tarplant, red sand verbena, and cliff aster) should be flagged/fenced for avoidance during construction. Pre-construction surveys for sensitive wildlife (i.e., California red-legged frog, southwestern pond turtle, two-striped garter snake) should be conducted within 7 days of the commencement of work on each trail alignment. This may require multiple pre-work wildlife surveys, depending on the construction timeline, to ensure that potential impacts to sensitive wildlife are avoided. If any federally- or state-listed wildlife species are observed or considered potentially present the USFWS and/or CDFW will be consulted regarding any necessary avoidance measures. This measure applies to all proposed improvements. 7. If the Project is implemented during the bird nesting season (January – mid-September), a qualified biologist shall conduct a pre-construction survey of the Survey Area and adjacent habitats within 7 days of vegetation removal		

Table 9-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring
or construction commencement (i.e., mobilization, staging equipment) to avoid impacts to nesting raptors and other birds. If breeding birds with active nests are found prior to (or during) campground/trail construction, a qualified biologist shall oversee the establishment of a buffer (prescriptively 300 feet and 500 feet for raptors and special-status passerines). No activities will be allowed within the buffer(s) until the young have fledged from the nest or the nest fails. The prescribed buffers may be adjusted by a qualified biologist to reflect existing conditions, including but not limited to ambient noise, topography, and level of disturbance. Consultation with CDFW may be necessary to implement reduced nest buffers. This measure applies to all proposed improvements. 8. Prior to the start of work, a County-approved biologist shall oversee a worker orientation for all trail crew personnel (including supervisors, equipment operators, laborers, and volunteers) which emphasizes the presence of special-status plant and wildlife species within or adjacent to the Survey Area, identification of those species, their habitat requirements, applicable regulatory policies and provisions regarding their protection, measures being implemented to avoid and/or minimize impacts, and penalties for noncompliance will be conducted. No staging of equipment or construction supplies shall occur prior to the worker orientation. This measure applies to all proposed improvements. 9. Prior to the start of campground construction, protective fencing and/or BMPs (e.g., silt fencing, fiber rolls) should be installed along the perimeters of disturbance areas to protect adjacent dune, riparian, purple needlegrass, and Gaviota tarplant habitat. Protective fencing and BMPs should also be installed along trails and around proposed parking lots following initial vegetation removal to protect surrounding native scrub habitat. This measure applies only to proposed campground improvements in the Upper Mesa expansion area, proposed campground improvements in the existing campground, and proposed blufftop trail improvements. 10. All vegetation removal and construction activities should be monitored full-time by a qualified biologist to ensure that impacts to sensitive habitat and plants are minimized to the greatest extent feasible and impacts to wildlife are avoided. This measure applies to all proposed improvements.		

Table 9-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring
11. Pesticide/insecticide use should be avoided to prevent impacts to sensitive invertebrates that have the potential to occur. This measure applies to all proposed improvements.		
MM BIO-4: General Construction Avoidance and Minimization Measures. To mitigate impacts to special-status species and sensitive habitats resulting from the implementation of the Jalama Beach County Park Expansion and Coastal Access Improvements Project, the County shall implement the following: • All construction equipment shall be limited to the designated work areas, access routes, and trail alignments. Trails should be constructed with hand tools whenever possible to avoid impacts to sensitive biological resources. • All motorized equipment used shall be maintained in proper working condition and shall be free of drips and leaks of coolant, hydraulic, and petroleum products. No equipment shall be used for the Project unless such equipment is free of leaks and drips. A spill prevention and clean-up kit (including socks, absorbent pads, kitty litter, broom, dustpan, shovel, and container for dirty absorbent material) shall be available on-site for immediate use in case of an accidental spill. No equipment maintenance or fueling shall occur within 100 feet from any drainages. • Dust generated by the construction activities shall be kept to a minimum with a goal of reducing impacts to adjacent habitat. A water truck or sprinkler system should be used to prevent excessive dust. • Trash and food items will be kept in closed containers and removed daily.	This measure shall apply to implementation of the improvements proposed as part of the Jalama Beach County Park Expansion and Coastal Access Improvements Project. These conditions shall be noted on all grading and construction plans.	County Parks staff shall ensure all conditions are reflected on all grading and construction plans, and shall ensure compliance on site during construction through periodic site visits.

Table 9-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring
MM BIO-5: Wildlife Movement Plan. Development of County parks, permitted uses in Recreation zones, permitted parks and trails, and RBPs shall be sited to avoid adverse affects to wildlife corridors or linkages to the extent feasible. Where development cannot be sited to avoid adverse affects to wildlife corridors or linkages, the County shall require the preparation of a Wildlife Movement Plan. The Wildlife Movement Plan shall be prepared by a biologist approved by County P&D. If the biologist finds that there are no potential wildlife corridors traversing the project site that would be adversely affected by the project, they shall submit a memorandum describing these findings to the County. If wildlife corridors would be adversely affected by the project, the Wildlife Movement Plan shall analyze proposed fencing in relation to the surrounding opportunities for wildlife movement/migration, identify the type, material, length, and design of proposed fencing, and shall propose non-disruptive, wildlife-friendly fencing, such as post and rail fencing, wire fencing, and/or high-tensile electric fencing, to allow passage by smaller animals and prevent movement in and out of the project sites by larger mammals, such as deer. The evaluation and Wildlife Movement Plan shall also identify project design features that would reduce potential impacts and maintain habitat and wildlife movement.	The Wildlife Movement Plan shall be prepared by the applicant and submitted as part of project application materials. For County Parks projects, the Wildlife Movement Plan shall be prepared prior to preparation of the final site plan. The County shall review and confirm that all recommendations for the protection of wildlife corridors are reflected in project plans and permit requirements. All project design features and protection measures shall be graphically depicted on project plans and submitted to the County for review and approval before the issuance of final approvals or permits by the County. All standards and requirements for the protection of wildlife movement corridors shall be printed on all building and grading plans.	County Parks or County P&D processing planner(s) shall ensure that the Wildlife Movement Plan is included as part of the project plans. The applicant shall demonstrate to County compliance monitoring staff that protection or other required measures are in place before ground disturbance and that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed as required by the approved Wildlife Movement Plan.
Cultural and Tribal Cultural Resources		
MM CTCR-1: Objective Development Standards for Addressing Historic and Archaeological Resources. Development of County parks, permitted uses in Recreation zones, permitted parks and trails, and RBPs shall be sited to avoid the alternation, relocation, or demolition of structures 50 years of age or greater. If the site of proposed development exhibits potentially historic and/or archaeological resources, the applicant shall retain a County P&D-qualified professional historian/archaeologist to document all potentially historic and/or archaeological resource features. If the historian/archaeologist finds that there are no qualifying historic or archaeological resources onsite with potential to be	This measure shall apply to applicable projects immediately following the certification of this EIR.	County compliance monitoring staff shall ensure compliance through a review of project plans and/or applicant/contractor-provided documentation.

Table 9-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring
adversely affected by proposed development, they shall submit a memorandum describing these findings to the County. If historic, archaeological, or tribal cultural resources are encountered during grading, construction, landscaping, other construction-related activity, or any operation-related activity, the Owner/Applicant and/or their agents, representatives, or contractors shall stop or redirect work immediately and retain a County P&D approved archaeologist and Native American representative to evaluate the significance of the find in compliance with the provisions of Phase 2 investigations of the County Archaeological Guidelines and funded by the Owner/Applicant.		
MM CTCR-2: Avoidance of Disturbance to Native Soils. To reduce impacts within the primary area of sensitivity associated with improvements proposed as part of the Jalama Beach County Park Expansion and Coastal Access Improvements project site, all new development shall be located on existing concrete foundations or slabs and existing utilities or subsurface features (e.g., septic tanks and leach fields) shall be abandoned in place to the maximum extent feasible. Where such avoidance is deemed infeasible, construction shall occur on sterile fill placed on geofabric. Designers should work with an archaeologist to determine what construction methods should be used to avoid or minimize impacts. Existing paving and structural foundations should remain in place to avoid ground disturbance, and (optionally) be covered with fill. The depth of fill over geofabric would vary depending on the depth of significant archaeological deposits but should be deep enough to avoid incursion into such deposit, plus a buffer of at least 12 inches. Where no excavation is planned but project elements (such as new campsites) would be placed on the surface over significant deposits, fill of at least 12 inches would be required. Fill should be deep enough to support shallow- to medium-rooted vegetation. Deep-rooted vegetation may cause impacts on archaeological deposits. The location and required depth of fill should be delineated on grading plans. Within the area of secondary sensitivity, the depth of required fill would vary depending on the depth of the significant archaeological deposit and the maximum depth of ground disturbance. Existing subsurface elements such as utility lines should be abandoned in place. For areas outside of, but adjacent to, the primary and secondary sensitivity areas, placement of cabins and associated elements on sterile fill, abandoning any existing utilities in place, and avoiding ground disturbance here would avoid disturbing these materials. The risk of encountering intact materials in this area	Protection or other required measures shall be in place before ground disturbance.	County Parks shall ensure that all archaeological resource protection standards are reflected in project plans. County Parks staff shall ensure that any areas identified for protection were not damaged or removed, or if damage or removal occurred, that correction is completed.

Table 9-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring
is considered relatively low, and monitoring would suffice as an appropriate condition for work in this area.		
MM CTCR-3: Location-Specific Phase 2 Testing. At the Jalama Beach County Park Expansion and Coastal Access Improvements project site, within the area of primary sensitivity, where new development requires ground disturbance, location-specific Phase 2 testing shall be required in previously untested areas to evaluate data potentials and assess project impacts. New play structures, and potentially the ranger structure, may require footings. As identified below, excavation for footings or foundations would require targeted Phase 2 excavation in the exact area(s) planned for disturbance. The purpose of the Phase 2 study would be to identify if data potentials are present in this part of the site, and if so, assess project impacts. Optimally, the Phase 2 work would include the collection of sufficient material so that if data potentials are present, additional analysis of that material would serve as Phase 3 data recovery/mitigation to reduce impacts from ground disturbance to less than significant. If Phase 2 testing demonstrates that the deposit within the project footprint does not contain a density and diversity of artifacts sufficient to address relevant research questions, then this area should be delineated on grading plans and monitoring would suffice during development activities. If Phase 2 testing indicates that data potentials are present, the area should be avoided or capped. Phase 2 testing results would delineate the area to be capped (the area with data potentials). The depth of capping would depend on the depth of significant deposits and the required depth of grading and would be identified in the Phase 2 report. In the area of primary sensitivity, if portions of the park are capped to protect the site, the Cultural Resource Guidelines for Santa Barbara County specify that an "index sample" should be collected and curated, since capping precludes future research within that area. Once these areas are identified, a review of previous excavations should occur to identify if they are sufficient to qualify as an index sample for the capped locations. Given the extent of prior work within the area of primary sensitivity, it is likely that sufficient data has been collected to qualify as an index sample. As with the primary sensitivity area, several locations within the area of secondary sensitivity have been previously tested. Comparison of the test results with proposed ground disturbance locations is necessary and could identify areas without data potentials, where ground disturbance would not cause a significant impact.	Phase 2 Testing shall be completed and recommendations shall be integrated into project plans before approval and construction.	County Parks shall ensure that all archaeological resource protection standards developed through Phase 2 Testing are reflected in project plans.

Table 9-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring
MM CTCR-4: Extended Phase 1/Phase 2 Testing Program. The Jalama Beach County Park Expansion and Coastal Access Improvements project proposes to relocate the existing administrative structures (e.g., ranger's residences, garages, etc.) from the existing park to the bluff immediately above the park. To characterize this area's deposit and identify where (and if) fill is required, a focused extended Phase 1/Phase 2 testing program shall be carried out within the area proposed for development. If the Extended Phase 1/Phase 2 testing demonstrates that the deposit within the project footprint does not have data potentials (i.e., deposit does not contain a density and diversity of artifacts sufficient to address relevant research questions), then no fill would be required, and monitoring would suffice during development activities. If the Extended Phase 1/Phase 2 results indicate that data potentials are present, the testing would clarify and delineate the area to be capped and the recommended depth of fill. The extended Phase 1/Phase 2 effort should be designed to collect enough material so that technical analysis of lithics, shell, and bone, and radiocarbon dating, could be performed and no additional excavation would be needed. This material would also serve as an index sample required for the area(s) that are capped.	Extended Phase 1/Phase 2 Testing shall be completed and recommendations shall be integrated into project plans before approval and construction.	County Parks shall ensure that all archaeological resource protection standards developed through Extended Phase 1/Phase 2 Testing are reflected in project plans.
MM CTCR-5: Post-Discovery Tribal Consultation. For future park, recreation, and trail projects and RBPs enabled by the Project, if tribal cultural resources are identified or discovered during construction, landscaping, or other construction-related or operational activities, the owner/applicant and/or their agents, representatives, or contractors shall immediately contact P&D. P&D shall coordinate consultation with a Native American tribal representative. The appropriate Native American tribal representative shall be identified using the most recent contact list provided by the NAHC. If mitigation actions are required through consultation with the Native American tribal representative, appropriate mitigation shall be funded by the owner/applicant.	If tribal cultural resources are discovered, construction activities shall stop immediately. The owner/applicant/owner shall immediately contact County P&D permit compliance staff, who would consult with a Native American tribal representative. This condition shall be printed on all building and grading plans.	County P&D permit compliance staff shall ensure that no further disturbance shall occur via periodic site visits and other appropriate measures until consultation with a Native American tribal representative is complete and any site-specific mitigation has been identified and implemented.
Geology and Soils		
MM GEO-1: Paleontological Resource Assessment and Monitoring. Development of County parks, permitted uses in Recreation zones, permitted parks and trails, and RBPs shall be sited to avoid adverse affects to significant paleontological resources to the extent feasible. Where projects are determined to have high or undetermined potential for significant paleontological resources,	The County shall confirm that a qualified paleontologist has been contacted and selected for assessment and monitoring before construction activities	County compliance monitoring staff shall ensure compliance through a review of project plans and/or applicant/contractor-provided documentation.

Table 9-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring
an intensive field survey and surface salvage should occur before earth-moving or ground-disturbing activities. The survey shall result in an adequate preconstruction paleontological resource impact assessment and a subsequent mitigation program, if applicable. If deemed necessary, for excavations in rock units of known high potential, the project paleontologist or paleontological monitor shall be present initially during 100% of the earth-moving activities. After 50% of excavations are completed in either an area or rock unit and no fossils of any kind have been discovered, the level of monitoring can be reduced or suspended entirely at the project paleontologist's discretion.	begin. To ensure compliance at the start of the project, a statement that confirms the site's paleontological potential, confirms the repository agreement with an established public institution, and describes the program for impact mitigation must be deposited with the lead agency and contractor(s) before any ground disturbance begins.	
MM GEO-2: Stop Work at Encounter. For individual recreation development projects and RBPs resulting from the proposed Project, all ground disturbing work shall stop or be redirected immediately if paleontological resources are encountered during grading, construction, landscaping, or other construction-related activity. A County-approved paleontologist who will salvage the fossils and assess the necessity for further mitigation measures, if applicable.	The County shall confirm that this paleontological resource protection standard is printed on all building and grading plans.	The County permit processing planner shall check plans before issuance of a permit for the proposed uses and related development. County compliance monitoring staff shall spot-check in the field throughout grading and construction.
Hazards and Hazardous Materials		
MM HAZ-1: Hazards Management for Public Parks. Development of County parks, permitted uses in Recreation zones, permitted parks and trails, and RBPs shall be located and designed to avoid hazardous sites and the adverse effects of nearby hazardous sites to the maximum extent feasible. Synthetic grass, artificial turf, or rubberized playground surfaces shall be allowed in public parks and playgrounds only if natural materials, surfaces, and turf is infeasible due to insufficient water supply.	This measure shall apply to applicable projects immediately following the certification of this EIR.	County compliance monitoring staff shall ensure compliance through a review of project plans and/or applicant/contractor-provided documentation.
MM HAZ-2: Incidental Discovery of Contamination. If previously unknown or unidentified soil and/or groundwater contamination that could present a threat to human health or the environment is encountered during construction at a development site enabled by the Project, construction activities near the contamination shall cease immediately. A qualified environmental specialist (e.g., a licensed Professional Geologist, a licensed Professional Engineer or	This measure shall apply to applicable projects immediately following the certification of this EIR.	County compliance monitoring staff shall ensure that no further disturbance shall occur until the contaminants are identified and a soil management plan and/or

Table 9-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring
similarly qualified individual) shall investigate to identify and determine the level of soil and/or groundwater contamination. If contamination is encountered, a Human Health Risk Management Plan shall be prepared and implemented that: 1) identifies the contaminants of concern and the potential risk each contaminant would pose to human health and the environment during construction and post-development; and 2) describes measures to be taken to protect workers, and the public from exposure to potential site hazards. Such measures could include a range of options, including, but not limited to, physical site controls during construction, remediation, long-term monitoring, post-development maintenance or access limitations, or some combination thereof. Depending on the nature of contamination, if any, appropriate agencies shall be notified. If needed, a Site Health and Safety Plan that meets OSHA requirements shall be prepared and in place before commencement of work in any contaminated area.		remediation plan is prepared and implemented.
Hydrology and Water Quality		
MM HWR-1: Recycled Water in Parks and Recreation Facilities. All County Parks projects shall be subject to the following standards. The County shall amend the Santa Barbara County zoning ordinances to add the following requirements for permitted uses in Recreation zones, permitted parks and recreation facilities, and public recreational components of RBPs: • For recreation projects including sports fields, campgrounds, or other features requiring a substantial water supply, such as landscaping, a Recycled Water Feasibility Assessment shall be prepared during the design phase to determine the site-specific water reuse strategies based on site conditions, service availability, and cost-effectiveness. • Landscaped areas (e.g., sports fields) shall be designed to use recycled water for irrigation where available. • Parks shall connect to existing recycled water lines or use recycled water infrastructure when feasible, as determined by the Recycled Water Feasibility Assessment.	This measure shall apply to applicable projects immediately following the certification of this EIR.	County compliance monitoring staff shall ensure compliance through a review of project plans and/or applicant/contractor-provided documentation.
Noise		
MM NOI-1: Recreation Noise Standards. All County Parks projects shall be subject to the following standards. The County shall amend the Santa Barbara County zoning ordinances to add the following requirements for permitted uses in Recreation zones, permitted parks and trails, and RBPs:	This measure shall be incorporated with proposed Project amendments to the zoning ordinances and standards	Permit compliance monitoring staff shall ensure compliance through a review of project plans

Table 9-1. Mitigation Monitoring and Reporting Program (Continued)

Mitigation Measure	Plan Requirements and Timing	Monitoring
• Outdoor amplified sound and other uses generating maximum noise levels above 65 dBA associated with public parks, trails, recreation facilities, and Recreation Benefit Projects shall not exceed 65 dBA at the property boundary and the amplified sound shall cease by 10:00 p.m.	shall apply to applicable projects immediately following the certification of this EIR.	and/or applicant/contractor-provided documentation.

This page was intentionally left blank.