



STATE OF CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE

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April 14, 2026

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Subject: Notice of Preparation of a Draft Environmental Impact Report for the Solomon Hills Specific Plan Project, SCH No. 2026030571, Santa Barbara County, CA

Dear Alia Vosburg and Tina Mitchell:

The California Department of Fish and Wildlife (CDFW) reviewed the Notice of Preparation (NOP) for a Draft Environmental Impact Report (DEIR) from the County of Santa Barbara for the Solomon Hills Specific Plan Project (Project) pursuant to the California Environmental Quality Act (CEQA) and CEQA Guidelines.

Thank you for the opportunity to provide comments and recommendations regarding those activities involved in the Project that may affect California fish and wildlife. Likewise, CDFW appreciates the opportunity to provide comments regarding those aspects of the Project that CDFW, by law, may be required to carry out or approve through the exercise of its own regulatory authority under the Fish and Game Code.

CDFW ROLE

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

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CDFW may also act as a Responsible Agency under CEQA. (Pub. Resources Code, § 21069; CEQA Guidelines, § 15381). CDFW expects that it may need to exercise regulatory authority as provided by the Fish and Game Code. As proposed, for example, the Project may be subject to CDFW's lake and streambed alteration regulatory authority (Fish & G. Code, § 1600 et seq.). Likewise, to the extent implementation of the Project as proposed may result in "take" as defined by State law of any species protected under the California Endangered Species Act (CESA) (Fish & G. Code, § 2050 et seq.) or the Native Plant Protection Act (NPPA; Fish & G. Code, § 1900 et seq.), the Project proponent may seek related take authorization as provided by the Fish and Game Code.

PROJECT DESCRIPTION SUMMARY

Proponent: Solstra Communities California, LLC (Solstra)

Objective: The Project's primary and underlying purpose is to create a new community with a range of housing types as well as a mix of commercial, office, public, quasi-public, recreational, and open space uses. The Project's general objectives are as follows:

- To redevelop the Specific Plan Area from historic oil and gas operations to a new community.
- To create a walkable and bikeable community and a balance of critical uses (residential, commercial, public/institutional).
- To deliver approximately 4,000 new housing units for all segments of the population, with approximately 625,000 square feet of commercial development.
- To facilitate the safe abandonment or re-abandonment of oil and gas activity in the Specific Plan Area.
- To cluster development with sufficient density to designate areas of open space and habitat conservation, while also allowing for the creation of recreational amenities such as parks, recreation centers, and trail system.

Location: The Project is located adjacent to and west of Highway 101, south of the unincorporated community of Orcutt by 0.7 miles, east of Highway 135 by 2 miles, and north of Los Alamos by 6 miles, in the County of Santa Barbara. The following terms are used to

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indicate various portions of the Project site which refers to the 4,195-acre area owned by Solstra:

- **Specific Plan Area.** The Specific Plan Area includes portions of APNs 101-020-085, 101-020-086, and 101-020-087. This area encompasses 1,616 acres of proposed development and is to be regulated by the Solomon Hills Specific Plan with the new Solomon Hills Specific Plan (SHSP) Land Use Designation. This area is currently zoned AG-II-100 with a Land Use Designation of Agricultural Commercial.
- **Newlove Park.** The 31-acre proposed Newlove Park is within the northern region of the Project site and is within the Orcutt Community Plan Area.
- **Conservation Easement.** Approximately 506 acres within the northern portion of the Project site, extending along and north of the northwestern boundary outside of the Specific Plan Area is proposed to be designated for habitat protection under a conservation easement.
- **Off-site Improvements.** The off-site improvements include portions of the anticipated utility areas, anticipated roadways, and anticipated highway improvements that are outside of the Project site boundary.

Timeline: The Project is proposed for construction in four buildout phases over a 14-year period with phased grading, access, and utilities scheduled in advance to align with each buildout phase.

Biological Setting: The Project site is largely undeveloped and is surrounded by large tracts of similarly undeveloped agricultural land. Numerous roads and pads associated with previous and current oil explorations and production exist in the Project site. The majority of these features are located on the southern and western portions of the Specific Plan Area. Cattle grazing also currently occurs in certain portions of the Project site.

The Biological Resources Assessment (BRA) prepared for the Project by David Wolff Environmental, LLC and dated January 30, 2025, indicates the Project would result in 914 acres of total ground disturbance. Field surveys were conducted from March 2023 to February 2024 by David Wolff. Protocol surveys were not conducted, and no rare plants or natural communities of special concern were observed in the Project site according to the BRA.

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The BRA indicates a 5-mile query was conducted of the California Natural Diversity Database (CNDDDB). The query returned records of 14 special status plants, including La Purisima manzanita (*Arctostaphylos purissima*; California Rare Plant Rank (CRPR) 1B.1), sand mesa manzanita (*Arctostaphylos rudis*; CRPR 1B.2), Lompoc yerba santa (*Eriodictyon capitatum*; Endangered Species Act (ESA)-listed endangered; NPPA-listed Rare; CRPR 1B.2), mesa horkelia (*Horkelia cuneata* var. *puberula*; CRPR 1B.1), black-flowered figwort (*Scrophularia atrata*; CRPR 1B.2), and Hoover's bent grass (*Agrostis hooveri*; CRPR 1B.2).

The CNDDDB query also returned records of 17 special status wildlife species, including vernal pool fairy shrimp (*Branchinecta lynchi*; ESA-listed threatened), coast horned lizard (*Phrynosoma blainvillii*; California Species of Special Concern (SSC)), California tiger salamander (*Ambystoma californiense* pop. 2; ESA-listed endangered; CESA-listed threatened), western spadefoot (*Spea hammondi*; ESA proposed threatened; SSC), southwestern pond turtle (*Actinemys pallida*; ESA proposed threatened; SSC), and California red-legged frog (*Rana draytonii*; ESA-listed threatened; SSC).

The BRA indicates a pair of golden eagles (*Aquila chrysaetos*; California fully protected species) nest within the Project site. Additionally, the Project site is within the mapped range of Crotch's bumble bee (*Bombus crotchii*; CESA candidate endangered) and western bumble bee (*Bombus occidentalis*; CESA candidate endangered).

Environmental Science Associates (ESA) produced an updated Biological Technical Report (BTR) at the request of Solstra in July 2025. ESA biologists conducted floristic surveys, vegetation mapping, general biological surveys, and wildlife surveys from March 2025 to June 2025. According to the BTR, sensitive natural communities within the grading area include coast live oak woodland (*Quercus agrifolia* Woodland Alliance; State Rank (S)4; 306.7 acres impacted), arroyo willow thickets (*Salix lasiolepis* Shrubland Alliance; S4; 0.6 acres impacted), Burton Mesa chaparral (*Arctostaphylos [purissima, rudis]*; S1; 14.4 acres impacted), California brittle bush scrub (*Encelia californica*–*Eriogonum cinereum* Shrubland Alliance; S3; 4.8 acres impacted), needle grass-melic grass grasslands (*Nassella* spp. – *Melica* spp. Herbaceous Alliance; S3; 21.8 acres impacted), saltgrass-alkali heath coastal (*Distichlis spicata*–*Frankenia salina* Coastal Herbaceous Alliance; S3; 3 acres impacted), silver dune lupine-mock heather scrub (*Lupinus chamissonis*–*Ericameria ericoides* Shrubland Alliance; S3; 11.7 acres), and soft and western rush-sedge marshes (*Juncus [effusus, patens]*–*Carex [pansa, praegracilis]* Herbaceous Alliance; S4; 2.6 acres impacted).

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The BTR includes observations of hundreds of special status plant species such as La Purisima manzanita, sand mesa manzanita, and Lompoc yerba santa. Multiple special status fauna species are proposed to have a potential to occur with the Project site, such as southwestern pond turtle, California tiger salamander, northern California legless lizard (*Anniella pulchra*; SSC), Crotch's bumble bee, monarch butterfly (*Danaus plexippus plexippus pop. 1*; ESA proposed threatened), San Diego desert woodrat (*Neotoma lepida intermedia*; SSC), coast-horned lizard, California red-legged frog, western spadefoot, and American badger (*Taxidea taxus*; SSC).

While the BRA indicated that the Project site did not contain any streams, the BTR indicates that the Project site does contain an ephemeral stream feature, approximately six acres of water potentially under the regulatory authority of CDFW are located within the grading area for the development. A final determination will be made regarding this feature during the wetland delineation that is scheduled for summer 2025. This is stated in the BTR, so it is unclear if the results have been provided in the Project materials for review. In addition to this, several isolated wetlands of varying sizes were observed throughout the Project site.

History: CDFW had previously provided comments on an early consultation at the request of the County based on a Biological Report by David Wolff Environmental, LLC dated June 28, 2024. Comments included, but were not limited to, rare plants, special status wildlife, streams and wetlands, and project description and alternatives.

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.

Specific Comments

1. **Clustered Development**. One Project goal is clustered development with sufficient density and scale to designate substantial areas of open space and for habitat conservation. The design depicted in the documents provided does not achieve this goal. While a large proportion of the residential and commercial development is concentrated in the southern portion of the Project area, smaller development polygons and a road network are distributed around the entire outside boundary of

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the Specific Plan Area. This design would result in a very large urban/wildland edge and would leave only narrow corridors of open space in the center of the property and between development bubbles. The current design would also encourage wildlife to move within close proximity to development. This could, in turn, lead to significant human/wildlife conflicts, including injury to humans, loss of pets and livestock, and mortality to predators and other wildlife. The remaining pathways through the property would require wildlife to cross multiple roads in order to move from one side of the Project to another, increasing roadkill risk and decreasing road safety.

Additionally, the areas proposed as open space are those rated as within the Very High and High fire hazard severity zone, as depicted in the Fire Protection Plan, prepared by DUDEK and dated July 2025. The proposed design would effectively isolate the open space and the highest fire hazard area into the center of the development donut.

CDFW recommends the County includes a Project Alternative in which all development is grouped together, rather than distributed throughout the Project site. The Alternative(s) should cluster development at one end or the other of the property, to allow wildlife to pass around the development, instead of through the middle. Trails and other recreational activities could then occur adjacent to the development and still leave a block of habitat suitable for disturbance-sensitive wildlife. In addition to reducing the amount of edge subject to potential human/wildlife conflict, consolidated development would reduce the number of homes that would be at risk from wildfire and possibly decrease the amount of fuel modification zones necessary for human safety.

2. **Roads and Highway Interchanges**. The Project proposes improving an existing interchange with Highway 101 and constructing a new one. CDFW recommends that the Project Description clearly state to what extent the roadwork will be analyzed under this Project, and what activities will be assessed as a part of a separate California Department of Transportation (Caltrans) effort (if any).

Additionally, CDFW recommends the County coordinate with Caltrans and CDFW's Caltrans liaison as early as feasible to determine what opportunities are available to improve the safety of wildlife that cross the highway. Any internal roads that cross open space corridors should be designed to accommodate unencumbered

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movement of wildlife along the length of the corridor. Roads should include wildlife under crossings with an adequate openness ratio to allow travel by the various species, small and large, to pass through the property.

3. **Newlove Park.** The proposed design east of Newlove Park does not avoid or minimize impacts to California tiger salamander. Newlove Park is located within the Orcutt Community Plan Area west of a known California tiger salamander pond. The Project proposes to construct active use soccer/football fields and other park improvements, placing maintained turf areas within roughly 300 feet of the California tiger salamander pond. The park design also shows a network of recreational trails throughout the Orcutt Community Plan Area east of the existing park.

In addition to the Project improvements, areas within the Orcutt Community Plan Area adjacent to Newlove Park, both to the east and west, are proposed to be compensatory mitigation for impacts to California tiger salamander. Generally speaking, CDFW does not consider areas open to the public to be suitable as mitigation for California tiger salamander or mitigation under a conservation easement. Furthermore, areas that contain trails or are subject to other public uses should be analyzed as impact areas. CDFW recommends that no trails be constructed or designated within areas potentially occupied by California tiger salamander. Due to California tiger salamander CESA-listed threatened status, refer to Comment 4 below.

4. **CESA.** CDFW considers adverse impacts to a species protected by CESA to be significant. Take of any endangered, threatened, candidate species, or NPPA-listed plant species that results from the Project is prohibited, except as authorized by state law (Fish & G. Code §§ 2080, 2085; Cal. Code Regs., tit. 14, §786.9). Consequently, if the Project or any Project-related activity will result in take of a species designated as endangered or threatened, or a candidate for listing under CESA, CDFW recommends that the Project proponent seek appropriate take authorization under CESA prior to implementing the Project. Appropriate authorization from CDFW may include an Incidental Take Permit (ITP) or a Consistency Determination in certain circumstances, among other options (Fish & G. Code, §§ 2080.1, 2081, subds. (b) and (c)). Early consultation is encouraged, as significant modification to a Project and mitigation measures may be required to obtain a CESA Permit.

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To ensure CDFW will be able to use the County's CEQA document for the issuance of an ITP, the DEIR should address all Project impacts to CESA-listed species and specify a mitigation, monitoring, and reporting program that will meet the requirements of an ITP.

Take under the federal ESA is more broadly defined than CESA; take under ESA also 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. Consultation with the United States Fish and Wildlife Service (USFWS), to comply with ESA, is advised well in advance of any Project-related ground-disturbing activities where impacts to special status ESA species will occur.

5. **Biological Baseline**. Attachment F – Biological Resources Report includes the BRA from David Wolff Environmental, LLC dated January 30, 2025, and the BTR from ESA dated July 2025. These reports include wildly opposing conclusions regarding the biological resources associated with the Project. Ultimately, CDFW believes the Project will result in significant adverse impacts to biological resources. CDFW recommends the County assume presence of special status species observed and utilize the results according to the BTR. In order to adequately disclose and analyze impacts to biological resources, it is necessary to utilize a thorough assessment of the plant and wildlife species and habitats that occur within both the entire Project impact footprint and in surrounding areas that may be impacted indirectly by Project construction or ongoing use. Baseline biological information should be provided for areas that will be directly or indirectly impacted by the development as well as areas that are proposed for conservation and/or compensatory mitigation.

CDFW recommends the County utilize the BTR for an accurate representation of biological resources in the subsequent environmental document. Lastly, CDFW offers coordination with the County to assist in conducting a thorough, robust evaluation of the potential impacts to biological resources resulting from the Project as well as the development of avoidance and minimization measures and compensatory mitigation necessary to reduce impacts to a level of less than significant.

6. **Crotch's Bumble Bee**. The BTR includes conflicting data regarding the presence of Crotch's bumble bee. Appendix E. Special-Status Wildlife Species with Potential to Occur On-Site indicates that there is a high potential for the species to occur on site

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due to suitable habitat for foraging and nesting. On the other hand, the potential for Crotch's bumble bee to occur on site indicated within MM G-10 Fish and Wildlife Jurisdiction Advisory is low. CDFW agrees with page 5-19 of the BTR to assume presence of the species to the current range, based on CDFW's [Crotch's Bumble Bee Range - CDFW \[ds3095\]¹](#) (CDFW 2026a), suitable habitat, and observations within a few miles of the Project site. In preparation of the Project's environmental document, CDFW recommends the County require the Project proponent to retain a qualified biologist with the appropriate handling permits to conduct focused surveys. Focused surveys should follow [CDFW's Survey Considerations for California Endangered Species Act Candidate Bumble Bee Species²](#). Focused surveys should also be conducted throughout the entire Project site during the appropriate flying season to ensure no missed detection of Crotch's bumble bee occurs. Findings from the focused survey should be included in the Project's environmental document for complete public disclosure and review.

The environmental document should provide a discussion of the Project's potential direct and indirect impacts on Crotch's bumble bee as well as their nesting, overwintering, and foraging habitat. The environmental document should provide measures to minimize and/or mitigate potential impacts to Crotch's bumble bee as well as habitat supporting the species. Coordination with CDFW is recommended and may include obtaining appropriate take authorization under CESA. Due to the CESA candidate listing, refer to Comment 4 above.

7. **Aquatic Species.** Attachment F – Biological Resources Report contains contradicting statements about the presence of habitat for aquatic species. Regarding vernal pool fairy shrimp, it says that the species would not occur because there is no suitable seasonal wetland/pond habitat. In discussing California tiger salamander there is discussion on pond habitat within the Project site leading to a high potential of occurrence. Due to pond habitat occurring within the Project site, CDFW believes there is suitable habitat for vernal pool fairy shrimp. CDFW is concerned that the presence of certain species has not been adequately evaluated, and recommends

¹ [Crotch's Bumble Bee Range - CDFW \[ds3095\] - Dataset - California Open Data](#)

² <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>

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the County provide a more thorough discussion as to whether presence of a species is being discounted based solely on a perceived lack of suitable habitat and conflicting survey results.

In addition to the discussion of suitable habitat, CDFW recommends focused surveys for California red-legged frog, California tiger salamander, southwestern pond turtle, vernal pool fairy shrimp, and western spadefoot toad be conducted following [established protocols](#)³ (CDFW 2026b) for each of these species given the presence of suitable habitat (e.g., the pond habitat within the Project site as discussed in Attachment F – Biological Resources Report). Surveys should include all areas that are proposed to be impacted by Project construction and ongoing use, areas proposed for conservation, and any adjacent areas that could be affected by changes in water availability or drainage patterns as a result of the Project. These surveys should be conducted prior to the County circulating their environmental document, and the document should include a discussion of the results of the surveys.

Finally, California tiger salamander, western spadefoot toad, and California red-legged frog occupy upland habitats to varying degrees outside breeding season. The County's environmental document should include a discussion of the potential for Project construction in uplands to result in harm or death to individuals, as well as avoidance and minimization measures to reduce potential direct impacts. The document should also include compensatory mitigation to replace upland dispersal habitats that are lost to Project construction. Additionally, compensatory mitigation is needed to offset the reduction of carrying capacity of remaining habitats that will be subject to edge effects from ongoing use of the Project.

8. **Lake and Streambed Alteration Agreement**. A complete delineation of potential streams on site has not been completed nor have they been provided with the Project materials. CDFW would agree with the BTR that possible stream habitat under CDFW's regulatory authority most likely exists within the Project impact areas. However, CDFW is unable to make meaningful comments regarding streams and wetlands due to the lack of reliable data provided. CDFW request the Project's environmental document

³ <https://wildlife.ca.gov/conservation/survey-protocols>

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include in-depth discussion on the following topics: evaluation of the various USGS blueline streams; areas of the site where topographic relief suggests the possibility of streams or aerial photographs show channels; locations of where the highway interchanges or improvements to Bicknell Road may cross streams; and a thorough understanding of the drainage patterns on the Project site.

CDFW exercises its regulatory authority as provided by Fish and Game Code section 1600 et seq. to conserve fish and wildlife resources which includes rivers, streams, or lakes and associated natural communities. As a Responsible Agency under CEQA, CDFW has authority over activities in streams and/or lakes that will divert or obstruct the natural flow, or change the bed, channel, or bank (including vegetation associated with the stream or lake) of a river or stream or use material from a streambed. For any such activities, the Project proponent (or "entity") must notify CDFW. Accordingly, because the Project would impact streams, the environmental document should include measures that require the Project proponent to notify CDFW pursuant to Fish and Game Code section 1602 prior to starting activities. Please visit CDFW's [Lake and Streambed Alteration Program⁴](#).

9. **Indirect Impacts**. CDFW recommends the environmental document evaluate the following indirect effects of the Project:

- Increased artificial night lighting from residential and commercial uses – this should be analyzed in the context of impacts to plants and wildlife.
- Increased ambient noise levels from residential and commercial uses and increased road usage – this should be analyzed in the context of impacts of noise on wildlife.
- Reduction in productivity and suitability of habitats adjacent to development due to human presence and domestic predators.

⁴ [Lake and Streambed Alteration Program](#)

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- Increased mortality from vehicle strikes, both from new internal roads and from lengthening the crossing distance with new and improved highway interchanges.
- Increased mortality from human/wildlife conflicts as development encroaches on habitats and narrows movement corridors.
- Unseasonal water availability due to irrigation or other water releases to the land. For example, habitats that are adapted to only seasonal precipitation could now be exposed to year-round elevated soil moisture. Changes in the soil moisture regime can promote nonnative weeds or disrupt seasonal cues for plants or wildlife. In addition, increased soil moisture is attractive to Argentine ants, which displace native ants, thereby eliminating the food supply for native horned lizards.
- Potential for park management activities to affect adjacent habitats, including:
 - introduction of nutrients and pesticides; and the effects to special status species (e.g., golden eagle)
 - control of gophers and ground squirrels and the effects to special status amphibians (e.g., California tiger salamander);
 - recreational trespass;
 - removal of vegetation resulting from safety concerns; and
 - potential of stormwater basins to attract aquatic wildlife and the impacts to such wildlife from subsequent maintenance of those basins.

10. **Mitigation Requirements.** Biological mitigation areas should be buffered from development, trails, and parks. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement and financial assurance and dedicated to a qualified entity for long-term management and monitoring. Additionally, the County's environmental document should include measures to protect the targeted habitat values in perpetuity. Issues that should be addressed include restrictions on access, proposed land dedications, monitoring and

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management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate endowment should be set aside to provide for long-term management of mitigation lands.

General Comments

- 1) Disclosure. The DEIR should provide an adequate, complete, and detailed disclosure about the effects which a proposed project is likely to have on the environment (Pub. Resources Code, § 20161; CEQA Guidelines, § 15151). Such disclosure is necessary so CDFW may provide comments on the adequacy of proposed avoidance, minimization, or mitigation measures, as well as assess the significance of the specific impact relative to plant and wildlife species impacted (e.g., current range, distribution, population trends, and connectivity).
- 2) Project Description and Alternatives. To enable adequate review and comment on the proposed Project from the standpoint of the protection of fish, wildlife, and plants, CDFW recommends the following information be included in the DEIR.
 - a. A complete discussion of the purpose and need for, and description of the proposed Project.
 - b. A range of feasible alternatives to the Project location to avoid or otherwise minimize direct and indirect impacts on sensitive biological resources and wildlife movement areas. CDFW recommends the County select Project designs and alternatives that would avoid or otherwise minimize direct and indirect impacts on biological resources. CDFW also recommends the County consider establishing appropriate setbacks from sensitive and special status biological resources. Setbacks should not be impacted by ground disturbance or hydrological changes from any future Project-related construction, activities, maintenance, and development. As a general rule, CDFW recommends reducing or clustering a development footprint to retain unobstructed spaces for vegetation and wildlife and provide connections for wildlife between properties and minimize obstacles to open space.
 - c. Project alternatives should be thoroughly evaluated, even if an alternative would impede, to some degree, the attainment of the Project objectives or

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would be more costly (CEQA Guidelines, § 15126.6). The DEIR shall include sufficient information about each alternative to allow meaningful evaluation, public participation, analysis, and comparison with the proposed Project (CEQA Guidelines, § 15126.6).

d. Where the Project may impact aquatic and riparian resources, CDFW recommends the County select Project designs and alternatives that would fully avoid impacts to such resources. CDFW also recommends an alternative that would not impede, alter, or otherwise modify existing surface flow, watercourse and meander, and water-dependent ecosystems and natural communities. Project designs should consider elevated crossings to avoid channelizing or narrowing of watercourses. Any modifications to a river, creek, or stream may cause or magnify upstream bank erosion, channel incision, and drop in water level, which may cause the watercourse to alter its course of flow.

3) Biological Baseline Assessment. An adequate biological resources assessment should provide a complete assessment and impact analysis of the flora and fauna within and adjacent to the Project site and where the Project may result in ground disturbance. The assessment and analysis should place emphasis on identifying endangered, threatened, rare, and sensitive species; regionally and locally unique species; and sensitive habitats. An impact analysis will aid in determining the Project's potential direct, indirect, and cumulative biological impacts, as well as specific mitigation or avoidance measures necessary to offset those impacts. CDFW also considers impacts to Species of Special Concern (SSC) a significant direct and cumulative adverse effect without implementing appropriate avoidance and/or mitigation measures. The DEIR should include the following information.

a. Information on the regional setting that is critical to an assessment of environmental impacts, with special emphasis on resources that are rare or unique to the region (CEQA Guidelines, § 15125(c)). The DEIR should include measures to fully avoid and otherwise protect Sensitive Natural Communities. 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

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can be obtained by visiting the [Vegetation Classification and Mapping Program - Natural Communities webpage](#)⁵.

- b. 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](#)⁶. Botanical field surveys should be comprehensive over the entire Project site, including areas that will be directly or indirectly impacted by the Project. Adjoining properties should also be surveyed where direct or indirect Project effects could occur, such as those from fuel modification, herbicide application, invasive species, and altered hydrology. Botanical field surveys should be conducted in the field at the times of year when plants will be both evident and identifiable. Usually, this is during flowering or fruiting. Botanical field survey visits should be spaced throughout the growing season to accurately determine what plants exist in the Project site. This usually involves multiple visits to the Project site (e.g., in early, mid, and late season) to capture the floristic diversity at a level necessary to determine if special status plants are present.
- c. Floristic alliance- and/or association-based mapping and vegetation impact assessments conducted in the Project site and within adjacent areas. The [Manual of California Vegetation](#)⁷, second edition, (Sawyer, Keeler-Wolf, & Evens, 2009) should also be used to inform this mapping and assessment. Adjoining habitat areas should be included in this assessment where the Project's construction and activities could lead to direct or indirect impacts off site.
- d. A complete and recent assessment of the biological resources associated with each habitat type in the Project site and within adjacent areas. A full literature review includes but is not limited to CDFW's [California Natural Diversity Database](#)⁸ (CNDDDB). The CNDDDB should be accessed to obtain current information on any previously reported sensitive species and habitat. An assessment should include a minimum nine-quadrangle search of the CNDDDB to

⁵ <https://wildlife.ca.gov/Data/VegCAMP/Natural-Communities>

⁶ <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=18959&inline>

⁷ <https://vegetation.cnps.org/>

⁸ <https://wildlife.ca.gov/Data/CNDDDB>

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determine a list of species potentially present in the Project site. A nine-quadrangle search should be provided in the Project's CEQA document for adequate disclosure of the Project's potential impact on biological resources.

- e. A complete, recent, assessment of endangered, rare, or threatened species and other sensitive species within the Project site and adjacent areas, including SSC 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 the Project site should also be addressed such as wintering, roosting, nesting, and foraging habitat. Focused species-specific surveys, conducted at the appropriate time of year and time of day when the sensitive species are active or otherwise identifiable, may be required if suitable habitat is present. See [CDFW's Survey and Monitoring Protocols and Guidelines](#)⁹ for established survey protocol. Acceptable species-specific survey procedures may be developed in consultation with CDFW and U.S. Fish and Wildlife Service.
 - f. A recent wildlife and rare plant survey. A lack of records in the CNDDDB does not mean that rare, threatened, or endangered plants and wildlife do not occur. Field verification for the presence or absence of sensitive species is necessary to provide a complete biological assessment for adequate CEQA review (CEQA Guidelines, § 15003(i)). CDFW generally considers biological field assessments for wildlife to be valid for a one-year period, and assessments for rare plants may be considered valid for a period of up to three years. Some aspects of the proposed Project may warrant periodic updated surveys for certain sensitive taxa, particularly if Project implementation build out could occur over a protracted time frame or in phases.
- 4) Direct and Indirect Impacts on Biological Resources. The DEIR should provide a thorough discussion of direct and indirect impacts expected to affect biological

⁹ <https://wildlife.ca.gov/conservation/survey-protocols>

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resources with specific measures to offset such impacts. The DEIR should address the following.

- a. A discussion of potential impacts from lighting, noise, temporary and permanent human activity, and exotic species, and identification of any mitigation measures. A discussion regarding Project-related indirect impacts on biological resources. These include 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.)).
 - b. A discussion of both the short-term and long-term effects of the Project on species population distribution and concentration, as well as alterations of the ecosystem supporting those species impacted (CEQA Guidelines, §15126.2(a)).
 - c. Impacts on, and maintenance of, wildlife corridor/movement areas, including access to undisturbed habitats in areas adjacent to the Project, should be fully analyzed and discussed in the DEIR.
 - d. A discussion of post-Project fate of drainage patterns, surface flows, and soil erosion and/or sedimentation in streams and water bodies. The discussion should also address the potential water extraction activities and the potential resulting impacts on habitat supported by the groundwater. Measures to mitigate such impacts should be included.
 - e. An analysis of impacts from proposed changes to land use designations and zoning, and existing land use designation and zoning located nearby or adjacent to natural areas that may inadvertently contribute to wildlife-human interactions. A discussion of possible conflicts and mitigation measures to reduce these conflicts should be included in the DEIR.
- 5) Cumulative Impact. Cumulative impacts on biological resources can result from collectively significant projects which are individually insignificant. The Project, when considered collectively with prior, concurrent, and probable future projects, may have a significant cumulative effect on biological resources. The Project may have the potential to substantially reduce the number or restrict the range of endangered, rare,

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or threatened species. Species that may be impacted by the Project include, but are not limited to, the biological resources described in this letter.

Accordingly, CDFW recommends the DEIR evaluate the Project's potential cumulative impacts on biological resources. The Project may have a "significant effect on the environment" if the possible effects of the Project are individually limited but cumulatively considerable. "Cumulatively considerable" means that the incremental effects of an individual 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 (Pub. Resources Code, § 21083(b)). The County's conclusions regarding the significance of the Project's cumulative impact should be justified and supported by evidence to make those conclusions. Specifically, if the County concludes that the Project would not result in cumulative impacts on biological resources, the County, "shall identify facts and analysis supporting the Lead Agency's conclusion that the cumulative impact is less than significant" (CEQA Guidelines section § 15130(a)(2)).

- 6) Mitigation Measures. Public agencies have a duty under CEQA to prevent significant, avoidable damage to the environment by requiring changes in a project through the use of feasible alternatives or mitigation measures (CEQA Guidelines, §§ 15002(a)(3), 15021). Pursuant to CEQA Guidelines section 15126.4, an environmental document shall describe feasible measures which could mitigate impacts below a significant level under CEQA. Mitigation measures must be feasible, effective, implementable, and fully enforceable/imposed by the Lead Agency through permit conditions, agreements, or other legally binding instruments (Pub. Resources Code, § 21081.6(b); CEQA Guidelines, § 15126.4).
 - a. The DEIR should provide mitigation measures that are specific and detailed (i.e., responsible party, timing, specific actions, location) in order for a mitigation measure to be fully enforceable and implemented successfully via a mitigation monitoring and/or reporting program (Pub. Resources Code, § 21081.6; CEQA Guidelines, § 15097).
 - b. If a proposed mitigation measure would cause one or more significant effects, in addition to impacts caused by the proposed Project, the DEIR should include a discussion of the effects of proposed mitigation measures (CEQA Guidelines, §

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15126.4(a)(1)). In that regard, the DEIR should provide an adequate, complete, and detailed disclosure about the Project's proposed mitigation measure(s). Adequate disclosure is necessary so CDFW may assess the potential impacts of proposed mitigation measures.

- 7) Compensatory Mitigation. The DEIR should include compensatory mitigation measures for the Project's significant impacts (direct and/or through habitat modification) to sensitive and special status plants, animals, and habitats. Mitigation measures should emphasize avoidance and minimization of Project-related impacts. For unavoidable impacts, on-site habitat restoration or enhancement should be discussed in detail. If on-site mitigation is not feasible or would not be biologically viable and therefore inadequate to mitigate the loss of biological functions and values, off-site mitigation through habitat creation and/or acquisition and preservation in perpetuity should be addressed. Areas proposed as mitigation lands should be protected in perpetuity with a conservation easement and financial assurance and dedicated to a qualified entity for long-term management and monitoring.
- 8) Long-term Management of Mitigation Lands. For proposed mitigation lands, the DEIR should include measures to protect the targeted habitat values in perpetuity. The mitigation should offset Project-induced qualitative and quantitative losses of biological resources. Issues that should be addressed include (but are not limited to) restrictions on access, proposed land dedications, monitoring and management programs, control of illegal dumping, water pollution, and increased human intrusion. An appropriate endowment should be set aside to provide for long-term management of mitigation lands.
- 9) Translocation/Salvage of Plants and Animal Species. Translocation and transplantation are the processes of removing plants and wildlife from one location and permanently moving it to a new location. CDFW generally does not support the use of translocation or transplantation as the primary mitigation strategy for unavoidable impacts to endangered, rare, or threatened plants and animals. These efforts are experimental, and the outcome is unreliable. CDFW has found that permanent preservation and management of habitat capable of supporting these species is often a more effective long-term strategy for conserving plants and animals and their habitats.

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10) Scientific Collecting Permit and Voucher Collecting Permit.

A Scientific Collecting Permit would be necessary if there is a plan to capture and relocate wildlife. Pursuant to the California Code of Regulations, title 14, section 650, qualified biologist(s) must obtain appropriate handling permits to capture, temporarily possess, and relocated wildlife to avoid harm or mortality in connection with Project-related 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). 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). For more information, please see CDFW's [Scientific Collecting Permit webpage](#)⁸. A voucher collection permit is required to collect state-listed plant species for identification purposes during field surveys, or to collect voucher specimens to document a newly-discovered or previously unvouchered occurrence of a state-listed plant. There is no charge to apply for a voucher collection permit. Anyone who collects scientific plant specimens of state-listed species, or who may encounter a state-listed species during field surveys should have a plant voucher collection permit. To apply for a Voucher Collecting Permit please see CDFW's [Voucher Collecting Permit Page](#)¹⁰.

11) Wetland Resources. CDFW, as described in Fish and Game Code section 703(a), is guided by the Fish and Game Commission's (Commission) policies¹¹. Through its Wetlands Resources policy, the Commission "...seek[s] to provide for the protection, preservation, restoration, enhancement, and expansion of wetland habitat in California" (California Fish and Game Commission, 2005). It is the policy of the Commission to strongly discourage development in or conversion of wetlands. It opposes, consistent with its legal authority, any development or conversion that would result in a reduction of wetland acreage or wetland habitat values. To that end, the Commission opposes wetland development proposals unless, at a minimum, project mitigation assures there will be 'no net loss' of either wetland habitat values or

¹⁰ [Voucher Collecting Permit Page](#)¹⁰.

¹¹ [Miscellaneous Policies](#)

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acreage. The Commission strongly prefers mitigation which would achieve expansion of wetland acreage and enhancement of wetland habitat values."

- a. The Wetlands Resources policy provides a framework for maintaining wetland resources and establishes mitigation guidance. CDFW encourages avoidance of wetland resources as a primary mitigation measure and discourages the development or type conversion of wetlands to uplands. CDFW encourages activities that would avoid the reduction of wetland acreage, function, or habitat values. Once avoidance and minimization measures have been exhausted, a project should include mitigation measures to assure a "no net loss" of either wetland habitat values, or acreage, for unavoidable impacts to wetland resources. Conversions include, but are not limited to, conversion to subsurface drains, placement of fill or building of structures within the wetland, and channelization or removal of materials from the streambed. All wetlands and watercourses, whether ephemeral, intermittent, or perennial, should be retained and provided with substantial setbacks, which preserve the riparian and aquatic values and functions benefiting local and transient wildlife populations. CDFW recommends mitigation measures to compensate for unavoidable impacts be included in the Project's environmental document and these measures should compensate for the loss of function and value.
- b. The Fish and Game Commission's Water policy guides CDFW on the quantity and quality of the waters of this State that should be apportioned and maintained respectively so as to produce and sustain maximum numbers of fish and wildlife; to provide maximum protection and enhancement of fish and wildlife and their habitat; encourage and support programs to maintain or restore a high quality of the waters of this State; prevent the degradation thereof caused by pollution and contamination; and, endeavor to keep as much water as possible open and accessible to the public for the use and enjoyment of fish and wildlife. CDFW recommends avoidance of water practices and structures that use excessive amounts of water, and minimization of impacts that negatively affect water quality, to the extent feasible (Fish & G. Code, § 5650).

12) Use of Native Plants and Trees. CDFW recommends the County require the Project Applicant to provide a native plant palette for the Project. The Project's landscaping

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plan should be disclosed and evaluated in the DEIR for potential impacts on biological resources such as natural communities adjacent to the Project site (e.g., introducing non-native, invasive species). CDFW supports the use of native plants for the Project especially considering the Project's location adjacent to protected open space and natural areas. CDFW strongly recommends avoiding non-native, invasive species for landscaping and restoration, particularly any species listed as 'Moderate', 'High', 'Limited', and 'Watch' by the [California Invasive Plant Council](#)¹² CDFW supports the use of native species found in naturally occurring plant communities within or adjacent to the Project site. In addition, CDFW supports planting native species of trees, such as oaks (*Quercus* genus), and understory vegetation (e.g., ground cover, vines, subshrubs, and shrubs) that create habitat and provide a food source for birds. CDFW recommends retaining any standing, dead, or dying tree (snags) where possible because snags provide perching and nesting habitat for birds and raptors. Finally, CDFW supports planting species of vegetation with high insect and pollinator value.

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 CNDDDB. The CNDDDB website provides direction regarding the types of information that should be reported and allows on-line submittal of field survey forms.

In addition, information on special status native plant populations and sensitive natural communities, should be submitted to CDFW's Vegetation Classification and Mapping Program using the Combined Rapid Assessment and Relevé Form¹³.

The County should ensure data collected for the preparation of the Project's environmental document is properly submitted.

FILING FEES

¹² <https://www.cal-ipc.org/plants/inventory/>

¹³ [Natural Communities — Submitting Information](#)

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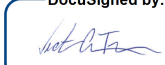
The Project, as proposed, would have an impact on fish and/or wildlife, and assessment of filing fees is necessary. Fees are payable upon filing of the Notice of Determination by the Lead Agency and serve to help defray the cost of environmental review by CDFW. Payment of the fee is required in order for the underlying project approval to be operative, vested, and final. (Cal. Code Regs, tit. 14, § 753.5; Fish & G. Code, § 711.4; Pub. Resources Code, § 21089.)

CONCLUSION

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

Questions regarding this letter or further coordination should be directed to Joleena De La Fe¹⁴, Environmental Scientist.

Sincerely,

DocuSigned by:

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Victoria Tang
Environmental Program Manager
South Coast Region

ATTACHMENTS

ec: California Department of Fish and Wildlife
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REFERENCES

California Fish and Game Commission. 2005. *Miscellaneous Policies*. Retrieved from <https://fgc.ca.gov/About/Policies/Miscellaneous>

California Department of Fish and Wildlife. 2023. "Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species." <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=213150&inline>.

[CDFW] California Department of Fish and Wildlife. 2026a. Crotch's Bumble Be Range – CDFW [ds3095]. Available from: [Crotch's Bumble Bee Range - CDFW \[ds3095\]](#)

[CDFW] California Department of Fish and Wildlife. 2026b. Survey and Monitoring Protocols and Guidelines. Available from: <https://wildlife.ca.gov/conservation/survey-protocols>