

### Mitigation Monitoring and Reporting Program

prepared by

**Montecito Water District** 

583 San Ysidro Road

Santa Barbara, California 93108

Contact: Adam Kanold, Assistant General Manager/Engineering Manager

prepared with the assistance of

Rincon Consultants, Inc.

209 East Victoria Street Santa Barbara, California 93101

**July 2021** 



### Mitigation Monitoring and Reporting Program

CEQA requires that a reporting or monitoring program be adopted for the conditions of project approval that are necessary to mitigate or avoid significant effects on the environment (Public Resources Code 21081.6). This mitigation monitoring and reporting program is intended to track and ensure compliance with adopted mitigation measures during the project implementation phase. For each mitigation measure recommended in the Final Initial Study-Mitigated Negative Declaration for the Montecito Water District (District) Reservoir Retrofit and Replacement Project, specifications are made herein that identify the action required, the monitoring that must occur, and the agency or department responsible for oversight.

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Com- pliance Verifi- cation Comme nts
Air Quality			_	_			
AQ-1: Fugitive Dust Control Measures  The following standard SBCAPCD fugitive dust control measures shall be implemented during project construction activities:	Include fugitive dust control measures in construction contractor specifications, as applicable	Prior to the issuance of construction bid documents	Once	Montecito Water District			
<ul> <li>During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site and from exceeding SBCAPCD's limit of 20 percent opacity for greater than three minutes in any 30 minute period. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency shall be required whenever the wind speed exceeds 15 miles per hour (mph). Reclaimed water shall be used whenever practicable. However, reclaimed water shall not be used in or around crops for human consumption.</li> <li>The amount of disturbed area shall be minimized.</li> </ul>	Field verify compliance with fugitive dust control measures	During construction	Periodically	_			
<ul> <li>On-site vehicle speeds shall be no greater than 15 mph when traveling on unpaved surfaces.</li> </ul>							
A track-out prevention device shall be installed and operated 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.							

							Com-
					Com-	Com-	pliance
					pliance	pliance	Verifi-
					Verifi-	Verifi-	cation
Mitigation Measure/			Monitoring	Responsible	cation	cation	Comme
Condition of Approval	Action Required	<b>Monitoring Timing</b>	Frequency	Agency	Initial	Date	nts

- If stockpiling of material is involved, soil stockpiled for more than one day shall be covered, kept moist, or treated with soil binders to prevent dust generation.
- After clearing, grading, earth moving or excavation is completed, the disturbed area shall be treated by watering, or using rollcompaction, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur. All driveways and sidewalks to be paved/surfaced shall be completed as soon as practicable.
- The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust off-site. 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 the SBCAPCD prior to grading/building permit issuance and/or map clearance.
- The project contractor(s) shall comply with SBCAPCD Rule 345: Control of Fugitive Dust from Construction and Demolition Activities, including all applicable standards and measures therein.

# Montecito Water District Reservoir Retrofit and Replacement Project

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Com- pliance Verifi- cation Comme nts
Biological Resources							
BIO-1: Worker Environmental Awareness Program							
Prior to initiation of all construction activities (including staging and mobilization), all personnel associated with project construction shall attend a Worker Environmental Awareness Program (WEAP) training, conducted by a qualified biologist, to assist workers in recognizing special status biological resources which may occur in the study area. This training will include information about nesting birds and the special status species potentially occurring in the study area.	Retain a qualified biologist to conduct a Worker Environmental Awareness Program training and review documentation of training	Prior to initiation of all construction activities (including staging and mobilization)	Once	Montecito Water District			
The specifics of this program shall include identification of special status species and habitats, a description of the regulatory status and general ecological characteristics of special status resources, and review of the limits of construction and measures required to avoid and minimize impacts to biological resources within the work area. A fact sheet conveying this information shall also be prepared for distribution to all contractors, their employees, and other personnel involved with construction of the project. All employees shall sign a form provided by the trainer documenting they have attended the WEAP and understand the information presented to them. The crew foreman shall be responsible for ensuring crew members adhere to the guidelines and restrictions designed to avoid impacts to special status species. If new construction personnel are added to the project, the crew foreman shall confirm the new personnel receive the WEAP training before starting work. The subsequent							

Mitigation Measure/ Condition of Approval training of personnel can include a video recording of the initial training and/or the use of written materials rather than in-person training by a biologist.	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Com- pliance Verifi- cation Comme nts
BIO-2: Sensitive Habitat Fencing							
Prior to project mobilization, where the project is adjacent to native habitat (i.e., environmentally sensitive habitat [ESH], riparian habitat, sensitive natural communities); temporary construction fencing shall be erected by the contractor at the edge of the temporary construction area to avoid impacts to the habitat throughout the duration of construction. If complete avoidance is not feasible, impacts shall be minimized as described in Mitigation Measure BIO-3.	Field verify erection of temporary construction fencing around ESH	Prior to project mobilization and during construction	Periodically	Montecito Water District			
BIO-3: Minimization of Sensitive Habitat Impacts							
If encroachment into sensitive natural communities cannot be avoided, areas of temporary disturbance within these habitats	Include minimization measures in construction contractor specifications, as applicable	Prior to the issuance of construction bid documents	Once	Montecito Water District			
shall be minimized to the extent practicable. Staging and parking areas shall be limited to sites which are unvegetated and/or previously disturbed areas comprising ruderal vegetation or non-native annual grasslands, ornamental landscaping, and paved/graded areas, to the extent practicable. If removal of consistive	Field verify compliance with minimization measures	During construction, if temporary disturbance of sensitive natural communities cannot be avoided	As needed	-			
extent practicable. If removal of sensitive vegetation is necessary during excavation and/or grading, the topsoil (top six inches) shall be salvaged and stored in temporary stockpiles and replaced in the same area following completion of excavation/grading activities. If removal of non-native invasive vegetation is necessary during excavation and/or grading, the	Field verify compliance with topsoil salvage, storage, and replacement requirements	During construction, if removal of sensitive vegetation is necessary	As needed				

Mitigation Measure/ Condition of Approval  plant material and topsoil shall be separated and exported off-site to a landfill or similar disposal facility. Temporary stockpiles with invasive species shall be stored away from salvaged sensitive natural communities and separate from sensitive vegetation topsoil. If revegetation of the site is necessary for soil stabilization and/or fugitive dust control, the revegetation plant palette shall be free of invasive plants listed in the California Invasive	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Compliance Verification Comme nts
Plant Council Inventory.  BIO-4: Construction Material Storage to Prevent Leaks and Spills							
Materials and equipment (when not in use) shall be stored on impervious surfaces or plastic ground covers to prevent spills or leakage.	Include construction material storage measures in construction contractor specifications, as applicable	Prior to the issuance of construction bid documents	Once	Montecito Water District			
Material storage and material/spoils from project activities shall be located and stored 100 feet from waterways. Adequate spill prevention and response equipment shall be maintained on site and readily available to implement to minimize impacts to the aquatic and marine environments. Construction materials and spoils shall be protected from stormwater runoff using temporary perimeter sediment barriers such as berms, silt fences, fiber rolls, covers, sand/gravel bags, and straw bale barriers, as appropriate.	Field verify compliance with construction material storage measures	During construction	Periodically	-			

Mitigation Measure/ Condition of Approval BIO-5: Construction Best Management Practices	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Com- pliance Verifi- cation Comme nts
To avoid and/or minimize potential direct and indirect impacts to special status species and potentially jurisdictional waters and water	Include BMPs in construction contractor specifications, as applicable	Prior to the issuance of construction bid documents	Once	Montecito Water District			
quality outside of the project area, the following Best Management Practices (BMPs) shall be implemented:	Field verify compliance with BMPs	During construction	Periodically	-			
a. Prior to project mobilization, all limits of construction work adjacent to potentially jurisdictional waters shall be clearly delineated with orange construction fencing or similar highly visible material and maintained throughout the duration of construction.							
<ul> <li>Off-site tracking of loose construction and landscape materials shall be prevented by implementing street sweeping, vacuuming, and rumble plates, as appropriate.</li> </ul>							
c. Site washout areas shall be at least 100 feet from a storm drain, open ditch, or surface water and prevent runoff flows from such activities from entering receiving water bodies.							
d. All vehicles and equipment shall be in good working condition and free of leaks. The contractor shall prevent oil, petroleum products, or any other pollutants from contaminating the soil or entering a watercourse (dry or otherwise). When vehicles or equipment are stationary, mats or drip pans shall be placed below vehicles to contain fluid leaks.							

# Montecito Water District Reservoir Retrofit and Replacement Project

Mitigation Measure/ Condition of Approval  e. Fugitive dust from ground disturbance activities shall be minimized using water trucks and covering of soil stockpiles.  f. A speed limit of 15 mph for construction vehicles shall be implemented on unpaved non-public roads.  g. All food related trash shall be disposed of in closed containers and removed from the project site each day during the construction period. Construction personnel shall not feed or otherwise attract wildlife to the construction area. At project completion, all project-generated debris, vehicles, building materials, and rubbish shall be removed from the project site.  h. Pets and firearms shall not be allowed on the project sites during construction.	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Compliance Verification Initial	Compliance Verification Date	Com- pliance Verifi- cation Comme nts
BIO-6: Arborist Study							
Prior to the start of construction, an Arborist Study should be conducted for protected trees	Retain a Certified Arborist to complete an Arborist Study	Prior to the start of construction	Once	Montecito Water			
with any portion of their dripline within the project area and a 20-foot buffer. Protected trees shall be defined as native trees that are six inches or greater in diameter, as is standard in the county. The study should plot the location of protected trees and identify the species. The Arborist Report shall be prepared by a Certified Arborist and include, at minimum, the following:  An inventory of all trees containing a canopy drip line within 20 feet of the project area, as feasible without trespassing on private lands. Inventory data shall record, at minimum: diameter at breast height (DBH), height, canopy spread, and overall health rating	Review and approve Arborist Study	Prior to the start of tree-disturbing construction activities	Once	District			

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Com- pliance Verifi- cation Comme nts
<ul> <li>Description of proposed site development activities including, but not limited to, excavation and grading, any tree trimming for access, and staging/parking.</li> <li>Tree protection recommendations which would at a minimum include a site plan depicting the project area, the tree protection zone (TPZ; six feet from the dripline, as is typical in the county¹), and project encroachment boundaries; tree protection fencing, activities prohibited/permitted within the tree protective zone, and standard measures for protecting trees during construction.</li> <li>The Arborist Report shall be submitted to the District for approval prior to the start of any tree-disturbing construction activities.</li> </ul>							
BIO-7: Pre-Construction Nesting Bird Surveys							
To avoid disturbance of nesting and special status birds, including raptor species, protected by the MBTA and CFGC 3503, activities related to the project including, but not limited to, vegetation removal, ground disturbance, and	Retain a qualified biologist to conduct a pre-construction nesting bird survey and review survey results	Within seven days prior to initiation of ground disturbance and vegetation removal activities	Once per reservoir site	Montecito Water District			
construction and demolition shall occur outside of the bird breeding season for migratory birds (January 1 through September 1), if practicable. If construction must begin during the breeding season, then a pre-construction nesting bird survey shall be conducted no more than seven days prior to initiation of ground disturbance and vegetation removal activities. The nesting bird pre-construction survey shall be conducted on foot inside the project footprint, including a 100-foot buffer (300 feet for raptors), and in inaccessible areas (e.g., private lands) from afar	Field verify compliance with any avoidance requirements, as needed	During initial ground disturbance and vegetation removal activities, as needed, until nests are inactive	Once per reservoir site	-			

# Montecito Water District Reservoir Retrofit and Replacement Project

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Com- pliance Verifi- cation Comme nts
using binoculars to the extent practicable. The survey shall be conducted by a biologist familiar with the identification of avian species known to occur in southern California coastal communities. If nests are found, an avoidance buffer (dependent upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site) shall be determined and demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground-disturbing activities shall occur inside this buffer until the avian biologist has confirmed breeding/nesting is completed, and the young have fledged the nest. Encroachment into the buffer shall occur only at the discretion of the qualified biologist.							
BIO-8: Pre-Construction Presence/Absence Survey for Special Status Wildlife Species							
Within seven days prior to the commencement of ground disturbing activities, a qualified biologist shall be retained to perform a survey for coast range newt, coast patch-nosed snake, and northern California legless lizard in natural	Retain a qualified biologist to perform a pre-construction special status species survey	Within seven days prior to the commencement of ground-disturbing activities	Once per reservoir site as needed	Montecito Water District			
habitat areas within the project footprint and a 50-foot buffer to determine the presence/absence of these species. The preconstruction survey shall be conducted on foot within the project footprint and 50-foot buffer. Raking shall be conducted in areas of sandy,	Field verify implementation of avoidance measures	During construction	As needed, if special status species are identified	_			
loose, and moist soils under sparse	Review pre-construction survey technical memorandum	Prior to project completion	Once	_			

Mitigation Measure/ Condition of Approval  vegetation/leaf litter to determine the presence/absence of northern California legless lizard. The qualified biologist shall temporarily move any identified special status wildlife species outside of the construction area, and temporary barriers shall be placed around the construction area, as practicable, to prevent ingress. Construction shall not proceed until the work area is determined to be free of special status wildlife species. The results of these surveys shall be documented in a technical memorandum.	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Compliance Verification Comme nts
BIO-9: Biological Construction Monitoring							
A qualified biological monitor shall be present during initial ground-disturbing activities and vegetation removal to confirm impacts to special status wildlife species are avoided. The monitor shall have the authority to halt construction activities to avoid potential impacts to special status species. The results of biological monitoring shall be documented in	Retain qualified biological monitor to monitor for special status species during initial ground-disturbing activities and vegetation removal	Prior to start of initial ground-disturbing activities and vegetation removal	Daily for initial ground-disturbing and vegetation removal activities	Montecito Water District			
daily logs and a technical memorandum at project completion.	Review biological monitoring technical memorandum	After project completion	Once				
BIO-10: Night Construction and Night Lighting							
Night-time construction should be avoided adjacent to Hot Springs Creek and the four unnamed drainages associated with the Terminal, Hot Springs, Park Lane, Buena Vista, and Bella Vista sites to avoid impacts to special	Avoid night-time construction adjacent to Hot Springs Creek and the four unnamed drainages associated with the Terminal, Hot Springs, Park Lane, Buena Vista, and Bella Vista sites	During construction	As needed	Montecito Water District			
status wildlife in and near these drainages. If construction must occur at night (between dusk and dawn), all lighting will be shielded and directed downward to minimize the potential for glare or spillover onto adjacent properties and to reduce impacts on local wildlife.	If night-time construction must occur, field verify that lighting is shielded and directed downward	During construction	Periodically, as needed				

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Com- pliance Verifi- cation Comme nts
Cultural Resources							
CUL-1: Unanticipated Discovery of Archaeological Resources							
In the event cultural resources are unexpectedly encountered during ground-disturbing activities, work in the immediate area must halt and an archaeologist meeting the Secretary of the	Retain an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology <sup>2</sup>	During ground- disturbing activities, if cultural resource is identified	As needed	Montecito Water District			
Interior's Professional Qualification Standards for archaeology <sup>2</sup> shall be contacted immediately to evaluate the find. If the discovery proves to be NRHP eligible, additional work such as data recovery excavation and Native American	Field verify required evaluation of the identified resource	During ground- disturbing activities, if cultural resource is identified	As needed	-			
consultation may be warranted to mitigate any adverse effects.	If discovery is NRHP eligible, complete additional work to mitigate adverse effects, if needed	During ground- disturbing activities, if cultural resource is identified	As needed	-			
Geology and Soils							
GEO-1: Unanticipated Discovery of Paleontological Resources							
In the event an unanticipated fossil discovery is made during the course of project development, construction activity should be halted in the	Notify and retain a qualified paleontologist	During construction, if paleontological resource is identified	As needed	Montecito Water District			
immediate vicinity of the fossil, and a qualified professional paleontologist should be notified and retained to evaluate the discovery,	Field verify required evaluation of the identified resource	During construction, if paleontological resource is identified	As needed				
determine its significance, and determine if additional mitigation or treatment is warranted. Work in the area of the discovery will resume once the find is properly documented and	If additional mitigation or treatment is warranted, implement additional measures	During construction, if paleontological resource is identified	As needed				
authorization is given to resume construction work. Any significant paleontological resources found during construction monitoring will be prepared, identified, analyzed, and permanently curated in an approved regional museum	Prepare, identify, analyze, and permanently curate significant paleontological resources	During construction, if significant paleontological resource is identified	As needed	-			

Mitigation Measure/ Condition of Approval repository under the oversight of the qualified paleontologist.	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Com- pliance Verifi- cation Comme nts
Noise							
N-1: Construction Noise Reduction Measures							
The following construction noise reduction measures shall be implemented during project construction activities:	Include construction noise measures in construction contractor specifications, as applicable	Prior to the issuance of construction bid documents	Once	Montecito Water District			
<ul> <li>Installation of temporary sound barriers/blankets along each project boundary line adjacent to the nearest single-</li> </ul>	Field verify compliance with construction noise reduction measures	During construction	Periodically				
family receivers, respectively. The temporary barriers/blankets shall have a minimum sound transmission loss of 21 and noise reduction coefficient of 0.75. The	Retain a noise consultant to conduct noise measurements at the use that registers a complaint	During construction, if noise complaint is registered, in a timely manner	As needed	_			
temporary barriers/blankets will be of sufficient height to extend from the top of the temporary construction fence and drape on the ground or be sealed at the ground. The temporary barriers/blankets will have grommets along the top edge with exterior grade hooks, and loop fasteners along the vertical edges with overlapping seams, with a minimum overlap of 2 inches	Review letter report of noise monitoring and implement additional feasible construction noise reduction measures	During construction, if noise complaint is registered	As needed				
<ul> <li>All heavy-duty stationary construction equipment shall be placed so that emitted noise is directed away from the nearest sensitive receivers.</li> </ul>							
A sign shall be provided at the yard entrance, or other conspicuous location, that includes a 24-hour telephone number for project information, and a procedure where a field engineer/construction manager will respond to and investigate noise complaints and take corrective action, if necessary, in a timely manner. The sign							

							Com-
					Com-	Com-	pliance
					pliance	pliance	Verifi-
					Verifi-	Verifi-	cation
Mitigation Measure/			Monitoring	Responsible	cation	cation	Comme
Condition of Approval	Action Required	<b>Monitoring Timing</b>	Frequency	Agency	Initial	Date	nts

will have a minimum dimension of 48 inches wide by 24 inches high. The sign will be placed 5 feet above ground level.

If a noise complaint(s) is registered, the contractor will retain a District-approved noise consultant to conduct noise measurements at the use(s) that registered the complaint. The noise measurements will be conducted for a minimum of 1 hour and will include 1-minute intervals. The consultant will prepare a letter report for code enforcement summarizing the measurements, calculation data used in determining impacts, and potential measures to reduce noise levels to the maximum extent feasible.

The following measures may also be used to reduce noise levels:

- The use of bells, whistles, alarms, and horns shall be restricted to safety warning purposes only.
- Noise-reducing enclosures shall be used around stationary noise-generating equipment (e.g., compressors and generators).
- Stationary noise-generating equipment shall be located as far from sensitive receivers, as feasible.

Mitigation Measure/ Condition of Approval	Action Required	Monitoring Timing	Monitoring Frequency	Responsible Agency	Com- pliance Verifi- cation Initial	Com- pliance Verifi- cation Date	Com- pliance Verifi- cation Comme nts
Tribal Cultural Resources							
TCR-1: Cultural Resources Sensitivity Training							
Prior to the start of ground-disturbing activities, an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology² shall conduct cultural and tribal cultural resources sensitivity training for all construction workers involved in ground-disturbing activities. A local Native American representative shall participate in the sensitivity training and have the opportunity to distribute information regarding cultural resources and/or protection of cultural resources.	Retain an archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology <sup>2</sup> to conduct a Worker's Environmental Awareness Program training, coordinate for a local Native American representative to participate in the training, and review documentation of training	Prior to the start of ground-disturbing activities	Once	Montecito Water District			
TCR-2: Native American Monitoring							
The District shall retain a local Native American representative to observe ground-disturbing activities up to five feet below the ground surface. Ground-disturbing activities include, but are not limited to, clearing/grubbing, excavation, grading, and trenching. If cultural resources are encountered, the local Native American representative shall have the authority to request ground-disturbing activities cease within 50 feet of the discovery. An archaeologist meeting the Secretary of the Interior's Professional Qualification Standards for archaeology² shall be contacted immediately to document and evaluate the find. Impacts to the find shall be avoided to the extent feasible; methods of avoidance may include, but shall not be limited to, capping or fencing, or project redesign. If necessary, the archaeologist may be required to prepare a treatment plan for archaeological testing in consultation with the local Native American representative. If the	Retain a local native American representative to observe ground-disturbing activities up to five feet below the ground surface	Prior to the start of ground-disturbing activities	Daily for ground-disturbing activities up to five feet below the ground surface	Montecito Water District			
	If needed, field verify required evaluation of the identified resource	During ground- disturbing activities, if cultural resource is identified	As needed				
	If avoidance is infeasible, prepare plan to reduce impacts to less than significant and conduct required consultation, if needed	During ground- disturbing activities, if cultural resource is identified	As needed				

							Com-
					Com-	Com-	pliance
					pliance	pliance	Verifi-
					Verifi-	Verifi-	cation
Mitigation Measure/			Monitoring	Responsible	cation	cation	Comme
Condition of Approval	Action Required	<b>Monitoring Timing</b>	Frequency	Agency	Initial	Date	nts

discovery proves to be eligible for the CRHR and cannot be avoided by the project, additional work, such as data recovery excavation, may be warranted to mitigate any significant impacts to historical resources.

SBCAPCD = Santa Barbara County Air Pollution Control District, mph = miles per hour; WEAP = Worker Environmental Awareness Program; ESH = environmentally sensitive habitat; BMP = Best Management Practice; DBH = diameter at breast height; TPZ = tree protection zone; MBTA = Migratory Bird Treaty Act; CFGC = California Fish and Game Code; NRHP = National Register of Historic Places

<sup>&</sup>lt;sup>1</sup> Santa Barbara, County of. 2021. Environmental Thresholds and Guidelines Manual. January 2021. Available at: https://www.countyofsb.org/plndev/permitting/environmentalreview.sbc.

<sup>&</sup>lt;sup>2</sup> National Park Service. 1983. Archaeology and Historic Preservation: Secretary of the Interior's Standards and Guidelines. Available at: http://www.nps.gov/history/local-law-Arch\_Standards.htm.