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Draft
Mitigated Negative Declaration

Stuart Whitman, Inc.
Vesting Tentative Tract Map
(Case No. 20TRM-00000-00001)

749 San Ysidro Road

March 2023

Project Proponent
Stuart Whitman, Inc.
6310 San Vicente Boulevard,
Suite 430
Los Angeles, CA 90048
(310) 477-5577

Agent
Steve Fort, AICP
SEPPS
1625 State Street, #1
Santa Barbara, CA 93101
(805) 966-2758

Prepared by
WSP USA Environment and
Infrastructure Inc. (WSP)
104 West Anapamu Street,
Suite 204A
Santa Barbara, CA 93101
(805) 962-0992

For More Information Contact Veronica King, Planner – Planning & Development (805) 568-2513

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Acronyms and Abbreviations

°F	degrees Fahrenheit
µg/m^3	micrograms per cubic meter
AB	Assembly Bill
ADU	Accessory Dwelling Unit
AF	acre feet
AFY	acre feet per year
APN	Assessor's Parcel Number
BMP	best management practice
CAAQS	California Ambient Air Quality Standards
CAL FIRE	California Department of Forestry and Fire Protection
CalEEMod	California Emissions Estimator Model
CARB	California Air Resources Board
CBC	California Building Code
CCIC	Central Coast Information Center
CDFW	California Department of Fish and Wildlife
CEC	California Energy Commission
CEQA	California Environmental Quality Act
CH_4	methane
CHL	California Historical Landmark
CNEL	Community Noise Equivalent Level
CO_2	carbon dioxide
CRHR	California Register of Historical Places
CRPR	California Rare Plant Rank
cy	cubic yard
dBA	A-weighted decibels
dbh	diameter breast height
ECAP	Energy and Climate Action Plan
EIA	U.S. Energy Information Administration
EIR	Environmental Impact Report
ESA	Environmental Site Assessment
ESCP	Erosion and Sediment Control Plan
ESH	Environmentally Sensitive Habitat
FEMA	Federal Emergency Management Agency
GHG	greenhouse gas
gpm	gallons per minute
GPS	global positioning system
HFC	hydrofluorocarbons
HUC	Hydraulic unit code
IPCC	International Panel on Climate Change
LUST	leaking underground storage tank
L_{max}	maximum sound level
MBAR	Montecito Board of Architectural Review
MBTA	Migratory Bird Treaty Act
FPD	Montecito Fire Protection District
MGB	Montecito Groundwater Basin
MJHMP	Multi-Jurisdictional Hazard Mitigation Plan
MLUDC	Montecito Land Use & Development Code
MT CO_2e/yr	metric tons of carbon dioxide equivalent per year
MWD	Montecito Water District
N_2O	nitrous oxide
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NO_x	nitrogen oxides
NF_3	nitrogen trifluoride
NPDES	National Pollutant Discharge Elimination System
NRCS	Natural Resources Conservation Service
NRHP	National Register of Historic Places
O_3	ozone
OPR	Office of Planning and Research
P&D	Planning & Development Division
PFC	perfluorocarbons
$PM_{2.5}$	particulate matter less than 2.5 micrometers in diameter
PM_{10}	particulate matter less than 10 micrometers in diameter
ppm	parts per million
psi	pounds per square inch
RWQCB	Regional Water Quality Control Board
SBCAPCD	Santa Barbara County Air Pollution Control District
SCCAB	South Central Coast Air Basin
SCS	Sustainable Communities Strategy
sf	square foot
SF_6	sulfur hexafluoride
SO_x	sulfur oxides
SR-	State Route
SRWMP	Source Reduction and Solid Waste Management Plan
SWMP	Storm Water Management Plan
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State Water Resources Control Board
SYBCI	Santa Ynez Band of Chumash Indians
TPP	Tree Protection Plan
tpy	tons per year
USACE	U.S. Army Corps of Engineers
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
V/C	volume to capacity
VMT	vehicle miles traveled
VOC	volatile organic compound

1.0 REQUEST / PROJECT DESCRIPTION

Project Background

The proposed Project includes the subdivision of an existing 13.02-acre residential property located at 749 San Ysidro Road in the community of Montecito, at the edge of the foothills of the Santa Ynez Mountains (see **Figure 1**). The proposed Project would establish four residentially developable parcels through the creation of a Vesting Tentative Tract Map (TM 14,851). It is anticipated that future development of up to four single-family residences and ancillary structures would be proposed at a later date by future property owners. The only construction proposed at this time is a shared-access driveway, drainage improvements for the shared-access driveway, utilities along the shared-access driveway to be stubbed at each proposed lot, a large planter and/or fountain at the cul-de-sac, and an entry gate.

Photograph 1. *The proposed Project would result in creation of four residentially developable parcels. Construction activities associated with the Vesting Tentative Tract Map would include demolition of the existing structures and hardscapes, limited grading, and construction of utilities and drainage improvements as well as a new shared-access driveway.*

The Project site, which is designated as Single Family-Semi-Rural Residential / Minimum Parcel Size – 3 acres, currently consists of one legal lot bordered by Oak Creek to the west and existing residential properties to the north, south, and east. Existing development at the Project site includes the existing approximately 2,978-square-foot (sf) single-family residence. Additional structures and ancillary improvements on the Project site include a barn, which is currently being used as an Accessory Dwelling Unit (ADU) as well as a primary garage, tennis court, pool, secondary detached garage and a caretaker cottage. The single-family residence and all of these ancillary improvements are clustered in the northwest corner of the Project site, adjacent to or within close proximity of Oak Creek. Existing access to the Project site is provided by an approximately 12-foot-wide private driveway that extends approximately 950 feet to the west from San Ysidro Road. Another gated, two-track dirt road also transverses the property, connecting San Ysidro Road in the southeast corner to the private driveway to the north.

The Project site slopes from north to south with an elevation change of approximately 75 feet over a distance of approximately 700 feet. The majority of the Project site is undeveloped and consists of non-native annual grassland that is mowed regularly to reduce potential wildfire hazards. There is extensive ornamental landscaping including mature non-native trees around the existing structures and along the private driveway. Coast live oak trees (*Quercus agrifolia*) and blue gum eucalyptus trees (*Eucalyptus globulus*) are located along the western boundary of the Project site along Oak Creek and scattered throughout the non-native annual grassland. Additionally, arroyo willows (*Salix lasiolepis*) are located along an unnamed ephemeral drainage that bisects the Project site. Both Oak Creek as well as the ephemeral drainage are mapped as Environmentally Sensitive Habitat (ESH) by the County of Santa Barbara.

Project Overview

The proposed Project would result in the creation of four developable parcels with Montecito Community Plan residential land use designations of Semi-rural Residential – 3-acre minimum parcel size (SRR-0.33) and Montecito Land Use & Development Code (MLUDC) zoning designations of 3-E-1 (Single Family Residential – 3-acre minimum parcel size). Each of the proposed lots would have a minimum lot size of 3 acres consistent with requirements of the respective land use and zoning designations.

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Project Vicinity Map

FIGURE 1

wsp

Project Site

FIGURE 2

Proposed Lot 1 would encompass approximately 3.14 acres of the eastern portion of the Project site. Proposed Lots 2 and 3, adjacent to Oak Creek on the western side of the Project site, would consist of approximately 3.03 gross acres and 3.34 gross acres, respectively. Proposed Lot 4, located in the center of the Project site, would also consist of approximately 3.54 gross acres. (The boundaries of the four developable parcels are shown on **Figure 2**.)

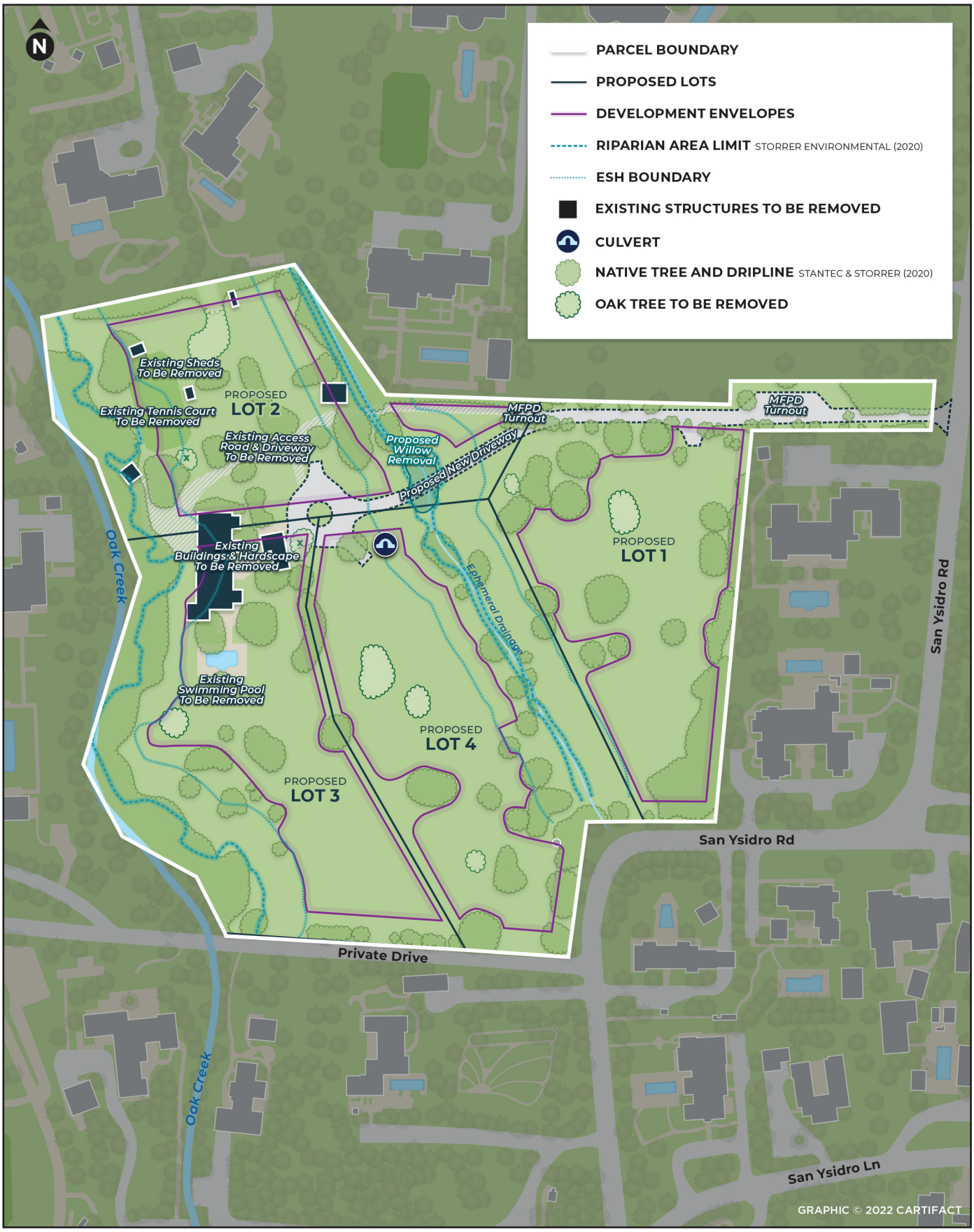
All future residential development would occur within the proposed development envelopes, with the exception of the sewer line connections to the existing sewer main, which would be located in proposed sewer line easements. Additionally, future stormwater facility designs may also require installation of storm drain lines and/or energy dissipaters outside of the development envelopes. The development envelopes would range in size from 1.23 to 1.64 acres and would be established as a part of the Vesting Tentative Tract Map. Complete plan drawings associated with the Vesting Tentative Tract Map are provided in **Attachment 1**.

Preliminary Demolition and Grading

The proposed Project would begin with the demolition of all existing structures and hardscapes associated with the existing residential property, including the 2,978-sf single-family residence, the barn that is currently being used as an ADU, primary garage, tennis court, pool, and the secondary detached garage. Following demolition, the approximately 950-foot-long private driveway would be rebuilt and extended to function as a shared-access driveway to serve the proposed lots. Construction of the shared-access driveway would require the following approximate raw earthwork quantities: 400 cubic yards (cy) of cut and 850 cy of fill in a limited area generally adjacent to the existing driveway and existing structures. Construction of the shared-access driveway would include a new culvert crossing over the unnamed ephemeral drainage on the west end of the driveway, replacement of an existing culvert in the approximate middle of the driveway, and drainage facilities to address runoff from the driveway, including a stormwater basin. Construction of these stormwater features would require the following approximate raw earthwork quantities: 380 cy of cut and 110 cy of fill. Additional construction activities would include trenching for utilities to serve the proposed lots and the proposed entry gate.

Photograph 2. *Implementation of the proposed Project would result in demolition and removal of five existing structures, including the primary residence, the barn that is currently used as an ADU, an outbuilding, and two garages. The existing pool and tennis court would also be demolished.*

Photograph 3. *A 10-foot-wide County right-of-way easement is located along the west side of San Ysidro Road. This easement would be maintained under the proposed Project and would continue to be used by pedestrians and horseback riders.*



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Proposed Project

FIGURE 3

Access Improvements

As previously described, the existing approximately 12-foot-wide by 950-foot-long private driveway would be demolished then rebuilt. The new 20-foot-wide shared-access driveway would be constructed extending west from San Ysidro Road for approximately 900 feet. (The proposed shared-access driveway would follow a portion of the existing driveway as it enters the property from San Ysidro Road.) This shared-access drive would provide direct access to proposed Lot 1 and would terminate at a roundabout that would provide additional access to proposed Lots 2, 3 and 4. A mechanical entry gate would be installed along the shared-access driveway, setback approximately 100 feet from its intersection with San Ysidro Road. Construction of the mechanical entry gate would require issuance of a Zoning Clearance and review by the Montecito Board of Architectural Review (MBAR) unless the gate is exempt from design review per MLUDC Section 35.472.070.C, *Exceptions to Design Review Requirements* (see MM VIS-3). Consistent with Montecito Fire Protection District (MFPD) requirements, in addition to the roundabout, the shared-access driveway would include two turnouts along the length of the road (see **Figure 3**). This access design was reviewed and approved by the MFPD on February 7, 2020 and again on October 25, 2022.

The gated, two-track dirt road that traverses the Project site would simply be left in place until future lot development is undertaken. Additionally, the 10-foot wide County right-of-way easement along San Ysidro Road that is used for hiking and equestrian use would also be maintained under the proposed Project.

Utility and Drainage Improvements

Existing 10- to 30-foot-wide utility easements are provided at the corner of San Ysidro Road and the existing private driveway.

An existing 10-foot-wide Montecito Sanitary District (District) sewer easement runs through the center of the Project site in a northwest-southeast direction. The proposed Project would provide 10-foot-wide sewer easements at each lot, connecting to the existing infrastructure. At the time of Vesting Tentative Tract Map application on September 15, 2020, the District determined there would be adequate capacity to treat additional wastewater associated with the proposed subdivision of the existing 13.02-acre property into four residentially developable parcels. Currently, the property is served by a Montecito Water District (MWD) meter; one private well is located in the southeast corner of the Project site within proposed Lot 4, A new MWD water connection would be constructed beneath the proposed shared-access driveway, connecting to the existing water main at San Ysidro Road. This would allow for waterline connections at each of the proposed developable parcels.

Future residential development of the subdivided lots, though not yet proposed, would be served by the MWD, Montecito Sanitary District, Southern California Edison, and the Southern California Gas Company. As part of the VTTM construction activities, utilities would be routed from San Ysidro Road along the new shared-access driveway and stubbed at each lot for connection by future residences.

Stormwater Drainage

Much of the stormwater at the existing Project site currently drains from the north property line to the south in a south-southeast direction. The western portion of the Project site drains to the southwest into Oak Creek and the central portion of the site drains into an unnamed ephemeral drainage bisecting the site. This drainage course also collects water from north of the Project site and discharges it at a culvert at San Ysidro Road.

The drainage associated with the proposed developable parcels has been studied conceptually to demonstrate that the stormwater flow direction would remain similar to existing conditions. It has been demonstrated to

Photograph 4. *An existing 24-inch culvert spans an unnamed ephemeral drainage bisecting the Project site.*

County Flood Control that the stormwater basin for the shared-access driveway is adequate, and adequate land area is available in each development envelope to accommodate stormwater associated with future residential development (GCV LLC 2021b). Future stormwater facilities for each proposed lot would be based on designs proposed for respective residences and subject to review and approval by P&D and County Flood Control**.** Future stormwater facility designs requiring installation of storm drain lines and/or energy dissipaters outside of the development envelopes shall avoid impacts to native vegetation or minimize any such impacts to the maximum extent feasible. Any potential impacts within ESH and/or the riparian corridor as a result of the installation of storm drain lines or energy dissipaters shall be mitigated by the Applicant and/or future property owner in accordance with the Habitat Restoration Plan (see MM BIO-6) and County-required mitigation ratios.

One 24-inch culvert within the ephemeral drainage would be replaced with a new 24-inch reinforced concrete culvert to accommodate flows from the ephemeral drainage beneath the proposed shared-access driveway. A second 24-inch culvert north of proposed Lot 1 would be replaced with a new 24-inch reinforced concrete culvert to continue to accommodate southerly flows coming from off the property to the north. This culvert is currently under the existing driveway which is proposed for replacement is not associated with an ephemeral drainage.

ESH and Riparian Impacts

Photograph 5. *Oak Creek forms the western boundary of the Project site and is considered ESH.*

The proposed development envelopes (see **Figure 3** and **Figure 5**) maintain a 50-foot structural setback from the top of bank along the majority of Oak Creek as required by the conditions of approval for a previously recorded Tract Map (TM 13,545), which created Assessor's Parcel Number (APN) 011-100-049 as it currently exists. The proposed development envelopes also generally maintain a 50-foot setback from the unnamed ephemeral drainage. However, portions of the proposed development envelopes for three of the developable parcels would extend into these setbacks. The proposed Project would allow for limited areas of ground disturbance (not structures) within 25 feet of top of bank or edge of riparian vegetation ESH (whichever is greater). These areas where the ESH buffer setback would be reduced are generally areas of degraded non-native grassland along the unnamed ephemeral drainage and areas where existing structural development and impermeable hardscape are being removed along Oak Creek (see **Attachment 2**).

Demolition of the existing structures and hardscapes within proposed Lots 2 and 3 would encroach into the 50-foot setback of Oak Creek. Demolition activities associated with the existing single-family residence as well as the existing tennis court would extend under the tree canopy along Oak Creek. Additionally, the demolition of the existing driveway and culvert would impact the unnamed ephemeral drainage. Following the completion of demolition activities, grading to establish the proposed retention basin for the shared driveway on proposed

Lots 1, 2, and 4 would also encroach into the arroyo willow ESH at the unnamed ephemeral drainage adjacent to the proposed shared driveway.

Two coast live oak trees are anticipated to be removed as a result of construction of the shared driveway and related drainage basin. The four proposed development envelopes include a total of nine additional coast live oak trees that could be impacted by future development. In total, initial demolition, grading, and future development activities would require removal of 11 of these trees and could result in root intrusion or other indirect impacts to other nearby trees. In addition, there is one arroyo willow thicket that would be impacted as a result of construction of the shared-access driveway and related stormwater basin. One additional arroyo willow thicket would likely be removed by future development on proposed Lot 1. In total, at least 4,624 sf of arroyo willow thicket, 1,472 sf of ESH, and 11,522 sf of ESH buffer would be impacted as result of initial demolition, the shared-access driveway, and related drainage and utilities improvements (see **Figure 4**). Future residential development within each of the four developable parcels, particularly Lots 2, 3, and 4 could result in additional removal or indirect impacts to oak trees, arroyo willow thicket, and ESH buffer area (see **Table 5** in **Section 4.4**, *Biological Resources*).

Habitat Restoration Plan

The Applicant has proposed to mitigate the impacts associated with encroachment into the 50-foot ESH setbacks, potential removal of 11 coast live oaks, and impacts to arroyo willow thickets through the implementation of a Habitat Restoration Plan and Tree Assessment and Protection Plan (see **Attachments 3, 4, and 5**). Restoration activities would include the following:

- 1.24 acres of riparian restoration (proposed to mitigate for impacts to coast live oaks, arroyo willows, and encroachment into the 50-foot buffer from Oak Creek and the unnamed drainage) as depicted on **Attachment 3** as areas R1, R2, and R3; and
- Habitat enhancement (i.e., weed removal), throughout the entirety of the 2.7 acres of required buffer areas along the eastern side of Oak Creek and both sides of the unnamed drainage, for encroachment into the prescribed 50-foot buffer.

The 1.24 acres (53,990 sf) of restoration is approximately 2.5 times the 0.48-acre (20,812 sf) area of buffer reduction included as a part of the proposed Project. There is no specific mitigation ratio for buffer reduction; the Applicant has proposed 2.5:1. Within the 1.24 acres (depicted on **Attachment 3** as areas R1, R2, and R3) the proposed Project would involve the following:

- Mitigating impacts to 4,624 sf of arroyo willows at a 3:1 ratio, resulting in planting and establishment of 13,880 sf of arroyo willow plantings in the buffer areas.
- Planting 33 15-gallon oak trees (3:1 for 11 impacted oak trees).
- Seeding and container planting with appropriate native plant species to achieve mitigation requirements and improve the habitat along Oak Creek and the unnamed drainage. Native planting and seeding would be focused on the south ends of Oak Creek and the unnamed drainage.

Routine maintenance activities would be implemented to control invasive plant species (i.e., weed maintenance) throughout the 2.7-acre buffer areas along the east side of Oak Creek and both sides of the unnamed ephemeral drainage (see **Figure 5** and **Attachment 3**).

Potential Future Development

While not currently proposed, the approval of the proposed Vesting Tentative Tract Map would enable future construction of four new single-family residences and ancillary structures (e.g., garages, ADUs, pools and

tennis courts, etc.). Construction activities would include the establishment of building pads, trenching for utilities improvements, grading and paving of connections to the shared-access driveway, and possibly new entry gates. These activities could occur anywhere within the development envelopes established under the proposed Vesting Tentative Tract Map. Future development would require approval of Land Use Permits (at a minimum), MBAR approval, and review by various County departments including County Flood Control.

In June 2018, the Federal Emergency Management Agency (FEMA) released Advisory Flood Elevations Recovery Maps for areas affected by the Thomas Fire and subsequent debris flows. The majority of the Project site is located within Advisory Flood Elevation requirements, but is not within a FEMA Flood Hazard Overlay or a FEMA Floodway. Only the bed of Oak Creek is mapped as within a FEMA Flood Hazard Overlay and a FEMA Floodway. The Santa Barbara Flood Control & Water Conservation District (Flood Control) has adopted flood plain management strategies requiring new structures built within the Advisory Flood Elevation Area to have finished floor elevations a minimum of 2 feet above Advisory Flood Elevations. Finish floor elevations for future residential structures would be required by County Flood Control to be 2 feet above minimum flood elevations applicable at the time approval is requested. Future residences would also be required to obtain approval of Post Construction Stormwater Control Plans by P&D and County Flood Control. Post Construction Stormwater Control Plans would ensure that anticipated runoff from future residences is no greater than what currently exists. As previously described, future stormwater facility designs requiring installation of storm drain lines and/or energy dissipaters outside of the development envelopes shall avoid impacts to native vegetation or minimize any such impacts to the maximum extent feasible. Any potential impacts within ESH and/or the riparian corridor as a result of the installation of storm drain lines or energy dissipaters shall be mitigated by the Applicant and/or future property owner in accordance with the Habitat Restoration Plan (see MM BIO-6) and County-required mitigation ratios.

Construction Activities

Initial construction activities associated with the Vesting Tentative Tract Map would include demolition and removal of the existing single-family residence, ancillary structures, and hardscapes as well as the construction of a new shared-access driveway that includes utilities stubbed to each lot, drainage improvements related to the shared driveway, and an entry gate. Heavy equipment necessary to support demolition of the existing structures and hardscapes at the Project site are foreseen to include a Bobtail dump truck, standard excavator, standard motor grader, compactor, delivery trucks, and light trucks for construction worker vehicles. Demolition activities would require approximately 2 months to complete (see **Table 2**). Removal of demolition debris would require approximately between 300 and 600 heavy haul truck trips. Following the demolition of the existing improvements, the Project site would be grubbed and graded as necessary to construct the new shared-access driveway, utility stubs to each lot that would run along the shared driveway, drainage improvements related to the shared-access driveway (including culvert construction and a retention basin), and the entry gate.

Heavy equipment necessary to construct the shared-access driveway would include a standard excavator, asphalt concrete paving truck, compactor, utility trucks, flat bed delivery trucks, and Bobtail dumptrucks. This phase of work would require 4 months to complete (see **Table 2**). Habitat restoration, including native seedings and container plantings would require approximately 3 months to complete. Additional materials delivery and construction worker trips would occur during with this final phase of work. Once this phase of work is complete, construction activities associated with the Vesting Tentative Tract Map would be considered complete.

Following the completion of these initial activities associated with the Vesting Tentative Tract Map, individual property owners would be expected to propose individual single-family residences and associated ancillary structures (e.g., garages, ADUs, pools and tennis courts, etc.) on each of the four

developable parcels. These subsequent construction activities would involve establishment of building pads that would comply with finish floor elevations for habitable structures as required by County Flood Control, trenching for utilities improvements, and grading and paving of connections to the shared-access driveway. As previously described, these activities could occur anywhere within the development envelopes established under the proposed Vesting Tentative Tract Map. The schedule for construction of these future single-family residences is not known, but each is likely to require a minimum of 1 year to complete including foundation work, framing, roofing, and interior improvements. Therefore, depending upon whether or not future construction is concurrent or staggered, construction activities on-site could extend over 3 to 5 years or longer, with potential for gaps between single-family residential development on each of the proposed lots.

Photograph 6. *The Project site has a secondary unpaved access road provided along the southern property boundary. This secondary access road, which would be located within proposed Lot 4, may be more suitable for construction access given that no sharp turns would be required. However, it may present challenges depending on the sequencing of residential development across the four developable parcels.*

Construction access to the Project site would be provided via the existing private driveway at 749 San Ysidro Drive. However, it may be desirable to establish temporary construction access at the southern end of the Project site along San Ysidro Road. The Applicant and the future property owners would be required to file a Construction Traffic Management Plan(s) (see MM REC-1) for review and approval by the County Department of Public Works to ensure that haul truck traffic is safely managed and that roads are maintained and cleaned (see **Section 4.13**, *Recreation* and **Section 4.14**, *Transportation / Circulation*). The construction parking and construction staging activities would be provided on-site.

Table 2. Estimated Construction Timeline and Construction Workforce

Construction Phase	Duration (Months)	Construction Workers
Demolition of Existing Improvements	2	10
New Shared-driveway, utility Installation and Drainage Improvements	4	15
Habitat Restoration/Plantings	3	10
Future Construction of Single-family Residences	12+	15

Required Permits and Approvals

The proposed Project would require consideration of the proposed Vesting Tentative Tract Map by the Montecito Planning Commission.

At the time of application for construction permits, the Applicant shall provide the Santa Barbara County Air Pollution Control District (SBCAPCD) with a list of equipment to be used during construction activities to determine if a permit is required. Prior to issuance of construction permits, the Applicant shall obtain any required permit(s) and show proof of such permit(s), if required or an exemption if no permit is needed.

The Applicant shall submit proof of exemption or a copy of the Notice of Intent to obtain coverage under the Construction General Permit of the National Pollutant Discharge Elimination System (NPDES) issued by the Central Coast Regional Water Quality Control Board (RWQCB). Prior to issuance of construction permits, the

Applicant shall submit the proof of exemption or Notice of Intent and shall provide a copy of the required Storm Water Pollution Prevention Plan (SWPPP) to Planning & Development Division (P&D) compliance monitoring staff (see MM GEO-1). The Applicant shall keep a copy of the proof of exemption or SWPPP on the Project site during grading and construction activities and P&D compliance monitoring staff shall site inspect during construction for compliance with the SWPPP (see **Section 4.8**, *Geologic Processes*).

The proposed Project would also be subject to review and approval by agencies with jurisdiction over resources that might be affected by the proposed Project. The proposed Project – including the proposed culvert removal and replacement within the unnamed ephemeral drainage would require a Section 401 Water Quality Certification issued by the Central Coast RWQCB. The proposed Project would also require a Lake and Streambed Alteration Agreement issued by the California Department of Fish and Wildlife (CDFW) pursuant to California Fish and Game Code Section 1600. The Applicant shall keep a copy of these permits on the Project site during grading and construction activities and P&D compliance monitoring staff would site inspect during construction for compliance with all permit conditions.

Future residential development projects within each of the four proposed development parcels would be subject to subsequent reviews by P&D, MBAR, and County Flood Control and potentially the Montecito Planning Commission. These reviews would require subsequent CEQA compliance and potentially additional approvals by agencies with jurisdiction over resources that could be affected.

2.0 PROJECT LOCATION

As previously described, the Project site is located on a 13.02-acre residential estate located at 749 San Ysidro Road in the community of Montecito. The Project site, which is privately owned, is accessed by a private driveway off San Ysidro Road. Additionally, a gated, unimproved "two-track" dirt road provides access through the Project site connecting the private driveway to San Ysidro Road at the southeast corner of the site.

Table 3. Site Information, Land Use Designation, and Zoning

Comprehensive Plan Designation	County of Santa Barbara: Urban Area, Montecito Community Plan Area APN 011-100-049: SRR-0.33 (Semi-rural Residential – 3-acre minimum parcel size)
Zoning District / Ordinance	**Ordinance**: Montecito Land Use & Development Code **Zoning**: 3-E-1 (Single Family Residential – 3-acre minimum parcel size)
Site Size	13.02 acres
Present Use / Development	Partially developed; private residential
Surrounding Uses / Zoning	<u>APN 011-100-026 (west)</u> 1419 E Mountain Drive: Developed Residential Estate, 3,000 sf or more 3-E-1 (Single Family Residential – 3-acre minimum parcel size)

	APN 011-100-014 (west) 751 San Ysidro Road: Developed Single Family Residence 3-E-1 (Single Family Residential – 3-acre minimum parcel size) APN 011-100-013 (south) 745 San Ysidro Road: Developed Single Family Residence 3-E-1 (Single Family Residential – 3-acre minimum parcel size) APN 011-100-048 (east) 753 San Ysidro Road: Developed Residential Estate, 3,000 sf or more 3-E-1 (Single Family Residential – 3-acre minimum parcel size) APN 011-100-047 (east) 805 San Ysidro Rd.: Developed Residential Estate, 3,000 sf or more 3-E-1 (Single Family Residential – 3-acre minimum parcel size) APN 011-100-056 (northeast) Undeveloped Vacant Land 3-E-1 (Single Family Residential – 3-acre minimum parcel size) APN 011-100-041 (north) Undeveloped Vacant Land 3-E-1 (Single Family Residential – 3-acre minimum parcel size). APN 011-100-046 (north) 1481 E Mountain Drive: Developed Single Family Residence 3-E-1 (Single Family Residential – 3-acre minimum parcel size) APN 011-100-044 (north) 1465 E Mountain Drive: Developed Residential Estate, 6,000 sf or more of living space 3-E-1 (Single Family Residential – 3-acre minimum parcel size) APN 011-100-029 (north) 1445 E Mountain Drive: Developed Residential Estate, 3,000 sf or more of living space 3-E-1 (Single Family Residential – 3-acre minimum parcel size) APN 011-100-043 (north) 1439 E Mountain Drive: Developed Single Family Residence 3-E-1 (Single Family Residential – 3-acre minimum parcel size) APN 011-100-016 (north) 1431 E Mountain Drive: Developed Residential Estate, 6,000 sf or more of living space 3-E-1 (Single Family Residential – 3-acre minimum parcel size)

	APN 011-100-031 (northwest) 1423 E Mountain Drive: Developed Single Family Residence 3-E-1 (Single Family Residential – 3-acre minimum parcel size)
Access	San Ysidro Road can be accessed via East Valley Road (State Route [SR-] 192) from the south or East Mountain Drive from the north.
Public Services	Water Supply: Montecito Water District (New Connection) Sewage: Montecito Sanitary District (New Connection) Electricity: Southern California Edison Natural Gas Southern California Gas Company Fire: Montecito Fire Protection District Law Enforcement: County of Santa Barbara Sheriff's Department

3.0 ENVIRONMENTAL SETTING

Physical Setting

The Project site is predominantly undeveloped with non-native annual grassland and scattered coastal live oak trees. The northwestern corner of the Project site is developed with existing structures and hardscapes. As previously described, existing development includes the approximately 2,978-sf single-family residence and ancillary improvements including a barn, which is currently being used as an ADU as well as a primary garage, tennis court, pool, secondary detached garage and a caretaker cottage. Existing access to the Project site is provided by an approximately 12-foot-wide private driveway that extends approximately 950 feet to the west from San Ysidro Road. An unnamed ephemeral drainage lined with arroyo willows also runs in a north-south direction bisecting the site. The ephemeral drainage conveys stormwater through a 24-inch culvert under the existing private driveway, southward toward San Ysidro Road. Another gated, two-track dirt road also transverses the property, connecting San Ysidro Road in the southeast corner to the private driveway to the north.

Photograph 7. *The majority of the Project site is characterized by non-native annual grassland that is mowed regularly to reduce potential wildfire hazard.*

The Project site is located immediately adjacent to San Ysidro Road. As previously described, a 10-foot wide County right-of-way easement for hiking and equestrian use is located along San Ysidro Road adjacent to the Project site. This easement would be maintained under the proposed Project. Surrounding land uses include large (3+ acres) residential estates with similar on-site structures including primary residences, ADUs, pools, tennis courts, dethatched garages, and ornamental landscaping. Each of these residential developments are surrounded by oaks and other trees and landscaping.

Slope and Topography

The Project site is located on a gentle, southern facing slope within the foothills of the Santa Ynez Mountains. The Project site ranges from a maximum height of 368 feet in the northwest corner to 296 feet in elevation at the southern property boundary (Storrer 2021). On-site slopes are generally less than 9 percent.

Flora and Fauna

Biological evaluations for the proposed Project have been previously completed in 2019, 2020, and 2021 by Storrer Environmental Services, LLC (see **Attachment 2**). Initial field reconnaissance was conducted in October 2019 and included botanical and wildlife surveys, vegetation mapping, and delineation of jurisdictional areas and ESH. Follow-up field investigations consisted of a monarch butterfly (*Danaus plexippus*) survey in February 2020, a spring botanical survey and nesting bird survey in May 2020, and an arborist survey and tree mapping in December 2020 and January 2021 (Storrer 2021).

Results of the biological resources assessment indicate that eight vegetation communities are present within the Project site: arroyo willow thicket, coyote brush-lemonade berry scrub, big pod ceanothus-laurel sumac scrub, eucalyptus grove, annual brome grassland, ice plant mats, ornamental/landscaping plantings, and ruderal/disturbed (Storrer 2021; see **Figure 4**).

As part of an arborist survey and tree mapping efforts completed in December 2020 and January 2021, 50 mature coast live oak trees were mapped within the proposed development envelopes. Although substantial numbers of oak trees are present along Oak Creek and scattered throughout the Project site, there are no contiguous oak woodland habitats within the Project site that are large enough to meet the definition under the Montecito Community Plan (Storrer 2021). Nevertheless, native trees are still protected per County and Montecito Community Plan policies. Two sensitive vegetation communities are present within the Project site, the riparian corridor associated with Oak Creek and the arroyo willow thicket along the unnamed ephemeral drainage. The Montecito Community Plan designates a 50-foot setback for Oak Creek. Additionally, when associated with riparian habitat (i.e., streams, ponds, drainages, etc.), arroyo willows are considered ESH and are protected by County and Montecito Community Plan policies.

Botanical surveys were conducted in October 2019 and May 2020, within the typical blooming season for the special-status plant species that have the potential to occur in the habitat available: Plummer's baccharis (*Baccharis plummerae* ssp. *plummerae*), Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*), white-veined monardella (*Monardella hypoleuca* ssp. *hypoleuca*), Gambel's watercress (*Nasturtium gambelii*), Nuttall's scrub oak (*Quercus dumosa*), black-flowered figwort (*Scrophularia atrata*), and Sonoran maiden fern (*Thelypteris puberula* var. *sonorensis*). No special-status plant species were observed in the Project site during the 2019 and 2020 field surveys (Storrer 2021).

No special-status wildlife species were observed within the Project site during the 2019 and 2020 field surveys. Special-status wildlife species that have the potential to occur within the Project site based on presence of suitable habitat and/or documented occurrences in the vicinity of the Project site include Monarch butterfly, California red-legged frog (*Rana draytonii*), two-striped garter snake (*Thamnophis hammondii*), Cooper's hawk (*Accipiter cooperii*), Townsend's big-eared bat (*Corynorhinus townsendii*), and big free-tailed bat (*Nyctinomops macrotis*) (Storrer 2021).

Historic Resources

Post/Hazeltine Associates was contracted by the Applicant to prepare a Phase I Historic Resources Management Report to evaluate whether the Project site has the potential to contain significant historic resources (Post/Hazeltine 2021). The report fulfills the requirements for historic resource evaluations outlined in the County of Santa Barbara's Appendix B to the Environmental Thresholds and Guidelines Manual, February 27, 2018; the Santa Barbara County Comprehensive Plan, Land Use Element.

Results of the Historic Resources Management Report conclude the property at 749 San Ysidro Road lacks sufficient architectural significance or historical associations to be considered a significant historic resource at the local level. Additionally, the house and guesthouse lack sufficient integrity of design or architectural significance to be eligible for listing in the National Register of Historic Places (NRHP) or the California Register of Historical Resources (CRHR) (Post/Hazeltine 2021; see **Attachment 5**). Therefore, potentially significant historic resources are not associated with the proposed Project.

Archaeology

Wood Environment & Infrastructure Solutions, Inc. (Wood) prepared an Archaeological Survey Report to document results of an intensive ground survey and archival research (Wood 2021; see **Attachment 6**). No unrecorded prehistoric or historical-period resources were identified from previous pedestrian surveys (Berry 1986; Stone 1984; Wilcoxon 1977), nor were any identified during the most recent intensive pedestrian survey (Wood 2021).

Wood's archaeologist also conducted a search of Native American Heritage Commission's (NAHC's) Sacred Lands File (SLF) in November of 2020. The SLF search returned "positive" results for presence of tribal resources within vicinity of the Project site. However, letters reflecting the negative results of the Archaeological Survey Report were sent to each of the interested tribal representatives. Each of the interested tribal representative agreed with the findings of the Archaeological Survey Report and requested notification in the event future development and/or inadvertent discovery.

Geology and Soils

Soil types within the Project site were determined based on a review of the Web Soil Survey of the South Coastal region of Santa Barbara County, California (Natural Resources Conservation Service [NRCS] 2022). One mapped soil unit has been identified within the Project site – Milpitas-Positas fine sandy loam (MeC), 2 to 9 percent slopes. Milpitas-Positas fine sandy loam (MeC) is a moderately well drained sandy soil (0 to 19 inches) with an underlying restrictive clay layer (19 to 41 inches). This soil type originates from mixed alluvium and forms on terraces at the base of hillsides (NRCS 2020). Milpitas-Positas fine sandy loam (MeC) is moderately well drained; however, runoff still can be high due to the low permeability of the underlying clay layer. The erosion potential for this soil type is low to moderate.

Surface Water Features

There are two drainages within the Project site: Oak Creek extends along the western property boundary for more than 800 feet, and an unnamed ephemeral drainage bisects the property over a distance of more than 600 feet (refer to **Figure 2**).

Oak Creek is an intermittent stream that originates in the foothills to the north and outlets to the Pacific Ocean 1.8 miles to south of the Project site (U.S. Environmental Protection Agency [USEPA] 2022). Oak Creek is extremely incised, with almost vertical 10- to 30-foot high banks. The stream bed ranges from 8 to 20 feet wide and is comprised primarily of boulders and large cobble. Oak Creek has direct connectivity

to the Pacific Ocean and is therefore considered Waters of the U.S. and Waters of the State under the jurisdiction of the U.S. Corps of Engineers, Central Coast RWQCB, and CDFW (Storrer 2021).

Photograph 8. *The unnamed ephemeral drainage bisecting the Project site is characterized by arroyo willow thickets.*

The unnamed drainage in the center of the Project site is an ephemeral (i.e., conveying flows during and/or immediately following a rain event) tributary to Oak Creek. As depicted in the National Wetlands Inventory (NWI) Wetland Mapper (USFWS 2022), the drainage originates along the hillside approximately 0.4-mile north of the Project site and receives runoff from the residences upslope of the property. There is a 24-inch culvert that conveys stormwater runoff in the drainage under the main access driveway. The drainage appears to be regularly maintained/cleared to prevent flooding of the existing private driveway and adjacent barn that is used as an ADU. The banks of the drainage are shallow at the north end (6 to 24 inches) and become more incised southward (up to 5 feet in depth). The width of the drainage ranges from 4 to 6 feet. The drainage flows into a 24-inch culvert at the southern property boundary which outlets at San Ysidro Road (Storrer 2021).

Stormwater runoff from this drainage is discharged into the gutter along San Ysidro Road and is conveyed along the road until it rejoins Oak Creek, south of the Project site. The drainage has a defined bed and bank and connectivity to Oak Creek downstream of the Project site and therefore, is likely to be considered Waters of the State and under the jurisdiction of Central Coast RWQCB and CDFW. Ephemeral drainages are generally not considered to be within the jurisdiction of the USACE (Storrer 2021).

Stormwater within the central portion of the Project site drains into the unnamed ephemeral drainage that bisects the site. There is an existing culvert underneath the private driveway that conveys stormwater into the ephemeral drainage; this culvert would be replaced as part of the proposed Project.

There is another culvert located along the main access driveway in approximately the middle of proposed Lot 1 (refer to **Figure 2**). This culvert directs stormwater runoff from the property to the north, into the annual grassland habitat south of the driveway. The culvert was mostly clogged with sediment at the time of the field survey by Storrer. Stormwater that outlets from this culvert sheet flow toward the center of proposed Lot 1, where the topography flattens out.

No groundwater was observed during the site visit for the Drainage Analysis; no groundwater is anticipated to occur due to the elevation of the property (GCV LLC 2021b**)**.

Cumulative Projects

Cumulative projects in Montecito consists of ongoing remodels, some new construction, and a substantial amount of rebuilding from the January 2018 Montecito Debris Flows. The community of Montecito is continuing to rebuild following the damage that occurred from the debris flows on January 9, 2018. Homes along East Mountain Drive and other area roadways proximate to the Project site are being actively repaired or reconstructed, along with ongoing repairs to roadways, bridges, and other public infrastructure in the area. In addition, Flood Control is pursuing expansion of several flood detention basins such as that along Cold Springs Creek within Cold Springs Canyon. As such, construction activities associated with the

proposed Project would overlap with other planned and pending private and public construction activities and associated vehicles and equipment, earth disturbance, and noise proximate to public roads, trailheads, and trails at or near the Project site.

4.0 POTENTIALLY SIGNIFICANT EFFECTS CHECKLIST

The baseline from which environmental impacts are assessed consists of the physical environmental conditions at the Project site as described in **Section 3.0**, *Environmental Setting*. Additional baseline information is included as appropriate for each of the environmental issue areas discussed within **Sections 4.1** to **4.15** below.

Potentially Significant and Unavoidable Impact: A fair argument can be made, based on the substantial evidence in the record, that an environmental impact resulting from the proposed Project may be significant and unavoidable.

Significant but Mitigable Impact: Incorporation of mitigation measures has reduced an effect from a Potentially Significant Impact to an Insignificant Impact.

Insignificant Impact: The proposed Project may result in an adverse environmental impact; however, the impact would not exceed the County's thresholds of significance established in the County's Environmental Thresholds and Guidelines Manual (County of Santa Barbara 2020).

No Impact: There is adequate support in the information referenced in or appended to the impact analysis to demonstrate that the proposed Project would result in no measurable impact or the County's threshold of significance simply does not apply.

Beneficial Impact: There is a beneficial effect on the environment resulting from the project.

Reviewed Under Previous Document: The analysis contained in a previously adopted/certified environmental document addresses this issue adequately for use in the current case and is summarized in the discussion below. The discussion should include reference to the previous documents, a citation of the page(s) where the information is found, and identification of mitigation measures incorporated from the previous documents.

4.1 AESTHETICS / VISUAL RESOURCES

Will the proposal result in:	Poten. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. The obstruction of any scenic vista or view open to the public or the creation of an aesthetically offensive site open to public view?		X			
b. Change to the visual character of an area?		X			
c. Glare or night lighting which may affect adjoining areas?		X			
d. Visually incompatible structures?		X			

Existing Setting:

The Project site is characteristic of a semi-rural residential neighborhood and is surrounded by adjacent residential estates consisting of 3+ acre lots. Views of the Project site from surrounding adjacent public vantage points are limited as the site is largely bordered by existing single-family residences and surrounding fencing and vegetation. Limited views of the Project site are available from approximately 400 feet of San Ysidro Road south of the site at the bend in the road, particularly to northbound travelers where site perimeter vegetation is relatively sparse. Primary views from this vantage point through scattered small trees consist of open grasslands in the foreground with the Santa Ynez Mountains clearly visible as a scenic backdrop. Such views are visible to northbound motorists for less than 10 seconds at typical speeds and for longer time periods for pedestrians and cyclists. Similar semi-public views across the Project site are available from the existing private driveway south of the Project site, which provides access to six to eight single-family residences.[1]

More distant views of the Project site from East Mountain Drive, a scenic roadway located more than 600 feet north of the site are blocked by existing dense vegetation such as native coast live oak trees. More distant views of the Project site are also available from segments of the heavily used McMenemy Trail located in the foothills 3,000 feet north of and roughly 1,200 feet above the Project site as well as from portions of the Girard Trail located at higher elevations further to the north. From these more distant locations the open grasslands within the Project site are visible and standout somewhat as they are surrounded by existing single-family residences and dense trees and shrubs. The Project site may also be intermittently visible from even more distant higher elevation trails such as the Edison Catway and San Ysidro Trail. The McMenemy Trail is extremely popular and likely accommodates tens of thousands of hikers annually as does the more distant San Ysidro Trail, while the Edison Catway and Girard trails are more lightly used. Although views of the community below are distant, the high-quality aesthetic experience provided by these readily accessible trails are valued by local residents. Due to neighboring homes and landscaping, existing development on-site is not readily visible from public viewing locations.

The Montecito Community Plan does not identify specific scenic viewpoints and does not discuss the importance of views from public trails; however, it acknowledges that there are several primary corridors by which scenic resources may be viewed by motorists. These include U.S. Highway 101, which provides views to the south of curving beaches with rocky headlands and to the north of chaparral covered mountains; Channel Drive and Olive Mill Road, which also provide scenic views of the ocean and mountains; East Valley Road, which provides views of estates and gardens and has a mountain backdrop; and Mountain Drive which provides panoramic views of the entire Montecito community, the coastal area, and the Channel Islands. In addition to these primary view corridors, many of the major north-south roads (e.g., San Ysidro Road) provide views of wooded areas and the Santa Ynez Mountains (County of Santa Barbara 1995).

County Environmental Thresholds: The County's Visual Aesthetics Impact Guidelines classify coastal and mountainous areas, the urban fringe, and travel corridors as "especially important" visual resources. A project may have the potential to create a significantly adverse aesthetic impact if (among other potential

[1] CEQA typically limits aesthetic concerns to those associated with public views. For example, in *Association for Protection etc. Values v. City of Ukiah (1991) 2 Cal. App. 4th 720*, the court determined that "we must differentiate between adverse impacts upon particular persons and adverse impacts upon the environment of persons in general. As recognized by the court in *Topanga Beach Renters Assn. v. Department of General Services (1976) 58 Cal.App.3d 188*, '[all] government activity has some direct or indirect adverse effect on some persons. The issue is not whether [the project] will adversely affect particular persons but whether [the project] will adversely affect the environment of persons in general."

effects) it would impact important visual resources, obstruct public views, remove significant amounts of vegetation, substantially alter the natural character of the landscape, or involve extensive grading visible from public areas. The guidelines address public, not private views.

Impact Discussion:

a, b, d) ***Significant but Mitigable.*** As previously described, all existing structures and hardscapes associated with the existing residential estate would be demolished and removed from the Project site. These initial demolition and construction activities – including the associated heavy construction equipment, heavy haul truck trips, construction workers, construction and demolition wastes, etc. – would be visible form the surrounding roadways. However, construction activities would be temporary and would generally occur over a limited area and for a short period of time (e.g., generally over a period 9 months).

The proposed Project would result in the potential removal of 11 coast live oak trees. Two of these trees are located adjacent to the existing residence where a MFPD-required roundabout is proposed; one is located within the footprint of proposed stormwater basin, which would capture runoff from the shared-access driveway. In addition, a total of 4,624 sf of riparian habitat (i.e., arroyo willow thicket) associated with the ephemeral drainage would be removed as a result of initial grading and development activities, including the proposed culvert replacement (see **Section 4.4**, *Biological Resources*).

Photograph 9. *Views of the Project site are available through the surrounding fencing and vegetation, in the location where the road bends along the southeastern corner of the Project site.*

Following the completion of the initial demolition and construction activities associated with the Vesting Tentative Tract Map, there would be a period where the 13.02-acre residential estate would be undeveloped or partially developed as the residential development projects are proposed and permitted by the County. Future single-family residences, while not included under the proposed Project, are assumed to be two stories with no basement consistent with surrounding land uses and structures. The future development of single-family residences and ancillary structures enabled by the proposed subdivision would not be visible from the primary view corridors identified in the Montecito Community Plan. However, new development would be briefly visible (e.g., for roughly 10 seconds) particularly to northbound motorists on San Ysidro Road, a major north-south road that provides views of wooded areas and the Santa Ynez Mountains, and for longer durations to pedestrians and cyclists using this road. In particular, residential development within the proposed development envelopes on the southern end of proposed Lot 1, 3, and 4 would occur within the existing view corridor of San Ysidro Road and would be briefly visible to passersby. However, the building footprints would be setback from the roadway and views of the Santa Ynez Mountains from San Ysidro Road would be partially maintained.

While future development of four single-family residences and ancillary structures would likely be visible to foothill trail users, changes to such distant views would not be a dominant visual intrusion into existing scenic foothill trail view corridors and over time when landscaping matures these new homes would blend into the surrounding development.

MM VIS-1 requires that all exterior surfaces of future buildings be colored to match the surrounding environment, such as with earth tones and non-reflective paints. MM VIS-2 requires that retaining walls, if necessary, shall also be colored and textured to match the surrounding environment and screened with vegetation wherever possible. MM VIS-4 would reduce temporary impacts to visual resources by requiring construction site cleanup and debris clearing during VTTM and future residential building activities. Future development would also be subject to review and approval by MBAR which would further ensure neighborhood compatibility, pursuant to MLUDC Section 35.472.070. Implementation of these mitigation measures would screen future residential development and would reduce impacts to less than significant.

c) ***Significant but Mitigable.*** The proposed Project would enable the development of four single-family residences, which would introduce new sources of exterior lighting that could the impact adjacent properties. Due to the semi-rural nature of the surrounding area and the visibility of the Project site from adjacent properties, lighting from the Project site could result in potentially significant impacts to adjacent properties. To prevent or reduce this potential impact, MM VIS-5 would require that all lighting associated with initial construction activities or future residential development be low intensity, low glare design, minimum height, and hooded to direct light downward. With these measures and design features in place, the impacts of glare and nighttime lighting on adjacent residences would be mitigated to a less than significant level.

Cumulative Impacts: The proposed Project would incrementally change the existing visual character of the Project site and Montecito area. The proposed Project would not obstruct or otherwise detract from scenic corridors identified in the Montecito Community Plan. At a minimum, all future residential development would be required to receive Design Review approval by the MBAR, which must make the finding that the project is well-designed, visually compatible with its surroundings, and minimizes visual impacts to the area. Even when considered with other cumulative projects in the area, the proposed Project would conform to surrounding land uses and would not contribute to a cumulatively considerable effect on aesthetics.

Mitigation Measures: The following mitigation measures would reduce impacts to aesthetics and visual resources to a less than significant level:

MM VIS-1: **Building Materials.** Natural building materials and colors compatible with surrounding terrain (e.g., earth-tones and non-reflective paints) shall be used on exterior surfaces of all structures, including fences.

Plan Requirements and Timing: Materials shall be denoted on all plans, including all plans for future residential development enabled by the proposed Project. All structures shall be painted prior to the issuance of Final Building Inspection Clearances.

Monitoring: P&D compliance monitoring staff shall inspect prior to the issuance of Final Building Inspection Clearances.

MM VIS-2: **Understories and Retaining Walls.** Understories and retaining walls shall be designed in tones that are compatible with surrounding terrain using textured materials or construction methods which create a textured effect. Native vegetation to screen retaining walls shall be planted.

Plan Requirements and Timing: Retaining wall plans and landscape plans shall be submitted to P&D for review and approval. Plans shall be submitted prior to issuance of a Zoning Clearance for initial improvements associated with the Vesting Tentative Tract

Map and Land Use Permits (LUPs) for future residential development enabled by the proposed Project; landscape vegetation shall be planted prior to issuance of Final Building Inspection Clearances for future residential development enabled by the proposed Project.

Monitoring: P&D compliance monitoring staff shall check plans and ensure installation prior to issuance of Final Building Inspection Clearances for future residential development enabled by the proposed Project.

MM VIS-3: **Architectural Review.** Prior to construction, unless the gate is exempt from design review per MLUDC Section 35.472.070.C, *Exception to Design Review Requirements*, the proposed mechanical entry gate must be reviewed by MBAR to ensure that it meets County Architectural Guidelines and Design Standards to further ensure neighborhood compatibility.

Plan Requirements and Timing: Unless the gate is exempt from design review**,** MBAR review shall occur prior to issuance of a Zoning Clearance for the proposed Project.

Monitoring: P&D compliance monitoring staff shall inspect the mechanical entry gate prior to construction consistent with issuance of Final Building Inspection Clearances.

MM VIS-4: **Construction Clean-up.** The Project site shall be cleared of all excess construction debris following the initial construction activities associated with the Vesting Tentative Tract Map as well as all future residential development enabled by the proposed Project.

Plan Requirements and Timing: This requirement shall be noted on all plans. Debris clearance shall occur prior to issuance of Final Building Inspection Clearances for future residential development enabled by the proposed Project.

Monitoring: P&D compliance monitoring staff shall inspect prior to issuance of Final Building Inspection Clearances.

MM VIS-5: **Lighting.** The Applicant and/or future property owners shall ensure any exterior night lighting installed on the project site is of low intensity, low glare design, minimum height, and shall be hooded to direct light downward onto the subject lot and prevent spill-over onto adjacent lots. No unobstructed beam of exterior light shall be directed toward any area zoned or developed residential. The Applicant and/or future property owners shall install timers or otherwise ensure lights are dimmed after 10:00 p.m.

Plan Requirements: The Applicant and/or future property owners shall develop a Lighting Plan for P&D and MBAR approval incorporating these requirements and showing locations and height of all exterior lighting fixtures.

Timing: P&D and MBAR shall review a Lighting Plan for compliance with this measure prior to issuance of a land use clearance for structures.

Monitoring: P&D compliance monitoring staff shall inspect structures upon completion to ensure that exterior lighting fixtures have been installed consistent with their depiction on the final Lighting Plan prior to Final Building Inspection Clearance.

Residual Impacts: With the incorporation of MM VIS-1 through MM VIS-5, residual impacts would be less than significant.

4.2 AGRICULTURAL RESOURCES

Will the proposal result in:	Poten. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. Convert prime agricultural land to non-agricultural use, impair agricultural land productivity (whether prime or non-prime) or conflict with agricultural preserve programs?				X	
b. An effect upon any unique or other farmland of State or Local Importance?				X	

Existing Setting: As previously described, the Project site is predominantly comprised of Milpitas-Positas fine sandy loam (MeC). The farmland classification of this soil map unit is categorized as farmland of Statewide importance. However, the Project site is located in an area mapped by the California Department of Conservation's California Important Farmland Finder as "urban and built-up land." Neither the Project site nor any of the surrounding areas are designated, zoned, or used for agricultural operations (refer to **Table 3**).

County Environmental Thresholds: The County's Agricultural Resource Guidelines provide a methodology for evaluating impacts to agricultural resources. The guidelines evaluate parcel size, soil classification, water availability, agricultural suitability, existing and historic land use, Comprehensive Plan land use designation, adjacent land use designation, agricultural preserve potential, and combined farming operations. The County's initial screening considers the value of a site's agricultural suitability and productivity, to determine whether the project's impact on loss or impairment of agricultural resources would be a potentially significant impact. These are guidelines, which are used with flexibility in application to specific sites, take into account specific circumstances and specific agricultural uses. When conversion of agricultural is proposed, a weighted point system is utilized to assign relative values to particular characteristics of a site's agricultural productivity (e.g., soil type, water supply, etc.).

Impact Discussion:

a, b) ***No Impact.*** As previously described, the Project site is in an area mapped by the California Department of Conservation's California Important Farmland Finder as "urban and built-up land." Neither the Project site nor any of the surrounding areas are designated, zoned, or used for agricultural operations (refer to **Table 2**). Due to the parcel size, topography, surrounding land uses, and zoning, there is no foreseeable development or use of the Project site as an agricultural property. The proposed Project would not result in the loss or disturbance of agricultural land, soils, or other agricultural resources. The proposed Project would have no impact on agricultural resources.

Cumulative Impacts: The proposed Project would have no direct or indirect impacts to agricultural resources as there are no active agricultural operations at or proximate to the Project site. Similarly, pending public and private developments, such as the reconstruction of homes, roads, bridges, or other public infrastructure in the vicinity would not impact existing or potential agricultural resources as the upper foothills of Montecito generally do not support such resources. Therefore, the proposed Project would not contribute to the regionally significant loss of agricultural resources and the proposed Project when

considered with other cumulative projects in the area would not result in a cumulatively considerable impact on agricultural resources.

Mitigation Measures and Residual Impacts: No mitigation measures are required; there would be no residual impacts associated with the implementation of the proposed Project.

4.3a AIR QUALITY

Will the proposal result in:	Poten. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. The violation of any ambient air quality standard, a substantial contribution to an existing or Projected air quality violation, or exposure of sensitive receptors to substantial pollutant concentrations (emissions from direct, indirect, mobile and stationary sources)?			X		
b. The creation of objectionable smoke, ash or odors?			X		
c. Extensive dust generation?			X		

Existing Setting: The Project site is located in the South Central Coast Air Basin (SCCAB) that encompasses San Luis Obispo, Santa Barbara, and Ventura counties. The SBCAPCD monitors and regulates the local air quality in the County.

Air quality is primarily characterized by ambient ground-level concentrations of seven specific pollutants – known as "criteria pollutants" – identified by the USEPA to be of concern with respect to public health and welfare. **Table 4** shows the National Ambient Air Quality Standards (NAAQS), which are set by the USEPA and the California Ambient Air Quality Standards (CAAQS), which are set by the California Air Resources Board (CARB). An area is designated in "attainment" when it is in compliance with the NAAQS and/or the CAAQS for a criteria pollutant. If an area exceeds the NAAQS and/or CAAQS, the area is classified as "nonattainment" for that criteria pollutant. If there are not enough data available to determine whether an area exceeds the NAAQS and/or CAAQS, the area is designated as "unclassified."

The County is currently in attainment of NAAQS and is in attainment for all CAAQS with the exception of the State's standards for particulate matter less than 10 micrometers in diameter (PM_{10}). In February 2021, CARB took action at a public hearing to change the County's designation from attainment to nonattainment for the State's ozone (O_3) standards. This change was based on data measured at multiple locations in the County for the 3-year period from 2017 to 2019. The California Office of Administrative Law finalized the designation change on September 27, 2021 (SBCAPCD 2021).

Applicable SBCAPCD Rules and Regulations: The SBCAPCD rules establish emission limitations and control requirements for various sources, based upon their source type and magnitude of emissions. The SBCAPCD rules applicable to the proposed Project may include the following:

- *Rule 302 (Visible Emissions).* Rule 302 prohibits emissions of visible air contaminants from any potential source of air contaminants. The rule prohibits air contaminants, other than water vapor, that are a certain level of darkness or opacity from being discharged for a combined period of more than 3 minutes in any 1 hour.
- *Rule 303 (Nuisance).* This rule could apply to fugitive dust emitted during proposed construction activities or odors during operation. This rule states that a person shall not discharge air contaminants from any source that can cause injury, detriment, nuisance, or annoyance to any

considerable number of persons, or that can endanger the comfort, repose, health, or safety of any such persons or their business or property.

- *Rule 311 (Sulfur Content of Fuels).* The purpose of this rule is to limit the sulfur content in gaseous fuels, diesel and other liquid fuels, and solid fuels for the purpose of both reducing the formation of sulfur oxides (SO_x) and particulates during combustion.
- *Rule 345 (Control of Fugitive Dust from Construction and Demolition Activities).* Rule 345 establishes limits on the generation of visible fugitive dust emissions at demolition and construction sites. The rule includes measures for minimizing fugitive dust from on-site activities and from trucks moving on- and off-site.

County Environmental Thresholds: The County's Air Quality Thresholds provide that a project would not have a significant impact on air quality if operation of the project would:

- Emit (from all Project sources, mobile and stationary), less than the daily trigger (currently 240 pounds per day of nitrogen oxides (NO_x) or volatile organic compounds (VOCs), 80 pounds per day for PM_{10}) for offsets set in the SBCAPCD New Source Review Rule, for any pollutant; and
- Emit less than 25 pounds per day of NO_x or VOCs from motor vehicle trips only; and
- Not cause or contribute to a violation of any CAAQS or NAAQS (except O_3);
- 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 Management Plans.

The County has not established thresholds for temporary impacts associated with construction activities; however, some construction projects may have the potential for construction-related dust to cause a temporary nuisance. As such, the County's Grading Ordinance requires standard dust control conditions for all projects involving grading activities. Because the County is currently in nonattainment for the State's PM_{10} standard, standard dust control conditions are required for all discretionary construction activities, regardless of the significance of the fugitive dust impacts, based on policies within the 1979 Air Quality Attainment Plan (SBCAPCD 2017). SBCAPCD also uses 25 tons per year (tpy) for any pollutant as a guideline for determining the significance of construction impacts.

Table 4. Criteria Air Pollutant Standards

Pollutant	Averaging Period	California (CAAQS)	Federal (NAAQS)
Ozone (O_3)	1-Hour Average	0.09 ppm (180 µg/m^3)	--
	8-Hour Average	0.070 ppm (137 µg/m^3)	0.070 ppm (137 µg/m^3)
Carbon Monoxide (CO)	1-Hour Average	20 ppm (23 µg/m^3)	35.0 ppm (40 mg/m^3)
	8-Hour Average	9.0 ppm (10 mg/m^3)	9.0 ppm (10 mg/m^3)
Nitrogen Dioxide (NO_2)	1-Hour Average	0.18 ppm (338 µg/m^3)	0.10 ppm (188 µg/m^3)
	Annual Arithmetic Mean	0.03 ppm (57 µg/m^3)	0.053 ppm (100 µg/m^3)

Pollutant	Averaging Period	California (CAAQS)	Federal (NAAQS)
Sulfur Dioxide (SO_2)	1-Hour Average	0.25 ppm (655 µg/m^3)	0.075 ppm (196 µg/m^3)
	24-Hour Average	0.04 ppm (105 µg/m^3)	--
	Annual Arithmetic Mean	--	0.030 ppm (80 µg/m^3)
Respirable Particulate Matter (PM_{10})	24-Hour Average	50 µg/m^3	150 µg/m^3
	Annual Arithmetic Mean	20 µg/m^3	--
Fine Particulate Matter ($PM_{2.5}$)	24-Hour Average	--	35 µg/m^3
	Annual Arithmetic Mean	12 µg/m^3	12.0 µg/m^3
Lead (Pb)	30-day Average	1.5 µg/m^3	--
	Calendar Quarter	--	1.5 µg/m^3
	Rolling 3-Month Average	--	0.15 µg/m^3
Sulfates	24-Hour Average	25 µg/m^3	No Federal Standards
Hydrogen Sulfide	1-Hour Average	0.03 ppm (42 µg/m^3)	
Vinyl Chloride	24-Hour Average	0.01 ppm (26 µg/m^3)	

Notes: ppm = parts per million; µg/m^3 = micrograms per cubic meter
Source: SBCAPCD 2021.

Although quantitative thresholds of significance are not currently in place for short-term emissions, the California Environmental Quality Act (CEQA) requires that short-term impacts such as exhaust emissions from heavy construction equipment and fugitive dust generation during grading be discussed in the environmental document. In the interest of public disclosure, the SBCAPCD recommends that construction-related NO_x, VOC, PM_{10} and particulate matter less than 2.5 micrometers in diameter ($PM_{2.5}$) emissions from diesel and gasoline powered equipment, paving, and other activities be quantified. Emissions associated with construction were estimated using the California Emissions Estimator Model (CalEEMod) version 2020.4.0 and following the guidance from SBCAPCD's Scope and Content for Air Quality Sections in Environmental Impact Reports (2022 Limited Update). While compliance with SBCAPCD rules and regulations is required, the analysis used to estimate emissions did not incorporate the emissions reductions associated with these rules and regulations; therefore, the analysis of construction and operational emissions below is considered to be a highly conservative analysis.

Impact Discussion:

a, c) ***Insignificant.*** Demolition of all existing structures and hardscapes, trenching and excavation activities associated with utilities and drainage improvements, and grading and paving for construction of the shared-access driveway would all occur in close proximity to a number of surrounding single-family residences. Additionally, following the completion of these initial activities, future development of single-family residences and ancillary structures within each of the four developable parcels would also occur in close

proximity surrounding single-family residences. There are no other sensitive receptors, such as schools, hospitals, or libraries located within 1 mile of the Project site.

Short-term Construction Emissions

Emissions estimates for the proposed Project were generated using CalEEMod version 2020.4.0, which are included in **Attachment 7**. Because various elements of initial construction activities, including future single-family residential development, would be constructed as different phases (i.e., at different times), estimates of construction emissions are presented per phase. Neither the SBCAPCD nor the County establish quantitative construction emissions thresholds for determining significant air quality impacts of land use projects; however, standard best management practices (BMPs) are required through compliance with SBCAPCD rules. As previously described, at the time of application for construction permits, the Applicant shall provide the SBCAPCD with a list of equipment to be used during construction activities to determine if a permit is required. Prior to issuance of construction permits, the Applicant shall obtain any required permit(s) and show proof of such permit(s), if required, or an exemption if no permit is needed. As previously discussed, SBCAPCD standard dust mitigation measures are required for the proposed Project, but have not been integrated into emission estimates presented in **Table 4** and **Table 5** (SBCAPCD Rules 302, 303, and 345). Similarly, diesel particulate and NO_x emission reduction measures, limits on VOCs for architectural coating products (SBCAPCD Rule 323.1), and requirements for asphalt paving activities (SBCAPCD Rule 329) are also required for the proposed Project, but have not been integrated into the emissions estimates. This approach presents a highly conservative estimate of construction emissions associated with the proposed Project.

Earth-moving operations at the Project site would not have the potential to result in significant short-term emissions of PM_{10} and other criteria pollutants. Due to the limited period of time that grading activities would occur on the Project site (i.e., 6 months), construction-related emissions of NO_x and VOCs would be less than significant and would not affect nearby residences. Similarly, the construction activities associated with future residential development enabled by the proposed Project, including the establishment of elevated building pads, would also be short-term and temporary and would not have the potential to result in significant emissions of criteria air pollutants.

Table 5. Estimated Maximum Daily Construction Emissions by Phase (lbs/day)

	Construction Year	Pollutant					
		VOCs	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Demolition of Existing Buildings and Hardscapes	2023	1.70	17.16	12.36	0.03	1.34	0.88
Construction of Shared-Access Driveway		0.87	7.13	11.09	0.02	0.45	0.35
Utility Trenching and Drainage Improvements		2.03	24.44	17.57	0.05	2.03	1.02
Habitat Restoration		0.18	1.60	2.44	0.01	0.15	0.09
Habitat Restoration	2024	0.17	1.50	2.44	0.01	0.14	0.08
Residence Construction		0.17	1.51	2.44	0.01	0.14	0.08
Residence Construction	2025	0.77	6.00	8.23	0.01	0.37	0.27
Residence Architectural Coating		0.72	5.69	8.19	0.01	0.33	0.24

	Construction Year	Pollutant					
		VOCs	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Maximum Daily Emissions (lbs/day)		**8.73**	**24.44**	**17.58**	**0.05**	**2.03**	**1.02**

Source: Wood 2022; see **Attachment 7**.

Long-term Operational Emissions

The proposed Project would not involve new stationary sources (i.e., equipment, machinery, hazardous materials storage, industrial or chemical processing, etc.) that would substantially increase the amount of criteria pollutants released into the atmosphere. Additionally, the proposed Project would not result in significant direct or indirect vehicle emissions. Based on the 2030 Travel Forecast for Santa Barbara County, it is estimated that 10.9 vehicle trips per day would be generated per household in 2030 (Santa Barbara County Association of Governments 2004) (see **Section 4.14**, *Transportation / Circulation*). Therefore, while not included as a part of the proposed Project, future residential development enabled by the proposed Project would result in negligible mobile emissions. Operational impacts associated with the proposed Project would be less than significant (see **Table 6**).

Table 6. Estimated Maximum Daily Operational Emissions (lbs/day)

	Pollutant					
	VOCs	NO_x	CO	SO_2	PM_{10}	$PM_{2.5}$
Area	0.88	<0.01	0.33	<0.01	<0.01	<0.01
Energy	<0.01	0.02	0.01	<0.01	<0.01	<0.01
Mobile	0.10	0.11	0.70	<0.01	0.15	0.04
Total	**0.98**	**0.13**	**1.04**	**<0.01**	**0.15**	**0.04**
SBCAPCD Vehicle Source Emissions Threshold	*25*	*25*	-	-	-	-
SBCAPCD Vehicle Source Emissions Threshold Exceeded?	***No***	***No***	**-**	**-**	**-**	**-**
SBCAPCD Area + Vehicle Source Emissions Threshold	*240*	*240*	-	-	*80*	-
SBCAPCD Area + Vehicle Source Emissions Threshold Exceeded?	***No***	***No***	**-**	**-**	***No***	***No***

Notes: SBCAPCD thresholds apply to VOCs, NO_x, and PM_{10}. See **Section 4.3b**, *Air Quality – Greenhouse Gas Emissions* for further discussion regarding greenhouse gas (GHG) emissions.
Source: Wood 2022; see **Attachment 7**.

b) ***Insignificant.*** The use of heavy construction equipment, heavy haul trucks, and asphalt paving for the new shared-access driveway during construction of the proposed Project would potentially result in the generation of objectionable odors associated with exhaust and paving emissions. Although diesel fumes from heavy construction equipment are sometimes found to be objectionable, the operation of heavy construction equipment during construction activities would be temporary. Additionally, the potential odors associated with the operation a heavy construction equipment would only be experienced periodically when the equipment is actively in use. Odors from asphalt paving are anticipated to dissipate quickly once the asphalt is laid and would not have objectionable odors once it's dry. The proposed Project would not result in new long-term operational activities (e.g., industrial operations) that would generate sources of objectionable odors. Additionally, the proposed Project would not result in the generation of smoke or ash during construction. Therefore, construction of the proposed Project would have less than significant impacts on smoke, ash, and odors.

Although not required to reduce potentially significant impact, it is County policy to require the implementation of MM AIR-1 to further reduce fugitive dust emissions during construction.

Cumulative Impacts: The proposed Project would contribute incrementally to cumulative pollutant emissions in the community of Montecito. As previously described, demolition and grading activities would entail heavy haul truck trips and other construction-related vehicle traffic that may coincide with emissions from heavy construction equipment and/or heavy haul truck trips associated with other cumulative projects. While not included as a part of the proposed Project, futures residential development enabled by the proposed Project could entail thousands of heavy haul truck trips associated with grading and materials deliveries. However, because of the limited emissions associated with the proposed Project, the contribution of the proposed Project to cumulative impacts would be incremental and not cumulatively considerable.

Mitigation Measures and Residual Impacts: Implementation of standard conditions through Chapter 14 (Grading Ordinance) of the County Code, implementation of SBCAPCD rules, including MM AIR-1 would ensure that there would be no potential for significant construction-related emissions, particularly fugitive dust emissions. There would be no residual impacts associated with the implementation of the proposed Project.

MM AIR-1: **Dust Control.** The Applicant and/or future property owners shall comply with the following dust control components at all times including weekends and holidays:

- Dust generated by the development activities shall be kept to a minimum with a goal of retaining dust on the site.
- During clearing, grading, earth moving, excavation, or transportation of cut or fill materials, use water trucks or sprinkler systems to prevent dust from leaving the site and to create a crust after each day's activities cease.
- During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site.
- Wet down the construction area after work is completed for the day and whenever wind exceeds 15 miles per hour (mph).
- When wind exceeds 15 mph, have site watered at least once each day including weekends and/or holidays.
- Order increased watering as necessary to prevent transport of dust off-site.
- Cover soil stockpiled for more than 2 days or treat with soil binders to prevent dust generation. Reapply as needed.
- If the site is graded and left undeveloped for over four weeks, the Applicant and/or future property owners shall immediately: (i) Seed and water to re-vegetate graded areas; and/or (ii) Spread soil binders; and/or (iii) Employ any other method(s) deemed appropriate by P&D or SBCAPCD.

Plan Requirements: These dust control requirements shall be noted on all grading and building plans.

Pre-Construction Requirements: The contractor or builder shall provide P&D monitoring staff 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 watering as necessary to prevent transport of dust offsite.
- Attend the pre-construction meeting.

Timing: The dust monitor shall be designated prior to the issuance of a grading. The dust control components apply from the beginning of any grading or construction throughout

all development activities until final inspection and until landscaping is successfully installed.

Monitoring: P&D processing planner shall ensure measures are on plans. P&D grading and building inspectors shall spot check; Grading and Building shall ensure compliance onsite. SBCAPCD inspectors shall respond to nuisance complaints.

4.3b AIR QUALITY – GREENHOUSE GAS EMISSIONS

Greenhouse Gas Emissions – Will the Project:	Poten. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X		
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X		

Existing Setting: GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O) hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), sulfur hexafluoride (SF_6), and nitrogen trifluoride (NF_3). GHGs trap heat in the atmosphere and regulate the Earth's temperature, referred to as "the greenhouse effect." However, human activities – including fossil fuel combustion, waste disposal, energy use, and land use changes – have accelerated GHG emission above pre-industrial levels (U.S. Global Change Research Program 2018). The global mean surface temperature increased by approximately 1.8 degrees Fahrenheit (°F) in the past 80 years, and is likely to reach a 2.7 °F increase between 2030 and 2050 at current global emission rates (International Panel on Climate Change [IPCC] 2018).

The largest source of GHG emissions from human activities in the U.S. is from fossil fuel combustion for electricity, heat, and transportation. Specifically, the Inventory of U.S. Greenhouse Gasses and Sinks: 1990-2017 states that the primary sources of GHG emissions from fossil fuel combustion in 2017 included electricity production (35 percent), transportation (36.5 percent), industry (27 percent), and commercial and residential end users (17 to 19 percent, respectively) (USEPA 2019). Factoring in all sources of GHG emissions, the energy sector accounts for 84 percent of total emissions in addition to agricultural (8 percent), industrial processes (5.5 percent), and waste management (2 percent) sources.

The County's Final Environmental Impact Report (EIR) for the Energy and Climate Action Plan (ECAP) (PMC, Inc. 2015) and the 2016 Greenhouse Gas Emissions Inventory Update and Forecast (County of Santa Barbara 2018) include a detailed description of the existing regional setting as it pertains to GHG emissions. Regarding non-stationary sources of GHG emissions within Santa Barbara County specifically, the transportation sector produces 38 percent of the total emissions, followed by the building energy (28 percent), agriculture (14 percent), off-road equipment (11 percent), and solid waste (9 percent) sectors (County of Santa Barbara 2018).

The GHG emissions from human activities have led to a rise in the average global temperature, which has the potential to substantially change the Earth's climate. More frequent and intense weather and climate-related events are expected to damage infrastructure, ecosystems, and social systems across the U.S. (U.S. Global Change Research Program 2018). California's Central Coast is expected to experience changes in precipitation patterns, reduced foggy days, increased extreme heat days, exacerbated drought and wildfire

conditions, and acceleration of sea level rise leading to increased coastal flooding and erosion (Langridge 2018).

Climate change results from GHG emissions "…generated globally over many decades by a vast number of different sources" rather than from GHG emissions generated by any one project (Kostka and Zishke 2013; Hegerl et al. 2007). As defined in CEQA Guidelines Section 15355 and discussed in CEQA Guidelines Section 15130, "…a cumulative impact consists of an impact which is created as a result of the combination of the [proposed] Project…evaluated…together with other Projects causing related impacts." Therefore, by definition, climate change is considered a cumulative impact under CEQA.

County Environmental Threshold: On January 26, 2021, Santa Barbara County adopted interim GHG emissions thresholds of significance based on the County's 2030 GHG target (i.e., 50 percent below 2007 levels by 2030), which are in line with the State's GHG emission reduction goals. The interim GHG emissions 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 projects causing related impacts. A CEQA lead agency may determine that a 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[a][2]). The CEQA Guidelines direct that a project's contribution to a significant cumulative impact will be rendered insignificant if the 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]).

Consistent with CEQA Guidelines Section 15064.7, the County developed and adopted interim GHG emissions thresholds of significance through analysis on the reasonably foreseeable incremental contribution of the project's emissions to the effects of climate change. CEQA Guidelines Section 15064.7(a) states, "[a] threshold of significance is an identifiable quantitative, qualitative or performance level of a particular environmental effect." Projects that comply with an applicable threshold will normally have an insignificant effect on the environment. Projects that exceed or otherwise do not comply with an applicable threshold may have a significant effect on the environment and, as a result, may require project modifications or mitigation measures to avoid or reduce those effects to insignificant levels. The following thresholds reflect this general guidance as well as the specific guidance set forth in CEQA Guidelines Section 15064.4 regarding the significance of impacts from GHG emissions.

Per CEQA Guidelines Section 15064.4, the County considers the following factors, among others, when determining the significance of impacts from GHG emissions on the environment: 1) the extent to which the project may increase or reduce GHG emissions as compared to the existing environmental setting; 2) whether the project emissions exceed a threshold of significance that applies to the project; and 3) the extent to which the project complies with regulations or requirements adopted to implement a Statewide, regional, or local plan for the reduction or mitigation of GHG emissions (e.g., CEQA Guidelines Section 15183.5[b]).

The thresholds framework consists, first, of a numerical threshold (Screening Threshold) and, second, an efficiency threshold (Significance Threshold). The County based the Screening Threshold on the types of land uses that the County permitted over a 10-year period (2010-2019). The County set the Screening Threshold at a level that captures the "fair share" of emissions from new development consistent with its 2030 GHG emissions target. The County based the Significance Threshold on the targeted level of emissions from new development in 2030 and projected population and employment for the unincorporated county for the same year. The interim GHG emissions thresholds recommend that land use projects be first assessed against a screening threshold of 300 metric tons of CO_2 equivalent per year (MT CO_2e/year). Staff will compare the quantified GHG emissions against the 300 MT CO_2e/year Screening Threshold using the Board-adopted Size-Based Project Screening Criteria Table, which lists the types and sizes of projects that

will typically emit less than 300 MT CO_2e/year. If the estimated GHG emissions are less than the Screening Threshold, staff can conclude that project will have an insignificant environmental impact, and the project would require no further analysis. For projects that exceed the screening threshold, a service population threshold of 3.8 MT CO_2e is recommended.

Impact Discussion:

a, b) ***Insignificant.*** As previously described, construction activities associated with the proposed Project would include the use of a caisson drilling truck, a Bobtail dump truck, a standard excavator, a standard motor grader, asphalt paving truck, compactor, delivery truck, and light trucks for worker transport. The County presumes a project that is smaller than the size-based screening criteria, absent substantial evidence to the contrary, would have an insignificant impact and do not require further impact analysis. While not included as a part of the proposed Project, each of the four single-family residences enabled by the proposed Project would be less than the 62,000-sf screening threshold, both individually and collectively. Nevertheless, a CalEEMod analysis was still prepared for the proposed Project (see **Attachment 7**), and demonstrates that the intermittent use of heavy construction equipment – for initial construction activities associated with the Vesting Tentative Tract Map as well as future residential development enabled by the proposed Project – would result in less than 300 MT CO_2e/year (see **Table 7**). Consequently, the short-term construction-related GHG emissions would be less than the interim GHG emissions thresholds and would be less than significant.

Table 7. Estimated Annual Construction-related GHG Emissions (MT CO_2e/year)

Year	GHG Emissions			
	CO_2	CH_4	N_2O	MT CO_2e / year
2023	237.29	0.06	<0.01	241.85
2024	141.72	0.02	<0.01	142.69
2025	10.18	<0.01	<0.01	10.23

Source: Wood 2022; see **Attachment 7**.

Operational GHG emissions associated with the proposed Project – including the four proposed single-family residences and ancillary structures that are not included in the proposed Project but would be enabled by the proposed Project – are estimated to be 49.72 MT CO_2e/year (see **Table 8**). Long-term operational GHG emissions associated with the proposed Project would be far less than 300 MT CO_2e/year and would be less than significant.

Table 8. Estimated Annual Operational GHG Emissions (MT CO_2e/year)

Year	GHG Emissions			
	CO_2	CH_4	N_2O	MT CO_2e / year
2023	237.29	0.06	<0.01	241.85
2024	141.72	0.02	<0.01	142.69
2025	10.18	<0.01	<0.01	10.23

Source: Wood 2022; see **Attachment 7**.

Cumulative Impacts: The proposed Project would not result in a long-term source of GHG emissions that would contribute substantially to cumulative impacts associated with global climate change. As previously described, demolition and grading activities would entail heavy haul truck trips and other construction-related vehicle traffic that may coincide with GHG emissions from heavy construction equipment and/or heavy haul truck trips associated with other cumulative projects. However, because of the temporary nature

and limited GHG emissions associated with construction, the contribution of the proposed Project to cumulative impacts would be considered incremental and not cumulatively considerable.

Mitigation Measures and Residual Impacts: No mitigation measures are required; there would be no residual impacts associated with the implementation of the proposed Project.

4.4 BIOLOGICAL RESOURCES

Will the proposal result in:	Poten. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
Flora					
a. A loss or disturbance to a unique, rare or threatened plant community?		X			
b. A reduction in the numbers or restriction in the range of any unique, rare or threatened species of plants?		X			
c. A reduction in the extent, diversity, or quality of native vegetation (including brush removal for fire prevention and flood control improvements)?		X			
d. An impact on non-native vegetation whether naturalized or horticultural if of habitat value?		X			
e. The loss of healthy native specimen trees?		X			
f. Introduction of herbicides, pesticides, animal life, human habitation, non-native plants or other factors that would change or hamper the existing habitat?		X			
Fauna					
g. A reduction in the numbers, a restriction in the range, or an impact to the critical habitat of any unique, rare, threatened or endangered species of animals?		X			
h. A reduction in the diversity or numbers of animals onsite (including mammals, birds, reptiles, amphibians, fish or invertebrates)?		X			
i. A deterioration of existing fish or wildlife habitat (for foraging, breeding, roosting, nesting, etc.)?		X			
j. Introduction of barriers to movement of any resident or migratory fish or wildlife species?		X			
k. Introduction of any factors (light, fencing, noise, human presence and/or domestic animals) which could hinder the normal activities of wildlife?		X			

Existing Setting: As described in **Section 3.0**, *Environmental Setting*, biological evaluations for the proposed Project were completed in 2019, 2020, and 2021 by Storrer Environmental Services, LLC. The purpose of the biological evaluations was to identify and document potential sensitive status species and habitats, delineate aquatic drainage features and associated riparian areas (including wetlands), inventory tree species and locations, and identify other ESHs. The complete results of the biological evaluations are provided in **Attachment 2**.

Flora

Native vegetation communities within the Project site include arroyo willow thicket, coyote brush-lemonade berry scrub, big pod ceanothus-laurel sumac scrub, eucalyptus grove, annual brome grassland, ice plant mats, ornamental/landscaping plantings, and ruderal/disturbed. Wild oats and annual brome grassland, a non-native grass community, makes up the majority (6.3 acres) of the 13.02-acre residential estate. Based on aerial imagery, the majority of the Project site has been regularly maintained/mowed since at least 1994 to reduce potential wildfire hazards, resulting in few native species and an abundance of non-natives, particularly over the open grassland areas (Storrer 2021). A brief description of the vegetation communities present within the Project site is provided below and depicted on **Figure 4**.

Wild Oats and Annual Brome Grassland

The majority of the habitat in proposed Lots 1, 3, and 4 is comprised of wild oats and annual brome grassland (6.3 acres) that is regularly mowed to reduce wildfire hazards. This community is dominated by non-native annual grasses including, ripgut brome (*Bromus diandrus*), soft chess (*B. hordeaceus*), Italian rye (*Festuca perennis*), wild oats (*Avena barbata*, *A. fatua*), barley (*Hordeum murinum* ssp. *leporinum*), kikuyu grass (*Pennisetum clandestinum*), and false brome (*Brachypodium distachyon*).

Weedy herbaceous species such as poison hemlock, bull thistle (*Cirsium vulgare*), sweet fennel (*Foeniculum vulgare*) wild radish (*Raphanus sativus*), black mustard (*Brassica nigra*), short-pod mustard (*Hirschfeldia incana*), bur clover (*Medicago polymorpha*), and onionweed (*Asphodelus fistulosus*), were apparent throughout the grassland areas. Coast live oak trees in relatively low density are scattered across these non-native grasslands.

Arroyo Willow Thicket

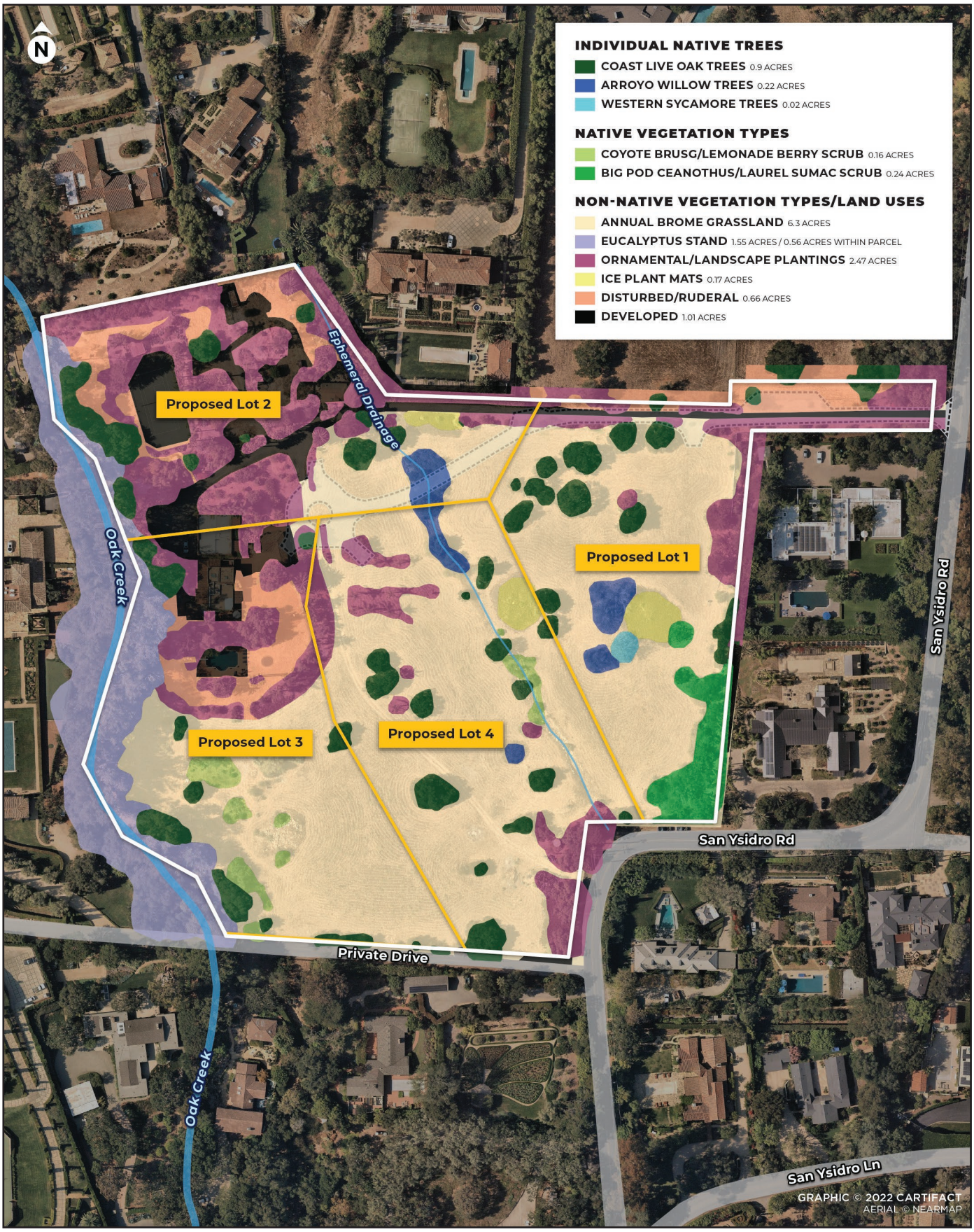
This plant community is associated with the unnamed ephemeral drainage in the middle of the Project site. Associated species along the ephemeral drainage were mostly non-native and include umbrella grass (*Cyperus alternifolius*), poison hemlock (*Conium maculatum*), and castor bean (*Ricinus communis*). Individual arroyo willows are also present in the central portions of proposed Lot 1 and Lot 4. When associated with riparian habitat, arroyo willows are considered ESH and are protected by County and Montecito Community Plan policies.

Coyote Brush-Lemonade Berry Scrub

Patches of coyote brush (*Baccharis pilularis* var. *consanguinea*) and lemonade berry (*Rhus integrifolia*) scrub are present in the southwest corner of the Project site and along the unnamed ephemeral drainage. These large shrubs are generally surrounded by annual grassland habitat. Associated shrub species include laurel sumac (*Malosma laurina*) and myoporum (*Myoporum laetum*).

Big Pod Ceanothus-Laurel Sumac Scrub

The southeastern corner of the Project site contains a stand of native scrub habitat dominated by big pod ceanothus (*Ceanothus megacarpus*) and laurel sumac (*Malosma laurina*). This community also contained several arroyo willow, small coast live oak trees, coyote brush, blackwood acacia (*Acacia melanoxylon*), giant reed (*Arundo donax*), and big saltbush (*Atriplex lentiformis*).



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Vegetation Communities

FIGURE 4

Mature Native Trees

Mature coast live oak trees are scattered throughout the Project site and along Oak Creek corridor. Individual live oak trees are protected by the Montecito Community Plan. However, per the Montecito Community Plan, oak woodlands are defined as stands dominated by coast live oak and other trees native to oak woodlands (including vegetation transition zones), which form a closed canopy of a minimum of 1 acre. Due to lack of contiguous habitat, the coast live oak trees within the Project site are not considered to be oak woodland (Storrer 2021). Complete details on tree locations, size, health, critical root zones, and protection measures are provided in **Attachment 4**.

Ice Plant Mats

Ice plant (*Carpobrotus edulis*) is one of eight invasive ice plant taxa that grow in California (Storrer 2021). This species is a ground-hugging perennial succulent that forms impenetrable mats, with yellow to pink flowers, covering large areas. This plant is widely planted for soil stabilization and landscaping. Several ice plant mats are present in the eastern portion of the Project site in proposed Lots 1, 2, and 4.

Ornamental Trees / Landscape Plantings

There is extensive landscaping and a wide variety of ornamental plant species present in the northwest portion of the Project site and along the private driveway. This vegetation community consists of species not native to the region that have been planted and/or exotic species that typically do not occur in the natural landscape outside of urban areas. Approximately 2.47 acres of ornamental trees and landscape plantings occur within the Project site. An arborist mapped 128 non-native trees of 17 different species, in and around proposed Project improvements (see **Attachment 4**).

Ornamental and landscape species that were observed include, but are not limited to: olive (*Olea europaea*), lemon (*Citus x limon*), avocado (*Persea americana*), blackwood acacia, Canary Island date palm (*Phoenix canariensis*), Mexican fan palm (*Washingtonia robusta*), Queen palm (*Syagrus romanzoffiana*), Aleppo pine (*Pinus halepensis*), black pine (*Pinus nigra*), Peruvian pepper tree (*Schinus resi*), Brazilian peppertree (*S. terebinthifolius*), Italian cypress (*Cupressus sempervirens*), Chinese juniper (*Juniperus chinensis*), London plane tree (*Platanus x hispanica*), jade plant (*Crassula ovata*), mission cactus (*Opuntia ficus-indica*), foxtail agave (*Agave attenuata*), Mexican bush sage (*Salvia leucantha*), hibiscus (*Hibiscus* sp.), blue plumbago (*Plumbago auriculata*), and bird of paradise (*Strelitzia reginae*).

Ruderal/Disturbed

Ruderal/disturbed habitat is present around existing structures and hardscape. This vegetation community consists of species not native to the region that have become naturalized and widespread in disturbed areas. Ruderal (i.e., disturbance adapted) plant species observed include short-pod mustard, sweet fennel, wild radish, cheeseweed (*Malva parviflora*), annual grasses (*Avena* sp., *Bromus* sp., *Hordeum* sp.), sow thistles (*Sonchus oleraceus, S. asper*), Bermuda buttercup (*Oxalis pes-caprae*), scarlet pimpernel (*Lysimachia arvensis*), and smilo grass (*Stipa miliacea* var. *miliacea*).

Special-Status Plant Species

As previously described, botanical surveys were conducted in October 2019 and May 2020, within the typical blooming season for the special-status plant species that have the potential to occur in the Project site. No special-status plant species were observed based on the field investigations, and none are expected to occur due to lack of suitable habitat within the Project site (Storrer 2021).

One sensitive vegetation community, arroyo willow thicket, is present within the Project site along the unnamed ephemeral drainage.

Fauna

The field investigations within the Project site enabled a characterization of habitat quality and assessment of potential for occurrence of special-status wildlife species.

Although not part of the Project site, Oak Creek was investigated for presence of special status species and their habitats. Shallow pools were present in Oak Creek and the unnamed ephemeral drainage during the January 2020 and May 2020 field investigations. The ephemeral drainage that bisects the Project site does not sustain surface water long enough to support aquatic or semi-aquatic wildlife species. During the May 2020 survey, the pools in the upper portion of Oak Creek appeared to support marginal breeding habitat for Baja California chorus frog but would be unlikely to support special-status wildlife species that require a longer hydroperiod (e.g., California red-legged frog, coast range newt [*Taricha torosa torosa*], two-striped garter snake, southwestern pond turtle [*Actinemys pallida*], etc.).

Special-status wildlife species that have the potential to occur in the Project site based on presence of suitable habitat and/or documented occurrences in the vicinity of the Project site include Monarch butterfly, California red-legged frog, two-striped garter snake, Cooper's hawk, Townsend's big-eared bat, and big free-tailed bat. Results of the targeted survey efforts and each species' habitat preferences, distribution, and key characteristics are summarized below. No special-status wildlife species were observed within the Project site during the 2019 and 2020 field surveys; overall, the relatively low number of wildlife species observed is a reflection of the surrounding residential land use (Storrer 2021).

Monarch Butterfly

Monarch butterfly overwintering sites are protected by State and County policies. Although the species is not listed as endangered or threatened, its autumnal and winter aggregation sites are especially vulnerable to disturbance. Aggregation sites are found in wind-protected tree groves that provide a microclimate with adequate sunlight and a nearby source of water and food. Known overwintering sites and any habitat with the above listed qualities is considered ESH by the County. There are several documented roosting sites in the vicinity of the Project site. The closest documented permanent roosting site is approximately 0.5-mile southeast, adjacent to the Valley Club of Montecito (CDFW 2020). Other nearby documented occurrences are closer to the coast (e.g., Ennisbrook, Romero Creek near U.S. Highway 101). Monarch butterflies have not been documented roosting in the habitat along Oak Creek. The blue gum eucalyptus trees along Oak Creek may not provide adequate wind protection or the appropriate microclimate to be considered a suitable aggregation site for this species. An overwintering season (i.e., November to March) survey for monarch butterflies was conducted on January 15, 2020 to determine if monarch butterflies utilize the habitat within the Project site; no monarch butterflies or evidence of overwintering activities/aggregations were observed.

California Red-Legged Frog

The California red-legged frog is listed as federally threatened under the Federal Endanger Species Act and is considered to be a Species of Special Concern by CDFW. California red-legged frogs are typically found in segments of streams and rivers sustaining prolonged surface flow or standing pools that afford cover and food resources. Upland dispersal and migration typically occur under wet conditions during fall and winter. Oak Creek does not sustain prolonged surface flow suitable to support breeding habitat. California red-legged frogs could be found in Oak Creek or the Project site on a seasonal, transient basis during dispersal and migration, but this species is unlikely to occur with regularity in actively maintained areas.

Two-Striped Garter Snake

The two-striped garter snake is considered to be a California Species of Special Concern by CDFW. This species generally occurs around pools, creeks, cattle tanks, and other water sources, but can also be found in rocky areas in oak woodland, chaparral, brushland, and coniferous forests. Two-striped garter snake could be

found in Oak Creek during periods of high flows on seasonal, transient basis. However, based on the flow regime of Oak Creek the occurrence two-striped garter snake in the Project site is considered unlikely.

Cooper's Hawk

Cooper's hawk, which is considered to be a Watch List species by the CDFW, is an uncommon year round resident and local breeder in the Santa Barbara region (Lehman 2019). Theis species prefers woodland habitats (e.g., oak, riparian, and ornamental) for nesting, but frequents a wide variety of habitats when hunting. Prey consists almost entirely of birds. There is suitable foraging and nesting habitat for Cooper's hawk within the Project site. Therefore, Cooper's hawk is considered to be an uncommon visitor and possible resident breeder in the vicinity of the Project site.

Townsend's Big-eared Bat

The Townsend's big-eared bat is considered to be a California Species of Special Concern by the CDFW. Townsend's big-eared bat is widely distributed with the Santa Barbara region. They typically roost in caves, mine tunnels, or buildings. There is no suitable roosting habitat in the Project site; however, foraging habitat is present in the adjacent Oak Creek.

Big Free-tailed Bat

Big free-tailed bat primarily inhabits rugged, rocky terrain. This species is considered to be a California Species of Special Concern. Big free-tailed bats are migratory, travelling seasonally from Mexico to southwestern U.S.. They prefer to roost in crevices, buildings, caves, but have also been found roosting in ponderosa pine (*Pinus ponderosa*), Douglas fir (*Pseudotsuga menziesii*), and desert shrubs. There is no preferred roosting habitat for this species within the Project site; however, foraging habitat is present in the adjacent Oak Creek.

County Environmental Thresholds: The County's Environmental Thresholds and Guidelines Manual includes guidelines for the assessment of impacts to biological resources. The following thresholds are applicable to the proposed Project:

Wetlands: Projects which result in a net loss of important wetland area 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 plant or wildlife species are considered to have a potentially significant effect on the environment. Projects which substantially interrupt wildlife access, use, and dispersal in wetland areas would typically be considered to have a potentially significant impact. Projects which disrupt the hydrology of wetlands systems would be considered to have a potentially significant impact.

Riparian Habitats: Project-related impacts may be considered significant due to: direct removal of riparian vegetation; disruption of riparian wildlife habitat, particularly animal dispersal corridors and or understory vegetation; or intrusion within the upland edge of the riparian canopy leading to potential disruption of animal migration, breeding, etc. through increased noise, light and glare, and human or domestic animal intrusion; or construction activity which disrupts critical time periods for fish and other wildlife species.

Native Grasslands: In general, project-related impacts to native grasslands may be considered significant if they involve removal of or severe disturbance to a patch or a combined patch area of native grasses that is greater than 0.25 acre in size. The grassland must contain at least 10 percent relative cover of native grassland species. Impacts to patch areas less than 0.25 acre in size that are clearly isolated and not part of a significant native grassland or an integral component of a larger ecosystem are usually considered insignificant.

Oak Woodlands and Forests: Project-related impacts may be considered significant due to 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.

Individual Native Trees: Project-related impacts may be considered significant due to the loss of 10 percent or more of the trees of biological value on a project site.

Other Rare Habitat Types: The County's Environmental Thresholds and Guidelines Manual recognizes that not all habitat-types found in Santa Barbara County are addressed by the habitat-specific guidelines. Impacts to other habitat types or species may be considered significant, based on substantial evidence in the record, if they substantially: 1) reduce or eliminate species diversity or abundance; 2) reduce or eliminate the quality of nesting areas; 3) limit reproductive capacity through losses of individuals or habitat; 4) fragment, eliminate, or otherwise disrupt foraging areas and/or access to food sources; 5) limit or fragment range and movement; or 6) interfere with natural processes, such as fire or flooding, upon which the habitat depends.

Impact Discussion:

a, b, c, d) ***Significant but Mitigable.*** As previously described Oak Creek and the arroyo willow thicket associated with the ephemeral drainage are both considered to be ESH. The Montecito Community Plan requires a minimum buffer strip of 50 feet for development near streams and creeks in urban areas. However, the proposed development envelopes would intrude upon these require setbacks. Demolition of the existing structures and hardscapes within proposed Lots 2 and 3 would encroach into the 50-foot setback of Oak Creek. The existing single-family residence as well as the existing tennis court and residence extend under the tree canopy along Oak Creek. Demolition of the existing driveway and replacement of the existing culvert would also impact within the unnamed ephemeral drainage.

Table 9. Summary of Impacts to ESH from Demolition Activities

Existing Features	Area in ESH to be Demolished	Area in ESH Buffer to be Demolished
Buildings/Hardscape	288 sf	4,634 sf 0.11-acre
Tennis Court	0	3,511 sf 0.08-acre
Pool and Hardscape	0	0
Driveway, Culverts, and Access Road	75 sf	4,186 sf 0.1-acre
Total Area Impacted from Demolition Activities	363 sf	12,331 sf 0.28-acre

Source: Storrer 2021; see **Attachment 2**.

As shown in **Table 10**, total impacts resulting from the utility and drainage improvements, new shared-access driveway, and future residential development within the development envelopes and sewer easements would result in 11,522 sf or 0.26-acres of disturbance related impact within ESH buffer, removal of up to 11 coast live oak trees, and removal of at least 4,624 sf or 0.11-acre of arroyo willow associated with the unnamed ephemeral drainage.

Table 10. Summary of Impacts from the Construction Activities

Proposed Improvements	Affected Habitat (sf)		Area in ESH	Area in ESH Buffer
	Arroyo Willow	Coast Live Oak Trees		
Proposed Shared Driveway & Drainage Improvements				
New Shared-Access Driveway, Culvert Replacement, and Sediment Basin 2 East	1,642 sf	2 trees removed	1,472 sf 0.03-acre	5,925 sf 0.14-acre
Proposed Lots & Potential Impacts from Future Development*				
Lot 1 Development Envelope, Sewer Line, and Sediment Basin 1	2,825 sf	1 tree removed	0	0
Lot 2 Development Envelope, Sewer Line, and Sediment Basin 2 West	0	2 trees removed	0	5,597 sf** 0.13-acre
Lot 3 Development Envelope, Sewer Line, and Sediment Basin 3	0	1 tree removed	0	0
Lot 4 Development Envelope, Sewer Line, and Sediment Basin 4	157 sf	5 trees removed	0	0
Subtotal of Potential Impacts within Proposed Development Envelopes	2,892 sf	9 trees removed	0	5,925 sf 0.14-acre
Total Project Impacts from the Shared-Access Driveway, Drainage Improvements, and Potential Impacts from Future Development	4,624 sf*** 0.11-acre	11 trees removed	1,472 sf 0.03-acre	11,522 sf 0.26-acre

Notes:
*The total area for each habitat type is provided for the proposed development envelopes.
**Most of the encroachment into the ESH buffer along Oak Creek and on proposed Lots 2 and 3 includes areas where the existing house, hardscape, and tennis court would be demolished.
***Potential impacts to 4,624 square feet of arroyo willow thicket and removal of 11 coast live oak trees would be mitigated at a 3:1 replacement ratio in the restoration planting/seeding areas (R1, R2, & R3) depicted on Proposed Riparian Buffer Restoration Areas (see **Attachment 3**).
Source: Storrer 2021.

The disturbance and loss of 0.26 acres of mapped ESH, removal of 11 coast live oak trees, removal of 4,624 sf of arroyo willow thicket, and distance to 1,472 sf (0.03-acre) of ephemeral drainage would be potentially significant but could be feasibly mitigated to less than significant level. The proposed Project – including the proposed removal and replacement of a culvert within the unnamed ephemeral drainage – would require a Section 401 Water Quality Certification issued by the Central Coast RWQCB, and a Lake and Streambed Alteration Agreement issued by CDFW pursuant to California Fish and Game Code Section 1600. The Applicant would be required to obtain these permits and comply with all required permit conditions. MM BIO-1 would require the qualified biologist to lead a worker orientation for

Photograph 10. *Riparian habitat occurs along the unnamed ephemeral drainage, which is considered ESH.*

all construction contractors emphasizing the presence of special-status species within and/or adjacent to the construction areas, 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.

As discussed in the Project Description, a Habitat Restoration Plan has been developed as a part of the proposed Project, which includes a 1.24-acre restoration area that would mitigate impacts to 4,624 sf of arroyo willows at a 3:1 ratio, resulting in planting and establishment of 13,880 sf of arroyo willow plantings in the buffer areas., and planting of 33 oak trees for a 3:1 replacement ratio.

Prior to issuance of a Zoning Clearance for initial improvements associated with the Vesting Tentative Tract Map, the Habitat Restoration Plan would be refined based on final proposed impacts and provide details of riparian mitigation planting location(s), mitigation ratios, site preparation, maintenance and monitoring requirements, performance criteria, and reporting requirements (see MM BIO-6). The Habitat Restoration Plan, at a minimum, must mitigate potential impacts to 11 coast live oak trees, 4,624 sf of arroyo willow thicket, and associated ESH buffer encroachments. At a minimum, restoration activities shall include the planting of 33 15-gallon replacement coast live oak trees as well as 13,880 sf of arroyo willows to achieve a 3:1 mitigation ratio. In addition, all restoration areas would be seeded and planted with a native plant palette comprised of regionally appropriate trees, shrubs, and herbs. Routine maintenance activities would be implemented to control invasive plant species (i.e., weed maintenance) throughout the 2.7-acre buffer areas along the east side of Oak Creek and both sides of the ephemeral drainage (see **Figure 5** and **Attachment 3**).

All future residential development would occur within the proposed development envelopes and sewer line easements. Future stormwater facility designs requiring installation of storm drain lines and/or energy dissipaters outside of the development envelopes shall avoid impacts to native vegetation or minimize any such impacts to the maximum extent feasible. Any potential impacts within ESH and/or the riparian corridor as a result of the installation of storm drain lines or energy dissipaters shall be mitigated by the Applicant and/or future property owner in accordance with the Habitat Restoration Plan (see MM BIO-6) and County-required mitigation ratios.

MM BIO-4 would require the qualified biologist to install orange construction fencing along the boundary of the disturbance footprint and prevent workers and equipment from damaging ESH, except in locations where existing improvements are proposed for demolition and/or where trenching, grading, or other construction activities are proposed and mitigated for under the Habitat Restoration Plan. MM BIO-5 would require the implementation of a Tree Assessment and Protection Plan (see **Attachment 4**). This plan would include protections for coast live oak and other native trees (e.g., arroyo willows, western sycamores, etc.), which would be avoided except in locations where existing improvements are proposed for demolition and/or where trenching, grading, or other construction activities are proposed and mitigated for under the Habitat Restoration Plan.

MM BIO-7 and MM BIO-8 requires implementation of general biological resource construction avoidance and protection measures be implemented, such as cleaning of construction equipment away from waterways, appropriate storage and staging areas located away from sensitive habitat, and use of erosion control measures. With the implementation of these mitigation measures, impacts to ESH would be reduced to a less than significant level.

wsp

Proposed Restoration

FIGURE 5

e) ***Significant but Mitigable.*** County of Santa Barbara and Montecito Community Plan policies protect individual oak trees that exceed 6 inches diameter at breast height (dbh). Potential direct removal of 11 individual live oak trees would be potentially significant; however, the proposed Project would mitigate this loss at a 3:1 ratio, which would result in a minimum of 33 individuals being planted at the Project site per specifications of the approved Habitat Restoration Plan (MM BIO-6) and Tree Assessment and Protection Plan (MM BIO-5). During future residential development enabled by the proposed Project, the construction of building pads within protected root zones or operation of heavy equipment in close proximity to such trees, could result in potential damage to and/or the need for removal of these trees. As described in MM BIO-5, individual trees located outside of the disturbance area, but within 25 feet of disturbance, shall be fenced at least 6 feet outside the critical root zone, unless approved grading shall occur closer to the trunk, or unless the tree is located far upslope. Trees disturbed within their critical root zone shall be deep fed and checked by a P&D-approved arborist for other treatment recommendations. If it becomes necessary to remove a tree, the tree shall be boxed and replanted. Any tree that is incidentally impacted resulting in the death of the tree shall be mitigated in accordance with the County's Grading Ordinance for Native Oak Tree Removal. With these mitigation measures in place, impacts to tree specimens would be less than significant.

f) ***Significant but Mitigable.*** As previously described, the implementation of the proposed Vesting Tentative Tract Map would involve initial construction activities that would result in removal of coast live oak trees, arroyo willow thicket, and associated ESH buffer encroachments. However, these impacts would be mitigated through the implementation of a Habitat Restoration Plan (MM BIO-6) and Tree Assessment and Protection Plan (MM BIO-5). While single-family residential development within the four developable lots is not proposed at this time, future residential development enabled by the proposed Project could result in the introduction of herbicides, pesticides, non-native plants, domestic animals, and other disturbances resulting from human habitation. However, these activities would be similar to existing activities at the Project site, which is extensively disturbed as a result of the existing single-family residence, ancillary structures, and associated activities (e.g., fuel management of existing grasslands, etc.). Impacts associated with human habitation of the four developable parcels would result in less than significant impacts.

g, h) ***Significant but Mitigable.*** As previously described, no special-status wildlife species have been documented at the Project site; however, six special status wildlife species have potential to occur; California red-legged frog, two-striped garter snake, Cooper's hawk, Townsend's big-eared bat, and big free-tailed bat (Storrer 2021). Demolition of all existing structures and hardscapes, trenching and excavation activities associated with utilities and drainage improvements, and grading and paving for construction of the shared-access driveway could result in potential impacts to these species. In the event future development results in incidental injury to or mortality of special-status wildlife species, this would be a significant impact. However, impacts can be mitigated during construction to a less than significant level through the recommended species-specific and sensitive habitat protection measures.

The potential for incidental injury or mortality to special-status wildlife species would be reduced through the implementation of MM BIO-2, which would involve a pre-construction survey for special-status species to be conducted by a qualified biologist. Any sensitive species found in the work area during the pre-construction survey would be left to leave on their own or shall be relocated by the qualified biologist off-site to an area that provides suitable habitat conditions, which would be identified by the qualified biologist and confirmed by the County in coordination with the U.S. Fish and Wildlife Service (USFWS) and CDFW, prior to any ground disturbing activities. Similarly, with respect to nesting birds afforded protection under the Migratory Bird Treaty Act (MBTA), as required by MM BIO-3, the qualified biologist would conduct a pre-construction survey of the proposed disturbance areas and adjacent habitats within 1 week of the initiation of construction activities (i.e., mobilization, staging, vegetation clearing, or excavation) to avoid impacts to nesting raptors and other birds during the bird nesting season (February 1 to August 31). Additionally, MM BIO-1 would require a qualified biologist to lead a worker orientation for all construction

crews emphasizing the presence of special-status wildlife species and their habitats. If wildlife species are identified during construction, the biologist would stop or re-direct work to allow the individuals to leave on their own or to re-locate the individual to an area that provides suitable habitat conditions. MM BIO-7 and MM BIO-8 would require the implementation of standard construction BMPs to reduce or avoid impacts to habitats and species.

i, j) ***Significant but Mitigable.*** As previously described, the majority of the Project site is composed of non-native annual grassland. There is suitable foraging and nesting habitat for Cooper's hawk within the Project site. Cooper's hawk is expected as an uncommon visitor and possible resident breeder in the vicinity of the Project site. Oak Creek provides foraging habitat for Townsend's big-eared bat, big free-tailed bat, and has habitat to potentially support occurrences of two-striped garter snake; however, no construction activities would occur within the creek corridor and are therefore these activities would be unlikely to affect existing foraging habitats.

Oak Creek does not sustain prolonged surface flow suitable to support breeding habitat for California red-legged frogs. California red-legged frogs could be found in Oak Creek or within the Project site on a seasonal, transient basis during dispersal and migration, but this species is unlikely to occur with regularity in actively maintained areas (Storrer 2021).

The only development proposed within the unnamed ephemeral drainage itself would be the removal of one 24-inch diameter culvert and replacement to maintain drainage function of the unnamed ephemeral drainage underneath the new shared-access driveway. The ephemeral drainage lacks a permanent source of water flow and does support aquatic species.

MM BIO-4 would require that the qualified biologist install orange construction fencing along the boundary of the disturbance footprint, preventing workers and equipment from damaging ESH, except in locations where existing improvements are proposed for demolition and/or trenching, grading, or other construction activities are proposed and mitigated for under the Habitat Restoration Plan. MM GEO-1 would require that all work within the creek corridor only occur when the creek is dry and not flowing with water and implements BMPs to prevent polluted runoff and impacts to water quality (see **Section 4.8**, *Geologic Processes*). With these mitigation measures, proposed construction activities would not introduce any long-term barriers to movement or any other factors that would adversely affect migratory movement or wildlife habitat.

k) ***Significant but Mitigable.*** Future development of the Project site would introduce lighting, walls, fencing, noise, and the presence of both humans and potentially domesticated pets. As previously described in **Section 3.0**, *Environmental Setting*, the majority of the Project site has been routinely mowed for fire fuels suppression in non-native grassland habitat; this is not prime wildlife foraging or nesting habitat.

Impacts to the mapped ESH associated with Oak Creek and the unnamed ephemeral drainage could result in potentially significant adverse impacts. In order to reduce these potential impacts to a less than significant level MM BIO-6 would require the preparation and implementation of a Habitat Restoration Plan, including monitoring of native vegetation planted after following construction. With these measures, impacts to wildlife activities would be less than significant.

Cumulative Impacts: As previously described, demolition of existing structures and hardscape, vegetation/tree removal, construction of the shared-access driveway and culvert replacement, grading to establish building pad elevations and construction of future residences would result in ground disturbance and vegetation removal that may have the potential to impact special-status species and sensitive habitats. The proposed Project also has the potential to impact sensitive species and habitats. However, the implementation of MM BIO-1 through MM BIO-8 would reduce impacts to less than significant with

mitigation. Therefore, when considered with other cumulative projects in the region – the proposed Project would not contribute to a considerable cumulative impact.

Mitigation Measures: The following mitigation measures would reduce the potentially significant impacts to biological resources to a less than significant level:

MM BIO-1: **Construction Worker Orientation.** Prior to the commencement of any construction-related activities, including initial construction activities associated with the Vesting Tentative Tract Map as well as future residential development enabled by the proposed Project, the P&D-approved biologist shall provide a worker orientation to be completed at a mandatory pre-construction meeting for all construction contractors, including site supervisors, equipment operators, and construction crews. (This orientation could occur during the mandatory pre-construction meeting.) This orientation shall emphasize the presence of special-status species within and/or adjacent to the construction areas, 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. This session shall be repeated in the event a new general contractor replaces the general contractor that was on-site during the original worker orientation and when non-compliance conditions arise.

Plan Requirements and Timing: The P&D-approved biologist shall conduct the training(s) prior to the commencement of any construction-related activities, including initial construction activities associated with the Vesting Tentative Tract Map as well as future residential development enabled by the proposed Project.

Monitoring: The Applicant shall provide a work orientation sign-in sheet to P&D. P&D permit compliance staff shall spot check attendance in the field using the orientation sign-in sheet.

MM BIO-2: **Pre-construction Wildlife Surveys.** Prior to initial construction activities associated with the Vesting Tentative Tract Map as well as future residential development enabled by the proposed Project, the P&D-approved biologist shall be contracted by the Applicant and/or future property owners to conduct a pre-construction survey of the Project site for special-status wildlife that have the potential to occur. Incidental take permits are not being requested, so no handling (i.e., capture and relocation) of federally listed and/or state listed species is proposed. If listed species are observed within or near the work area, work shall be suspended and the USFWS and CDFW shall be notified.

Plan Requirements and Timing: The qualified biologist shall conduct the survey no more than 1 week (7 days) prior to the commencement of any construction activities, including initial construction activities associated with the Vesting Tentative Tract Map as well as future residential development enabled by the proposed Project. If listed species are observed within or near the work area, work shall be suspended and the USFWS and CDFW shall be notified.

Monitoring: P&D permit compliance staff shall review the survey report(s) for compliance with this condition prior to the commencement of ground-disturbing activities and shall perform site inspections throughout the construction period to verify compliance in the field.

MM BIO-3: **Nesting Bird Surveys.** To avoid disturbance of nesting birds, including raptorial species, protected by the MBTA and California Fish and Game Code Sections 3503, 3503.5, and 3513, no construction activities, including initial construction activities associated with the Vesting Tentative Tract Map as well as future residential development enabled by the proposed Project, shall begin during the bird nesting season (February 1 through August 31), whenever feasible. If construction activities must begin during the bird nesting season, then a pre-construction nesting bird survey shall be performed by the P&D-approved biologist. Pre-construction surveys for nesting birds shall occur within the area to be disturbed and shall extend outward from the disturbance area by 500 feet. The distance surveyed from the disturbance may be reduced if property boundaries render a 500-foot survey radius infeasible, or if existing disturbance levels within the 500-foot radius (e.g., a steep ledge or rocky area) are such that construction-related activities would not disturb nesting birds in those outlying areas. If any occupied or active bird nests are found, a buffer shall be established and demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. The buffer shall be 300 feet for non-raptors and 500 feet for raptors, unless otherwise determined by the P&D-approved biologist. Buffer reductions shall be based on the known natural history traits of the bird species, nest location, nest height, existing pre-construction level of disturbance in the vicinity of the nest, and proposed construction activities. All construction personnel shall be notified as to the location of the buffer zone and to avoid entering the buffer zone during the nesting season. Blasting, if necessary to remove bedrock during construction, shall not be used during the bird nesting season between March 1 and August 1. No ground disturbing activities or vegetation removal shall occur within this buffer until the P&D-approved biologist has confirmed that nesting is completed, the young have fledged and are no longer dependent on the nest, or the nest fails, and there is no evidence of a second nesting attempt; thereby determining the nest unoccupied or inactive. If birds protected under MBTA or the California Fish and Game Code are found to be nesting in construction equipment, that equipment shall not be used until the young have fledged and are no longer dependent on the nest, and there is no evidence of a second nesting attempt.

Plan Requirements and Timing: If construction activities must begin within the nesting season (February 1 to August 31), then the pre-construction nesting bird survey shall be conducted no more than 1 week (7 days) prior to commencement of vegetation removal, grading, or other construction activities. Active nests shall be monitored by the P&D-approved biologist at a minimum of once per week until it has been determined that the nest is no longer being used by either the young or adults, and there is no evidence of a second nesting attempt. Bird survey results and buffer recommendations shall be submitted to P&D for review and approval prior to commencement of grading or construction activities. The P&D-approved biologist shall prepare weekly monitoring reports, which shall document nest locations, nest status, actions taken to avoid impacts, and any necessary corrective actions taken. Active nest locations shall be marked on an aerial map and provided to the construction crew on a weekly basis after each survey is conducted. Active nests shall not be removed without written authorization from USFWS and CDFW.

Monitoring: P&D permit compliance staff shall review the survey report(s) for compliance with this condition prior to the commencement of ground-disturbing activities and shall perform site inspections throughout the construction period to verify compliance in the field.

MM BIO-4: **Habitat Setback and Pre-Construction Fencing.** Prior to the initiation of any construction related activities, including initial construction activities associated with the Vesting Tentative Tract Map as well as future residential development enabled by the proposed Project, the P&D-approved biologist shall supervise the temporary installation of orange construction fence along the boundaries of the disturbance footprint and ESH.

A minimum development setback of 50 feet from Oak Creek shall be maintained except in locations where existing improvements are proposed for demolition and/or trenching, grading, or other construction activities are proposed and mitigated for under the Habitat Restoration Plan. In locations along Oak Creek where coast live oaks are present, the development setback of 50 feet shall extend from the outer edge of the oak canopy. Protective fencing around oaks along Oak Creek should be installed consistent with the Tree Assessment and Protection Plan.

A minimum development setback of 50 feet the unnamed ephemeral drainage that bisects the Project site shall be maintained except in locations where existing improvements are proposed for demolition and/or trenching, grading, or other construction activities are proposed and mitigated for under the Habitat Restoration Plan. Protective fencing around arroyo willow thickets and other native vegetation should be installed prior to the start of staging or construction. In locations along the drainage where the new shared-access driveway and culvert replacement are proposed, protective fencing shall be used both upstream and downstream of the work area to ensure minimal impacts to surrounding arroyo willows.

Plan Requirements and Timing: The P&D-approved biologist shall oversee installation of the fencing. Fencing shall be installed prior to any construction-related activities, including initial construction activities associated with the Vesting Tentative Tract Map as well as future residential development enabled by the proposed Project.

Monitoring: P&D compliance monitoring staff shall perform site inspections throughout the construction phase.

MM BIO-5: **Tree Assessment and Protection Plan.** The Applicant shall submit a Tree Assessment and Protection Plan prepared by a P&D-approved arborist and/or biologist and designed minimize damage to on-site trees. At a minimum the Tree Assessment and Protection Plan shall include the following measures, which shall be applied during the initial construction activities associated with the Vesting Tentative Tract Map as well as future residential development enabled by the proposed Project:

- No grading activities shall take place within the area within 6 feet of the dripline of any trees not previously proposed and approved for removal by P&D unless grading activity is monitored by a P&D approved arborist and the measures described below are followed as applicable.
- Individual trees located outside of the disturbance area, but within 25 feet of disturbance, shall be fenced at least 6 feet outside the critical root zone, unless approved grading shall occur closer to the trunk, or unless the tree is located far upslope.
- No irrigation shall be permitted within 6 feet of the dripline of any protected tree unless specifically authorized by P&D.

- All construction staging areas, parking areas, and washout receptacles shall be kept out of the critical root zones.
- Tree roots disturbed by construction shall be cut clean and kept moist until the soil can be back-filled. Trees disturbed within their critical root zone shall be deep fed and checked by a P&D-approved arborist for other treatment recommendations.
    - If it becomes necessary to remove a tree, the tree shall be boxed and replanted.
    - Any tree that is incidentally impacted resulting in the death of the tree shall be mitigated in accordance with the County's Grading Ordinance for Native Oak Tree Removal.
- The following shall be completed only by hand and under the direction of a P&D-approved arborist/biologist:
    - Any trenching required within the dripline or sensitive root zone of any specimen.
    - Cleanly cutting any roots of 1 inch in diameter or greater, encountered during grading or construction.
    - Tree removal and trimming.
- If the use of hand tools is deemed infeasible, P&D may authorize work with rubber-tired construction equipment weighing 5 tons or less. If significant large rocks are present, or if spoil placement would impact surrounding trees, then P&D may authorize the use of a small tracked excavator (i.e., 215 or smaller track hoe) under the direction of the P&D-approved biologist.

Plan Requirements and Timing: The Applicant shall: 1) submit the Tree Assessment and Protection Plan; 2) include all applicable components in Tree Assessment and Protection Plan; 3) include as notes or depictions all plan components listed above, graphically depicting all those related to earth movement, construction, and temporarily and/or permanently installed protection measures. The Applicant and/or future property owners shall comply with this measure prior to issuance of a Land Use Permit for individual lot development. Plan components shall be included on all plans prior to the issuance of grading and building permits associated with future residential development enabled by the proposed Project. The Applicant and/or future property owners shall install tree protection measures on-site prior to issuance of grading/building permits and pre-construction meeting.

Monitoring: The Applicant and/or future property owners shall demonstrate to P&D compliance monitoring staff that trees identified for protection were not damaged or removed or if damage, or removal occurred, that correction is completed as required by the Tree Assessment and Protection Plan.

MM BIO-6: **Habitat Restoration Plan.** The Applicant shall submit for P&D approval a Habitat Restoration Plan prepared by a P&D-approved biologist. The plan shall be coordinated and consistent with the required Fuel Management Plan (see MM FP-1). At a minimum, the plan shall include the following requirements and components:

- Riparian mitigation ratios, planting location(s), site preparation, maintenance and monitoring requirements, performance criteria, and reporting requirements:

  - Arroyo willow removal shall be mitigated at a 3:1 ratio, resulting in planting and establishment of no less than 13,880 sf of arroyo willow thickets;
  - Coast live oak removal shall be mitigated at a 3:1 ratio, resulting in planting of no less than 33 trees (any tree that is incidentally impacted resulting in the death of the tree shall also be mitigated in accordance with this measure);
  - No less than 1.24 acres of seeding and planting with a native plant palette comprised of regionally appropriate trees, shrubs, and herbs; and
  - Maintenance of invasive plant species (i.e., weed maintenance) throughout the 2.7-acre buffer areas along the east side of Oak Creek and both sides of the unnamed drainage.
- The plan must outline methods to be implemented to remove and control invasive and non-native vegetation at the Project site.
- Grading shall be designed to ensure that habitat areas have proper drainage during and after construction, per the recommendations of the P&D-approved biologist.
- The plan shall require the use of native species, including locally obtained plants and seed stock.
- The new plantings shall be irrigated with drip irrigation on a timer and shall be weaned off of irrigation over a period of 2 to 3 years.
- The plan must identify performance criteria for monitoring native trees, shrubs, and herbaceous species. These performance criteria must be monitored for a period of no less than 5 years post planting, including summarizing monitoring results in an annual report to be submitted to P&D for review and comment.

Plan Requirements and Timing: The Applicant shall submit the Habitat Restoration Plan prior to issuance of the Zoning Clearance for the initial construction activities associated with the Vesting Tentative Tract Map. The Applicant shall include as notes or depictions all plan components listed above, graphically depicting all those related to earth movement, construction, and temporarily and/or permanently installed protection measures prior to issuance of grading and building permits. The Applicant shall post a performance security to ensure installation prior to Final Building Inspection Clearance and maintenance for 5 years.

Monitoring: The Applicant shall demonstrate to P&D compliance monitoring staff that all required components of the approved plan are in place and maintained throughout the maintenance period. P&D compliance monitoring staff signature is required to release the installation security upon satisfactory installation of all items in approved plans and maintenance security upon successful implementation of this plan.

MM BIO-7: **Designated Construction Staging Areas, Parking Areas, Washout Areas, and Equipment Storage and Stockpile Areas.** Prior to the initiation of any construction-related activities, including initial construction activities associated with the Vesting Tentative Tract Map as well as future residential development enabled by the proposed Project, one or more construction equipment filling and storage areas and one or more washout areas for the washing of concrete trucks, paint, equipment, or similar activities

shall be established within the Project site to contain spills, facilitate cleanup and proper disposal and prevent contamination from discharging to the water bodies, drainage ditches, storm drains, or street. All construction equipment shall be limited to designated work area and staging areas. Similarly, all construction worker parking would be limited to pre-arranged parking areas. Minor adjustments may be made in the field in consideration of physical constraints (e.g., topography), with the approval of the P&D-approved biologist. Construction equipment and vehicles shall not be driven or parked off of paved surfaces or existing dirt roads, except where required for approved work. No fill, soil, rocks, or construction materials shall be stored or placed within the existing riparian area, except where required for approved work. Note that any polluted water and materials shall be contained in these areas and removed from the Project site weekly. The Applicant must identify equipment storage areas that no larger than 50- by 50-foot unless otherwise approved by P&D staff. Staging, washout, and storage areas must be located at least 100 feet from any storm drain, waterbody, or sensitive biological resources. Equipment shall be staged in designated upland work areas as far from the active stream channel as possible. All staged equipment shall be equipped with secondary containment. A spill containment and cleanup kit shall be on-site at each location while work is in progress.

Plan Requirements and Timing: The P&D-approved biologist shall evaluate proposed staging and parking areas before any equipment can be brought to or staged near the Project site. Proposed staging areas, parking areas, washout areas, and equipment storage and stockpile areas shall be shown on a site plan submitted to P&D staff prior to issuance of the follow-up Zoning Clearance for initial construction activities associated with the Vesting Tentative Tract Map. The locations shall be shown on all building permits and clearly marked with signage. The Applicant shall install the area prior to commencement of construction of initial improvements associated with the Vesting Tentative Tract Map. All equipment shall be inspected by the P&D-approved biologist before being moved to the staging areas.

Monitoring: P&D permit compliance staff shall spot check in the field throughout construction activities.

MM BIO-8: **Other Standard Construction Best Management Measures.** The following general construction BMPs shall be implemented during all construction-related activities, including future residential development enabled by the proposed Project:

- 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 construction-related activities unless such equipment is free of leaks and drips.
- 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 shall be used to prevent excessive dust.
- 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.
- Any equipment or vehicles driven and/or operated during construction-related activities shall be checked and maintained daily to prevent leaks of materials that if introduced to water could be deleterious to aquatic life.

Service and refueling of equipment would not occur within 100 feet of Oak Creek or the unnamed ephemeral drainage.

- Construction material shall be stockpiled in ruderal or grassland habitat and/or in existing disturbed areas (e.g., along driveways/access roads, parking areas) at least 100 feet from Oak Creek.
- BMPs (e.g., silt fencing, straw wattles) shall be installed between the work areas and Oak Creek to ensure sediment runoff from construction does not enter the stream channel or adjacent habitat.
- Unattended soil stockpiles shall be covered.
- Erosion control measures (e.g., which may include silt fencing, jute netting, straw bales) shall be used throughout all phases of construction where sediment runoff from exposed areas could enter Oak Creek.
- Open excavations shall be covered at the close of each workday. If this is not feasible, escape ramps shall be installed in the pits to ensure no entrapment of animals occur.
- Trash and food items shall be kept in closed containers and removed daily.

Plan Requirements and Timing: The P&D-approved biologist shall direct and ensure the implementation of standard construction BMPs, as appropriate.

Monitoring: P&D permit compliance staff shall perform site inspections throughout the construction period to verify compliance in the field.

Residual Impacts: With the incorporation of MM BIO-1 through MM BIO-8 as well as MM GEO-1, MM-GEO-2, and MM FP-1 residual impacts would be less than significant.

4.5 CULTURAL RESOURCES

Will the proposal result in:	Poten. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. Cause a substantial adverse change in the significance of any object, building, structure, area, place, record, or manuscript that qualifies as a historical resource as defined in CEQA Section 15064.5?			X		
b. Cause a substantial adverse change in the significance of a prehistoric or historic archaeological resource pursuant to CEQA Section 15064.5?		X			
c. Disturb any human remains, including those located outside of formal cemeteries?		X			
d. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in the Public Resources Code Section 21074 as either a site, feature, place, 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:		X			

Will the proposal result in:	Poten. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or 2) 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 € of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision € of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.					

Existing Setting: The Barbareño Chumash resided throughout the South Coast from Carpinteria west to Point Conception. The coastal areas along the Santa Barbara Channel represent the highest density of prehistoric occupation along the West Coast. Larger tribal villages are recorded closer to the coastline, particularly at the confluence with creeks and/or estuaries. Smaller temporary campsites and special activity areas (e.g., plant gathering/processing and hunting areas) were located in higher elevations within the foothills of the Santa Ynez Mountains, often in close proximity to fresh water sources such as Cold Springs Creek.

Archaeology and Cultural Resources

As previously described an archaeological site records and literature search of the Central Coast Information Center (CCIC) was conducted for the Project site on December 3, 2020. The records search included a review for known archaeological sites, previously undertaken cultural resource surveys, and any sites listed on the NRHP, CRHR, California Historical Landmark (CHL), or local monuments occurring within the Project site. This search included a review of all sites and surveys within a 0.5-mile radius of the Project site. The search found one prehistoric resource and two historical-period resources within the 0.5-mile buffer surrounding the Project site; however, none were located within the Project site boundaries (Wood 2021).

A pedestrian survey was conducted on November 11, 2020, during which the Project site were both surveyed using 15-meter-wide transects. The pedestrian survey area was divided into four areas representing the four proposed developable lots. No unrecorded cultural or archaeological materials were observed within the Project site (Wood 2021). An Extended Phase I Archaeological Resources Investigation was not recommended or undertaken as no unrecorded cultural materials were observed, no previously recorded cultural resources exist within or adjoining the Project site, and the potential for buried cultural deposits or archaeological resources is low.

A search of the NAHC's SLF returned "positive" results for presence of tribal resources within vicinity of the Project site. However, letters reflecting the negative results of the Archaeological Survey Report were sent to each of the interested tribal representatives. Each of the interested tribal representative agreed with

the findings of the intensive survey report and requested notification in the event future development and/or inadvertent discovery.

Pursuant to the requirements of Assembly Bill (AB) 52, the County contacted the local Native American tribal representatives of the SYBCI and Barbareño/Ventureño Band of Mission Indians to formally notify the tribes of a consultation opportunity and communicate the negative results of the pedestrian survey. No responses or requests for formal tribal consultation were received and tribal cultural resources were not identified for the Project site.

Historic Resources

Due the presence of existing structures within the Project site, a Phase I Historic Resources Management Report was prepared for the proposed Project by Post/Hazeltine to evaluate the presence of significant historic resources associated with the Project site. The report fulfills the requirements for historic resource evaluations outlined in the County of Santa Barbara's Appendix B to the Environmental Thresholds and Guidelines Manual, February 27, 2018 and the Santa Barbara County Comprehensive Plan, Land Use Element.

Results of this assessment indicated that the Project site contains a single-story house, constructed by 1948 (with later additions added after 1969); a guest house built by 1938; a detached garage built by 1982; a "barn" structure located on the north side of the entrance drive (built in 1982); a second detached garage built after 1977; and a swimming pool and tennis court both built after 1977. However, none of the resources evaluated meet the criteria of a significant historic resource pursuant to local (County), CRHR, or NRHP criteria (Post/Hazeltine 2021).

County Environmental Thresholds: Chapter 8 of the County's Environmental Thresholds and Guidelines Manual contains guidelines for the identification, significance evaluation, and mitigation of impacts to cultural resources, including archaeological, historic, and tribal cultural resources. In accordance with the requirements of CEQA, these guidelines specify that if a resource cannot be avoided, it must be evaluated for importance under specific CEQA criteria. CEQA Guidelines Section 15064.5(a)(3)A-D contains the criteria for evaluating the importance of archaeological and historic resources. Generally, a resource shall be considered by the lead agency to be "historically significant" if the resource meets the significance criteria for listing in the CRHR: (A) Is associated with events that have made a significant contribution to the broad patterns of California's history and cultural heritage; (B) Is associated with the lives of persons important in our past; (C) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or (D) Has yielded, or may be likely to yield, information important in prehistory or history. The resource also must possess integrity of at least some of the following: location, design, setting, materials, workmanship, feeling, and association. For archaeological resources, the criterion usually applied is (D).

CEQA calls cultural resources that meet these criteria "historical resources." Specifically, a "historical resource" is a cultural resource listed in, or determined to be eligible for listing in, the CRHR, or included in or eligible for inclusion in a local register of historical resources, as defined in Section 5020.1(k), or deemed significant pursuant to criteria set forth in Section 5024.1(g). As such, any cultural resource that is evaluated as significant under CEQA criteria, whether it is an archaeological resource of historic or prehistoric age, a historic built environment resource, or a tribal cultural resource, is termed a "historical resource."

CEQA Guidelines Section 15064.5(b) states that "a Project that may cause a substantial adverse change in the significance of an historical resource is a Project that may have a significant effect on the environment." As

defined in CEQA Guidelines Section 15064.5(b), substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. The significance of an historical resource is materially impaired when a project: 1) demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the CRHR; 2) demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources; or 3) demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the CRHR as determined by a lead agency for purposes of CEQA.

For the built environment, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings, is generally considered as mitigated to a less than a significant impact level on the historical resource.

a) ***Insignificant.*** No historic resources are known to occur within the Project site; therefore, demolition of the existing structures and hardscapes would have no effect on historic resources. Impacts to historic resources from the proposed Project would be less than significant and would not conflict with County of Santa Barbara Historical and Archaeological Policies and Goal CR-M-1 of the Montecito General Plan Update: Preserve and Project Properties and Structures with Historic Importance in the Montecito Community to the Maximum Extent Feasible of the Montecito General Plan.

b-d) ***Significant but Mitigable.*** The Negative Archaeological Survey Report determined that the potential for buried cultural deposits or archaeological resources is low (Wood 2021) and no tribal cultural resources have been associated with the site. MM CUL-1 would require a qualified archaeologist to lead a worker orientation for all construction contractors emphasizing the potential for previously unknown buried archaeological resources within and/or adjacent to the construction areas, identification of those resources, applicable regulatory policies and provisions regarding their protection, and penalties for noncompliance. In the event that buried cultural resources are inadvertently discovered during construction activities MM CUL-2 would require that the Applicant to stop or immediately redirect work in the event archaeological remains are encountered during grading, construction, landscaping, or other construction-related activities. A qualified archaeologist shall evaluate the significance of the find in compliance with the provisions of the County Archaeological Guidelines and conduct appropriate mitigation to be funded by the Applicant. In the unlikely event that potential human remains are identified during excavations or grading, all activity in the vicinity of the find would be immediately suspended and redirected elsewhere. All steps required to comply with Public Resources Code Section 5097.98 would be implemented. With the implementation of MM CUL-1 and MM CUL-2 impacts to archaeological, prehistoric, and historic resources, as well as human remains, would be less than significant with mitigation.

Cumulative Impacts: As previously described, division of the 13.02-acre residential estate into four developable parcels would facilitate construction activities and ground disturbance that may have the potential to impact historic built resources or buried archaeological resources. Based on the lack of known archaeological resources in the vicinity of the Project site, the proposed Project would not be expected to result in impacts to known archaeological, prehistoric, and tribal resources. Nevertheless, the implementation of MM CUL-1 and MM CUL-2 would reduce impacts to less than significant with mitigation. Therefore, when considered with other cumulative projects in the region – including reconstruction efforts associated with the debris flows – the proposed Project would not contribute to a considerable cumulative impact.

Mitigation Measures: While highly unlikely, the implementation of the following mitigation measures would reduce potentially significant impacts to cultural resources to less than significant:

MM CUL-1: **Stop Work at Encounter.** The Applicant and/or their agents, representatives or contractors shall stop or redirect work immediately in the event archaeological remains are encountered during grading, construction, landscaping, or other construction-related activity. The Applicant shall immediately contact P&D and a P&D-approved archaeologist shall evaluate the significance of the find in compliance with the provisions of the County Archaeological Guidelines and conduct appropriate mitigation funded by the Applicant and/or future property owners.

Plan Requirements and Timing: This condition shall be printed on all building and grading plans.

Monitoring: P&D permit processing planner shall check plans prior to issuance of Zoning Clearance and P&D compliance monitoring staff shall spot check in the field throughout grading and construction.

MM CUL-2: **Encountering Human Remains.** Consistent with CEQA Guidelines Section 15064.5(e), if human remains are accidentally discovered or recognized during construction activities, State Health and Safety Code Section 7050.5 requires that no further disturbance shall occur until the County Coroner has made the necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the NAHC. The NAHC shall then identify the person(s) thought to be the Most Likely Descendent of the deceased Native American, who shall then help determine what course of action should be taken in dealing with the remains. Per Public Resources Code 5097.98, the landowner shall ensure that the immediate vicinity, according to generally accepted cultural or archaeological standards or practices, where the Native American human remains are located, is not damaged or disturbed by further development activity until the landowner has discussed and conferred, as prescribed in this section (Public Resources Code 5097.98), with the most likely descendants regarding their recommendations, if applicable, taking into account the possibility of multiple human remains.

Plan Requirements and Timing: If human remains are discovered, construction activities shall stop immediately. The Applicant shall immediately contact P&D permit compliance staff, who would be responsible for contacting the County Coroner.

Monitoring: P&D permit compliance staff shall ensure that no further disturbance shall occur until the County Coroner has made all necessary findings as to origin and disposition pursuant to Public Resources Code Section 5097.98.

Residual Impacts: With the incorporation of MM CUL-1 and MM CUL-2, residual impacts would be less than significant.

4.6 ENERGY

Will the proposal result in:	Poten. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. Substantial increase in demand, especially during peak periods, upon existing sources of energy?			X		
b. Requirement for the development or extension of new sources of energy?			X		

Existing Setting: Private electrical and natural gas utility companies provide service to customers in the unincorporated areas of the County. The Project site is currently served by Southern California Edison for electrical power to the existing single-family estate residence at 749 San Ysidro Drive.

According to the California Energy Commission (CEC), California used approximately 288,613 gigawatts per hour of electricity in 2017 (CEC 2018). Electricity usage in California for differing land uses varies substantially by the type of uses in a building, type of construction materials used in a building, and the efficiency of all electricity consuming devices within a building. Because of the State's energy efficiency standards and efficiency and conservation programs, California's per-capita energy use has remained stable for more than 30 years, while the national average has steadily increased (CEC 2018).

Natural gas represents one third of energy commodities consumed in California, and mainly falls into four sectors: 1) residential; 2) commercial; 3) industrial; and 4) electric power generation. In addition, natural gas is a viable alternative to petroleum for use in cars, trucks, and buses. According to the U.S. Energy Information Administration (EIA), California used approximately 2.382 quadrillion British thermal units of natural gas in (EIA 2020). By sector, industrial uses utilized approximately 35.8 percent of the State's natural gas, followed by approximately 35 percent from electric power, approximately 17.5 percent from residential uses, approximately 10.3 percent from commercial uses, and approximately 1.5 percent from transportation uses (EIA 2020).

County Environmental Thresholds: The County has not established significance thresholds for electrical and/or natural gas service impacts. Private electrical and natural gas utility companies provide service to customers in Central California and Southern California, including the unincorporated areas of the County.

Impact Discussion:

a, b) ***Insignificant.*** The proposed Project includes division of the existing 13.02-acre residential estate into four developable parcels and would enable construction of four new single-family residences and ancillary structures (e.g., ADUs, garages, pools and tennis courts, etc.). Initial construction activities would include the extension of existing utilities to each of the four lots for future residential development. The future development of the lots enabled by the proposed Project would not result in a substantial increase in demand upon existing sources of energy or the development or extension of new sources of energy. The Applicant would be required to obtain "can and will serve" letters from all associated utility providers for the area and provide copies of these letters to P&D. As such, it is anticipated that the providers would be able to serve the individual properties in the future without undue strain on the existing infrastructure. In summary, the proposed Project would have a negligible effect or adverse impact on regional energy supplies.

Cumulative Impacts: The proposed Project would create a negligible demand on existing energy sources. Therefore, when considered with other cumulative projects in the region – including reconstruction efforts

associated with the debris flows – the proposed Project would not contribute to a cumulatively considerable impact on energy resources.

Mitigation Measures and Residual Impacts: No mitigation measures are required; residual impacts associated with the proposed Project would remain less than significant.

4.7 FIRE PROTECTION

Will the proposal result in:	Poten. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. Introduction of development into an existing high fire hazard area?		X			
b. Project-caused high fire hazard?		X			
c. Introduction of development into an area without adequate water pressure, fire hydrants or adequate access for firefighting?			X		
d. Introduction of development that will hamper fire prevention techniques such as controlled burns or backfiring in high fire hazard areas?		X			
e. Development of structures beyond safe Fire Dept. response time?			X		

Existing Setting: Due to relatively low annual precipitation, highly flammable vegetation, and high velocity "sundowner" and "Santa Ana" winds, the County has routinely experienced major wildfires that can threaten residents' safety and damage property. One of the most recent examples in the region was the Thomas Fire, which burned approximately 281,893 acres, including extensive areas within the Montecito foothills. Following the Thomas Fire in December 2017, a subsequent storm event in January 2018 resulted in substantial debris flows along several creeks within the Montecito foothills and those of the Carpinteria Valley. The debris flows impacted expansive areas within the community of Montecito, resulting in 23 fatalities, damage to or loss of more than 400 homes and dozens of businesses, and temporary but prolonged 3 week long closure of U.S. Highway 101.

Photograph 11. *The Project site is located just over 2 miles from MFPD Station No. 2*

According to information obtained from the California Department of Forestry and Fire Protection (CAL FIRE), the Project site is located in a State and local Very High Fire Hazard Severity Zone (CAL FIRE 2021). The County Multi-Jurisdictional Hazard Mitigation Plan (MJHMP) also designates critical hazard areas of the County, as areas subject to greater threat from wildfire, and identifies these areas based on slope, vegetation, ability to respond to fire threats, and localized weather conditions to assist in preparation of County hazard mitigation and response planning (County of Santa Barbara Office of Emergency

Management 2017).[2] The Project site is located within an area designated as being at risk to extreme threat to wildfire.

The Project site occurs within the service area of the MFPD. The Project site is located approximately 2.3 miles northeast from MFPD Station No. 2, located at 2300 Sycamore Canyon Road. As discussed in **Section 4.4**, *Biological Resources*, it is apparent from historic imagery and site reconnaissance visits the non-native grasses are routinely mowed for fuels suppression. An existing water tank located within proposed Lot 2 would remain; however, there are no existing public or private water services to the Project site.

County Environmental Thresholds: The following County Fire Department standards are applied in evaluating impacts associated with the proposed development:

- The emergency response thresholds include Fire Department staff standards of one on-duty firefighter per 4,000 persons (generally 1 engine company per 12,000 people, assuming three firefighters/station). The emergency response time standard is approximately 5 to 6 minutes.
- Water supply thresholds include a requirement for 750 gallons per minute (gpm) at 20 pounds per square inch (psi) for all single family dwellings.
- The ability of the County's engine companies to extinguish fires (based on maximum flow rates through hand held line) meets state and national standards assuming a 5,000-sf structure. Therefore, in any portion of the MFPD's response area, all structures over 5,000-sf are an unprotected risk (a significant impact) and therefore should have internal fire sprinklers.
- Access road standards include a minimum width (depending on number of units served and whether parking would be allowed on either side of the road), with some narrowing allowed for driveways. Cul-de-sac diameters, turning radii and road grade must meet minimum Fire Department standards based on project type.
- Two means of egress may be needed and access must not be impeded by fire, flood, or earthquake.

A potentially significant impact could occur in the event any of these standards is not adequately met.

Impact Discussion:

a, b, d) ***Significant but Mitigable.*** The Project site is located at the edge of the foothills of the Santa Ynez Mountains and in a High Fire Hazard Severity Zone of the County (CAL FIRE 2021). The proposed subdivision of the 13.02-acre residential estate into four developable parcels would enable additional habitable development within an existing high fire-risk area. However, any future residential development would be required to comply with County building code by incorporating fire-resistant materials (e.g., adobe, ferrocement, tile, brick, rock and concrete). In order to reduce impacts associated with the proposed development in the High Fire Hazard Severity Zone to less than significant, MM FP-1 would require a Fuel Management Plan directing the Applicant to remove dead and dying vegetation and to create defensible space around the structures. MM FP-2 would require that the construction crews take special care to prevent sparks that could ignite a forest fire, including maintaining staging areas and using power tools and equipment away from vegetation. Implementation of these measures would reduce the potentially significant impact to fire protection to less than significant with mitigation.

c, e) ***Insignificant.*** While there are no fire service lines or fire hydrants, the proposed Project would not obstruct or preclude the use of existing regional water sources use to fight wildfires. Additionally, the

[2] The Santa Barbara County MJHMP is currently undergoing revisions. The 2022 Draft MJHMP is complete and available for review here: https://readysbc.org/2021/03/19/2022mjhmpupdate/.

existing water tank on-site may be used by fire crews in the event of a fire. The proposed Project includes a new waterline extension underneath the new shared-access drive that would provide water service to each of the four developable parcels as well as water necessary for fire-fighting activities. Consistent with MFPD requirements, proposed improvements along the new shared-access driveway would include two turnouts along the length of the road, and a turnaround roundabout located at the end of the access road. The road would also be widened from an existing width of 12 feet to a width of 20 feet consistent with MFPD standards. Each of these design features have been extensively coordinated with the MFPD and would ensure that impacts associated with fire hazards and access would be less than significant.

Cumulative Impacts: The proposed Project would enable up to three new permanent residences and ancillary development into the existing High Fire Hazard Severity Zone. This new development would be combined with dozens of fire and debris flow rebuilds and new construction. While the proposed Project would not affect the existing access or response time of MFPD Station No. 2, it could incrementally increase future demand for service. Further, the implementation of MM FP-1 and MM FP-2 would reduce the risk of wildfire hazard through various requirements intended to reduce the potential for accidental spark or ignition during the proposed construction activities. Therefore, when considered with other cumulative projects in the region – including reconstruction efforts associated with the debris flows – implementation of the proposed Project would not contribute to a cumulatively considerable impact.

Mitigation Measures: The implementation of the following mitigation measures would reduce potentially significant impacts related to fire protection to a less than significant:

MM FP-1: **Fuel Management Plan.** A Fuel Management Plan, which shall be coordinated and consistent with the Habitat Restoration Plan (refer to MM BIO-2), shall be prepared by a P&D-approved biologist for each future residential development. The plan shall be designed to maintain defensible space around habitable structures while preserving native plants and habitat areas to the maximum extent feasible. The total management area shall be 100 feet from structures or to the property line, whichever is closer, with treatment areas broken into two zones: Zone 1 – the first 30 feet from structures (0-30 feet), and Zone 2 – the next 70 feet from structures (30-100 feet). For future residential development that proposes a Fuel Management Plan that would affect ESH, the Fuel Management Plan shall be required to assess potential impacts to ESH. If the Fuel Management Plan would result in potential disturbance to ESH a restoration plan shall be prepared consistent with Montecito Community Plan Development Standard BIO MM-1.31.

The plan shall include the following requirements/components:

- Within Zone 1 (0-30 feet): Trees shall be thinned as required and free of all dead, dying and diseased material.
- Within Zone 1 (0-30 feet): Where trees are immediately adjacent to driveways, trees should be limbed up to a height of 13.5 to allow fire truck clearance.
- Within Zone 1 (0-30 feet): Trees shall be trimmed such that they do not overhang the roofline. No tree canopy should be located within 10 feet of chimneys.
- Within Zone 1 (0-30 feet): Following removal of existing vegetation, the cleared area shall be revegetated with fire resistive, non-invasive plants subject to required maintenance and irrigation.
- Within Zone 2 (30-100 feet): Native vegetation may remain in place and thinned in a mosaic pattern to reduce fuel volumes. Thinning shall occur to

the maximum extent feasible to meet the Californian state law (Public Resource Code Section 4291) for vertical and horizontal continuity while preserving biological value. This zone shall be thinned to allow native vegetation to have a growing period.

- The growing period shall allow for the vegetation to grow to the minimum standards and then a cut-back shall be required to the maximum extent required. The vegetation shall not be allowed to encroach on the minimum standard for vertical and horizontal requirements at any time. Vegetation management shall require multiple cut-backs each year to maintain this standard.
- Within Zone 2 (30-100 feet): Priority shall be given to protecting endangered plant species and sensitive native plants when conducting mosaic clearance to the maximum extent feasible.
- Within Zone 2 (30-100 feet): Protected native coast live oak trees shall remain in place and are protected as part of the mapped environmentally sensitive habitat. No planting of non-native vegetation shall occur in this area. Thinning of lower limbs, removal of dead plant material and removal of understory vegetation shall only occur in this area.

Plan Requirements and Timing: Prior to issuance of LUPs for each future residential development enabled by the proposed Project, the Applicant and/or future property owners shall submit individual Fuel Management Plan for review and approval by P&D and MFPD. Compliance with the MFPD's fuel management standards shall be required for the life of each of the residential developments.

Monitoring: The Applicant shall demonstrate to P&D compliance monitoring staff that fuel clearance has been completed according to the requirements specified within this condition and as a part of the Fuel Management Plan. MFPD shall perform ongoing inspection as needed and respond to complaints.

MM FP-2: **Fire Protection.** During all construction-related activities, including initial construction activities associated with the Vesting Tentative Tract Map as well as future residential development enabled by the proposed Project, all appropriate measures shall be taken to minimize the potential for brush fires from use of heavy construction equipment, vehicles with catalytic converters, mechanized hand tools, etc. These measures shall include, but shall not be limited to:

- To the maximum extent practicable staging areas for handheld power tools and/or heavy construction equipment shall be designated within open areas away from existing vegetation and in areas of reduced risk of ignition;
- Construction crews shall be required to have an extinguisher on-site during construction activities involving the use of handheld power tools or heavy construction equipment;
- Personnel shall be briefed on the dangers of wildfire and be able to respond accordingly should the need arise;
- On-site supervisor(s) shall have a cell phone, satellite phone, or other means of initiating a 911 response time in a timely manner in the event of a wildfire and/or medical emergency;

- All dead and decadent vegetation within the Project site shall be removed at the discretion of the qualified biologist and all soil disturbance other than debris removal should be kept at a minimum;
- Smoking shall be prohibited during construction activities other than in a designated staging area; and
- All equipment maintenance and refueling shall occur off-site or within the designated staging area.

Plan Requirements and Timing: The Applicant and/or future property owners shall demonstrate all required provisions for fire protection to the P&D prior to issuance of a Zoning Clearance for initial improvements associated with the Vesting Tentative Tract Map and LUPs for future residential development enabled by the proposed Project. The name and telephone number of the on-site supervisor shall be provided to P&D as well as the MFPD prior to issuance of a Zoning Clearance or subsequent LUPs.

Monitoring: P&D permit compliance staff shall spot check in the field throughout construction activities.

Residual Impacts: With the incorporation of MM FP-1 and MM FP-2, residual impacts would be less than significant.

4.8 GEOLOGIC PROCESSES

Will the proposal result in:	Poten. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. Exposure to or production of unstable earth conditions such as landslides, earthquakes, liquefaction, soil creep, mudslides, ground failure (including expansive, compressible, collapsible soils), or similar hazards?			X		
b. Disruption, displacement, compaction or overcovering of the soil by cuts, fills or extensive grading?		X			
c. Exposure to or production of permanent changes in topography, such as bluff retreat or sea level rise?				X	
d. The destruction, covering or modification of any unique geologic, paleontologic or physical features?		X			
e. Any increase in wind or water erosion of soils, either on or off the site?		X			
f. Changes in deposition or erosion of beach sands or dunes, or changes in siltation, deposition or erosion which may modify the channel of a river, or stream, or the bed of the ocean, or any bay, inlet or lake?		X			
g. The placement of septic disposal systems in impermeable soils with severe constraints to disposal of liquid effluent?				X	
h. Extraction of mineral or ore?				X	
i. Excessive grading on slopes of over 20%?		X			
j. Sand or gravel removal or loss of topsoil?				X	

Will the proposal result in:	Poten. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
k. Vibrations, from short-term construction or long-term operation, which may affect adjoining areas?			X		
l. Excessive spoils, tailings or over-burden?				X	

Existing Setting:

The Project site is located on a gentle, southern facing slope of the Santa Ynez foothills. As described in **Section 3.0**, *Environmental Setting*, one mapped soil unit has been identified in the Project site – Milpitas-Positas fine sandy loam (MeC). Milpitas-Positas fine sandy loam (MeC) is a moderately well drained sandy soil (0 to 19 inches) with an underlying restrictive clay layer (19 to 41 inches). This soil type originates from mixed alluvium and forms on terraces at the base of hillsides (i.e., footslopes) (NRCS 2020). Milpitas-Positas fine sandy loam (MeC) is moderately well drained; however, runoff can be high due to the low permeability of the underlying clay layer. The erosion potential for this soil type is low to moderate.

No geotechnical investigations have been prepared for the proposed Project to date.

County Environmental Thresholds: Pursuant to the County's Thresholds and Guidelines Manual, impacts related to geological resources may have the potential to be significant if the proposed 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 P&D or County 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 Problems" areas designated by the Board of Supervisors 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 proposes 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.

Impact Discussion:

a) ***Insignificant.*** The Project site is not underlain by any known fault. The nearest fault is the Mission Ridge Fault, located approximately 0.5 mile to the south of the Project site. This fault runs in an east-west direction and is of the Late Quaternary period (i.e., the most recent fault displacement has occurred during the past 700,000 years) (California Geological Survey [CGS] 2022). As evidenced by existing development on-site and in the surrounding area (e.g., single-family residences, garages, tennis courts, pools, private driveways, etc.), it can be inferred the Project site is capable of supporting some type of similar residential development. Compliance with the California Building Code (CBC) would ensure that potential ground shaking impacts caused by movement along a distant fault are less than significant. All soil-related hazards would be less than significant through the normal building permit review of the required Soils Engineering Study, plan check, and periodic inspections by grading inspectors during construction. With these measures, impacts from geologic hazards would be less than significant.

b, i) ***Significant but Mitigable.*** As previously described, none of the slopes of the Project site exceed 20 percent. Nevertheless, the future residential development enabled by the proposed Project would involve extensive grading to establish building pads, trenching and excavation activities associated with utilities and drainage improvements, and grading and paving for driveway access. For purposes of this analysis, it is assumed grading could occur anywhere within each of the four proposed development envelopes.

While the impacts associated with grading activities could be potentially significant, MM GEO-1 would require the development and implementation of a SWPPP, Storm Water Management Plan (SWMP), and/or an Erosion and Sediment Control Plan (ESCP) as part of the proposed Project. Grading, erosion, and sediment control plans would be 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. With the implementation of MM GEO-1, impacts would be less than significant.

c, h, j, l) ***No Impact.*** The Project site is not located in a coastal area or along a coastal bluff. As such, sea level rise would have no impact on the proposed Project. Additionally, there are no unique physical or geologic features located at the Project site and the proposed Project would not include any mining, mineral extraction, or removal of sand, gravel, or topsoil. Therefore, no mitigation measures are necessary for these areas of concern.

d) ***Significant but Mitigable.*** No known paleontological resources have been recorded within the Project site or within the surrounding vicinity (University of California Museum of Paleontology 2022). The potential to encounter paleontological resources during construction would be low. In the unlikely event that previously unknown paleontological resources are encountered, MM GEO-2 would require that the Applicant stop or immediately redirect work in the event paleontological resources are encountered during grading, construction, landscaping, or other construction-related activities. A qualified paleontologist shall document the discovery as needed, evaluate the potential resource, assess the significance of the find, and develop an appropriate treatment plan in consultation with P&D. With this mitigation implemented, potentially significant impacts to previously unknown paleontological resources would be mitigated to less than significant.

e, f) ***Significant but Mitigable.*** The substantial grading for the proposed Project, particularly within the immediate vicinity of Oak Creek and the unnamed ephemeral drainage would result in a potential for substantial erosion and sediment transport. However, as previously described, MM GEO-1 would require the development and implementation of a SWPPP, SWMP, and/or an ESCP as part of the proposed Project. The implementation of standard construction BMPs (e.g., silt fencing) to address potential erosion as well as revegetation of the Project site following the completion of construction. With the implementation of these measures impacts would be less than significant.

g) ***No Impact.*** There are no existing or proposed septic systems associated with the proposed Project. An existing 10-foot Montecito Sanitary District (District) sewer easement runs through the center of the Project site. The proposed Project would extend sewer service to each of the four lots to treat wastewater. Therefore, there would be no impacts from septic systems.

k) ***Insignificant Impact.*** The proposed Project is located within a semi-rural residential area of Montecito. Parcel sizes surrounding the Project site are 3+ acres. Substantial vibrations are not anticipated from the proposed construction activities as there is no pile-driving required for the proposed Project. Additionally, given the size of proposed lots and the distance from surrounding residences, vibrations from general construction activities (e.g., heavy equipment use for grading, etc.) would not be felt at nearby residences. Therefore, vibration caused by short-term construction-related activities would be less than significant.

Cumulative Impacts: As previously described, subdivision of the existing 13.02-acre residential estate into four developable parcels and future construction of up to four single-family residences enabled by the proposed Project would entail substantial ground disturbance and thousands of heavy haul truck trips. However, the proposed Project would not contribute to geological or public safety hazards. Therefore, when considered with other cumulative projects in the region – the proposed Project would not contribute to a cumulatively considerable effect on geologic hazards within the County.

Mitigation Measures: The incorporation of the following mitigation measures would reduce geologic impacts to a less than significant level:

MM GEO-1: **Erosion and Sediment Control Plan.** Where required by the latest edition of the California Green Code and/or Chapter 14 of the Santa Barbara County Code, a SWPPP, SWMP, and/or an ESCP shall be implemented during all construction-related activities, including initial construction activities associated with the Vesting Tentative Tract Map as well as future residential development. Grading and erosion and sediment control plans shall be designed to minimize erosion during construction and shall 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 Applicant and/or future property owners shall submit the SWPPP, SWMP, and/or ESCP using BMPs designed to stabilize the site, protect natural watercourses/creeks, prevent erosion, convey storm water runoff to existing drainage systems keeping contaminants and sediments on-site. The SWPPP, SWMP, and/or ESCP shall be a part of the Grading Plan submittal and would be reviewed for its technical merits by P&D.

Plan Requirements and Timing: The grading and SWPPP, SWMP, and/or ESCP shall be submitted for review and approved by P&D prior to issuance of a Zoning Clearance for initial improvements associated with the proposed Vesting Tentative Tract Map and LUPs for future residential development enabled by the proposed Project. The plan shall be designed to address erosion, sediment and pollution control during all phases of development of the site until all disturbed areas are permanently stabilized. The SWPPP requirements shall be implemented prior to the commencement of grading and throughout the year. The ESCP and SWMP requirements shall be implemented between November 1 and April 15 of each year, except pollution control measures shall be implemented year round.

Monitoring: P&D permit compliance staff shall perform site inspections throughout the construction phase.

MM GEO-2: **Inadvertent Discovery of Paleontological Resources:** If paleontological resources are encountered during any construction-related activities, the Applicant shall halt or divert work and notify a qualified paleontologist who shall document the discovery as needed, evaluate the potential resource, assess the significance of the find, and develop an appropriate treatment plan in consultation with P&D. At a minimum, the qualified paleontologist shall assign a unique field number to each specimen identified; photograph the specimen and its geographic and stratigraphic context along with a scale near the specimen and its field number clearly visible in close-ups; record the location using a global positioning system (GPS) unit with accuracy greater than 1 foot horizontally and vertically (if such equipment is not available, horizontal measurements and bearings to nearby permanent features or accurately surveyed benchmarks, and vertical measurements

by sighting level to points of known elevation would be used); record the field number and associated specimen data (identification by taxon and element, etc.) and corresponding geologic and geographic site data (e.g., location, elevation, etc.) in the field notes and in a daily monitoring report; stabilize and prepare all fossils for identification; identify to lowest taxonomic level possible by paleontologists, qualified and experienced in the identification of that group of fossils; and record on the outside of the container or bag the specimen number and taxonomic identification, if known.

Plan Requirements and Timing: If paleontological resources are discovered, construction activities would stop immediately. The Applicant shall immediately contact P&D permit compliance staff.

Monitoring: P&D permit compliance staff shall ensure that no further disturbance shall occur until a qualified paleontologist documents, evaluates, and assesses the find.

Residual Impacts: With the incorporation of MM GEO-1 and MM GEO-2, residual impacts would be less than significant.

4.9 HAZARDOUS MATERIALS / RISK OF UPSET

Will the proposal result in:	Poten. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. In the known history of this property, have there been any past uses, storage or discharge of hazardous materials (e.g., fuel or oil stored in underground tanks, pesticides, solvents or other chemicals)?				X	
b. The use, storage or distribution of hazardous or toxic materials?		X			
c. A risk of an explosion or the release of hazardous substances (e.g., oil, gas, biocides, bacteria, pesticides, chemicals or radiation) in the event of an accident or upset conditions?		X			
d. Possible interference with an emergency response plan or an emergency evacuation plan?			X		
e. The creation of a potential public health hazard?		X			
f. Public safety hazards (e.g., due to development near chemical or industrial activity, producing oil wells, toxic disposal sites, etc.)?				X	
g. Exposure to hazards from oil or gas pipelines or oil well facilities?				X	
h. The contamination of a public water supply?				X	

Existing Setting:

The Project site is predominantly undeveloped non-native annual grassland with exception of the northwestern corner, which contains existing developed structures and hardscapes. This area has not experienced previous soil or groundwater contamination and has never been used for the frequent or long-term storage of a hazardous waste or material. The closest site monitored by the State Water Resources

Control Board (SWRCB) GeoTracker database is a leaky underground storage tank (LUST) cleanup site located at a private residence on Picacho Lane, approximately 1,500 feet to the southwest of the Project site.

County Environmental Thresholds: The County's Public Safety Thresholds address involuntary public exposure from projects involving significant quantities of hazardous materials. The threshold addresses the likelihood and severity of potential accidents to determine whether the safety risks of a project exceed significant levels.

Impact Discussion:

a) ***No Impact.*** There is no evidence that hazardous materials were used, stored, or spilled on Project site in the past. There are no hazardous sites within 0.5 miles of the Project site that could be disturbed by construction-related activities associated with the proposed Project. Therefore, there are no impacts related to past site usage and there are no aspects of the proposed use that would include or involve hazardous materials at levels that would constitute a hazard to human health or the environment.

b, c, e) ***Significant but Mitigable.*** Construction activities associated with the proposed Project, including initial construction activities associated with the Vesting Tentative Tract Map as well as future residential development, would involve the use of light-duty vehicles, handheld power tools, heavy construction equipment, generators, and other equipment that would introduce gasoline, diesel, and/or hydraulic fluid. In particular, heavy construction equipment may include the transport and temporary on-site storage of petroleum products for the purpose of fueling construction equipment. Further, all transport, handling, use, and disposal of substances such as petroleum products would comply with applicable Federal, State, and local health and safety regulations. Construction workers would employ temporary BMPs to avoid potential accidental spills. For example, MM BIO-7 and MM BIO-8 require that all staged equipment would be equipped with secondary containment and a spill containment and cleanup kit would be on-site while work is in progress. These measures also require that equipment shall be staged in designated work areas as far from Oak Creek and the unnamed ephemeral drainage as possible and that designated washout areas are established at least 100 feet from any storm drain, waterbody, or sensitive biological resources. With the implementation of theses mitigation measures, impacts associated with hazardous materials would be less than significant.

Residential land uses often have small amounts of household products such as fuels and herbicides that are considered hazardous materials. However, these materials would only be kept in small quantities and would not pose a serious risk to the public.

d) ***Insignificant.*** The proposed Project would not substantially impact the surrounding transportation network. The Project site is located on a private road in a semi-rural area. The proposed Project would include a new paved, 20-foot-wide shared-access driveway with two vehicle turnouts and a roundabout, providing emergency access to the Project site. Therefore, as described in **Section 4.7**, *Fire Protection*, impacts to evacuation or emergency response would be less than significant.

f, g) ***No Impact.*** There are no oil wells or toxic disposal sites within a 1-mile radius of the Project site (SWRCB 2022). Therefore, the proposed construction activities would not have the potential to encounter, result in exposure to, or otherwise impact oil wells or toxic disposal sites.

h) ***No Impact.*** Water service to each of the future single-family residences enabled by the proposed Project would be supplied by connections to the existing MWD system. There are no public water supply intake areas associated with the Project site. Therefore, there would be no impact.

Cumulative Impacts: As previously described, reconstruction or repair of as many as 400 residences as well as public infrastructure (e.g., roads, bridges, new or expanded flood control detention basins) would result in the temporary use of hazardous materials during construction. Similarly, the proposed Project would also involve the temporary use of hazardous materials; however, the implementation of MM BIO-7 and MM BIO-8 would reduce the risk of accidental spills during the proposed construction activities. Further, in the highly unlikely event of a spill, it would occur in a localized area within the undeveloped area, which would provide for expedient containment and clean-up. Therefore, when considered with other cumulative projects in the region – including reconstruction efforts associated with the debris flows – the proposed Project would not contribute to a cumulatively considerable impact.

Mitigation Measures and Residual Impacts: With the implementation of MM BIO-7 and MM BIO-8, impacts related to hazards and hazardous materials would be reduced to less than significant.

4.10 LAND USE

Will the proposal result in:	**Poten. Signif. and Unavoid.**	**Significant but Mitigable**	**Insignif.**	**No Impact / Beneficial Impact**	**Reviewed Under Previous Document**
a. Structures and/or land use incompatible with existing land use?				X	
b. 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?		X			
c. The induction of substantial growth or concentration of population?				X	
d. The extension of sewer trunk lines or access roads with capacity to serve new development beyond this proposed Project?				X	
e. Loss of existing affordable dwellings through demolition, conversion or removal?				X	
f. Displacement of substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X	
g. Displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X	
h. The loss of a substantial amount of open space?				X	

Will the proposal result in:	Poten. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
i. An economic or social effect that would result in a physical change? (e.g., freeway ramp closure resulting in isolation of an area, close of businesses in the vicinity, neighborhood degenerates, and buildings deteriorate. Or, if construction of new freeway divides an existing community, the construction would be the physical change, but the economic / social effect on the community would be the basis for determining that physical change would be significant.)				X	
j. Conflicts with adopted airport safety zones?				X	

Existing Setting: As described in **Section 3.0**, *Existing Setting,* the Project site is located in the Montecito Community Plan Area. The proposed Project would subdivide the existing 13.02-acre residential estate into four developable parcels, consistent with existing land use and zoning designations of SRR-0.33 (Semi-rural Residential – 3-acre minimum parcel size). The surrounding parcels have similar land use designations and zoning (refer to **Table 3**).

County Environmental Thresholds: The County's Environmental Thresholds and Guidelines Manual does not include specific thresholds for land use. Generally, a significant impact may occur if a project would be potentially inconsistent with policies and standards adopted by an agency for the purposes of environmental protection or would result in substantial growth inducing effects.

Impact Discussion:

a) ***No Impact.*** The Project site consists of one legal lot encompassing approximately 13.02 acres, which is designated as Single Family – Semi-Rural Residential / Minimum Parcel Size – 3 acres (SR-0.33). The Santa Barbara County Comprehensive Plan Land Use Element describes the purpose of the SR-0.33 designation is to provide for residential development that will preserve the semi-rural character of the Montecito Planning Area and portions of the Toro Canyon Plan area and the adjacent Cima Del Mundo property. The Semi-Rural Residential designation is characterized by narrow winding roads; predominantly low density residential development; limited commercial, resort/visitor-serving uses and infrastructure development; a lack of sidewalks and traffic lights; and a diversity of housing, architecture, landscaping and property sizes. The intent is to allow only development which will minimize additional depletion of constrained resources, services, and infrastructure.

The SRR-0.33 density factor designates a minimum parcel size of 3 acres with 0.33 units per acre. This density factor describes the maximum number of primary dwelling units that may be permitted if the County determines that resources, services, and infrastructure are adequate to support ultimate buildout.

As a result of the proposed Project, each of the four developable parcels would comply with the SRR-0.33 land use designation and be consistent with existing and adjacent zoning. Therefore, implementation of the proposed Project would not conflict with any underlying land use designation. All future residential development enabled by the proposed Project would be reviewed by MBAR to ensure aesthetic compatibility with the existing semi-rural scenic character of the area and so as not to obstruct or interfere with public views or create inappropriate night glare or light spill-over (refer to **Section 4.1**, *Aesthetics / Visual Resources*).

b) ***Significant but Mitigable.*** Within the Montecito Community Plan, Land Use Policy LU-M-1.1 states that architectural and development guidelines shall be adopted, implemented, and enforced by the County in order to preserve, protect, and enhance the semi-rural environment of Montecito and the natural mountainous setting. Issue areas that have specific land use policies within the Montecito Community Plan that were reviewed for the proposed development include the following:

Table 12. Land Use Policy Consistency Analysis

Policy	Relationship to Project
LU-M-1.2 Excessive grading for the sole purpose of creating or enhancing views shall not be permitted.	**Consistent.** Grading included as a part of the proposed Vesting Tentative Tract Map would be required for utilities and drainage improvements as well as the shared-access driveway. Grading activities associated with future residential development enabled by the proposed Project would be required to establish minimum base elevations for residential structures as required by FEMA and Flood Control requirements. None of these grading activities would be for the sole purpose of enhancing views.
LU-M-2.1 New structures shall be designed, sited, graded, and landscaped in a manner which minimizes their visibility from public roads.	**Consistent.** All new development included as a part of the proposed Project as well as all future residential development enabled by the proposed Project would be subject to the current zoning requirements of the MLUDC and reviewed by MBAR to ensure aesthetic compatibility with the existing scenic character of the area. The Architecture and Landscape Plan would ensure compatibility with Policy LU-M-2.1.
LU-M-2.2 Lighting of structures, roads and properties shall be minimized to protect privacy, and to maintain the semi-rural, residential character of the community.	**Consistent with Mitigation.** MM VIS-5 requires that all lighting associated with future residential development enabled by the proposed Project be low intensity, low glare design, minimum height, and would be hooded to direct light downward and prevent spill-over onto adjacent lots. With these mitigation measures in place, the proposed Project would be consistent with this policy.
AQ-M-1.3 Air pollution emissions from new development and associated construction activities shall be minimized to the maximum extent feasible. These activities shall be consistent with the Air Quality Attainment Plan and Air Pollution Control District guidelines.	**Consistent.** As described in **Section 3.4a**, *Air Quality*, the Applicant and future property owners shall obtain any required permit(s) and show proof of such permit(s), if required or an exemption if no permit is needed. All construction activities would incorporate standard BMPs required through compliance with SBCAPCD rules.
BIO-M-1.2 The following biological resources and habitats shall be identified as environmentally sensitive and shall be protected and preserved to the extent feasible through the Environmentally Sensitive Habitat (ESH) overlay: Riparian woodland corridors, Monarch butterfly roosts, Sensitive native flora, Coastal sage scrub.	**Consistent with Mitigation.** The Project site has designated ESH associated with Oak Creek and arroyo willow thicket along the unnamed ephemeral drainage. Encroachment into these habitat buffer zones as a part of demolition and construction activities would be mitigated though use of a Habitat Restoration Plan (refer to MM BIO-2) and other protective measures during construction (refer to **Section 4.4**, *Biological Resources*). Additional habitat protection policies are provided in **Section 4.4**, *Biological Resources*). With the implementation of these mitigation measures, the proposed Project would be consistent with these policies.
BIO-M-1.3 Environmentally Sensitive Habitat (ESH) areas within the Montecito Planning Area shall be protected, and where appropriate, enhanced.	

Policy	Relationship to Project
BIO-M-1.13 The habitat located on the hillside area north of Mountain Drive and Bella Vista Road and reaching the northern boundary of the Planning Area shall be recognized as particularly valuable because of the presence of chaparral, sensitive native flora and riparian resources to be protected and/or preserved. Any development proposal in this area shall be designed to avoid areas which contain these habitats and/or identified sensitive species.	
BIO-M-1.20 Pollution of streams, sloughs, drainage channels, underground water basins, estuaries, the ocean and areas adjacent to such waters shall be minimized.	
BIO-M-1.6 Riparian vegetation shall be protected as part of a stream or creek buffer. Where riparian vegetation has previously been removed, (except for channel cleaning necessary for free-flowing conditions as determined by the County Flood Control District) the buffer shall allow the reestablishment of riparian vegetation to its prior extent to the greatest degree possible. Restoration of degraded riparian areas to their former state shall be encouraged.	
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 development shall incorporate the best mitigation measures feasible to minimize the impact to the greatest extent.	**Consistent with Mitigation.** The proposed Project would result in the removal of 11 coast live oak trees, 4,624 sf of arroyo willow thicket, and associated ESH buffer encroachments. The proposed Project, along with the proposed development envelopes, would ensure that no structures would be proposed within the riparian corridor. Impacts from grading and the necessary driveway improvements would be mitigated through the implementation of an approved Habitat Restoration Plan (MM BIO-6), which would replace coast live oak trees and arroyo willows at a 3:1 ratio, provide 1.24 acres of native planting and seeding, and provide 2.7 acres of routine maintenance activities (i.e., weed maintenance) throughout the 2.7-acre buffer areas along the east side of Oak Creek and both sides of the unnamed drainage. Replacement of the existing 24-inch diameter culvert within the unnamed ephemeral drainage beneath the new shared-access driveway, which is required to meet FEMA and Flood Control requirements, would also be subject to permit conditions from the Central Coast RWQCB and CDFW.
BIO-M-1.8 The minimum buffer strip for development near streams and creeks in Rural Areas shall be presumptively 100 feet from top of bank and for streams in Urban Areas, 50 feet. These minimum buffers may be adjusted upward or downward on a case-by-	

Policy	Relationship to Project
case basis but shall not preclude reasonable development of a parcel. The buffer shall be established based on an investigation of the following factors and after consultation with the Department of Fish and Game and Regional Water Quality Board in order to protect the biological productivity and water quality of streams: • Soil type and stability of stream corridors; • How surface water filters into the ground; • Slope of the land on either side of the stream; • location of the 100 year flood plain boundary; and • Consistency with adopted plans, particularly Biology/Habitat policies. The buffer area shall be indicated on all grading plans. All ground disturbance and vegetation removal shall be prohibited in the buffer area.	
BIO-M-1.10 All development, including dredging, filling and grading within stream corridors, shall be limited to activities necessary for the construction of uses specified in Policy B-1.7. When such activities would require removal of riparian plant species, revegetation with local native plants shall be required on both banks and extending outward 25 feet from each top of bank, except where it would preclude reasonable development of a parcel.	
BIO-M-1.15 To the maximum extent feasible, specimen trees shall be preserved. Specimen trees are defined for the purposes of this policy as mature trees that are healthy and structurally sound and have grown into the natural stature particular to the species. Native or non-'native trees that have unusual scenic or aesthetic quality, have important historic value, or are unique due to species type or location shall be preserved to the maximum extent feasible.	**Consistent with Mitigation**. The proposed demolition as well as the construction of the utilities and drainage improvements, the shared-access road, and future residential development enabled by the proposed Project would involve the potential removal of up to 11 coast live oak trees (refer to **Section 4.4**, *Biological Resources*). MM BIO-7 requires a Tree Assessment and Protection Plan that would minimize damage to on-site trees, including protecting the critical root zone with fencing. Additionally, MM BIO-7 describes mitigation for unexpected damage to trees, which includes replacing trees at a County-designated ratio. With these measures in place, the proposed Project would be consistent with these policies.
BIO-M-1.16 All existing native trees regardless of size that have biological value shall be preserved to the maximum extent feasible.	

Policy	Relationship to Project
BIO-M-1.17 Oak trees, because they are particularly sensitive to environmental conditions, shall be protected to the maximum extent feasible. All land use activities, including agriculture shall be carried out in such a manner as to avoid damage to native Coast Live Oak trees. Regeneration of oak trees shall be encouraged.	
BIO-M-1.18 Trees serving as known raptor nesting or key raptor roosting sites shall be preserved to the maximum extent feasible.	**Consistent with Mitigation.** MM BIO-2 would require a P&D-approved biologist to conduct a pre-construction wildlife survey. Additionally, MM BIO-3 would require a nesting bird survey for construction activities occurring within the nesting bird season. If an active nest is found on site, a buffer shall be established around the tree. No ground disturbing activities or vegetation removal shall occur within this buffer until the P&D-approved biologist has confirmed that nesting is completed, the young have fledged and are no longer dependent on the nest, or the nest fails, and there is no evidence of a second nesting attempt; thereby determining the nest unoccupied or inactive. With these measures, the proposed Project would be consistent with these policies.
BIO-M-1.23 Where sensitive plant species and sensitive animal species are found pursuant to the review of a discretionary Project, efforts shall be made to preserve the habitat in which they are located to the maximum extent feasible. For the purposes of this policy sensitive plant species are those species which appear on a list in the California Native Plant Society's Inventory of Endangered Vascular Plants of California. Sensitive animal species are defined as those animal species identified by the California Department of Fish and Game, the U.S. Fish and Wildlife Service and/or are listed in Tate's The Audubon Blue List (birds).	
FD-M-1.1 In order to prevent hillside erosion, removal of vegetation on slopes 20 percent or greater shall be limited to that necessary for fire protection and for reasonable development of the parcel.	**Consistent with Mitigation.** The proposed Project would be required to incorporate several mitigation measures to minimize erosion and flood potential. MM GEO-1 requires construction measures such as covering storm drains and using stabilizing methods like gravel pads to reduce sedimentation. It also requires that graded areas shall be re-vegetated upon completion with native vegetation to minimize erosion potential. With these measures, the proposed Project would be consistent with these policies.
FD-M-2.1 Development shall be designed to minimize the threat of on-site and downstream flood potential and to allow recharge of the groundwater basin to the maximum extent feasible.	
FD-M-2.2 New development shall be located in a manner that minimizes the need for flood control measures.	
GEO-M-1.1 Mountainous watershed areas shall be protected to the maximum extent feasible from development which would interfere with their watershed function and would intensify fire and flood danger.	**Consistent.** The proposed Project includes future construction of four single-family residences, which would add a small increase in fire danger to the Project site. However, the proposed Project has been designed for ease of emergency response access, including a 20-foot-wide paved shared-access driveway, including a roundabout and two turnouts (refer to **Section 4.7**, *Fire Protection*). As such, the proposed Project would be consistent with this policy.

Policy	Relationship to Project
GEO-M-1.2 Grading from future ministerial and discretionary Projects in Montecito shall be minimized to the extent feasible in order to prevent unsightly scars in the natural topography due to grading, and to minimize the potential for earth slippage, erosion, and other safety risks.	**Consistent.** Grading included as a part of the proposed Vesting Tentative Tract Map would be required for utilities and drainage improvements as well as the shared-access driveway. Grading activities associated with future development enabled by the proposed Project would be required to establish minimum base elevations for residential structures as required by FEMA and Flood Control requirements. None of these grading activities would be for the sole purpose of enhancing views.
GEO-M-1.6 Excessive grading for the sole purpose of creating or enhancing views shall not be permitted.	
GEO-M-1.3 New development on previously cleared slopes that show scarring or remaining significant disturbance shall be required to include plans for revegetation for those areas**.**	**Consistent with Mitigation.** MM BIO-6 would require the preparation and implementation of a Habitat Restoration Plan that focuses on planting native species and revegetation of riparian areas. With this mitigation measure in place, the proposed Project would be consistent with this policy.
VIS-M-1.1 Development shall be subordinate to the natural open space characteristics of the mountains**.**	**Consistent with Mitigation.** The proposed Project would implement several measures to ensure design is compatible with the natural surroundings. For example, MM VIS-1 requires natural building materials and colors compatible with surrounding terrain (e.g., earth-tones and non-reflective paints). Additionally, all future residential development enabled by the proposed Project would be subject to the current zoning requirements of the MLUDC and reviewed by MBAR to ensure aesthetic compatibility with the existing scenic character of the area. With these mitigation measures implemented, the proposed Project would be consistent with these policies.
VIS-M-1.2 Grading required for access roads and site development shall be limited in scope so as to protect the viewshed.	
VIS-M-1.3 Development of property should minimize impacts to open space views as seen from public roads and viewpoints.	
VIS-M-1.4 In hillsides areas where water tanks are required for structural fire-fighting purposes, tanks should be designed to: 1) blend in with natural land forms; 2) not impinge on the viewshed; and 3) be screened by landscaping.	

c-g, i, j) ***No Impact.*** The proposed Project would not cause a physical change to the environment that would conflict with any applicable environmental policy or regulation adopted by the County in these issue areas. While the proposed Project would add four new single-family residences, the proposed Project is not growth inducing in that it would not provide capacity for additional growth. For example, the utility extensions would serve the four developable parcels and would not provide additional capacity for future growth in the neighborhood or the wider community of Montecito. Additionally, the proposed Project would not result in the loss of affordable housing, loss of open space, or a significant displacement of people. The proposed Project would not conflict with any airport safety zones. Therefore, the proposed Project would be compatible with these enumerated criteria relating to land use.

h) ***No Impact.*** The Project site consists of a privately-owned 13.02-acre residential estate. Under the proposed Project the existing Project site would be subdivided into four developable parcels. The proposed Project would have no impact on public open space.

Cumulative Impacts: The proposed Project would not be incompatible with any existing land uses or otherwise conflict with any applicable land use plan, policy, or regulation. Therefore, when considered with other cumulative projects in the region – including reconstruction efforts associated with the debris flows

– the proposed construction activities would not contribute to a cumulatively considerable impact on land use.

Mitigation Measures and Residual Impacts: MM VIS-1 through VIS-5, MM BIO-1 through MM BIO-8, and MM GEO-1 would apply. With the incorporation of these measures, both short- and long-term development-related impacts to land use would be less than significant.

4.11 NOISE

Will the proposal result in:	Poten. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. Long-term exposure of people to noise levels exceeding County thresholds (e.g., locating noise sensitive uses next to an airport)?			X		
b. Short-term exposure of people to noise levels exceeding County thresholds?		X			
c. Project-generated substantial increase in the ambient noise levels for adjoining areas (either day or night)?			X		

Existing Setting: The ambient noise levels at the Project site are characteristic of a semi-rural residential setting, with infrequent and temporary noise generated by adjacent residences and vehicle traffic along San Ysidro Road. The Santa Barbara County Noise Element identified an ambient noise level of less than 60 A-weighted decibels (dBA) Community Noise Equivalent Level (CNEL) for the entire Montecito Community Plan Area north of East Valley Road, approximately 0.5 miles south of the Project site.[3,4] Traffic levels in this area are relatively low characteristic with low density residential development (i.e., 3 acre and larger parcels). South of East Valley Road, traffic levels are slightly elevated and contribute to slightly louder noise levels. The Santa Barbara County Noise Element identified an ambient noise level between 60 and 64 dBA CNEL in the commercial district of Montecito. The Santa Barbara County Noise Element establishes 65 dBA CNEL as the acceptable residential exterior noise level.

The Project site is primarily surrounded by other single-family residences with exception to the Oak Creek riparian corridor to the west. There are no other sensitive receptors, such as schools, hospitals, or libraries, within 1 mile of the Project site.

The proposed construction schedule would comply with the Montecito Community Plan's construction operation hours of 7:00 a.m. to 4:30 p.m. Monday through Friday, with no construction activities on weekends or holidays (County of Santa Barbara 1995). Construction activities would only occur outside of these hours during an emergency posing substantial threats to life and property.

County Environmental Thresholds: Noise is defined as unwanted or objectionable sound that is measured on a logarithmic scale and commonly expressed in dBA. For example, a soft whisper measures at 30 dBA and a lawn mower measures at 100 dBA at 5 feet. In noise-sensitive settings, the sounds generated at night

[3] The most common weighting that is used in noise measurement is A-Weighting. Like the human ear, this effectively cuts off the lower and higher frequencies that the average person cannot hear. A-weighted measurements are expressed as dBA or dB(A).

[4] CNEL represents the average of A-weighted sound levels occurring during a 24-hour period and accounts for the greater sensitivity of most people to nighttime noise by weighting noise levels at night (i.e., "penalizing" night-time noises). Noise between 10:00 p.m. and 7:00 a.m. is weighted by adding 10 dBA to take into account the greater annoyance of night-time noises. Additionally, noise between the hours of the 7:00 p.m. and 10:00 p.m. is weighted by adding 5-dBA.

are often more intrusive than sounds generated during the day. This is the case because outdoor background noise levels and indoor household activities are lower at night, making individual noise events stand out more sharply. The CNEL referenced in County thresholds accounts for the greater sensitivity of most people to nighttime noise by weighting noise levels at night (i.e., "penalizing" night-time noises).

The County's Noise Thresholds specify that a Project that would generate noise levels in excess of 65 dBA CNEL for exterior exposure and 45 dBA CNEL for interior exposure may have a significant impact on surrounding noise sensitive land uses. The thresholds identify noise-sensitive land uses to include residential dwellings and recreational areas (e.g., public parks and trails). The County's Noise Thresholds also indicate that Project construction, involving heavy construction equipment typically generate noise levels up to 90 dBA CNEL, which may be experienced 1,600 feet from the activity source.

Impact Discussion:

a, c) ***Insignificant.*** The proposed Project site is located off a private drive adjacent to San Ysidro Road, outside of 65 dBA noise contours for roadways, public facilities, airport approach and take-off zones. The proposed Project consists of demolition of existing structures and hardscapes, construction of utilities and drainage improvements, shared-access driveway, and the future residential development enabled by the proposed Project including building pads, single-family residences, and ancillary structures. The proposed Project would not result in long-term exposure of people to noise levels exceeding County thresholds or in any substantial increase in the ambient noise levels for adjoining areas. The only sensitive receptors that could be affected by temporary increases in ambient noise levels would be users of the 10-foot hiking and equestrian easement on San Ysidro Road as well as the residential properties adjacent to the Project site. Residential use of the Project site would not generate long-term significant increases to ambient noise levels; therefore, impacts associated with the proposed Project would be less than significant.

b) ***Significant but Mitigable.*** Development associated with the proposed Project would have the potential to result in construction activities generating short-term noise impacts to neighboring residential properties. As previously described, construction activities associated with the proposed Project would involve the use of light-duty trucks, hand tools, handheld power tools, generators, and heavy construction equipment. This construction equipment, particularly power tools and 10-ton class excavators may generate noise that could exceed County thresholds. For example, an excavator can generate a maximum sound level (L_{max}) of approximately 81 dBA at 50 feet. A hydraulic hammer can generate a L_{max} of approximately 90 dBA at 50 feet. However, this noise would be intermittent with power tools and heavy construction equipment in operation in discrete periods throughout the day. While noise levels along San Ysidro Road could exceed 81 dBA adjacent to the Project site, the proposed construction schedule would generally comply with the Montecito Community Plan's construction operation hours of 7:00 a.m. to 4:30 p.m. Monday through Friday, with no construction activities on weekends or holidays, as required by MM NOI-1. MM NOI-2 would require shieling for construction equipment that exceeds 65 dBA. With all of these measures, impacts from noise during construction would be less than significant with mitigation.

Cumulative Impacts: The proposed Project would contribute incrementally to cumulative noise in the community of Montecito. Initial construction activities including demolition of existing structures and hardscapes as well as construction activities associated with the proposed utilities and drainage improvements and shared-access driveway, would involve temporary increases in ambient noise. Future residential development enabled by the proposed Project would involve similar construction noise; the construction of building pads in particular would involve temporary, but prolonged increases in ambient noise associated with heavy construction equipment and thousands of heavy haul truck trips. These activities the associated light-duty vehicles, handheld power tools, generators, and heavy construction equipment would contribute to a temporary increase in noise. However, when considered with the other

cumulative projects in the region – and compliance with standard construction hours, noise shielding requirements, etc. – the proposed Project would not contribute to a considerable cumulative impact.

Mitigation Measures: The following mitigation measures would reduce the proposed Project's noise effects to a less than significant level:

MM NOI-1: **Construction Hours.** All construction-related activities, including equipment maintenance and site preparation, shall be limited to the hours between 7:00 a.m. and 4:30 p.m., Monday through Friday. No construction shall occur on weekends or State holidays. Non-noise generating interior construction activities such as plumbing, electrical, drywall and painting (which does not include the use of compressors, tile saws, or other noise-generating equipment) would not be subject to these restrictions. Any subsequent amendment to the Comprehensive Plan, applicable Community or Specific Plan, or Zoning Code noise standard upon which these construction hours are based shall supersede the hours stated herein.

Plan Requirements and Timing: The Applicant and/or future property owners shall provide and post a sign stating these restrictions at all construction site entries. Signs shall be posted prior to commencement of construction and maintained throughout construction.

Monitoring: The Applicant and/or future property owners shall demonstrate that required signs are posted prior to grading/building permit issuance and pre-construction meeting. Permit compliance staff shall spot check and respond to complaints.

MM NOI-2: **Equipment Shielding-Construction.** Stationary construction equipment that generates noise which exceeds 65 dBA at the Project site shall be shielded with appropriate acoustic shielding to the satisfaction of P&D.

Plan Requirements and Timing: The Applicant and/or future property owners shall designate the equipment area with appropriate acoustic shielding on building and grading plans. Equipment and shielding shall be installed prior to construction and remain in the designated location throughout construction activities.

Monitoring: The Applicant and/or future property owners shall demonstrate that the acoustic shielding is in place prior to commencement of construction activities. P&D compliance staff shall perform site inspections throughout construction to ensure compliance.

Residual Impacts: With the incorporation of MM NOI-1 through MM NOI-2, residual impacts would be less than significant.

4.12 PUBLIC FACILITIES

Will the proposal result in:	Poten. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. A need for new or altered police protection and/or health care services?				X	
b. Student generation exceeding school capacity?				X	

Will the proposal result in:	Poten. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
c. Significant amounts of solid waste or breach any national, state, or local standards or thresholds relating to solid waste disposal and generation (including recycling facilities and existing landfill capacity)?		X			
d. A need for new or altered sewer system facilities (sewer lines, lift-stations, etc.)?			X		
e. The construction of new storm water drainage or water quality control facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?			X		

Existing Setting: Major public services include emergency services, law enforcement, fire protection, schools, library, solid waste management, water, wastewater, and specialized facilities such as landfills. Fire protection issues are addressed in **Section 4.7**, *Fire Protection*, recreation issues are discussed in **Section 4.13**, *Recreation*, and transportation issues are discussed in **Section 4.14**, *Transportation / Circulation*.

County Environmental Thresholds: The County's Environmental Thresholds and Guidelines Manual does not include specific thresholds for public facilities. However, the County's Solid Waste Thresholds describe that a project would result in significant impacts to landfill capacity if it would generate 196 tons per year (tpy) of solid waste. This volume represents 5 percent of the expected average annual increase in waste generation, and is therefore considered a significant portion of the remaining landfill capacity. In addition, construction and demolition waste from remodels and rebuilds is considered significant if it exceeds 350 tons. A project which generates 40 tpy of solid waste would have an adverse effect on solid waste generation, and mitigation via a Solid Waste Management Plan is recommended. Additionally, the County's school threshold describes that a project would have a have a significant impact if it would generate sufficient students to require an additional classroom.

Impact Discussion:

a, b) ***No Impact.*** The proposed Project would divide the existing 13.02-acre residential estate into four developable lots, each of which could be developed with single-family residences. This level of new development would not have a significant impact on existing police protection or health care services. Existing service levels would be sufficient to serve the proposed Project and the proposed Project would not generate students in excess of school capacity within the Montecito public school district.

c) ***Significant but Mitigable.*** Both the proposed demolition of existing structures and hardscapes as well as the proposed construction of the shared-access driveway and utilities improvements are anticipated to generate solid waste in excess of County thresholds (see Table 13).

Table 13. Solid Waste Generation Estimates

Total Area	Solid Waste Generation Factor	Total Solid Waste
Demolition		
49,423 sf	60 pounds per square foot	2,965,380 pounds (1,345 tons)

New Construction Enabled by the Proposed Project		
58,721	15 pounds per square foot	880,815 (399 tons)
	County's Solid Waste Thresholds	350 tons
	County's Solid Waste Threshold Exceeded?	***Yes***

MM U-1 would require the Applicant and/or future property owners to prepare a Source Reduction and Solid Waste Management Plan (SRWMP) to be implemented during both initial demolition and future residential construction activities. With the implementation of MM U-1 impacts associated with solid waste generation during demolition and future construction activities enabled by the proposed Project would be reduced to a less than significant level.

d) ***Insignificant.*** The new structures would require the extension of the Montecito Sanitary District's (District's) sewer lines; as discussed in **Section 4.15**, *Water Resources and Flooding*, the District has confirmed they have capacity to extend service to each of the four Lots. Therefore, the proposed Project would have less than significant impacts to sewer.

e) ***Insignificant.*** New impervious surfaces associated with anticipated development could result in greater surface runoff from the Project site since there would be less open ground capable of absorbing rainwater. Future stormwater facilities for each proposed lot would be based on designs proposed for respective residences and subject to review and approval by P&D and County Flood Control. However, as discussed in **Section 4.15**, *Water Resources and Flooding*, it has been demonstrated to County Flood Control that adequate land area is available in each development envelope to accommodate stormwater associated with future residential development (GCV LLC 2021b).

Future stormwater facilities for each proposed lot would be based on designs proposed for respective residences and subject to review and approval by P&D and County Flood Control. However, as discussed in **Section 4.15**, *Water Resources and Flooding*, it has been demonstrated to County Flood Control that adequate land area is available in each development envelope to accommodate stormwater associated with future residential development (GCV LLC 2021b). Under existing, pre-project conditions, stormwater exists the property in five locations; in the post-development condition stormwater would continue to exit the property in five locations and rock dissipation aprons would be constructed to protect against erosion and sedimentation in the drainage (GCV LLC 2021b). Therefore, the proposed Project would have less than significant impacts related to stormwater drainage and water quality control facilities.

Cumulative Impacts: The proposed Project would have negligible impacts on public facilities. Therefore, when considered with other cumulative projects in the region, the proposed construction activities would not contribute to a cumulatively considerable impact.

Mitigation Measures: The following mitigation measure would reduce the proposed Project's solid waste generation during construction to a less than significant level.

MM U-1: **Source Reduction and Solid Waste Management Plan (SRWMP) during Construction.** The Applicant shall prepare a Source Reduction and SRWMP for construction and submit to the County for approval prior to issuance of grading permits for the initial improvements associated with the proposed demolition and future residential construction activities. The SRWMP shall describe commitments to reduce the amount of waste generated during construction of the project and estimate the reduction in solid waste generated during each phase of project construction. The SRWMP shall include, at a minimum:

- Construction Source Reduction
  - A description of how fill would be used on the construction site, instead of landfilling.
  - A program to purchase materials that have recycled content for project construction
- Construction Solid Waste Reduction
  - Prior to construction, the contractor shall arrange for construction recycling service with a waste collection provider. Roll-off bins for the collection of recoverable construction materials shall be located onsite. The Applicant, or authorized agent thereof, shall arrange for pick-up of recycled materials with a waste collection provider or shall transport recycled materials to the appropriate service center. Wood, concrete, drywall, metal, cardboard, asphalt, soil, and land clearing debris may all be recycled.
  - The contractor shall designate a person to monitor recycling efforts and collect receipts for roll-off bins and/or construction waste recycling. All subcontractors shall be informed of the recycling plan, including which materials are to be source-separated and placed in proper bins.
  - Recycling and composting programs including separating excess construction materials on-site for reuse/recycling or proper disposal (e.g., concrete, asphalt, wood, brush). Provided separate on-site bins as needed for recycling.

Plan Requirements and Timing. The Applicant shall submit a SRSWMP for construction to P&D for review and approval prior issuance of a grading permit for the initial improvements associated with the proposed demolition and future residential construction activities. The Applicant shall implement all aspects of the Plan during construction of the proposed Project in accordance with the above-described conditions.

Monitoring. The Applicant shall demonstrate to P&D compliance monitoring staff that all required source reduction and solid waste reduction measures are implemented during construction activities.

Residual Impacts. With the incorporation of MM U-1, residual impacts would be less than significant.

4.13 RECREATION

Will the proposal result in:	Poten. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. Conflict with established recreational uses of the area?		X			
b. Conflict with biking, equestrian and hiking trails?		X			
c. Substantial impact on the quality or quantity of existing recreational opportunities (e.g., overuse of an area with constraints on numbers of people, vehicles, animals, etc. which might safely use the area)?				X	

Existing Setting: The Project site consists of a privately-owned 13.02-acre residential estate. A Class II bicycle lane exists along San Ysidro Road between U.S. Highway 101 and Valley Road. The bicycle lane does not extend further north to the portion of San Ysidro adjacent to the Project site. A 10-foot wide County right-of-way easement for hiking and equestrian use is located on San Ysidro Road adjacent to the Project site.

County Environmental Thresholds: The County's Thresholds and Guidelines Manual contains no threshold for park and recreation impacts. However, the Board of Supervisors has established a minimum standard ratio of 4.7 acres of recreation/open space per 1,000 people to meet the needs of a community. The Santa Barbara County Parks Division maintains more than 900 acres of parks and open spaces, as well as 84 miles of trails and coastal access easements.

Impact Discussion:

a, b) ***Significant but Mitigable.*** The Project site is located on private property; however, a 10-foot wide County right-of-way easement for hiking and equestrian use is located along San Ysidro Road adjacent to the Project site. Construction activities to remove the existing private driveway and construct the new shared-access driveway off of San Ysidro Road would temporarily impact access across this easement. Similarly, construction access by heavy haul trucks and construction worker vehicles would also be likely to interrupt the right-of-way easement. For example, during future residential development enabled by the proposed Project import of fill could result in as many as 1,500 to 3,000 haul truck trips (or up to 6,000 round trips) with approximately 80-100 trucks entering the Project site each day (or up to 200 round trips). Depending on whether or not future construction is concurrent or staggered, construction activities on-site could extend over 3 to 5 years or longer. Construction access to the Project site would be provided via the existing private driveway at 749 San Ysidro Drive. However, temporary construction access may need to be established at the southern end of the Project site along San Ysidro Road. No detailed construction traffic management plans have been prepared/provided to describe how construction activities and/or heavy truck traffic would be managed to ensure user safety and maintain the right-of-way open for public use. There are currently no estimates for the frequency/duration of any potential right-of-way closure. MM REC-1 would require noticing well in advance of the initiation of construction activities and the use of traffic flaggers to prevent any conflicts between heavy construction equipment, heavy haul truck trips, pedestrians, bicyclists, and horseback riders. The Traffic and Pedestrian Management Plan would minimize any right-of-way closures to the maximum extent feasible during initial construction activities associated with the proposed Vesting Tentative Tract Map as well as future residential development enabled by the proposed Project.

Following the completion of initial construction activities associated with the proposed Vesting Tentative Tract Map, the affected turn-off at San Ysidro Road would return to pre-project conditions. Similarly, following the completion of all future residential development enabled by the proposed Project, the hiking and equestrian easement would be unaffected by construction-related vehicle trips and/or temporary closures. With the hiking and equestrian easement preserved as part of the proposed Project, impacts to an established recreational use and trails would be less than significant.

c) ***No Impact.*** The proposed Project would result in the creation of four developable parcels, which could be developed in the future with single-family residences and ancillary structures. The minimal population increase associated with the implementation of the proposed Project would result in less than significant adverse impacts on the quality and quantity of existing recreational opportunities, both in the vicinity of the Project site and Countywide.

Cumulative Impacts: The proposed Project would contribute incrementally to disruptions in the use of the County's 10-foot hiking and equestrian easement within San Ysidro right-of-way during demolition of the existing, and construction of new, shared-access driveway. However, the implementation of implementation of MM REC-1 would ensure that impacts to users along the San Ysidro easement would be less than significant with mitigation. When considered with the other cumulative projects in the region, the proposed Project would not contribute to a considerable cumulative impact.

Mitigation Measures: The following mitigation measures would reduce the impacts of the proposed Project on recreational resources to a less than significant level:

MM REC-1: **Construction Traffic Management Plan:** Prior to the commencement of any construction-related activities, including initial construction activities associated with the proposed Vesting Tentative Tract Map as well as future residential development enabled by the proposed Project, the Applicant and/or future property owners shall prepare a construction-related Construction Traffic Management Plan. At a minimum, the plan shall provide a comprehensive construction schedule, describe the location and duration of necessary construction-related disruptions, and provide a list of traffic control measures to ensure the safety of motorists, pedestrians, bicyclists, and horseback riders during construction activities.

The Applicant and/or future property owners shall provide all adjacent property owners and residences along San Ysidro Road from East Valley Road, north to East Mountain Drive with a construction activity schedule and construction routes at least 1 month in advance of construction activities. Notices shall also be posted along the affected County right-of-way easement.

The Applicant and/or future property owners shall also ensure that construction flaggers are in place along the San Ysidro Road, during construction activities including on-site driveway demolition, grading, and paving directly adjacent to San Ysidro Road, as well as during periods of heavy haul truck use (e.g., materials export or delivery). The flaggers shall hold pedestrians and horseback riders (for minutes at a time) in order for the safe operation of heavy equipment as well as passage of heavy haul trucks and other construction vehicles during construction activities. The flaggers shall have radios for communications to ensure public safety and to reduce the time of impacts on any recreational use of the roadway. Temporary right-of-way closures, which may be required for work on the shared-access driveway and utilities where they intersect with San Ysidro Road, shall be limited to the maximum extent feasible during construction activities and shall require agreement from P&D. Areas that necessitate temporary closure must be signed, fenced or roped off, and monitored by construction workers during construction to protect public safety.

Plan Requirements and Timing: The Applicant and/or future property owners would be required to prepare respective Traffic and Pedestrian Management Plans for review and approval by P&D, Santa Barbara County Parks Division, and Santa Barbara County Public Works prior to the issuance of a Zoning Clearance for initial improvements associated with the Vesting Tentative Tract Map and LUPs for future residential development enabled by the proposed Project. The Applicant and/or future property owners shall also work with P&D, Santa Barbara County Parks Division, and Santa Barbara County Public Works to ensure that appropriate noticing occurs within the Montecito community at least 1 month

before construction activities that affect the 10-foot wide County right-of-way easement for hiking and equestrian use.

Monitoring: County Planning and Development Department permit compliance staff shall spot check in the field throughout construction activities.

Residual Impacts: With the incorporation of MM REC-1, residual impacts would be less than significant.

4.14 TRANSPORTATION / CIRCULATION

Will the proposal result in:	Poten. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
a. Generation of substantial additional vehicular movement (daily, peak-hour, etc.) in relation to existing traffic load and capacity of the street system?			X		
b. A need for private or public road maintenance, or need for new road(s)?			X		
c. Effects on existing parking facilities, or demand for new parking?		X			
d. Substantial impact upon existing transit systems (e.g., bus service) or alteration of present patterns of circulation or movement of people and/or goods?			X		
e. Alteration to waterborne, rail or air traffic?				X	
f. Increase in traffic hazards to motor vehicles, bicyclists or pedestrians (including short-term construction and long-term operational)?		X			
g. Inadequate sight distance? Ingress/egress? General road capacity? Emergency access?		X			
h. Impacts to Congestion Management Plan system?				X	

Existing Setting: The Project site is located along San Ysidro Road, a paved two-lane road that provides neighborhood access within the community of Montecito. Access to the Project site is provided by an approximately 12-foot-wide private driveway that extends approximately 950 feet to the west from San Ysidro Road. Another gated, two-track dirt road also transverses the property, connecting San Ysidro Road in the southeast corner to the private driveway to the north. A 10-foot wide County right-of-way easement for hiking and equestrian use is located along San Ysidro Road adjacent to the Project site. No bicycle lanes are provided along San Ysidro Road, though bicyclists do often share the road with vehicles. Additionally, there is no parking available along San Ysidro Road.

County Environmental Thresholds: According to the County's Environmental Thresholds and Guidelines Manual, a significant traffic impact would occur when:

- The addition of Project traffic to an intersection increases the volume to capacity (V/C) ratio by the value provided below, or sends at least 15, 10 or 5 trips to an intersection operating at LOS D, E or F.

Level of Service (including Project)	Increase in Volume/Capacity Greater Than
A	0.20
B	0.15
C	0.10
	Or the addition of:
D	15 trips
E	10 trips

- Project access to a major road or arterial road would require a driveway that would create an unsafe situation, or would require a new traffic signal or major revisions to an existing traffic signal.
- Project adds traffic to a roadway that has design features (e.g., narrow width, road side ditches, sharp curves, poor sight distance, inadequate pavement structure) or receives use which would be incompatible with substantial increases in traffic (e.g., rural roads with use by farm equipment, livestock, horseback riding, or residential roads with heavy pedestrian or recreational use, etc.) that will become potential safety problems with the addition of Project or cumulative traffic. Exceeding the roadway capacity designated in the Circulation Element may indicate the potential for the occurrence of the above impacts.
- Project traffic would utilize a substantial portion of an intersection(s) capacity where the intersection is currently operating at acceptable levels of service (A-C) but with cumulative traffic would degrade to or approach LOS D (V/C 0.81) or lower. Substantial is defined as a minimum change of 0.03 for intersections which would operate from 0.80 to 0.85 and a change of 0.02 for intersections which would operate from 0.86 to 0.90, and 0.01 for intersections operating at anything lower.

SB 743 changed transportation impact analysis under the CEQA Guidelines by requiring the use of vehicle miles traveled (VMT) rather than LOS or similar measures of vehicle capacity or traffic congestion to evaluate transportation impacts. The County has therefore developed: 1) new methodologies and metrics for estimating VMT; 2) screening criteria for projects assumed to have a less than significant impact on VMT; 3) thresholds of significance; and 4) feasible mitigation measures to reduce VMT. On September 15, 2020, the Board of Supervisors updated the County's Environmental Thresholds and Guidelines Manual to shift from LOS to VMT-based metrics. Specifically, Chapter 18, Thresholds of Significance for Transportation Impacts, of the Environmental Thresholds and Guidelines Manual now contains standardized VMT metrics, VMT screening criteria, VMT thresholds of significance, and VMT mitigation measures tailored to the unincorporated areas of Santa Barbara 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 Santa Barbara County.

Impact Discussion:

a, b, d) ***Insignificant.*** Construction traffic would utilize the Olive Mill Road or San Ysidro Road exits from Highway 101 to reach the Project site. As described in **Section 1.0**, *Request / Project Description*, during demolition activities approximately 300 to 600 truck trips would be required to export construction and demolition debris associated with the existing structures and hardscapes. Additionally, during future residential development enabled by the proposed Project, import of fill to the Project site to establish the building pads would result in an additional 1,500 to 3,000 haul truck trips. During these activities heavy haul trucks would access the Project site via the existing private driveway or the informal two-track dirt road transverses the property, connecting San Ysidro Road in the southeast corner to the private driveway to the north. However,

depending on the sequence of construction with the four developable parcels, use of the dirt road may not be feasible.

Based on the 2030 Travel Forecast for Santa Barbara County, it is estimated that 10.9 vehicle trips per day would be generated per household in 2030 (Santa Barbara County Association of Governments 2004). Therefore, while not included as a part of the proposed Project, future residential development enabled by the proposed Project would account for a total of 43.6 trips per day.

Affected intersections along the route would include San Ysidro Road and East Valley Road, which is cited in the Montecito Community Plan as experiencing an acceptable LOS A (see Policy CIRC-M-1.6). The contribution of the proposed Project to peak hour traffic at these intersections represents a negligible increase over existing traffic levels and would not exceed any threshold of significance. Traffic generated by the proposed Project would not result in any alterations to public streets that would require new roads or a significant amount of increased roadway maintenance. Therefore, the proposed Project would have a less than significant impact.

According to a technical advisory on evaluating transportation impacts from the State of California Governor's Office of Planning and Research (OPR), "[a]bsent substantial evidence indicating that a Project would generate a potentially significant level of VMT, or inconsistency with a Sustainable Communities Strategy (SCS) or general plan, Projects that generate or attract fewer than 110 trips per day[5] generally may be assumed to cause a less than significant transportation impact" (OPR 2017). Therefore, because the proposed construction activities would generate fewer trips than the OPR's threshold of 110 trips per day, impacts related to VMT would be less than significant.

c) ***Significant but Mitigable.*** The proposed Project would provide all required parking for the proposed single-family residences within each of the four developable lots. MM REC-1 requires that all construction workers park on-site. With this mitigation measure, the proposed Project would have less than significant impacts to public parking.

e, h) ***No Impact.*** Roadways and intersections within the vicinity of the Project site operate at acceptable levels of service and are not subject to Congestion Management Plan requirements. The proposed Project does not include any alteration to waterborne, rail, or air traffic. As designed and conditioned, the proposed Project would have no impact on existing transportation facilities nor would it create any new demand for any new public facilities. Therefore, there would be no impacts to waterborne, rail, or air traffic or Congestion Management Plan requirements.

f, g) ***Significant but Mitigable.*** As discussed in **Section 4.13**, *Recreation*, initial construction activities related to the proposed Vesting Tentative Tract Map as well as future residential development enabled by the proposed Project would introduce additional temporary heavy haul truck trips and construction worker trips. For example, during future residential development enabled by the proposed Project the import of fill could result in as many as 1,500 to 3,000 haul truck trips (or up to 6,000 round trips) with approximately 80-100 trucks entering the Project site each day (or up to 200 round trips). Depending on upon whether or not future construction is concurrent or staggered, construction activities on-site could extend over 3 to 5 years or longer. These trips could increase in traffic hazards to motor vehicles, bicyclists, and/or pedestrians, particularly given

[5] "CEQA provides a categorical exemption for existing facilities, including additions to existing structures of up to 10,000 square feet, so long as the Project is in an area where public infrastructure is available to allow for maximum planned development and the Project is not in an environmentally sensitive area. (CEQA Guidelines Section 15301[e][2]) Typical project types for which trip generation increases relatively linearly (i.e., general office building, single tenant office building, office park, and business park) generate or attract an additional 110-124 trips per 10,000 square feet. Therefore, absent substantial evidence otherwise, it is reasonable to conclude that the addition of 110 or fewer trips could be considered not to lead to a significant impact" (OPR 2017).

the potential constraints around site access (e.g., sharp turns that are difficult to navigate by heavy haul trucks). However, the implementation of MM REC-1 would require noticing well in advance of the initiation of construction activities and the use of traffic flaggers to prevent any conflicts between heavy construction equipment, heavy haul truck trips, pedestrians, bicyclists, and horseback riders. The Traffic and Pedestrian Management Plan would minimize any right-of-way closures to the maximum extent feasible during initial construction activities associated with the proposed Vesting Tentative Tract Map as well as future residential development enabled by the proposed Project. With the implementation of MM REC-1, the short-term, temporary construction-related impacts would be less than significant.

As discussed in **Section 1.0**, *Request / Project Description*, the new shared-access driveway would be constructed to MPFD standards, including providing two turnouts and a roundabout as emergency access features. These improvements would be required to comply with MPFD's development standards for fire access. Since the access is a private driveway, all costs associated with these improvements would be borne entirely by the Applicant. Residential traffic generated by the proposed Project would not result in significant impacts to road capacity since mitigated with the standard County transportation impact fee. The proposed Project would not impede transit access, nor would it otherwise cause or exacerbate an unsafe traffic condition related to use of San Ysidro Road for ingress/egress. As designed, the proposed Project would provide adequate sight distance and access for all necessary emergency services. With these design features long-term impacts would be less than significant.

Cumulative Impacts: As previously described, division of the existing 13.02-acre residential estate into four developable lots. Initial construction activities would include demolition of existing structures, drainage improvements, and utility improvements, and future construction of residential structures enabled by the proposed Project would entail thousands of heavy haul truck trips. In contrast proposed Project would result in minimal vehicle trips associated with shuttling construction crews and equipment. Therefore, given the minimal number of truck trips associated with the proposed construction when considered with cumulative projects in the region the proposed Project would not contribute to cumulatively considerable impacts to transportation/circulation.

Mitigation Measures and Residual Impacts: The implementation of MM REC-1 would reduce the transportation impacts associated with the proposed Project to a less than significant level. No additional mitigation measures would be required.

4.15 WATER RESOURCES / FLOODING

Will the proposal result in:	**Poten. Signif. and Unavoid.**	**Significant but Mitigable**	**Insignif.**	**No Impact / Beneficial Impact**	**Reviewed Under Previous Document**
a. Changes in currents, or the course or direction of water movements, in either marine or fresh waters?			X		
b. Changes in percolation rates, drainage patterns or the rate and amount of surface water runoff?		X			
c. Change in the amount of surface water in any water body?			X		

Will the proposal result in:	Poten. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
d. Discharge, directly or through a storm drain system, into surface waters (including but not limited to wetlands, riparian areas, ponds, springs, creeks, streams, rivers, lakes, estuaries, tidal areas, bays, ocean, etc.) or alteration of surface water quality, including but not limited to temperature, dissolved oxygen, turbidity, or thermal water pollution?		X			
e. Alterations to the course or flow of flood water or need for private or public flood control Projects?			X		
f. Exposure of people or property to water related hazards such as flooding (placement of Project in 100 year flood plain), accelerated runoff or tsunamis, sea level rise, or seawater intrusion?				X	
g. Alteration of the direction or rate of flow of groundwater?			X		
h. Change in the quantity of groundwater, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations or recharge interference?			X		
i. Overdraft or over-commitment of any groundwater basin? Or, a significant increase in the existing overdraft or over-commitment of any groundwater basin?			X		
j. The substantial degradation of groundwater quality including saltwater intrusion?			X		
k. Substantial reduction in the amount of water otherwise available for public water supplies?			X		
l. Introduction of storm water pollutants (e.g., oil, grease, pesticides, nutrients, sediments, pathogens, etc.) into groundwater or surface water?		X			

Existing Setting: The community of Montecito is located with the Mission Creek-Front Country Santa Barbara Channel watershed (Hydraulic Unit Code [HUC] 180600130203), which spans approximately 110 square miles, including the front country of the Santa Ynez Mountains to the Pacific Ocean from Goleta Slough to Summerland (USEPA 2022).

The Project site overlies the Montecito Groundwater Basin (MGB), a 9.6 square mile coastal groundwater basin (Montecito Groundwater Sustainability Agency 2020). The Department of Water Resources originally designated the MGB as a very low priority basin; however, it was reprioritized as a medium priority basin in 2020. Natural recharge to the MGB occurs through subsurface inflow from unconsolidated and consolidated rocks, infiltration of precipitation over the MGB, and stream seepage. The five major contributing watersheds that bisect the MGB include the Montecito Creek watershed, which is approximately 6.2 square miles; the Oak Creek watershed (2 square miles); the San Ysidro Creek watershed (4.9 square miles); the Romero Creek watershed (5 square miles); and the Toro Canyon Creek watershed (4.1 square miles). Together, these watersheds have an area of 22.2 square miles.

Groundwater pumped from MWD wells makes up 10 to 15 percent of the water supply portfolio, approximately 600-acre feet (AF) per year, and is a local and reliable source of supply. MWD's monthly groundwater production varies, averaging about 50 AF per month. Groundwater supplies remain depleted from the extreme drought which began in 2011. As of 2019, hydrogeologists forecast that it will take several consecutive years of above average rainfall for the groundwater basin to recover. Based on the Drainage Analysis field survey, there was no groundwater observed with the Project site; groundwater is not expected due to the elevation of the property (GCV LLC 2021).

The MWD Urban Water Management Plan found that single-family residential properties make up to approximately 92 percent of total service connections, using approximately 3,187 acre-feet per year (AFY), or approximately 79 percent of total water use. The Plan projected 4,336 AFY gross water use in 2025 servicing approximately 11,749 people, for a projected daily per capita water use of 109 AFY (MWD 2020).

As previously described, one unnamed ephemeral drainage bisects the Project site, running in a north-south direction. Oak Creek is located immediately adjacent to the Project site, forming its western boundary. A FEMA Special Flood Hazard Area Zone AE floodway associated with the Oak Creek corridor is adjacent to the Project site.

In June of 2018, FEMA Recovery Mapping was published, giving Advisory Flood Elevations for areas affected by the Thomas Fire. The Project site is located within a Recovery Flood Mapping Area and therefore the finished floor area would typically be required to be 2 feet higher than the 100-year flood elevation and substantially higher than existing grade. Flood Control has also adopted flood plain management strategies requiring new structures built within this High Hazard Area to have finish floor elevations a minimum of 2 feet above Advisory Flood Elevations. All proposed developable lots would be subject to County Ordinance 15a – Floodplain Management.

Water Resources Thresholds: According to the County's Surface and Storm Water Quality Significance Guidelines, a significant water quality impact is presumed to occur if the proposed 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 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 of categories of industrial activity regulated under the NPDES Phase I industrial storm water 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 Central Coast RWQCB's Basin Plan or otherwise impairs the beneficial uses[6] of a receiving water body;

[6] Beneficial uses for the County are identified by the Central Coast RWQCB in the Water Quality Control Plan for the Central Coastal Basin, or Basin Plan, and include (among others) recreation, agricultural supply, groundwater recharge, fresh water habitat, estuarine habitat, support for rare, threatened or endangered species, preservation of biological habitats of special significance.

- Results in a discharge of pollutants into an "impaired" water body that has been designated as such by the SWRCB or the Central Coast RWQCB under Section 303(d) of the Federal Water Pollution Prevention and Control Act; or
- Results in a discharge of pollutants of concern to a receiving water body, as identified by the Central Coast RWQCB.

Additionally, a project would have a significant effect on water resources if it would exceed established threshold values which have been set for each overdrafted groundwater basin. These values were determined based on an estimation of a basin's remaining life of available water storage. If the project's net new consumptive water use (i.e., total consumptive demand adjusted for recharge less discontinued historic use) exceeds the threshold adopted for the basin, the project's impacts on water resources are considered significant.

A project would also be considered to have a significant effect on water resources if a net increase in pumpage from a well would substantially affect production or quality from a nearby well.

Impact Discussion:

a, c) ***Insignificant*** As previously described, one 24-inch culvert within the unnamed ephemeral drainage would be replaced with a new 24-inch reinforced concrete culvert to accommodate flows from the ephemeral drainage beneath the proposed shared-access driveway. The proposed Project would require a Section 401 Water Quality Certification issued by the Central Coast RWQCB and a Lake and Streambed Alteration Agreement issued by CDFW pursuant to California Fish and Game Code Section 1600. Although the channel would be temporarily altered during in-water work, existing flows and outlets of this drainage would be maintained; therefore, the proposed Project does not include development that would change existing currents, course, or direction of water movements (i.e., marine or fresh waters).

b, d, l) ***Significant but Mitigable.*** The proposed Project also includes several mitigation measures aimed at preventing water pollution during construction. MM GEO-1 requires that sediments be controlled with BMPs such as covering storm drains and blocking entrances with gravel pads and that all areas be revegetated after grading to reduce sedimentation (refer to **Section 4.8**, *Geologic Processes*). MM BIO-8 requires that equipment storage areas be located at least 100 feet from storm drains or water bodies. With these mitigation measures, impacts to surface water runoff flows would be less than significant (refer to **Section 4.4**, *Biological Resources*).

Following the future residential development enabled under the proposed Project, there would result in a net increase in impervious surfaces and could result in potentially significant impacts on surface water runoff. Uncontrolled and unmanaged storm water run-off can often carry with it a number of pollutants commonly found at construction sites or residential areas, such as oils and grease from driveway areas, and pesticides and fertilizers from landscaped areas.

Future stormwater facilities for each proposed lot would be based on designs proposed for respective residences and subject to review and approval by P&D and County Flood Control. However, it is anticipated future stormwater control would remain similar to existing conditions with stormwater draining in a south-southeast direction and the center of the Project site draining to the unnamed ephemeral drainage that bisects the site. It is anticipated that stormwater facilities that may include detention basins would be constructed within each of the proposed developable parcels. County Flood Control would require facilities and basins to be sized such that they would ensure that post-development peak storm water runoff would not exceed pre-development conditions. It is anticipated water in excess of the retention volume (referred to as "dead storage") in the basins

would be piped through storm drains and released into the ephemeral drainage, using rock energy dissipation aprons to protect against erosion and sedimentation.

GCV LLC completed a Drainage Analysis in December 2021 to conduct an analysis of the pre- and post-condition flows associated with the proposed Project. Since the proposed stormdrain pipes are sized to convey the peak 25-year flow, the detention basins would mitigate any additional runoff generated by future development of the site. As such, the post development peak storm water runoff would not exceed the pre-development rate for the 2-year through 100-year storm events (GCV LLC 2021).

e) ***Insignificant.*** The proposed Project would not alter of the course or flow of flood waters or generate the need for flood control Projects. The Drainage Analysis and Conceptual Stormwater Plan developed for the proposed Project concluded that future residential development would not increase floodway elevations or floodway widths. The proposed Project would maintain existing drainage patterns and five overland exit locations.

Future residential development enabled by the proposed Project would not be located within the standard FEMA identified 100-year floodplain or a floodway. However, the proposed elevation of the building pads would be required to meet FEMA and Flood Control requirements for the finish floor elevations to be a minimum of 2 feet above advisory flood elevations as prescribed by FEMA Recovery Mapping. These advisory flood elevations are based on a model that represents a worst-case scenario (e.g., a scenario where all culverts, bridges and other typical drainage features are completely clogged with debris). Therefore, impacts related to the flow of flood water would be less than significant.

f) ***No Impact.*** The proposed Project would be situated at the base of the mountainous region of the County, and is approximately 2 miles from the ocean and at an elevation of nearly 350 feet above mean high tide. Therefore, there would be no impact on risks associated with tsunamis, sea level rise, or seawater intrusion.

g-k) ***Insignificant.*** As part of the proposed Project, and Applicant proposes a new waterline underneath the new shared-access driveway to supply water connections at each of the four developable parcels. Future residential development would be served by the MWD. MWD has reviewed the application materials to determine water service availability and confirmed it can make service available to the Project site subject to the following conditions:

- The Certificate of Water Service availability only pertains to the proposed subdivision activities and establishment of utility hookups and does not extend to future Projects, improvements, development, or land use modifications. Any changes to the proposed land use modifications are subject to additional review and approval by MWD.
- New water service for land use modifications shall require submittal of architectural and landscape plans, and estimates of Total Water Use calculations for landscape and irrigation. MWD will not approve water meter installation until architectural and landscape plans are reviewed and approved by MWD in accordance with its ordinances and regulations including Water Limitation Ordinance 89.

The Applicant must also provide MWD with calculations of total estimated water use. Water meter installation would not be approved for the proposed Project until these conditions are met. Therefore, with MWD's review and approval of Applicant's proposed water use associated with future development, the impact of the proposed Project on water supplies would be less than significant.

Cumulative Impacts: As previously described, division of the existing 13.02-acre residential estate into four developable parcels and future construction of up to four residences would result in the temporary use of hazardous materials during construction. Similarly, the proposed Project would also involve the

temporary use of hazardous materials; however, the implementation of MM GEO-1 would reduce the risk of accidental spills during the proposed construction activities. Further, in the highly unlikely event of a spill, it would occur in a localized area within the Project site, which would provide for expedient containment and clean-up. Therefore, when considered with other cumulative projects in the region – including reconstruction efforts associated with the debris flows – the proposed Project would not contribute to a cumulatively considerable impact.

Mitigation Measures and Residual Impacts: The design of the proposed drainage improvements and compliance with FEMA and Flood Control requirements along with the implementation of MM BIO-1, MM BIO-8, and MM GEO-1 would ensure that impacts would remain less than significant.

5.0 INFORMATION SOURCES

5.1 County Departments Consulted

Montecito Fire Protection District; Santa Barbara County Public Works Department; Santa Barbara County Flood Control District; Santa Barbara County Parks Department; Santa Barbara County Health Department – Environmental Health Services; Santa Barbara County Surveyor

5.2 Comprehensive Plan

✓	Seismic Safety/Safety Element		Conservation Element
✓	Open Space Element	✓	Noise Element
	Coastal Plan and Maps	✓	Circulation Element
✓	ERME		

5.3 Other Sources

✓	Field work		Ag Preserve maps
✓	Calculations	✓	Flood Control maps
✓	Project plans	✓	Other technical references
	Traffic studies		(reports, survey, etc.)
✓	Records	✓	Planning files, maps, reports
✓	Grading plans	✓	Zoning maps
	Elevation, architectural renderings	✓	Soils maps/reports
✓	Published geological map/reports	✓	Plant maps
✓	Topographical maps	✓	Archaeological maps and reports
			Other:

6.0 PROJECT SPECIFIC *(short- and long-term)* AND CUMULATIVE IMPACT SUMMARY

Class I Impacts (Potentially Significant and Unavoidable):

- None identified

Class II Impacts (Significant but Mitigable Impact):

- Aesthetics / Visual Resources
- Biological Resources

- Cultural Resources
- Fire Protection
- Geologic Processes
- Hazardous Materials / Risk of Upset
- Land Use
- Noise
- Public Facilities
- Recreation
- Transportation / Circulation
- Water Resources / Flooding

Class III Impacts (Insignificant):

- Agricultural Resources
- Air Quality
- Air Quality – Greenhouse Gas Emissions
- Energy

Cumulative Impacts:

- None identified

7.0 MANDATORY FINDINGS OF SIGNIFICANCE

Will the proposal result in:	**Poten. Signif. and Unavoid.**	**Significant but Mitigable**	**Insignif.**	**No Impact / Beneficial Impact**	**Reviewed Under Previous Document**
1. Does the Project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, contribute significantly to greenhouse gas emissions or significantly increase energy consumption, or eliminate important examples of the major periods of California history or prehistory?		X			
2. Does the Project have the potential to achieve short-term to the disadvantage of long-term environmental goals?			X		

Will the proposal result in:	Poten. Signif. and Unavoid.	Significant but Mitigable	Insignif.	No Impact / Beneficial Impact	Reviewed Under Previous Document
3. 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.)		X			
4. Does the Project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?		X			
5. Is there disagreement supported by facts, reasonable assumptions predicated upon facts and/or expert opinion supported by facts over the significance of an effect which would warrant investigation in an EIR?				X	

1. With implementation of the project design features, required permit conditions, and the mitigation measures identified herein, the proposed Project would not substantially affect individuals or populations of sensitive plant and wildlife species, contribute to cumulatively considerable GHG emissions, increase energy consumption, or affect important archaeological, cultural, or historic resources.

2. The proposed Project would include the temporary use of power tools, generators, heavy construction equipment, and heavy haul trucks of which would be fueled by gasoline and diesel. Use of these fuels would create a negligible increase in demand on existing energy sources when considered in the context of regional supplies. The proposed Project would result in four developable lots would facilitate the development of four single-family residences with ancillary structures, each of which would require electricity and natural gas. Additionally, the proposed Project would introduce additional vehicle trips associated with the residents and any guests at the proposed single-family residences. However, fuels consumption associated with this use would be negligible.

3. With implementation of the project design features, required permit conditions, and the mitigation measures identified herein, the potential environmental impacts of the proposed Project would not be significant. When considered with other cumulative projects in the region, the proposed Project would not contribute to a cumulatively considerable impact.

4. With implementation of the project design features, required permit conditions, and the mitigation measures identified herein, impacts to human beings associated with air quality, hazards, and noise would not be significant during construction or operation of the proposed Project.

5. There is no known supportable disagreement or expert opinion that would warrant preparation of an EIR.

8.0 INITIAL REVIEW OF PROJECT CONSISTENCY WITH APPLICABLE SUBDIVISION, ZONING AND COMPREHENSIVE PLAN REQUIREMENTS

Land Use: LU-M-1.2, LU-M-2.1, LU-M-2.2

Air Quality: AQ-M-1.3

Biological Habitats: BIO-M-1.2, BIO-M-1.3, BIO-M-1.6, BIO-M-1.7, BIO-M-1.8, BIO-M-1.10, BIO-M-1.15, BIO-M-1.16, BIO-M-1.17, BIO-M-1.18, BIO-M-1.19, BIO-M-1.20, and BIO-M-1.23

Flooding and Drainage: FD-M-1.1 and FD-M-2.1

Geology, Hillside & Topography: GEO-M-1.1, GEO-M-1.2, and GEO-M-1.6

Visual/Open Space Resources: VIS-M-1.1, VIS-M-1.2, VIS-M-1.3, and VIS-M-1.4

9.0 RECOMMENDATION BY P&D STAFF

On the basis of the Initial Study, the P&D staff:

__ Finds that the proposed Project WILL NOT have a significant effect on the environment and, therefore, recommends that a Negative Declaration (ND) be prepared.

X Finds that although the proposed Project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures incorporated into the REVISED PROJECT DESCRIPTION would successfully mitigate the potentially significant impacts. Staff recommends the preparation of an ND. The ND finding is based on the assumption that mitigation measures will be acceptable to the applicant; if not acceptable a revised Initial Study finding for the preparation of an EIR may result.

_ Finds that the proposed Project MAY have a significant effect on the environment, and recommends that an EIR be prepared.

_ Finds that from existing documents (previous EIRs, etc.) that a subsequent document (containing updated and site-specific information, etc.) pursuant to CEQA Sections 15162/15163/15164 should be prepared.

Potentially significant unavoidable adverse impact areas:
__With Public Hearing __Without Public Hearing

PREVIOUS DOCUMENT: N/A

PROJECT EVALUATOR:_____ **DATE:**_____

10.0 DETERMINATION BY ENVIRONMENTAL HEARING OFFICER

_ I agree with staff conclusions. Preparation of the appropriate document may proceed.
_ I DO NOT agree with staff conclusions. The following actions will be taken:
_ I require consultation and further information prior to making my determination.

SIGNATURE:_____ **INITIAL STUDY DATE**: _____

SIGNATURE:_____ **NEGATIVE DECLARATION DATE**:_____

SIGNATURE:_____ **REVISION DATE:** _____

SIGNATURE:_____ **FINAL NEGATIVE DECLARATION DATE:** _____

11.0 REFERNCES

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12.0 ATTACHMENTS

1. Civil Engineering Drawings, GCV LLC. May 2022.
2. Final Revised Biological Resources Assessment – 749 San Ysidro Road, Storrer Environmental Services, LLC. December 2021.
3. Proposed Riparian Buffer Restoration Areas, Terra Solutions. December 2021.
4. Tree Assessment and Protection Plan, Bill Spiewak Consulting Arborist. November 2021.
5. Phase 1 Historic Resources Management Report, Post/Hazeltine Associates. February 2021.
6. Negative Archaeological Survey Report, Wood Environment & Infrastructure Solutions, Inc. January 2021.
7. CalEEMod Emissions Modeling Output, Wood Environment & Infrastructure Solutions, September 2022.