ATTACHMENT 2

1.0 CEQA FINDINGS

1.1 CEQA FINDINGS AND STATEMENT OF OVERRIDING CONSIDERATIONS

FINDINGS PURSUANT TO PUBLIC RESOURCES CODE SECTION 21081 AND THE CEQA GUIDELINES SECTIONS 15090 AND 15091:

A. CONSIDERATION OF THE EIR

The Final Program Environmental Impact Report (FPEIR), 01-EIR-01, was presented to the Board of Directors and all voting members of the Board have reviewed and considered the FPEIR, 01-EIR-01, and its appendices prior to approving this proposal. In addition, the Board has reviewed and considered testimony and additional information presented at or prior to the public hearing on December 11, 2001.

B. FULL DISCLOSURE

The Board of Directors finds and certifies that the Final EIR constitutes a complete, accurate, adequate and good faith effort at full disclosure under CEQA, and represents the independent judgement of the Board of Directors. The Board further finds and certifies the Final EIR has been completed in compliance with CEQA and is adequate for this project.

C. LOCATION OF DOCUMENTS

The documents and other materials which constitute the record of proceedings upon which this decision is based are in the custody of the Deputy Director of the Water Resources Division, Santa Barbara County Public Works, located at 123 E. Anapamu St., Santa Barbara, CA 93101.

D. ENVIRONMENTAL REPORTING AND MONITORING PROGRAM

Pursuant to Public Resources Code Section 21081.6, the Board hereby adopts the approved project description and mitigation measures, with their corresponding mitigation monitoring requirements, as the monitoring program for this project. The monitoring program is designed to ensure compliance during project implementation and mitigation or avoidance of significant effects on the environment.

E. FINDINGS THAT CERTAIN UNAVOIDABLE IMPACTS ARE MITIGATED TO THE MAXIMUM EXTENT FEASIBLE

The Final Program EIR for the Updated Routine Maintenance Program identifies four environmental impacts which cannot be fully mitigated and therefore considered unavoidable. Those impact areas are: Water Quality; Wetlands, Riparian Habitat, and Rare Plants; and Fish, Aquatic Species, and Wildlife. To the extent the impacts remain unavoidable, such impacts are acceptable when weighed against the overriding social, economic, and other considerations, set forth in the Statement of Overriding Considerations included herein. Each of these "Class I" impacts identified by the Final EIR are discussed below, along with the appropriate findings as per CEQA Section 15091:

Water Quality:

1. Potentially Reduce the Amount of Natural Biofiltering. Removal and/or thinning of vegetation from channel bottom due to brushing, herbicide application, desilting, and channel shaping cause a temporary reduction in vigor and/or cover of successional riparian habitats and emergent wetlands. This same impact could occur due to clearing pilot channels and outlet works in debris basins, as well as removing sediments from basins. Conducting a maintenance needs analysis, minimizing vegetation removal from the channel bottom, maintaining biofiltering by reseeding the channel bottom, and post channel bed treatment reduce these potential impacts. Although biofiltration impacts may be mitigated to insignificance on individual creeks, the impact remains cumulatively significant.

Wetlands, Riparian Habitat, and Rare Plants

1. Reduce Amount and Quality of Channel Bottom Habitat. Removal and/or thinning of vegetation from channel bottom due to brushing, herbicide application, desilting, and channel shaping cause a temporary reduction in vigor and/or cover of successional riparian habitats and emergent wetlands. This same impact could occur due to clearing pilot channels and outlet works in debris basins, as well as removing sediments from basins. Although the functions and values of the habitat temporarily disturbed by maintenance would be replaced through the District's habitat restoration program, there is a potentially adverse cumulative effect of annual habitat disturbances throughout the County. Therefore, impacts due to the reduction of the amount and quality of channel bottom habitat remain significant.

Fish, Aquatic Species, and Wildlife

1. Displace Wildlife due to Vegetation Removal in the Channel Bottom. Removal and/or thinning of vegetation from channel bottom due to brushing, herbicide application, desilting, and channel shaping cause a temporary reduction in vigor and/or cover of successional riparian

habitats and emergent wetlands. This same impact could occur due to clearing pilot channels and outlet works in debris basins, as well as removing sediments from basins. These actions could reduce foraging and loafing habitat for certain riparian and wetland dependent bird species. It can also reduce habitat heterogeneity for reptiles and small mammals, and degrade aquatic habitats by removing protective cover and increasing temperatures. While the long term functions and values of the habitat temporarily disturbed by maintenance would be replaced through the District's updated habitat restoration program, there will be a temporal impact to wildlife that cannot be fully mitigated. Therefore, impacts due to the displacement of wildlife due to vegetation removal from the channel bottom would remain significant.

2. Adverse Effects of Maintenance on Aquatic Habitat. Channel shaping, bank stabilization by placing fill or grading banks, sandbar removal, excessive removal and/or thinning of in-channel vegetation, and pilot channel construction could reduce vegetation cover, pools and gravel beds, organic input from overhanging vegetation supporting aquatic productivity, and instream cover and debris providing micro-habitat. In addition, fish and aquatic organisms could be directly displaced. These impacts are temporary and reversible. Although impacts to aquatic habitat may be mitigated to insignificance on individual creeks, the impact remains cumulatively significant.

F. FINDINGS THAT CERTAIN IMPACTS ARE MITIGATED TO INSIGINIFICANCE BY CONDITIONS OF APPROVAL

The Final PEIR (01-EIR-01) identified several subject areas for which the project is considered to cause or contribute to significant, but mitigable environmental impacts. Each of the these impacts is discussed below along with the appropriate findings as per CEQA Section 15091:

1. Hydrology

Preventing a Build up of Channel Resistance May Increase Velocities. Channel resistance is reduced by brushing, mowing, spraying, and discing to remove obstructive and/or silt-trapping vegetation; and by removing storm debris and obstructive sandbars. These actions can result in higher velocities, which in turn could theoretically cause minor and localized channel degradation that contributes to bank erosion in the affected reach. To ensure that this impact is avoided under the current program, the District would conduct an "engineering analysis" to determine the need, nature, and extent of maintenance activities each year along maintained drainages, and give full consideration of incidental adverse hydraulic effects associated with channel maintenance. In addition, post

maintenance channel bed treatment would reduce this impact to a less than significant level.

Reduced Bank Stability due to Giant Reed Removal. Removal of large stands of Giant Reed could destabilize banks and result in increased local bank erosion and downstream sedimentation. Hydraulic impacts would be localized. Using the least invasive removal techniques and stabilizing the banks using biotechnical methods that include native plants would reduce this impact to a less than significant level.

Unintended Bank Erosion from Hard Bank Protection. Installation of hard bank protection could cause local bank erosion and channel bed degradation on the opposite banks due to increased flow velocities. Using biotechnical methods of bank stabilization to the maximum extent feasible would reduce this impact to a less than significant level.

Effect of Equipment on Channel Bed. For large maintenance projects, the movement of equipment in the channel bed can disrupt any armored layer on the channel bed and loosen sediments. It may also reduce the channel topographic diversity, which imparts a certain resistance to flow, thereby increasing flow velocities and sediment transport capacity. To ensure that this impact is avoided under the current program, the District would conduct an "engineering analysis" to determine the need, nature, and extent of maintenance activities each year along maintained drainages, and give full consideration of incidental adverse hydraulic effects associated with channel maintenance. In addition, post maintenance channel bed treatment would reduce this impact to a less than significant level.

2. Water Quality

Potentially Adverse Herbicide Concentrations. There is a potential for localized elevated concentrations of glyphosate in drainages due to excessive application of herbicides or poor application methods that result in overspray which would degrade water quality. Responsible application of herbicide, water quality monitoring, reporting water quality incidents, and reducing overall herbicide use would reduce this impact to a less than significant level.

Accidental Spills and Leaks. Accidental leakage or spill of fuel and/or oil from heavy equipment working within or directly adjacent to the watercourse or in a debris basin can cause discharge of pollutants to the creek, which would degrade water quality. Mixing and dispensing herbicides and equipment fueling outside the channel or basin, developing spill containment procedures, training field personnel and equipping all

field vehicles with appropriate spill containment materials would reduce this impact to a less than significant level.

3. Wetlands, Riparian Habitat, and Rare Plants

Remove Bank Habitat. The District may place "hard" bank protection (i.e., grouted rip-rap) to stabilize a severely eroded bank. Under the updated maintenance program, the use of hard bank protection would only be allowed if no other alternatives using biotechnical methods are available or feasible. Hard bank protection would be limited to 150' and the area impacted shall be mitigated at a 2:1 ratio. These mitigation measures would reduce this impact to a less than significant level.

Access Ramp Habitat Impacts. Construction or maintenance of access ramps could temporarily reduce the amount of riparian habitat. The distance between access ramps shall be minimized and placed in areas with minimum potential for erosion. Ramps shall be sited, constructed and maintained in a manner that minimizes disturbance to flora and fauna. Ramps shall be removed if unneeded. Infrequently used ramps shall be seeded. These mitigation measures would reduce this impact to a less than significant level.

Temporary Habitat Disturbance. Disturbance of channel banks and bed from heavy equipment during channel shaping, placement of bank protection, desilting operations, ramp construction, and repair of bank protection and grade stabilizers could temporarily remove wetland, riparian and aquatic habitats in work areas. These areas shall be restored with native plants after maintenance is completed. This mitigation measure would reduce this impact to a less than significant level.

Displace Sensitive Plants. Disturbance of channel banks and bed from heavy equipment during channel shaping, placement of bank protection, desilting operations, ramp construction, and repair of bank protection and grade stabilizers could remove regionally rare plant species. This same impact could occur due to clearing pilot channels and outlet works in debris basins, as well as removing sediments from basins. The District shall conduct pre-construction biological surveys to identify sensitive plant and animal species. The District shall modify maintenance activities to avoid sensitive species. If sensitive species cannot be avoided, they shall be relocated with the help of experts. All maintenance activities shall be monitored daily to ensure that sensitive species are avoided or protected to the maximum extent feasible. These mitigation measures would reduce this impact to a less than significant level.

4. Fish, Aquatic Species, and Wildlife

Displace Wildlife for Hard Bank Protection. Placement of "hard" bank stabilization without native vegetation would permanently reduce the amount of existing and future bank riparian vegetation. This action could also adversely affect nesting and foraging habitat for riparian-dependent bird species, as well as cover for riparian amphibians, reptiles, and mammals. The District shall provide compensatory habitat at a 2:1 ratio for impacts associated with hard bank protection. This mitigation measure would reduce this impact to a less than significant level.

Displace Wildlife for New Access Ramps. Construction or maintenance of access ramps could temporarily reduce the amount of riparian habitat. This action could adversely affect nesting, cover, and foraging habitat for riparian-dependent bird species, as well as cover for riparian amphibians, reptiles, and mammals. The District shall provide compensatory habitat for impacts associated with the construction of new access ramps. This mitigation measure would reduce this impact to a less than significant level.

Displace or Remove Sensitive Fish and Wildlife. Disturbance of channel banks and bed from heavy equipment during channel shaping, placement of bank protection, desilting operations, ramp construction, and repair of bank protection and grade stabilizers could remove and displace sensitive fish and wildlife species, depending upon location and time of year. This same impact could occur due to clearing pilot channels and outlet works in debris basins, as well as removing sediments from basins. The District shall conduct pre-construction biological surveys to identify sensitive plant and animal species. The District shall modify maintenance activities to avoid sensitive species. If sensitive species cannot be avoided, they shall be relocated with the help of experts. All maintenance activities shall be monitored daily to ensure that sensitive species are avoided or protected to the maximum extent feasible. The District shall also provide compensatory habitat for impacts associated with maintenance. These mitigation measures would reduce this impact to a less than significant level.

Fish and Wildlife Exposure to Herbicide There is a potential, albeit very remote, that adverse herbicide concentrations may be temporarily present in aquatic areas immediately after spraying due to excessive or poor application. Responsible application of herbicide, water quality monitoring, and reducing overall herbicide use would reduce this impact to a less than significant level.

Fish Passage Impacts from New Grade Stabilizers A new or reconstructed stabilizer could create a vertical drop, which may become a fish passage impediment or barrier over time, depending on the height of the vertical drop. The District shall repair existing or construct new grade stabilizers such that they do not create an impediment for fish. This mitigation measure would reduce this impact to a less than significant level.

5. Air Quality

Equipment Emissions. Temporary emissions of reactive organic compounds (ROC), particulate matter, and NOx associated with gasoline and diesel-powered heavy-duty maintenance equipment, as well as employee vehicles and trucks transporting excavated materials to and from maintenance sites. The District shall implement APCD approved measures for each piece of heavy duty diesel construction equipment to minimize NOx emissions. This mitigation measure would reduce this impact to a less than significant level.

Fugitive Dust Emissions. Temporary emissions of fugitive dust (particulate matter) due to earth moving activities during maintenance, including channel shaping, desilting, bank stabilization by placing fill or grading banks, bank protection construction or repair, pilot channel construction, and access ramp construction. The District shall implement the APCD's approved measures to minimize fugitive dust emissions. This mitigation measure would reduce this impact to a less than significant level.

6. Noise

Maintenance Equipment Noise. Maintenance activities that require the use of heavy equipment, such as channel shaping and desilting, could temporarily increase the ambient indoor and outdoor noise levels for noise-sensitive receptors located in close proximity to the watercourse where maintenance work is conducted. This impact would be limited to weekdays between 7:30 AM and 4:30 PM, with a limited duration of several days at any one location. In addition, maintenance equipment shall be equipped with properly functioning muffler systems and noisy operations shall be conducted as far as possible from sensitive receptors. These mitigation measures would reduce this impact to a less than significant level.

7. Cultural Resources

Disturb Cultural Resources. There is a remote potential for certain earth-disturbing maintenance activities to disturb buried prehistoric and historic archeological sites and isolated artifacts. This impact would occur only on undisturbed upland sites outside watercourse channels and basins due to incidental excavation grading banks for stabilization, installing or repairing bank protection, and constructing access ramps. The District shall consult with a qualified archaeologist if cultural materials are discovered during maintenance activities. In addition, the District shall conduct an archaeological investigation in areas that may be disturbed by excavation. These mitigation measures would reduce this impact to a less than significant level.

8. Recreation

Potentially Adverse Herbicide Concentrations. There is a potential for localized elevated concentrations of glyphosate in drainages due to excessive application of herbicides or poor application methods that result in overspray which would degrade water quality, and affect recreational users along creeks. Responsible application of herbicide would reduce this impact to a less than significant level.

Impacts of Reduced Sediment Supply to Beaches. Periodic removal of the sediments from the basins contributes to the reduction in overall sediment supply to local beaches. Suitable sediments removed from debris basins or other maintenance operations shall be disposed of at the beach. This mitigation measure would reduce this impact to a less than significant level.

9. Visual Resources

Visual Impacts in Channels. An adverse visual impact would occur if maintenance activities resulted in the removal of substantial amounts of riparian vegetation or very large specimen trees (such as oaks, sycamores) and/or substantially modifies the banks and bed of a watercourse such that the affected reach is clearly characterized as a man-altered landscape feature. The District shall minimize brushing in the channel bottom, minimize removal of bank vegetation, incorporate natural channel dimensions during channel reshaping, restore all temporarily disturbed areas with native riparian trees and shrubs, and use biotechnical methods with riparian vegetation for bank protection and repair, as feasible. These

mitigation measures would reduce this impact to a less than significant level.

Santa Ynez River

1. Water Resources

Equipment Leaks and Spills. Accidental leakage or spill of fuel and/or oil from the mowing equipment working within the channel can cause discharge of pollutants and degrade water quality. Equipment fueling or maintenance shall not occur within the river channel. Spill containment and clean-up procedures for vehicle fuels and oils shall be developed by the District. All field personnel shall be trained and all field vehicles shall be equipped with appropriate materials. These mitigation measures would reduce this impact to a less than significant level.

2. Wetlands, Riparian Habitat, and Rare Plants

Habitat Disturbance. Periodic disturbance to immature willow scrub due to mowing operations. The amount of such habitat disturbed during each maintenance event will not exceed 16 acres. The District has provided 18 acres of compensatory habitat within the City of Lompoc near the Santa Ynez River. The District shall remove giant reed and prevent colonization within the maintenance reach, subject to available resources. The District shall consider additional habitat restoration if opportunities arise along the river. Areas of mowing will be flagged and limited to the minimum necessary. Disturbance of the riverbed shall be minimized and maintenance staff shall be trained to avoid sensitive areas and environmental protection measures. These mitigation measures would reduce this impact to a less than significant level.

Disturbance to Wetlands. Mowing operations and accessing the river channel could in advertently disturb ponds and wetlands. No clearing shall occur within 25 feet of ponds and wetlands. Prior to clearing, District personnel shall place flagging, stakes, or other readily visible markers around ponds and wetlands to be avoided. This mitigation measure would reduce this impact to a less than significant level.

Access Ramp Habitat Impacts. Construction or maintenance of access ramps could temporarily reduce the amount of riparian habitat, which in turn could adversely affect nesting, cover, and foraging habitat for riparian-dependent bird species, as well as cover for riparian amphibians, reptiles, and mammals. After each mowing event, the access ramps shall be seeded with low-growing native grasses, herbs, and shrubs common to the river banks of the project reach to restore habitat after the mowing event. This mitigation measure would reduce this impact to a less than significant level.

Impacts to Rare Plants. Accessing the river channel with the crew and mower could potentially affect the regionally rare Lompoc figwort which occurs in woodland habitat along the river banks. The District biologist shall monitor clearing events located near sensitive species to avoid the areas or relocate the sensitive species. This mitigation measure would reduce this impact to a less than significant level.

3. Fish, Aquatic Species, and Wildlife

General Impacts to Wildlife. Mowing will temporarily displace wildlife that utilize immature willow scrub, and reduce the quality of the habitat. The District shall limit areas to be disturbed, avoid ponds and wetlands, as well as seasonal avoidance. These mitigation measures would reduce this impact to a less than significant level.

Displace or Disturb Sensitive Wildlife. Mowing operations and accessing the river channel could displace or disturb the California red-legged frog and the southwestern pond turtle. These species are residents in ponds and wetland areas of the river channel. Impacts to these species would be avoided. The willow flycatcher, least Bell's vireo, and various regionally rare riparian breeding birds are absent from the river during the work period. Periodic mowing of immature willow scrub would not adversely affect the quality of the habitat for these species. The District shall limit areas of disturbance, and avoid ponds and wetlands. In addition, the District shall conduct pre-construction biological surveys, monitor for sensitive species and do seasonal avoidance to protect sensitive species. These mitigation measures would reduce this impact to a less than significant level.

Disturbance to Migrating Steelhead. Mowing operations and accessing the river channel could displace or disturb steelhead if they are migrating through the project reach. The southern steelhead migrates upstream from December 1st through March 1st. Smolts migrate downstream to the lagoon or ocean during the period February through May. The mowing will be restricted to the period October through November. This mitigation measure will reduce this impact to a less than significant level.

Equipment Leaks and Spills, as it affects aquatic organisms and sensitive species (see Water Quality). Equipment fueling or maintenance shall not occur within the river channel. Spill containment and clean-up procedures for vehicle fuels and oils shall be developed by the District. All field personnel shall be trained and all field vehicles shall be equipped with appropriate materials. These mitigation measures would reduce this impact to a less than significant level.

G. CUMULATIVE EFFECTS

The Final PEIR identifies and summarizes cumulative impacts (Section 9.0) but does not classify any such impact area as significant and unavoidable. For purposes of these findings, it is presumed that any of the identified environmental effects which are classified as Class I on a site or project specific basis also have the potential to create significant, unavoidable cumulative effects in the various locations where maintenance is performed, and over time where performed repeatedly on the same site. Therefore, the Board also finds that the mitigation measures adopted herein on a project specific basis will mitigate the cumulative effects of the maintenance program to the maximum extent feasible.

H. FINDINGS THAT IDENTIFIED PROJECT ALTERNATIVES ARE NOT FEASIBLE

The Final PEIR, 01-EIR-01, prepared for the project evaluated the following alternatives; 1) No Maintenance Alternative, 2) Traditional Maintenance Alternative, 3) Current Maintenance (No Project) Alternative, and 4) the Proposed Project Alternative. The Proposed Project Alternative includes alternatives for the Santa Ynez River. Those alternatives include; SY-1) No Project Alternative, SY-2) Minimum (50' wide) Mowing Alternative, SY-3) Minor (75' wide) Mowing Alternative, SY-4) Proposed (100' wide) Mowing Alternative, and SY-5) Original (300' wide) Mowing Alternative.

The project alternatives have been screened based on the following criteria: 1) technical feasibility, 2) economic feasibility, 3) land and institutional considerations, 4) meeting the project objectives, and 5) environmental impacts.

1. No Maintenance Alternative

Under this alternative, the drainages and debris basins in the County would no longer be maintained on a routine basis. Instead, they would be repaired or reconstructed only after conditions arise in which there is an imminent and substantial threat to public facilities and infrastructure due to the following: (1) loss of channel conveyance because of debris dams, sediment accumulation, blocked culverts, bank failure, or landslides that will cause flood damage to public facilities and infrastructure; and (2) channel bed degradation or bank failure that threatens public facilities and infrastructure. No bank stabilization would occur after damaging floods unless public roads or infrastructure are threatened. No mowing would occur along the lower Santa Ynez River.

This alternative is included per the requirements of CEQA. It does not meet the project objectives.

2. Traditional Maintenance

Prior to 1992, the District conducted routine maintenance similar to the current program, except that the following procedures and actions were not included:

- The District generally cleared creek beds and banks with a dozer
- The District did not restore habitat to compensate for impacts to in-stream vegetation
- The District utilized a greater volume of herbicide and treated a larger area
- The District did not have a staff biologist assigned to conduct pre-maintenance surveys, to monitor certain maintenance work, to capture and relocate sensitive species at work sites, and to conduct habitat restoration. The District addressed biological issues in a more *ad hoc* manner rather than in a systematic manner.

This alternative is included for information purposes only. It does not meet the project objectives, as described in Section 2.2.

3. Current Maintenance

The current program was approved in 1992. It includes environmental protection through the use of SMPs, and the preparation of Annual Plans for maintenance and their associated CEQA compliance. This program has been successfully implemented for nine years. It does not include the following key elements of the proposed updated program: (1) an off-site habitat restoration option at the Los Carneros Mitigation Bank; (2) full consideration of incidental hydraulic impacts when determining maintenance needs; (3) new analytic tools for assessing channel conditions; (4) inclusion of the Santa Ynez River maintenance project; (5) accounting for impact acreage, as well as habitat values and functions; and (6) consideration of alternative bank protection methods.

4. Proposed Project

The Proposed Project Alternative contains 5 alternatives for the Santa Ynez River.

SY-1 No Project Alternative

Under this alternative, maintenance mowing along the lower Santa Ynez River would not occur under any circumstances.

SY-2 Minimum Mowing Alternative

Under this alternative, the District would mow vegetation in the river channel with the objective of creating a 50-foot wide cleared zone, using the same methods as the proposed project. However, the District would not mow more than 8 acres. All other elements of the proposed project would be the same, including the environmental protection measures (see Section 3.0), and the mitigation measures (see Section 6.0).

SY-3 Minor Mowing Alternative

Under this alternative, the District would mow vegetation in the river channel with the objective of creating a 50-foot wide cleared zone, using the same methods as the proposed project. However, the District would not mow more than 12 acres. All other elements of the proposed project would be the same, including the environmental protection measures (see Section 3.0), and the mitigation measures (see Section 6.0).

SY-4 Moderate Mowing (Proposed Project)

Under this alternative, the District would mow vegetation in the river channel with the objective of creating a 100-foot wide cleared zone, using the same methods as the proposed project. However, the District would mow no more than 16 acres, subject to limitations described in Section 3.3.2: (1) no more than 20 percent of the project reach would have a 100-foot wide mowed swath in any given maintenance year; and (2) after conducting maintenance along the river, no additional maintenance would occur along the same reaches for three years.

SY-5 Original Mowing Alternative

Under this alternative, the District would mow up to 125 acres of riparian vegetation from the river channel and connect it to the current open areas (estimated to be about 38 acres) to establish a continuous 300-foot wide cleared zone. All other elements of the proposed project would be the same, including the environmental protection measures (see Section 3.0), and most of the mitigation measures (see Section 6.0). This alternative would not include

restoration of offsite habitat that would fully mitigate for the periodic disturbance of 125 acres. The District first proposed a channel maintenance project on the lower Santa Ynez River in 1990. That project consisted of a 300-foot wide cleared zone. The District was unable to find suitable and available off site locations for full habitat mitigation. Despite repeated attempts from 1990-1994, the District could not develop a feasible and complete habitat mitigation proposal.

Summary of Santa Ynez River Alternatives

- The Minimum and Minor Mowing Alternatives would result in less environmental impacts than the proposed project. However, they would not provide a suitable level of flood protection deemed necessary and reasonable by the District, and established by recent, previous clearing events. Hence, they are considered undesirable, although they still represent feasible alternatives.

- The No Project Alternative would result in greater environmental impacts than the proposed project due to the damaging effects of flooding on prime farmlands and on mature riparian woodland on the riverbanks. This alternative would not meet the District's objectives, and is considered infeasible and undesirable.

- The Original Mowing Alternative would cause substantially greater impacts than the proposed project, including several potentially significant, unmitigable habitat impacts.

Based on the above analyses, the environmentally superior alternative is the Minor Mowing Alternative. However, it is not considered desirable as it does not substantially meet the project objectives.

Summary

The alternatives to the proposed maintenance program would not avoid or reduce the significant unmitigable impacts (Class I) associated with the proposed updated maintenance program, with the exception of the No Maintenance Alternative.

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The Traditional Maintenance and the Current Maintenance alternatives would have new and additional significant impacts compared to the

proposed project, resulting in an overall greater number and magnitude of environmental impacts.

The No Maintenance Alternative would not meet the basic project objectives to reduce flooding hazards and protect public infrastructure through preventative maintenance, rather than through emergency responses. This alternative would also have severe environmental impacts of increased flooding and bank erosion.

The No Maintenance Alternative would lessen most of the significant, but mitigable impacts (Class II) of the proposed project. The Traditional Maintenance and the Current Maintenance alternatives would not substantially lessen the Class II impacts of the proposed project.

The No Maintenance Alternative is not considered feasible by the District because it would not meet the District's project objectives. The Traditional Maintenance Alternative is not considered feasible because it would have greater environmental impacts that can be avoided, and would most likely not be permitted by the state and federal resource agencies.

Based on the above analyses, the environmentally superior alternative is the proposed Updated Routine Maintenance Program (Proposed Project).

I. STATEMENT OF OVERRIDING CONSIDERATIONS

The Final PEIR, 01-EIR-01, identifies impacts to Water Quality; Wetlands, Riparian Habitat, and Rare Plants; and Fish, Aquatic Species, and Wildlife as significant environmental impacts which are considered unavoidable. Having balanced the benefits of the project against its significant and unavoidable effects, the Board of Directors hereby determines that the project's unavoidable impacts are acceptable in light of the project's benefits. Each benefit set forth below constitutes an overriding consideration warranting approval of the project, independent of the other benefits, despite each and every unavoidable impact. Pursuant to CEQA Sections 15043, 15092, and 15093, any remaining significant effects on the environment are acceptable due to these overriding considerations:

By approving the Proposed Project, the Board of Directors has adopted the Environmentally Superior Alternative. Class I impacts have been identified for Water Quality; Wetlands, Riparian Habitat, and Rare Plants; and Fish, Aquatic Species, and Wildlife. These Class I impacts would be mitigated to the maximum extent feasible by the measures outlined in Section 5.1.3, 5.2.3, and 5.3.3.

There are over 260 miles of major channels, improved and unimproved, operated and maintained by the District in Santa Barbara County. These channels perform two functions: they carry the enormous peak runoff from the hills and uplands safely through the developed communities in the valleys and coastal plains; and they provide an outlet for extensive urban drainage systems that extend throughout the County's urbanized areas.

Existing Flood Control District facilities cannot be left unattended or unmaintained if they are to continue to protect life and property. It is estimated that it would cost over $200 million to replace the District's maintained facilities. For example, failure to maintain the 37 debris, siltation, and retention basins constructed in the County will cause large amounts of debris to be passed downstream, creating a significant potential for channel plugging and flooding. Additional flooding occurs as channel vegetation, particularly along the invert of a creek, becomes dense. These channels must be maintained to control vegetation growth. The County's transportation, utility, and communication systems as well as community planning and residential subdivisions have been designed based on flood protection criteria which are in turn based on vegetation control of the creek beds. Failure to control vegetation exposes county residents to significantly more damage in storm events due to flooding and erosion.

The Board recognizes the need to balance flood control mandates which are necessary for the protection of life and property against protection of environmental resources. The mitigation measures and Annual Plan process eliminate or significantly reduce a large number of environmental impacts associated with performance of flood control maintenance activities. The Board finds that the alternative adopted (Proposed Project) mitigates environmental effects to the maximum extent feasible when weighed against legal, technical, social, and economic mandates relative to flood control protection.

The Board therefore finds that the remaining unavoidable significant environmental effects are acceptable.