COUNTY OF SANTA BARBARA
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Revised Final Mitigated Negative Declaration

Frampton Lot Line Adjustment & Recorded Map Modification

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1.0 REQUEST/PROJECT DESCRIPTION

The proposed project is a request for a Lot Line Adjustment (LLA – 19LLA-00000-00003) & Recorded Map Modification (RMM – 19RMM-00000-00001) to adjust the property lines and modify the building and development envelopes between two lots for future residential development. No structural development is currently proposed. The size of the lots would not change from 2.0 and 10.67 acres but the lot lines and building/development envelopes would change. The building envelopes identify the location of future structures, construction storage and staging, while allowing other uses such as grading, utilities, paving, etc. to occur outside the building envelopes. The development envelopes identify the location of site preparation, ground disturbances and construction activities including those for structures, access, easements, subsurface grading, sewage disposal, and drainage components. No ground disturbance, including (a) grading; (b) vegetation removal unless required by the Carpinteria-Summerland Fire Protection District or approved as part of the Fire Fuel Management and Habitat Improvement Plan; (c) ornamental, non-native landscaping; or (d) development, is allowed outside the development envelopes, except paving and utilities required for driveway access to serve the development envelopes. Lot A, which is 2.0 acres and currently has building/development envelopes of 0.29 and 0.04 acres, respectively, would have new envelopes of 0.45 and 0.28 acres. Lot B, which is 10.67 acres and currently has building/development envelopes of 0.37 and 0.12 acres, respectively, would have new envelopes of 0.60 and 0.40 acres. The existing and proposed envelopes are in the same general location on the parcels and the envelopes have been designed to avoid slopes in excess of 30% while the majority of the slopes within the envelopes are less than 20%. Future development of the lots would be served by the Montecito Water District, private onsite wastewater treatment systems, and the Carpinteria-Summerland Fire Protection District. Access to the site would be provided via Toro Canyon Road via two existing unpaved driveways. The properties involved include a 2-acre lot and a 10.67-acre lot both zoned 10-E-1 and shown as Assessor's Lot Numbers 155-230-017 and -018 located at 785 and 805 Toro Canyon Road, in the Toro Canyon Area, First Supervisorial District.

2.0 PROJECT LOCATION

The proposed project is located at 785 and 805 Toro Canyon Road (APNs 155-230-017 and -018), First Supervisorial District.

2.1 Site Information		
Comprehensive Plan Designation	Urban area, Residential with a 10-acre minimum lot size. (APN 155-230-017, -018)	
Zoning District, Ordinance	Land Use & Development Code, 10-E-1 (10-acre minimum lot size)	
Site Size	Lot A (APN 155-230-017): 2 acres gross, 1.94 net Lot B (APN 155-230-018): 10.67 acres gross, 10.34 net	
Present Use & Development	Vacant	
Surrounding Uses/Zoning	North: Residential, 10-E-1 South: Residential, 10-E-1 East: Vacant, RR-20 West: Residential, 10-E-1	
Access	Toro Canyon Road via two existing unpaved driveways	
Public Services	Water Supply	Montecito Water District
	Sewage:	Private onsite wastewater treatment systems
	Fire:	Carpinteria-Summerland Fire Protection District

3.0 ENVIRONMENTAL SETTING

3.1 PHYSICAL SETTING

The two lots are located on Toro Canyon Road approximately half a mile northeast of its intersection with East Valley Road in the foothills of the south slope of the Santa Ynez Mountains and in the upper watershed of Toro Canyon Creek at an elevation of approximately 845 feet above sea level.

Most of the property is characterized by steep slopes and the current Development Envelopes are in an area of the site with less than a 20 percent slope gradient. Lodo-Sespe complex soils cover the steeper portions of both lots. The lowest elevation portions of both lots, adjacent to Toro Canyon Road, are mapped as Todos clay loam. Toro Canyon Creek and its associated riparian vegetation runs along the east side of Toro Canyon Road, opposite the lots. Alluvial soils associated with this drainage do not occur on the subject lots. No substantial geologic hazards have been identified within the area of the property proposed for future development.

Two plant communities/wildlife habitats are predominant on the subject lots: non-native annual grassland and coastal sage scrub, along with small patches of native grassland and numerous native and non-native trees (coast live oak, eucalyptus, and ornamental trees). Vegetation present within the Envelopes consists primarily of weedy, non-native annual grassland. The 100-foot Fire Fuel Management Zones (FFMZ) on both lots extend into areas characterized as eucalyptus woodland with ruderal non-native grasses understory interspersed with coastal sage scrub vegetation that, although disturbed by previous road grading and tree removal, retains a high level of biological diversity that provides habitat for a number of special-status plants and animals. The initial biological assessment was conducted in January 2019 and vegetation within FFMZs was remapped based on a site visit in April 2019 to more accurately portray the distribution of plant communities at the height of growing season during an above-average rainfall year, and recent removal of dead eucalyptus trees from a portion of the FFMZ revealed little or no understory of coastal sage scrub as originally reported.

Vegetation Type	Biological Evaluation (January 2019)	Spring Evaluation (April 2019)
Coastal Sage Scrub (ESH)	29,445 sf (0.68 acres)	11,100 sf (0.25 acres)
Native Grasses (ESH)	2,110 sf (0.05 acres)	2,110 sf (0.05 acres)

Coast live oak trees are scattered throughout coastal sage scrub on both lots and occur as isolated trees or clumps along the eastern and northern portions of Lot 2. Numerous mature coast live oaks, eucalyptus, and other ornamental trees on both lots provide suitable roosting and possibly nesting habitat for raptors but a large number of eucalyptus trees are dead or dying due to the effects of drought and beetle infestation. These trees are not known roosts of Monarch butterflies. There is no designated Environmentally Sensitive Habitat within the area to be disturbed as part of the proposed project.

A Phase I archeological survey of the site was conducted and no cultural resources were discovered on the site (David Stone and Dustin Kay, March 1999). The nearest identified cultural resource site exists within half a mile of the property.

The site is currently vacant. A single family dwelling built in the 1890's and substantially altered in the 1970's and 1980's by the previous owners of the property was demolished in May 2004.

The nearby lots in the vicinity of the project property are developed with single family dwellings constructed on hillsides that flank the branches of Toro Canyon Creek.

3.2 ENVIRONMENTAL BASELINE

The environmental baseline from which the project's impacts are measured consists of the physical environmental conditions in the vicinity of the project, as described above.

4.0 POTENTIALLY SIGNIFICANT EFFECTS CHECKLIST

The following checklist indicates the potential level of impact and is defined as follows:

Potentially Significant Impact: A fair argument can be made, based on the substantial evidence in the file, that an effect may be significant.

Less Than Significant Impact with Mitigation: Incorporation of mitigation measures has reduced an effect from a Potentially Significant Impact to a Less Than Significant Impact.

Less Than Significant Impact: An impact is considered adverse but does not trigger a significance threshold.

No Impact: There is adequate support that the referenced information sources show that the impact simply does not apply to the subject 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.	Less than Signif. with Mitigation	Less Than Signif.	No 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 located approximately half a mile northeast of the intersection of Toro Canyon Road with East Valley Road, in a rural area bounded by a mix of low density residential development and open undeveloped land. Public views in this area are dominated by the Santa Ynez Mountains. Views of this site are limited to the immediate neighboring properties and from Toro Canyon Road.

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 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, d) The proposed project would not obstruct any scenic views given the location of the development envelopes relative to Toro Canyon Road. The project proposes to adjust the lot lines and expand the building/development envelopes on each lot within the vicinity of their current locations. The current envelopes are approximately 20 feet away from each other; the proposed envelopes would be approximately 50 feet apart. Potential visual impacts associated with future residential development would be the same. Given the sloping topography of the site, it is likely that future residences would be subject to Ridgeline/Hillside requirements, which would limit building heights to 25 feet. This would help to reduce the potential visual impacts associated with future residential development. However, if not sited or designed properly, future residential development could have the potential to create an aesthetically offensive view open to the public or result in visually incompatible structures. Future

development would be subject to review and approval by the South Board of Architectural Review (MM-Aest 04), which is responsible for ensuring that development is compatible with its built and natural surroundings. Together with proper design controls on building materials and colors (MM-Aest 06 & 07), the design review would ensure that visual impacts associated with future residential development are less than significant. Impacts would be less than significant with mitigation.

b) Development of the lots in their current shape and envelope configuration would be expected to have generally similar impacts in their proposed configuration in regards to visual character. The project proposes to adjust the lot lines between two lots and increase the building/development envelopes. Lot A which is 2.0 acres and currently has building/development envelopes of 0.29 and 0.04 acres, respectively, would have new envelopes of 0.45 and 0.28 acres. Lot B which is 10.67 acres and currently has building/development envelopes of 0.37 and 0.12 acres, respectively, would have new envelopes of 0.60 and 0.40 acres. The lots would remain the same size after the lot line adjustment while the building/development envelopes would increase within the vicinity of their existing locations. The site is located along a portion of Toro Canyon Road that is developed with single family dwellings and accessory structures east of the road before transitioning to undeveloped steep terrain. As such, development of homes within the project site would not substantially change the visual character of the area.

c) Given the location of the project site in a transition zone from low density residential development to undeveloped rural terrain, there is the potential for light and glare impacting the night sky if future lighting is not properly controlled. The application of standard lighting restrictions, as reviewed and approved by the South Board of Architectural Review (MM-Aest 10), would ensure that impacts with respect to glare and night lighting would be less than significant.

Cumulative Impacts: The implementation of the project is not anticipated to result in any substantial change in the aesthetic character of the area since public views of the project would be limited and it is expected that design review of future development would ensure that development is visually compatible with its surroundings. Further, the project does not increase the number of residential lots as compared to the existing lot configuration. Thus, the project would not cause a cumulatively considerable effect on aesthetics.

Mitigation and Residual Impact:
The following mitigation measures would reduce the project's aesthetic impacts to a less than significant level:

1. **Aest-04 BAR Required.** The Owner/Applicant shall obtain Board of Architectural Review (BAR) approval for project design. All project elements (e.g., design, scale, character, colors, materials and landscaping shall be compatible with vicinity development. **TIMING:** The Owner/Applicant shall submit architectural drawings of future residential development on each lot for review and shall obtain final SBAR approval prior to issuance of applicable Land Use Permits. Grading plans, if required, shall be submitted to P&D concurrent with or prior to SBAR plan filing. **MONITORING:** The Owner/Applicant shall demonstrate to P&D compliance monitoring staff that the project has been built consistent with approved SBAR design and landscape plans prior to Final Building Inspection Clearance.

2. **Aest-06 Building Materials.** Natural building materials and colors compatible with surrounding terrain (earth-tones and non-reflective paints) shall be used on exterior surfaces of all structures, including water tanks and fences. **PLAN REQUIREMENT**: Materials shall be denoted on building plans. **TIMING:** Structures shall be painted prior to Final Building Inspection Clearance. **MONITORING**: P&D compliance monitoring staff shall inspect prior to Final Building Inspection Clearance.

3. **Aest-07 Understories and Retaining Walls.** Understories and retaining walls higher than six (6) feet shall be in tones 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**: The Owner/Applicant shall submit retaining wall plans and vegetation screening plans to P&D for review and approval. **TIMING**: Plans shall be submitted prior to Issuance of the Land Use Permit; vegetation shall be installed prior to Final Building Inspection Clearance. **MONITORING:** P&D compliance monitoring staff shall check plans and ensure installation prior to Final Building Inspection Clearance.

4. **Aest-10 Lighting.** The Owner/Applicant 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 or onto the public roadway. The Owner/Applicant shall install timers or otherwise ensure lights are dimmed after 10 p.m. No lighting shall be allowed ~~along driveways or~~ outside designated building/development envelopes except at driveway entrances to demark entry and ~~the junction with the Lot 2 development envelope~~ driveway or road junctions to demark a change in direction. **PLAN REQUIREMENTS**: The Owner/Applicant shall develop a Lighting Plan for SBAR approval incorporating these requirements and showing locations and height of all exterior lighting fixtures with arrows showing the direction of light being cast by each fixture. **TIMING**: Lighting shall be installed in compliance with this measure prior to Final Building Inspection Clearance. **MONITORING:** P&D and/or BAR shall review a Lighting Plan for compliance with this measure prior to approval of a Land Use Permit for structures. P&D Permit Compliance staff shall inspect structures upon completion to ensure that exterior lighting fixtures have been installed consistent with their depiction on the final Lighting Plan.

With the incorporation of these measures, residual impacts would be less than significant.

4.2 AGRICULTURAL RESOURCES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No 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	

The project site does not contain a combination of acreage and/or soils which render the site an important agricultural resource. The site does not adjoin and/or will not impact any neighboring agricultural operations.

Mitigation and Residual Impact: No impacts are identified. No mitigations are necessary.

4.3a AIR QUALITY

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No 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		

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
b. The creation of objectionable smoke, ash or odors?				X	
c. Extensive dust generation?			X		

County Environmental Threshold:

Chapter 5 of the Santa Barbara County Environmental Thresholds and Guidelines Manual (as revised in 2018) addresses the subject of air quality. The thresholds provide that a proposed project will not have a significant impact on air quality if operation of the project will:

- emit (from all project sources, mobile and stationary), less than the daily trigger for offsets for any pollutant (currently 55 pounds per day for NOx and ROC, and 80 pounds per day for PM_{10});
- emit less than 25 pounds per day of oxides of nitrogen (NOx) or reactive organic compounds (ROC) from motor vehicle trips only;
- not cause or contribute to a violation of any California or National Ambient Air Quality Standard (except ozone);
- not exceed the APCD health risk public notification thresholds adopted by the APCD Board; and
- be consistent with the adopted federal and state Air Quality Plans.

No thresholds have been established for short-term impacts associated with construction activities. However, the County's Grading Ordinance requires standard dust control conditions for all projects involving grading activities. Long-term/operational emissions thresholds have been established to address mobile emissions (i.e., motor vehicle emissions) and stationary source emissions (i.e., stationary boilers, engines, and chemical or industrial processing operations that release pollutants).

Impact Discussion:

The project would not result in significant new vehicle emissions (i.e., new vehicular trips to or from the site would be fewer than 100). It would not involve new stationary sources (i.e., equipment, machinery, hazardous materials storage, industrial or chemical processing, etc.) that would increase the amount of pollutants released into the atmosphere. The project would also not generate additional smoke, ash, odors, or long term dust after construction. The project's contribution to global warming from the generation of greenhouse gases would be negligible.

a-c) Potential Air Quality Impacts

Short-Term Construction Impacts. The project is limited to a Lot Line Adjustment to adjust the property lines and modify the building and development envelopes between two lots for future residential development. No development is currently proposed. While the envelopes would increase in size, they do not expand into areas of the lot with slopes 30% or greater which would require additional grading in the future. Construction activities associated with future development would be expected to require some level of grading, but given that the slopes within the envelopes are predominantly less than 20%, future grading would be minimized. Earth moving operations at the project site would not have the potential to result in significant project-specific short-term emissions of fugitive dust and $PM_{10,}$ with the implementation of standard dust control measures that are required for all new development in the County.

Emissions of ozone precursors (NO_x and ROC) during construction associated with future development would result primarily from the on-site use of heavy earthmoving equipment. Due to the limited period of time that grading activities would occur on the project site, construction-related emissions of NO_x and ROC would not be significant on a project-specific or cumulative basis. However, due to the non-attainment status of the air basin for ozone, the project should implement measures recommended by the APCD to reduce construction-related emissions of ozone precursors to the extent feasible. Compliance with these measures is routinely required for all new development in the County.

Long-Term Operation Emissions. Long-term emissions are typically estimated using the CalEEMod computer model program. However, the proposed project of a Lot Line Adjustment and Recorded Map Modification and the eventual construction of two single family dwellings is below threshold levels for significant air quality impacts, pursuant to the screening table maintained by the Santa Barbara County APCD. Therefore, the proposed project would not have a potentially significant long-term impact on air quality.

Cumulative Impacts:

The County's Environmental Thresholds were developed, in part, to define the point at which a project's contribution to a regionally significant impact constitutes a significant effect at the project level.

In this instance, the project has been found not to exceed the significance criteria for air quality. Therefore, the project's contribution to regionally significant air pollutant emissions is not cumulatively considerable, and its cumulative effect is less than significant (Class III).

Mitigation and Residual Impact:

1. Implementation of standard conditions placed on future grading permits as implemented through Chapter 14 (Grading Ordinance) of the County Code, along with standard APCD conditions would ensure potential short-term dust and diesel emission impacts are less than significant. The project would not result in significant project-specific long-term air quality impacts. No further mitigation measures are required.

4.3b AIR QUALITY - GREENHOUSE GAS EMISSIONS

Greenhouse Gas Emissions - Will the project:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No 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: Greenhouse gases (GHG) 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) (California Health and Safety Code, § 38505(g)). These gases create a blanket around the earth that allows light to pass through but traps heat at the surface, preventing its escape into space. While this is a naturally occurring process known as "the greenhouse effect," human activities have accelerated the generation of GHG emissions above pre-industrial levels (U.S. Global Change Research Program 2018). The global mean surface temperature increased by approximately 1.8°F (1°C) in the past 80 years, and is likely to reach a 2.7°F (1.5°C) increase between 2030 and 2050 at current global emission rates (IPCC 2018).

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

The County of Santa Barbara's Final Environmental Impact Report for the Energy and Climate Action Plan (EIR) (PMC, 2015) and the *2016 Greenhouse Gas Emissions Inventory Update and Forecast* (County of Santa Barbara Long Range Planning Division, 2018) contain a detailed description of the proposed project's 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% of the total emissions, followed by the building energy (28%), agriculture (14%), off-road equipment (11%), and solid waste (9%) sectors (County of Santa Barbara Long Range Planning Division 2018).

The overabundance of GHG in the atmosphere has led to a warming of the earth and has the potential to substantially change the earth's climate system. More frequent and intense weather and climate-related events are expected to damage infrastructure, ecosystems, and social systems across the United States (U.S. Global Change Research Program 2018). California's Central Coast, including Santa Barbara County, will be affected by 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, Ruth 2018).

Global mean surface warming results from GHG emissions generated from many sources over time, rather than emissions generated by any one project (IPCC 2014). As defined in CEQA Guidelines Section 15355, and discussed in Section 15130, "'Cumulative impacts' refers to two or more individual effects which, when considered together, are considerable or which compound or increase other environmental impacts." Therefore, by definition, climate change under CEQA is a cumulative impact.

CEQA Guidelines Section 15064.4(b) states that a lead agency "should focus its analysis on the reasonably foreseeable incremental contribution of the project's [GHG] emissions to the effects of climate change." A project's individual contribution may appear small but may still be cumulatively considerable. Therefore, it is not appropriate to determine the significance of an individual project's GHG emissions by comparing against state, local, or global emission rates. Instead, the Governor's Office of Planning and Research recommends using an established or recommended threshold as one method of determining significance during CEQA analysis (OPR 2008, 2018). A 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)].

Environmental Threshold:

Santa Barbara County's Energy and Climate Action Plan (ECAP), adopted in 2015, is a GHG emission reduction plan. The County has been implementing the plan's emission reduction measures since 2016. However, the County is not projected to meet the 2020 GHG emission reduction goal contained within the plan, and the plan is going to be updated beginning in fiscal year 2019-2020. Therefore, at this time, a significance threshold is more appropriate for project-level GHG emission analysis, rather than tiering off the ECAP's Environmental Impact Report (EIR).

CEQA Guidelines Section 15064.4(a) states "A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project." CEQA Guidelines Section 15064.4(b) further states,

> A lead agency should consider the following factors, among others, when assessing the significance of impacts from greenhouse gas emissions on the environment:
>
> (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
>
> (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project…

The County of Santa Barbara does not have an adopted GHG emission significance threshold for sources other than industrial stationary sources. Therefore, significance thresholds from other California jurisdictions or agencies can be appropriately applied to land use projects within Santa Barbara County, as long as substantial evidence is provided to describe why the selected threshold is appropriate (CEQA Guidelines, § 15064.7(d)).

In 2012, San Luis Obispo County Air Pollution Control District (APCD) established an annual significance threshold of 1,150 metric tons of carbon dioxide equivalent ($MTCO_2e$/yr). This significance threshold is approximately equivalent to the operational GHG emissions associated with a 70-unit residential subdivision in an urban setting (49-unit rural development) or a 40,000 sq. ft. strip mall in an urban setting (San Luis Obispo County APCD 2012). Santa Barbara County selected the San Luis Obispo County APCD threshold of 1,150 $MTCO_2e$/yr as the most appropriate threshold to determine significance of cumulative impacts from GHG emissions for this proposed project. The rationale for applying the San Luis Obispo County APCD GHG emissions significance threshold is discussed below.

Threshold Applicability

- The threshold applies to GHG emissions that are not industrial stationary sources, but that are subject to discretionary approvals by the County, where the County is the CEQA lead agency.
- The threshold was developed to be consistent with Assembly Bill 32 (the California Global Warming Solutions Act of 2006), which established the State of California's 2020 GHG emissions reduction goal.
- The selected threshold considers GHG emissions comprehensively by measuring in annual metric tons of carbon dioxide equivalent.
- The threshold assessed historical and potential future land use development trends in San Luis Obispo County to establish the significance threshold. San Luis Obispo and Santa Barbara Counties have similar historical and potential future land use development trends.
- The threshold applies to GHG emissions from residential and commercial land use projects.
- The threshold assumes that construction emissions will be amortized over the life of a project and added to the operational emissions.
- The threshold does not apply to GHG that are emitted throughout the life cycle of products that a project may produce or consume.

Impact Discussion:

a, b) The proposed lot line adjustment and recorded map modification and eventual construction of new residences and appurtenant structures would not increase the residential density or type of use on site. Therefore, GHG emissions from direct, indirect, and mobile sources associated with the site would not substantially change, and would continue to be typical of a single-family residential land use. New development would be constructed to meet current Title 24 Building Code requirements for energy efficient construction and appliances. Typical construction equipment would be used during demolition and construction, and site disturbance would be commensurate with the type and size of this single-family residential project.

While climate change impacts cannot result from a particular project's greenhouse gas emissions, the project's incremental contribution of greenhouse gas emissions combined with all other sources of greenhouse gases may have a significant impact on global climate change. For this reason, a project's contribution to greenhouse gas emissions is analyzed below under "Cumulative Impacts."

Cumulative Impacts:

Since the project does not increase the number of residential lots, the proposed project's total greenhouse gas emissions would be less than the applicable threshold. Therefore, the project's incremental contribution to a cumulative effect is not cumulatively considerable and the project's greenhouse gas emissions will not have a significant impact on the environment (Class III).

Mitigation and Residual Impact:
Since the proposed project would not have a significant impact on the environment, no additional mitigation is necessary. Therefore, residual impacts would be less than significant.

References:

California Air Resources Board, *Climate Change Scoping Plan*, December 2008.
California Energy Commission, http://cal-adapt.org/tools/factsheet/, as accessed on August 31, 2015.

County of Santa Barbara Long Range Planning Division, *Energy and Climate Action Plan*, May 2015.

County of Santa Barbara Long Range Planning Division, *Planner's Step-by-Step Guide for Evaluating Greenhouse Gas Emissions*, July 2015.

County of Santa Barbara Planning and Development, *Environmental Thresholds and Guidelines Manual*, October 2008 (Revised July 2015).

PMC, *Final Environmental Impact Report for the Energy and Climate Action Plan*, May 2015.

Santa Barbara County Association of Governments, *Santa Barbara County Regional Growth Forecast 2005-2040*, August 2007.

U.S. Environmental Protection Agency, *Inventory of U.S. Greenhouse Gasses and Sinks: 1990-2011*, April 2013.

4.4 BIOLOGICAL RESOURCES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No 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			

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
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 Plant and Animal Communities/Conditions:

Background and Methods:

Santa Barbara County has a wide diversity of habitat types, including chaparral, oak woodlands, wetlands, and beach dunes. These are complex ecosystems and many factors are involved in assessing the value of the resources and the significance of project impacts. For this project, three site visits were conducted: on November 28, 2018 to familiarize the biologist with the site and the proposed building and development envelopes; on December 10, 2018 to evaluate the lots for special-status and unregulated wildlife, characterize existing conditions and land use, and to map vegetation in order to determine potential impacts on such impacts, if necessary; and on April 4, 2019 to update and more accurately portray the distribution of plant communities, particularly coastal sage scrub (ESH), at the height of the growing season during an above-average rainfall year and because recent removal of dead eucalyptus trees and duff (bark, branches, leaves) from a portion of the Fire Fuel Management Zone (FFMZ) revealed little or no understory of coastal sage scrub, as originally reported in the Biological Evaluation prepared by Hunt & Associates. Please see Attachments 2 & 3 for the Biological Evaluation and Spring Update reports. The following analysis is based on this information.

Flora:
The 12.2-acre site consists primarily of non-native annual grassland and highly disturbed coastal sage scrub. Coast live oak trees are scattered throughout the coastal sage scrub on both lots and occur as isolated trees or clumps of trees interspersed with blue gum eucalyptus trees along the eastern and northern portions of Lot 2. Coastal sage scrub habitat on Lots 1 and 2 are thoroughly infested with dead and dying eucalyptus trees and other non-native trees, as well as non-native grasses. These invasive species are degrading the value of this habitat for native plants and wildlife. Small patches of native grassland, totaling approximately 0.05 acres, exist outside of the proposed development envelopes on Lot 2. The California Department of Fish & Wildlife indicates that the following special status plants have the potential to occur in the area: Santa Barbara locoweed, White-veined monardella, South Coast branching phacelia, Michael's rein orchid, Sonoran maiden fern, Plummer's baccharis, Long-spined spineflower, Mesa horkelia, Santa Barbara bedstraw, Santa Barbara honeysuckle, South Coast Range morning-glory, Nuttall's scrub oak, Hoffmann's gooseberry, and Humboldt lily. The site contains Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*), a California Native Plant Society (CNPS) List 1B species (rare, threatened, or endangered in California and elsewhere), which is scattered throughout coastal sage scrub habitat on Lot 2, and as individual plants north of the development envelope on Lot 2.

Fauna:
The proposed Building and Development Envelopes on both lots have limited value as habitat for plants and animals because they are vegetated with weedy, non-native annual grassland. Special status wildlife species expected to inhabit the project region include: Monarch butterfly, Shoulderband snails, South Coast newt, California red-legged frog, California legless lizard, Two-striped garter snake, White-tailed kite, Cooper's hawk, Sharp-skinned hawk, Allen's hummingbird, Pacific slope flycatcher, Redbat, San Diego desert

woodrat, American badger, Ringtail, and Mountain lion. No special-species wildlife were observed during the site visits but a number of species may occur based on the presence of suitable habitat on-site and known observations in the vicinity of the project site.

Thresholds:
Santa Barbara County's Environmental Thresholds and Guidelines Manual (2008) includes guidelines for the assessment of biological resource impacts. The following thresholds are applicable to this project:

Native Grasslands: In general, project created 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 one-quarter (1/4) acre in size. The grassland must contain at least 10 percent relative cover of native grassland species (based on a sample unit). Impacts to patch areas less than one-quarter 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 created 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 created impacts may be considered significant due to the loss of 10% or more of the trees of biological value on a project site.

Other Rare Habitat Types: The 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-d) Based on the biological surveys conducted within the subject lots, no sensitive plant species are located within the proposed envelopes. In addition, the envelopes are comprised primarily of non-native annual grassland. No ESH occurs within the proposed building or development envelopes; ESH is only found within the FFMZs. Therefore, grading and construction associated with future residential development would not be expected to impact these species. However, fire fuel management practices associated with future residential development on Lot 2 could disturb or eliminate at least 420 square feet of Santa Barbara honeysuckle, a species that is classified as rare, threatened, or endangered in California and elsewhere by the California Native Plant Society and California Department of Fish and Wildlife, in the northeastern corner within the 100-foot fire fuel management zone (FFMZ). In addition, fuel management practices that are indiscriminately applied within the FFMZ on Lot 1 and Lot 2 could impact disturbed coastal sage scrub within a 0.68-acre area, and up to 2,110 square feet (0.05-acres) of native needle grass that appears to meet the criteria for classification as 'native grassland'. Both of these habitats are listed as Environmentally Sensitive Habitat (ESH) by the County of Santa Barbara and by the California Department of Fish and Wildlife, because they support high biodiversity, including a number of special-status species. Policy BIO-TC-1 of the Toro Canyon Plan requires mitigating impacts to ESH at a 3:1 ratio, which equals approximately 2.04 acres of coastal sage scrub and 0.15 acres of native grassland. There is more than enough disturbed coastal sage scrub and areas suitable for native grassland colonization on Lot 2 to meet the 3:1 mitigation requirement. The following mitigation measures would be incorporated into the project to address the possibility of indirect impacts to flora: mapping species occurrence on plans (MM Bio-1a), limiting work areas (MM Bio-1b), avoiding species during Fire Fuel Management activities (MM Bio-1c), delineating the FFMZs (MM Bio-2a),

implementation of a Fire Fuel Management and Habitat Improvement Plan (MM Bio-2b), and a native landscaping plan (MM Bio-2c).

f, k) The site was previously developed with a single family dwelling, which was demolished in May 2004, and was therefore already exposed to herbicides, pesticides, animal life, human habitation, non-native plants, and other factors normally associated with a single family dwelling. Additionally, the proposed project is limited to a Lot Line Adjustment and modification of development envelopes. As such, the number of residential lots and amount of future residential development would not change as a result of the proposed project. Impacts are less than significant.

e) Future development of the two lots could remove or damage mature coast live oak trees. All oaks were observed outside of the building envelopes but within the development envelope and FFMZs. Nine oaks are located within the development envelopes and an additional eight within the FFMZs. Therefore, 17 oaks are subject to possible impact or removal due to landscaping or fire fuel management practices if not properly regulated, though normally individual oak trees are permitted to remain within fuel management areas if properly cleared of dead limbs. Implementation of MM Bio-2b would reduce any potential impacts to mature trees to less than significant levels.

h-j) No special-status wildlife were observed during the site visits but a number of species may occur there based on the presence of suitable habitat on-site and known observations in the vicinity of the project site. Construction and/or landscaping associated with future residential development could destroy a large big-eared woodrat (*Neotoma macrotis)* nest located in the southeast corner of Lot 2 outside of the envelope. The nests of this native mouse provides suitable microhabitat for a number of special-status wildlife species. Potentially significant impacts may arise from required fire fuel management practices. There are numerous coast live oak trees, eucalyptus trees, and other ornamental trees that may be used as foraging, roosting, and/or nesting habitat within and in close proximity to the project site. As such, future residential development could impact nesting birds if construction were to occur during the bird nesting season. However, no nests were reported during surveys completed in November 2018, December 2018, and April 2019, but the potential remains for nests to become established in the future. The following mitigation measures would be incorporated into the project to address the possibility of indirect impacts to wildlife: a pre-construction survey (MM Bio-4b), a tree survey (MM Bio-4a), and fencing of a woodrat nest (MM Bio-3). With implementation of these measures, indirect impacts would be less than significant.

Cumulative Impacts:

Mitigation identified below to address project-specific impacts associated with future residential development would ensure that the project, consisting of a Lot Line Adjustment and modification to the development and building envelopes of two lots, would not have a cumulatively considerable effect on the County's biological resources.

Mitigation and Residual Impact:

The following mitigation measures would reduce the project's biological resource impacts to a less than significant level:

1. **MM Bio-1a Map Species Occurrence on Construction Plans:** The location and extent of Santa Barbara honeysuckle, Nuttall's oak trees, California Walnut, chaparral, and coastal sage scrub shall be shown on all construction and landscaping plans and flagged for avoidance during construction and landscaping associated with future residential development. **PLAN REQUIREMENTS:** This measure shall be noted on all grading and building plans associated with future residential development. **TIMING:** Lots shall be resurveyed and location and extent of Santa Barbara honeysuckle, Nuttall's oak trees, California Walnut, chaparral, and coastal sage scrub shall be identified on all grading and landscape plans submitted to P&D associated with future residential development and shall be flagged prior to the pre-construction meeting. **MONITORING:** P&D processing planner shall ensure these areas are depicted on plans submitted to P&D prior to Land Use Permit approval. Permit Compliance staff and Grading and Building inspectors shall monitor throughout construction to ensure compliance and respond to complaints.

2. **MM BIO-1b Delimit Work Areas:** The limits of the Development Envelope and the 100-foot Fire Fuel Management Zone (FFMZ) around the Development Envelope shall be fenced with orange construction fencing prior to any ground disturbance. **PLAN REQUIREMENTS:** These limits shall be graphically depicted on all grading and building plans submitted to P&D for Land Use Permit approval for future residential development. **TIMING:** Fencing shall be installed prior to the pre-construction meeting. **MONITORING:** P&D processing planner shall ensure limits are depicted on plans prior to Land Use Permit approval. Permit Compliance staff and Grading and Building inspectors shall monitor throughout construction to ensure fencing remains in place.

3. **MM Bio-1c Species Avoidance During Fire Fuel Management Activities:** Because Santa Barbara honeysuckle, Nuttall's oak trees, California Walnut, chaparral, and coastal scrub patches are discrete and not distributed throughout the FFMZ on Lot 2, fire fuel management practices shall avoid removing ~~this~~ these native species. Santa Barbara honeysuckle, Nuttall's oak trees, California Walnut, chaparral, and coastal scrub stands shall be permanently staked or fenced for avoidance during vegetation management. **PLAN REQUIREMENTS:** Limits of 100-foot FFMZ shall be depicted on all plans submitted to P&D for Land Use Permit approval for future residential development. **TIMING:** Limits of 100-foot FFMZ shall be staked with rebar or other permanent markers in the field prior to the pre-construction meeting for individual lot development. **MONITORING:** Permit Compliance staff and Grading and Building inspectors shall monitor throughout construction to ensure Santa Barbara honeysuckle, Nuttall's oak trees, California Walnut, chaparral, and coastal sage scrub stands are permanently staked or fenced.

4. **MM Bio-2a Delineate FFMZs:** Prior to Land Use Permit issuance, the limits of the 100-foot fire fuel management zone on both lots shall be permanently marked with rebar or other metal stakes to delineate the zone during future fire fuel management activities. **PLAN REQUIREMENTS:** Limits of 100-foot FFMZ shall be depicted on all plans submitted to P&D for Land Use Permit approval for future residential development. **TIMING:** Limits of 100-foot FFMZ shall be staked with rebar or other permanent markers in the field prior to the pre-construction meeting. **MONITORING:** Permit Compliance staff and Grading and Building inspectors shall monitor throughout fire fuel management activities.

5. **MM Bio-2b Fire Fuel Management and Habitat Improvement Plan:** Prior to Land Use Permit Issuance, a qualified biologist shall prepare a Fire Fuel Management and Habitat Improvement Plan that specifically addresses the methods to be used to protect ESH (coastal sage scrub habitat, Santa Barbara honeysuckle, Nuttall's oaks, California walnut trees, and native grassland) within the FFMZ and throughout the remainder of the property outside the Development Envelopes during fire fuel management operations. The Plan shall address how native vegetation within the FFMZs and throughout the remainder of the property outside the Development Envelopes on both lots will be modified, methods and measures to be implemented to selectively remove and control the spread of invasive, non-native grasses and shrubs, and selective removal of dead and dying non-native trees. Plan goals shall balance maximizing habitat values with fire safety.

The Plan shall include procedures for improving the quality of chaparral and coastal sage scrub habitat by removal and control of non-native grasses and shrubs and selective removal of dead and dying eucalyptus and other non-native trees. Non-native vegetation shall be controlled so that native shrubs and trees can naturally recolonize these areas. The Plan shall contain the following elements:

- Specific recommendations on how to manage native vegetation within the 0-35 foot, 35-70 foot, and 70-100 foot fire fuel management zones. Vegetation management should balance fire safety with maintaining habitat quality for native plants and wildlife.
- Specific recommendations for the removal and control of eucalyptus trees in coastal sage scrub both within and outside of the FFMZs on both lots. Removal of these invasive, non-native species will greatly enhance native habitat quality. Eucalyptus should be cut at ground level and the stumps left in place to avoid unnecessary soil disturbance. Eucalyptus trunks should be scattered on-site to stabilize soils on steep slopes and to create valuable microhabitat for wildlife.

- Eucalyptus duff should be removed by hand (e.g. raking) in order to create sites where native coastal sage scrub shrubs and native trees (e.g. coast live oak) can re-colonize. These cleared areas should be monitored to eradicate and control invasive, non-native herbaceous vegetation.
- A qualified biologist should survey eucalyptus and other non-native trees to be removed for nesting birds, per standards developed by the California Department of Fish and Wildlife.
- Dead or dying coast live oaks that do not present a safety hazard should be left in place as nesting and roosting habitat for a variety of birds.
- The Plan should avoid unnecessarily degrading the occurrence or density of native grasses on any lot. Specifically, native grasses in the 0-30 ft zone and 30-100 ft zone should be mowed or weed-whipped, so that the root masses are not disturbed. Mowing or weed-whipping should only occur after the native grasses have set seed. Seed heads should be left on the ground to germinate.
- The Plan shall include a 5 year maintenance and monitoring period to ensure restoration of native vegetation outside the Development Envelopes as well as success criteria.

PLAN REQUIREMENTS AND TIMING: The Fire Fuel Management Plan shall be prepared and submitted to P&D and Carpinteria-Summerland Fire Protection District for review and approval prior to Land Use Permit Issuance. A Notice to Property Owner shall be recorded on each lot that includes the approved Fire Fuel Management Plan. The Plan shall be implemented consistent with the approved maintenance schedule and beginning with construction of initial infrastructure improvements or individual lot development, whichever occurs first. **MONITORING:** Permit Compliance staff shall site inspect to confirm compliance following the first year's fuel clearance activities. For years 2 through 5, conformance with the Fire Fuel Management Plan shall be demonstrated through the submittal of annual photo documentation by the Owner/Applicant or site visits as necessary at the discretion of the Permit Compliance staff. Compliance with the Fire Fuel Management shall be for the life of the project.

6. **MM Bio-2c Landscaping Species:** Landscaping plans shall use native, locally-occurring species where feasible. **PLAN REQUIREMENTS:** Prior to issuance of the Land Use Permit, a qualified biologist or certified landscape architect shall review the proposed species palette on all landscaping plans to ensure that native, locally-occurring species are incorporated into the landscaping plan and that the planting palettes do not include invasive, non-native species. **TIMING:** Landscaping plans shall be reviewed and approved by P&D and BAR, if applicable, prior to Land Use Permit Issuance. **MONITORING:** Permit Compliance staff shall ensure landscape plantings are installed according to plans prior to Final Building Inspection Clearance.

7. **MM-Bio-3 Woodrat Nest and California Walnut Trees:** Construction and/or landscaping could destroy a large woodrat nest and California Walnut Trees located in the southeast corner of Lot 2. The nests of this native mouse provides suitable microhabitat for a number of special-status wildlife species. If the nest or native California Walnut Trees can be avoided, ~~it~~they shall be surrounded with orange construction fencing for the duration of construction and landscaping under the supervision of a qualified biologist. If not, a qualified biologist shall be retained to dismantle the nest and capture and relocate all inhabitants to suitable habitat nearby. **PLAN REQUIREMENTS:** Woodrat nest and California Walnut Trees and pre-construction fencing shall be delineated on all plans. **TIMING:** A County-approved biologist shall conduct a pre-construction survey of both lots no more than one week prior to the pre-construction meeting to assess the woodrat nest and determine if construction fencing is required prior to any construction activities. **MONITORING:** Permit Compliance staff shall meet with the biologist at the pre-construction meeting and/or review construction fencing if required.

8. **MM Bio-4a Tree Survey:** To avoid disturbance of nesting and special status birds including raptorial species protected by the Federal Migratory Bird Treaty Act and Sections 3503, 3503.5, and 3513 of the California Fish and Game Code, proposed project activities, including, but not limited to, vegetation removal, ground disturbance, and construction shall occur outside of the bird breeding season (February 1 through August 15). If these activities must begin within the breeding season, then pre-construction surveys shall be conducted. The nesting bird pre-construction survey shall be conducted within the disturbance footprint and a 500-foot buffer as allowable without trespassing on private lands. The survey shall be conducted by a County-qualified biologist familiar with the identification of raptors and special status species

known to occur in Santa Barbara County using typical methods. If nests are found, a buffer ranging in size from 25 to 500 feet (25 feet for urban-adapted species such as Anna's hummingbird and California towhee and up to 500 feet for certain raptors) depending upon the species, the proposed work activity, and existing disturbances associated with land uses outside of the site, shall be determined and demarcated by the biologist with bright orange construction fencing, flagging, construction lathe, or other means to mark the boundary. All construction personnel shall be notified as to the existence of the buffer zone and to avoid entering the buffer zone during the nesting season. No ground disturbing activities shall occur within this buffer until the County-qualified biologist has confirmed that breeding/nesting is completed and the young have fledged the nest. Nesting birds surveys are not required for construction activities occurring between August 16 and February 1.

PLAN REQUIREMENTS AND TIMING. If vegetation removal, ground disturbance, or construction must begin within the breeding season, then the pre-construction survey shall be conducted no more than one week prior to commencing vegetation removal, grading, or construction activities. Active nests shall be monitored 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. Bird survey results shall be submitted to P&D for review and approval prior to commencing grading or construction activities. These requirements would be applied to initial infrastructure improvements as well as individual lot development.

MONITORING: P&D shall be given the name and contact information for the biologist prior to initiation of the pre-construction survey. Permit Compliance and P&D staff shall verify compliance in the field and perform site inspections throughout the grading and construction. P&D staff shall review the survey report(s) prior to commencement of grading.

9. **MM Bio-4b Pre-Construction Survey:** A qualified biologist shall conduct a pre-construction survey of both lots no more than one week prior to initial vegetation grubbing and shall monitor initial grubbing and grading to salvage wildlife disturbed by this activity. **PLAN REQUIREMENTS:** This requirement shall be printed on all plans. **TIMING:** A County-approved biologist shall survey the lots no more than one week prior to initial vegetation grubbing and the pre-construction meeting. **MONITORING:** The Owner/Applicant shall demonstrate to P&D compliance monitoring staff that a County-approved biologist conducted the survey no more than one week prior to construction commencement. Survey results shall be submitted to P&D compliance monitoring staff prior to the pre-construction meeting.

With the incorporation of these measures, residual impacts would be less than significant.

4.5 CULTURAL RESOURCES

Will the proposal:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No 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	

Will the proposal:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No Impact**	**Reviewed Under Previous Document**
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: 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 (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.				X	

County Environmental Thresholds: Chapter 8 of the Santa Barbara County Environmental Thresholds and Guidelines Manual (2008, revised February 27, 2018) 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 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 California Register of Historical Resources: (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 California Register of Historical Resources, or included in or eligible for inclusion in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1. 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 California Register of Historical Resources; (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 California Register of Historical Resources 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 (Weeks and Grimmer 1995), is generally considered as mitigated to a less than a significant impact level on the historical resource.

Existing Setting:
For at least the past 10,000 years, the area that is now Santa Barbara County has been inhabited by Chumash Indians and their ancestors. David Stone and Dustin Kay conducted a Phase 1 survey for the subject lots (March 1999). They did not locate any cultural resources. The nearest cultural resource is located approximately 2,500 feet to the south of the subject lots and consists of a low-density artifact concentration and possible temporary campsite. No cultural resources have been identified within the project boundaries.

As of the date of the Draft MND ~~To date~~, Santa Barbara County ~~has~~ had received one tribal request, from the Barbareño/Ventureño Band of Mission Indians, to participate in government-to-government consultation pursuant to Public Resources Code (PRC) Section 21080.3.1 and in accordance with the provisions of Assembly Bill (AB) 52. On December 10, 2019, P&D staff sent a formal notice of application completeness for the proposed project was sent to Julie Tumamait-Stenslie, Chair, Barbareño/Ventureño Band of Mission Indians. The notice provided notification of the opportunity for consultation under AB 52, and included a description of the proposed project and a copy of the Phase 1 study. No reply was received and no tribal cultural resources (TCRs) were identified on the subject lot.

In response to a comment letter on the Draft MND from the Native American Heritage Commission (NAHC), P&D conducted a Sacred Lands Search on April 13, 2020. NAHC reported a "positive" finding and provided a list of Native American representatives to contact for information. Notices of the Draft MND were sent to several of the representatives on this list and no response was received.

The two lots are currently vacant. In May 2004, the previous owners demolished the single family dwelling built in the 1890's and substantially altered in the 1970's and 1980's. According to a previous Phase 1 Cultural Historical Resources Report (Architectural Research Consultants, 1999), the structure did not constitute a significant historical resource based on a review of the County Cultural Resource Guidelines, primarily due to the substantial alterations to the building and the loss of its historical farming context on the site.

Impact Discussion:
a-d) As discussed above, no cultural resources were identified within or adjacent to the project area. As a result, the proposed project would not cause a substantial adverse change in the significance of any historical resource, cause a substantial adverse change in the significance of a prehistoric or historic archaeological resource, disturb any human remains, or cause a substantial adverse change in the significance of a tribal cultural resource. In order to comply with cultural resource policies, future development would be conditioned with a standard archaeological discovery clause which requires that any previously unidentified cultural resources discovered during site development are treated in accordance with the County's Cultural Resources Guidelines [Chapter 8 of the County's Environmental Thresholds and Guidelines Manual (rev.3/2018)]. Impacts would be less than significant.

Cumulative Impacts:

Since the project would not significantly impact cultural resources, it would not have a cumulatively considerable effect on the County's cultural resources.

Mitigation and Residual Impact:

The following condition, routinely applied to development projects, would ensure that future development on the subject lots would be consistent with County cultural resource protection polices:

1. **CulRes-09 Stop Work at Encounter.** The Owner/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 Owner/Applicant shall immediately contact P&D staff, and retain a P&D approved archaeologist and Native American representative to evaluate the significance of the find in compliance with the provisions of the County Archaeological Guidelines and conduct appropriate mitigation funded by the Owner/Applicant. PLAN REQUIREMENTS: This condition shall be printed on all building and grading plans. MONITORING: P&D permit processing planner shall check plans prior to Issuance of Grading or Building Permit and P&D compliance monitoring staff shall spot check in the field throughout grading and construction.

Residual impacts would be less than significant.

4.6 ENERGY

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No 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		

Impact Discussion: The County has not identified significance thresholds for electrical and/or natural gas service impacts (Thresholds and Guidelines Manual). Private electrical and natural gas utility companies provide service to customers in Central and Southern California, including the unincorporated areas of Santa Barbara County. The proposed project consists of a Lot Line Adjustment to adjust the lot lines between 2 existing lots and a Recorded Map Modification to adjust the existing building and development envelopes on the property that would eventually

be developed with single family residences on each. The proposed project would not increase the number of residentially developable lots. Energy use is estimated as follows:

Energy Use

Multiplier	Project Demand
Natural Gas (13.7 million BTU per capita[1])	82.2 million BTU per year (assuming household of 3, 2 households)
Electricity (7.4MWh/yr/home PG&E; 6.9 MWh/yr/home SCE)[2]	13.8 megawatt hours per year

In summary, the project would have a negligible effect on regional energy needs. No adverse impacts would result.

Cumulative Impacts:

The project's contribution to the regionally significant demand for energy is not considerable, and is therefore less than significant.

Mitigation and Residual Impact:

No mitigation is required. Residual impacts would be less than significant.

4.7 FIRE PROTECTION

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No 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:

The project site is served by the Carpinteria-Summerland Fire Protection District, but is outside of CSFPD's five-minute response zone. The nearest fire hydrant is located along Toro Canyon Road across from the southeast corner of the project site. The proposed Development Envelopes on the two lots would be readily accessed by two separate unpaved driveways off of Toro Canyon Road.

Like much of Toro Canyon, the site is located within a designated high fire hazard area. There is a probability that any new development on the proposed lots would be exposed to a wildfire. The steep topography, high fuel load, and frequency of "sundowner" winds create the potential for major wildfires. The threat to property and human safety would depend on the speed of the fire, location of the ignition point, and amount of traffic congestion during evacuation, as well as whether the fire occurs during a time when most people in the area

[1] http://apps1.eere.energy.gov/states/residential.cfm/state=CA#ng
[2] http://enduse.lbl.gov/info/LBNL-47992.pdf

are at home. Under the wrong set of environmental conditions, Toro Canyon could experience a firestorm event.

Fire protection in the area is constrained by emergency access and evacuation problems: The main access route, Toro Canyon Road, is narrow and winding, with limited or no shoulder width. The site itself is constrained by the high fuel load on portions of the property. However, no development is proposed at this time and the residential density would not increase as a result of this project since the project is limited to a lot line adjustment and minor modifications to the designated building and development envelopes.

In addition, the Proposed Final Environmental Impact Report for the Toro Canyon Plan has identified that the current ratio of one fire fighter per 2,900 residents is within an acceptable level of service, and that buildout of the Plan (831 additional residents) would not adversely affect the service ratio.

Impact Discussion:

a-e) The Carpinteria-Summerland Fire Protection District reviewed the project and requires no conditions except for new property addressing (Ed Foster, letter dated April 24, 2019). The proposed project does not increase the number of residential lots. Future residential development of the two lots would be required to comply with Fire District and Building Code requirements commonly applied to all new development in high fire hazard areas, including with respect to adequate access, construction with the use of fire resistant building materials and sprinkler systems, maintenance of defensible space requirements, and adequate water pressure and infrastructure (e.g. hydrants) for firefighting purposes. Compliance with these standard requirements associated with future residential development would ensure impacts remain less than significant.

Mitigation and Residual Impact:

Residual impacts to fire protection would be adverse but less than significant with compliance with standard Fire District and Building Code requirements applied to future residential development.

4.8 GEOLOGIC PROCESSES

Will the proposal result in:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No 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			

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
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	
k. Vibrations, from short-term construction or long-term operation, which may affect adjoining areas?				X	
l. Excessive spoils, tailings or over-burden?				X	

Threshold

Pursuant to the County's Adopted 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 PWD. Areas constrained by geology include lots 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% grade.

Impact Discussion:

a) Potential to Result in Geologic Hazards. The project site is not underlain by any known fault. Compliance with existing building regulations would ensure potential ground shaking impacts caused by movement along a distant fault are less than significant. Liquefaction potential in the area has been determined to be low based on seismic mapping completed by Moore and Taber June 1974. Any potential for expansive soils would be avoided by the use of non-expansive engineered fill. All soils-related hazards would be less than significant through the normal building permit review and inspection process.

b, i) Potential for Grading-Related Impacts. There is no development or grading proposed as part of this project. However, residential development is expected in the future and would potentially involve earthwork within the designated envelopes. However, the envelopes have been designed to avoid slopes in excess of 30% and the majority of the slopes within the envelopes are less than 20%. As such, future grading in these areas would likely have negligible impacts on the environment.

c) Exposure to Rising Sea Level. The project is located more than 2 miles north of the Pacific Ocean and would not be subject to sea level rise.

e, f) Potential Erosion and Sedimentation Impacts. Grading operations that would occur on the project site associated with future development would remove vegetative cover and disturb the ground surface, thereby increasing the potential for erosion and sedimentation impacts especially since Toro Canyon Creek is located

across the street from the subject parcels. However, the potential for the project to cause substantial erosion and sediment transport would be adequately mitigated by the County's standard erosion control and drainage requirements. Thus, impacts would be less than significant with mitigation.

d, g, h, j, k, l) Other Potential Geological Hazards. There are no unique geological features located on the project site based on a site visit. Septic systems proposed with future development would require review and approval from Environmental Health Services. The project would not involve mining, the loss of topsoil, or construction-related vibrations.

Cumulative Impacts:
Since the project would not result in significant geologic impacts after mitigation, and geologic impacts are typically localized in nature, it would not have a cumulatively considerable effect on geologic hazards within the County.

Mitigation and Residual Impact:

The following mitigation measures would reduce the project's geologic impacts to a less than significant level:

1. MM Geo-2 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 Storm Water Pollution Prevention Plan (SWPPP), Storm Water Management Plan (SWMP) and/or an Erosion and Sediment Control Plan (ESCP) shall be implemented as part of 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 Owner/Applicant shall submit the SWPPP, SWMP or ESCP) using Best Management Practices (BMP) designed to stabilize the site, protect natural watercourses/creeks, prevent erosion, convey storm water runoff to existing drainage systems keeping contaminants and sediments onsite. The SWPPP or ESCP shall be a part of the Grading Plan submittal and will be reviewed for its technical merits by P&D. Information on Erosion Control requirements can be found on the County web site re: Grading Ordinance Chapter 14 (http://sbcountyplanning.org/building/grading.cfm) refer to Erosion and Sediment Control Plan Requirements; and in the California Green Code for SWPPP (projects < 1 acre) and/or SWMP requirements. **PLAN REQUIREMENTS**: The grading and SWPPP, SWMP and/or ESCP shall be submitted for review and approved by P&D prior to approval of land use clearances. 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. **TIMING**: The SWPPP requirements shall be implemented prior to the commencement of grading and throughout the year. The ESCP/SWMP requirements shall be implemented between November 1st and April 15th of each year, except pollution control measures shall be implemented year round. **MONITORING**: P&D staff shall perform site inspections throughout the construction phase.

2. MM Geo-3 WatConv-03 Erosion and Sediment Control Revegetation. The Owner/Applicant shall re-vegetate graded areas upon within 30 days of completion of grading activities with deep rooted, native, drought-tolerant species to minimize slope failure and erosion potential. Use hydroseed, straw blankets, other geotextile binding fabrics or other P&D approved methods as necessary to hold slope soils until vegetation is established. P&D may require the reseeding of surfaces graded for the placement of structures if construction does not commence within 30 days of grading. **PLAN REQUIREMENTS:** Include this measure as a note on all grading and building plans. **TIMING:** The Owner/Applicant shall re-vegetate graded areas within 30 days of completion of grading activities. **MONITORING:** The Owner/Applicant shall demonstrate compliance to grading and building inspectors in the field.

With the incorporation of these measures, residual impacts would be less than significant.

4.9 HAZARDOUS MATERIALS/RISK OF UPSET

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No 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	

Impact Discussion:

There is no evidence that hazardous materials were used, stored or spilled on site in the past, 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.

Mitigation and Residual Impact: No impacts are identified. No mitigations are necessary.

Cumulative Impacts:
Since the project would not create significant impacts with respect to hazardous materials and/or risk of upset, it would not have a cumulatively considerable effect on safety within the County.

4.10 LAND USE

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No 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	

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
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	
i. An economic or social effect that would result in a physical change? (i.e. Closure of a freeway ramp results in isolation of an area, businesses located in the vicinity close, 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 the physical change would be significant.)				X	
j. Conflicts with adopted airport safety zones?				X	

Impact Discussion:

The proposed project does not cause a physical change that conflicts with adopted environmental policies or regulations. The project is not growth inducing, and does not result in the loss of affordable housing, loss of open space, or a significant displacement of people. The proposed project is limited to a Lot Line Adjustment and Recorded Map Modification with no development proposed. The project does not increase the number of residentially developed lots. Future development would be limited to allowed uses established in the 10-E-1 residential zone district and would be subject to consistency with applicable County policies with respect to resource protection and neighborhood compatibility. Given the location of the envelopes and scope of the project, there are no clear policy conflicts that would occur as a result of future residential development within the envelopes. The project does not involve the extension of a sewer trunk line, and does not conflict with any airport safety zones. The project is compatible with existing land uses.

Mitigation and Residual Impact: No impacts are identified. No mitigation is necessary.

4.11 NOISE

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No 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			

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
c. Project-generated substantial increase in the ambient noise levels for adjoining areas (either day or night)?				X	

Setting/Threshold: Noise is generally defined as unwanted or objectionable sound which is measured on a logarithmic scale and expressed in decibels (dB(A)). The duration of noise and the time period at which it occurs are important values in determining impacts on noise-sensitive land uses. The Community Noise Equivalent Level (CNEL) and Day-Night Average Level (L_{dn}) are noise indices which account for differences in intrusiveness between day- and night-time uses. County noise thresholds are: 1) 65 dB(A) CNEL maximum for exterior exposure, and 2) 45 dB(A) CNEL maximum for interior exposure of noise-sensitive uses. Noise-sensitive land uses include: residential dwellings; transient lodging; hospitals and other long-term care facilities; public or private educational facilities; libraries, churches; and places of public assembly.

The proposed project site is located outside of 65 dB(A) noise contours for roadways, public facilities, airport approach and take-off zones. Surrounding noise-sensitive uses consist of private residences.

Impact Discussion:

a, c) The proposed project consists of a lot line adjustment between two lots and a recorded map modification to adjust the building and development envelopes in those lots. The residential density of the lots would remain unchanged since each lot would still be potentially developed with a single family dwelling. Long-term noise generated onsite would not: 1) exceed County thresholds, or 2) substantially increase ambient noise levels in adjoining areas. Noise sensitive uses on the proposed project site would not be exposed to or impacted by off-site noise levels exceeding County thresholds. Impacts would be less than significant.

b) The proposed project would not result in construction activities generating short-term noise impacts exceeding County thresholds. Impacts would be less than significant. However, construction activities associated with future development may generate short-term noise exceeding County thresholds. There is existing residential development within 1,600 feet of the lot boundaries that may be sensitive to future short-term noise generating activities.

Cumulative Impacts:
The implementation of the project is not anticipated to result in any substantial noise effects. Therefore, the project would not contribute in a cumulatively considerable manner to noise impacts.

Mitigation and Residual Impact: The following mitigation measures would reduce the project's noise effects to a less than significant level:

1. **Noise-02 Construction Hours**. The Owner /Applicant, including all contractors and subcontractors shall limit construction activity, including equipment maintenance and site preparation, to the hours between 8:00 a.m. and 5:00 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) are not subject to these restrictions. Any subsequent amendment to the Comprehensive General 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:** The Owner/Applicant shall provide and post a sign stating these restrictions at all construction site entries. **TIMING**: Signs shall be posted prior to commencement of construction and maintained throughout construction. **MONITORING**: The Owner/Applicant shall demonstrate that required signs are posted prior to grading/building permit issuance and pre-construction meeting. Building inspectors and permit compliance staff shall spot check and respond to complaints.

With the incorporation of these measures, residual impacts would be less than significant.

4.12 PUBLIC FACILITIES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No 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	
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	

Impact Discussion:

a-c) The proposed project would result in the increase of two new homes and accessory structures within the area. A similar number of homes could be developed under the existing lot configuration. Thus, the Lot Line Adjustment and Recorded Map Modification 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. The proposed project would not generate solid waste in excess of County thresholds.

d) Future development on the subject lots would be served by private on-site wastewater systems. These septic systems proposed with future development would require review and approval from Environmental Health Services to ensure compliance with County regulations.

e) The proposed project would adjust the lot lines between two lots and modify the development envelopes while no construction is proposed. Future development within the new envelopes may create more impervious surfaces than the current lot configuration due to expanded envelopes. However, it is unclear at this time the amount of impervious surfaces that future development may propose and it would likely consist of a negligible increase compared to the current envelope configuration. No additional drainages or water quality control facilities would be necessary to serve the project. Therefore, the project would have no impact to public facilities.

Mitigation and Residual Impact: No impacts are identified. No mitigation is necessary.

4.13 RECREATION

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No 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	

Impact Discussion:

a, b) The proposed project site is not located on or near any established recreational uses, including biking, equestrian or hiking trails. No adverse impacts would result.

c) The proposed project, consisting of a Lot Line Adjustment and Recorded Map Modification, would not result in any population increase and would have no adverse impacts on the quality or quantity of existing recreational opportunities, either in the project vicinity or County-wide.

Mitigation and Residual Impact: No mitigation is required. Residual impacts would be less than significant.

Cumulative Impacts:

Since the project would not affect recreational resources, it would not have a cumulatively considerable effect on recreational resources within the County.

4.14 TRANSPORTATION/CIRCULATION

Will the proposal result in:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No 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?				X	
ingress/egress?				X	
general road capacity?				X	
emergency access?				X	
h. Impacts to Congestion Management Plan system?				X	

Impact Discussion:

The proposed project is limited to a Lot Line Adjustment and Recorded Map Modification and, as such, would not increase vehicular traffic to or from the site nor would it affect roadways; parking facilities; pedestrian, bicycle, or transit access; or any other type of transportation facility. A similar number of homes could be developed under the existing lot configuration.

Mitigation and Residual Impact: No mitigation is required. Residual impacts would be less than significant.

4.15 WATER RESOURCES/FLOODING

Will the proposal result in:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No Impact**	**Reviewed Under Previous Document**
a. Changes in currents, or the course or direction of water movements, in either marine or fresh waters?		X			

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
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	
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			

Water Resources Thresholds

A project is determined to 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 [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 is also deemed 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.

Water Quality Thresholds:
A significant water quality impact is presumed to occur if the project:

- Is located within an urbanized area of the county and the project construction or redevelopment individually or as a part of a larger common plan of development or sale would disturb one (1) or more acres of land;
- Increases the amount of impervious surfaces on a site by 25% 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 Regional Water Quality Control Board's (RWQCB) Basin Plan or otherwise impairs the beneficial uses[3] of a receiving water body;
- Results in a discharge of pollutants into an "impaired" water body that has been designated as such by the State Water Resources Control Board or the RWQCB under Section 303 (d) of the Federal Water Pollution Prevention and Control Act (i.e., the Clean Water Act); or
- Results in a discharge of pollutants of concern to a receiving water body, as identified by the RWQCB.

Impact Discussion

a, c) The project would not change the course or direction of water movements or change the amount of water in a surface water body.

b-d, l) Although there is no development proposed as part of this Lot Line Adjustment & Recorded Map Modification, the eventual residential development would create minor amounts of additional storm water runoff as a result of newly constructed impermeable surfaces (i.e. structures, driveways, patios, etc.). The Recorded Map Modification would slightly enlarge the building and development envelopes such that incrementally more development could be accommodated in the future. Construction activities such as grading could also potentially create temporary runoff and erosion problems. The project site is located adjacent to Toro Canyon Creek. In light of the known potential of construction sites to generate considerable sediment, trace metals, nutrients, oil and grease, pesticides, herbicides, and other synthetic organic compounds, potentially significant short term construction related impacts to water quality are anticipated. Future residential development would involve the use of fertilizers, pesticides, and household cleaners and chemicals that are typical for residential lots. Runoff from driveways could introduce oil and other hydrocarbons into drainage facilities. However, the project would be expected to generate only minor amounts of storm water pollutants, generally similar to what could potentially occur with residential development under the existing lot configuration. Minor amounts of such household hazardous material would not present a significant potential for release of waterborne pollutants and would be highly unlikely to create a public health hazard. Future development would be required to comply with applicable water quality control requirements under the County's NPDES regulations depending on the amount of new development

[3] Beneficial uses for Santa Barbara County are identified by the Regional Water Quality Control Board 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.

proposed. Application of standard County grading, erosion, and drainage-control measures would ensure that no significant increase of erosion or storm water runoff would occur.

e-f) The project is not located in any mapped flood plain or floodway. The development envelopes would be 90 to 100 feet from Toro Canyon Creek. Any structures on the site would be located at elevations more than 25 feet above the lowpoint (thalweg) of the creek. Flood hazards would be less than significant.

g-k) The project would be supplied water from Montecito Water District, which receives its water from the Montecito Groundwater Basin and the State Water Project. Since the volume of water extracted annually does not exceed its safe yield, this basin is not overdrafted. The proposed use of septic systems would contribute in an adverse but less than significant manner to regional degradation of groundwater quality.

Cumulative Impacts:

The County's Environmental Thresholds were developed, in part, to define the point at which a project's contribution to a regionally significant impact constitutes a significant effect at the project level. In this instance, the project has been found not to exceed the threshold of significance for water resources with the implementation of standard water quality measures. Therefore, the project's contribution to the regionally significant issues of water supplies and water quality is not considerable, and is less than significant.

Mitigation and Residual Impact:

The following mitigation measures applied to future residential development, along with MM Geo-2 (Erosion and Sediment Control Plan) and MM Geo-3 (Erosion and Sediment Control Revegetation), would reduce the project's water resource impacts to a less than significant level:

1. MM Wat-1 **WatConv-04 Equipment Storage-Construction**. The Owner/Applicant shall designate a construction equipment filling and storage area(s) within the designated development/building envelope to contain spills, facilitate clean-up and proper disposal and prevent contamination from discharging to the storm drains, street, drainage ditches, creeks, or wetlands. The areas shall be no larger than 50 x 50 foot unless otherwise approved by P&D and shall be located at least 100 feet from any storm drain, waterbody or sensitive biological resources. **PLAN REQUIREMENTS:** The Owner/Applicant shall designate the P&D approved location on all permits. **TIMING**: The Owner/Applicant shall install the area prior to commencement of construction. **MONITORING**: P&D compliance monitoring staff shall ensure compliance prior to and throughout construction.

2. MM Wat-2 **WatConv-05 Equipment Washout-Construction.** The Owner/Applicant shall designate a washout area(s) for the washing of concrete trucks, paint, equipment, or similar activities to prevent wash water from discharging to the storm drains, street, drainage ditches, creeks, or wetlands. Note that polluted water and materials shall be contained in this area and removed from the site as needed. The area shall be located at least 100 feet from any storm drain, waterbody or sensitive biological resources. **PLAN REQUIREMENTS:** The Owner/Applicant shall designate the P&D approved location on all permits. **TIMING:** The Owner/Applicant shall install the area prior to commencement of construction. **MONITORING**: P&D compliance monitoring staff shall ensure compliance prior to and throughout construction.

With the incorporation of these measures, residual impacts would be less than significant.

5.0 INFORMATION SOURCES

5.1 County Departments Consulted:

Police, Fire, Public Works, Flood Control, Parks, Environmental Health, Special Districts, Regional Programs, Other : _____

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:

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

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

The project would result in project-specific impacts that are significant but mitigable in the following issue areas: biological resources, geologic processes, noise, aesthetic/visual resources, fire protection, and water resources/flooding. The project would result in project-specific impacts that are less than significant in the following issue areas: air quality, cultural resources, energy, hazardous materials, land use, public facilities, recreation, and transportation/circulation. Mitigation measures applied to the project would ensure that the project would not result in any significant cumulative impacts.

7.0 MANDATORY FINDINGS OF SIGNIFICANCE

Will the proposal result in:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No 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.	Less than Signif. with Mitigation	Less Than Signif.	No 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. Project specific biological resource and water quality impacts would be mitigated to a less than significant level through mitigation measures, as discussed in Section 4.4 (Biological Resources), Section 4.7 (Fire Protection), Section 4.8 (Geological Processes), and Section 4.15 (Water Resources). Therefore, the project would not 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, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. As discussed in sections 4.3 (Air Quality), Section 4.6 (Energy) and Section 4.5 (Cultural Resources), the project would not contribute significantly to greenhouse gas emissions, to increased energy consumption, nor would it eliminate important examples of the major periods of California history or prehistory.

2. The project would not have the potential to achieve short-term to the disadvantage of long-term environmental goals, because proposed mitigation measures would reduce all potentially significant impacts to less than significant.

3. As discussed in the "cumulative impacts" section under each issue area of this document, the project would not result in any impacts which are cumulatively considerable.

4. The project does not result in environmental effects which would cause substantial adverse effects on human beings, either directly or indirectly. There is no excessive noise, no known or expected hazardous materials and no other factors associated with the project that would cause substantial adverse effects on human beings.

5. There is no known disagreement among experts regarding the projects impacts.

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

Coastal Plan Policies 2-1, 2-6, 3-13, 3-14, 3-15, 3-17, 3-18, 3-19, 4-7, 9-18, 9-35, 9-36, 9-37 and Coastal Act Policies 30231 and 30251.

9.0 RECOMMENDATION BY P&D STAFF

On the basis of the Initial Study, the staff of Planning and Development:

___ 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 a Mitigated ND. The Mitigated 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 _X_ Without Public Hearing

PREVIOUS DOCUMENT:

PROJECT EVALUATOR: **Travis Lee** **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**: _____

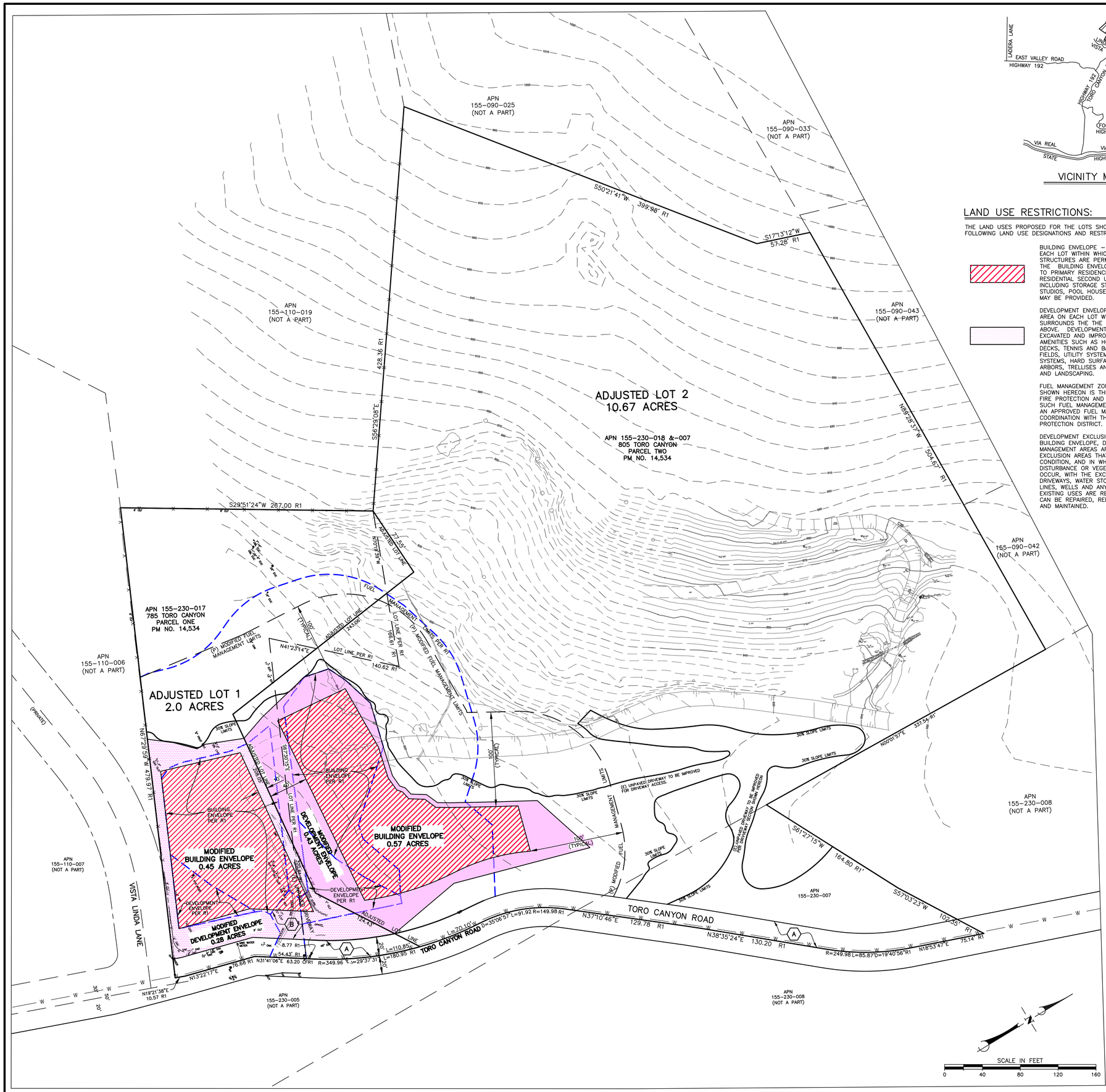
SIGNATURE:_____ **NEGATIVE DECLARATION DATE**:_____

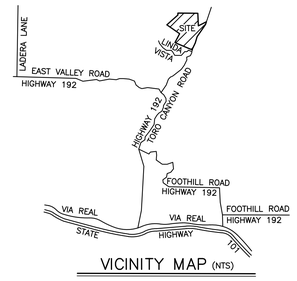
SIGNATURE:_____ **REVISION DATE:** _____

SIGNATURE: Alex Tuttle **FINAL NEGATIVE DECLARATION DATE:** 10/27/20

11.0 ATTACHMENTS

1. Vicinity Map/Site Plan
2. Biological Evaluation dated January 31, 2019
3. Biological Evaluation – Spring update
4. Draft MND Comment Letter - NAHC





VICINITY MAP (NTS)

LAND USE RESTRICTIONS:

THE LAND USES PROPOSED FOR THE LOTS SHOWN HEREON ARE SUBJECT TO THE FOLLOWING LAND USE DESIGNATIONS AND RESTRICTIONS:

BUILDING ENVELOPE – THE BUILDING ENVELOPE IS THE AREA ON EACH LOT WITHIN WHICH RESIDENTIAL PRIMARY AND ACCESSARY STRUCTURES ARE PERMITTED. PERMITTED STRUCTURES WITHIN THE BUILDING ENVELOPE MAY INCLUDE BUT ARE NOT LIMITED TO PRIMARY RESIDENCES, GARAGES, GUEST HOUSES OR RESIDENTIAL SECOND UNITS AND OTHER ACCESSORY STRUCTURES INCLUDING STORAGE STRUCTURES, HOBBY ROOMS, ARTIST STUDIOS, POOL HOUSES, CABANAS AND OTHER STRUCTURES AS MAY BE PROVIDED.

DEVELOPMENT ENVELOPE – THE DEVELOPMENT ENVELOPE IS THE AREA ON EACH LOT WHERE DEVELOPMENT CAN OCCUR, AND SURROUNDS THE THE BUILDING ENVELOPE AREA DESCRIBED ABOVE. DEVELOPMENT ENVELOPE AREAS MAY BE GRADED, EXCAVATED AND IMPROVED FOR NON-STRUCTURAL USES AND AMENITIES SUCH AS HOT TUBS, FENCES AND WALLS, PATIOS, DECKS, TENNIS AND BALL COURTS, SEPTIC TANKS AND LEACH FIELDS, UTILITY SYSTEMS AND INFRASTRUCTURE, IRRIGATION SYSTEMS, HARD SURFACED DRIVEWAYS, WALKS AND TRAILS, ARBORS, TRELLISES AND OTHER SIMILAR GARDEN ENHANCEMENTS AND LANDSCAPING.

FUEL MANAGEMENT ZONE – THE FUEL MANAGEMENT ZONE AS SHOWN HEREON IS THE AREA IN WHICH FUEL MANAGEMENT FOR FIRE PROTECTION AND SUPPRESSION PRACTICES CAN OCCUR. SUCH FUEL MANAGEMENT SHALL BE UNDERTAKEN PURSUANT TO AN APPROVED FUEL MANAGEMENT PLAN PREPARED IN COORDINATION WITH THE CARPINTERIA–SUMMERLAND FIRE PROTECTION DISTRICT.

DEVELOPMENT EXCLUSION AREAS – THE AREAS NOT DEFINED AS BUILDING ENVELOPE, DEVELOPMENT ENVELOPE, FUEL MANAGEMENT AREAS ARE RELEGATED AS DEVELOPMENT EXCLUSION AREAS THAT ARE TO BE LEFT IN AN UNDISTURBED CONDITION, AND IN WHICH NO DEVELOPMENT, GRADING, GROUND DISTURBANCE OR VEGETATION REMOVAL OF ANY KIND CAN OCCUR, WITH THE EXCEPTION OF EXISTING ACCESS ROADS, DRIVEWAYS, WATER STORAGE TANKS, INFRASTRUCTURE, PIPE LINES, WELLS AND ANY ALL OTHER SIMILAR USES. SUCH EXISTING USES ARE RESERVED RIGHTS TO THE LOT OWNER AND CAN BE REPAIRED, REPLACED, RENOVATED, REMOVED, UPGRADED AND MAINTAINED.

GENERAL NOTES

1. SUBDIVISION MAP ACT:

THIS MAP REPRESENTS A PROPOSED RECORD MAP MODIFICATION OF BUILDING AND DEVELOPMENT ENVELOPES, AND FUEL MANAGEMENT AREAS, AS DEPICTED AND APPROVED FOR PARCELS ONE AND TWO OF PARCEL MAP NO. 14,534, 57 PMB 64–66) PURSUANT TO THE PROVISIONS OF THE SUBDIVISION MAP ACT OF THE STATE OF CALIFORNIA, GOVERNMENT CODE SECTION 66412 (d) ET SEQ, AND SANTA BARBARA COUNTY CODE CHAPTER 21. CONCURRENTLY, A SEPARATE APPLICATION IS BEING PROCESSED FOR APPROVAL OF A LOT LINE ADJUSTMENT WHICH WILL RECONFIGURE BOUNDARY LINES OF SAID PARCELS ONE AND TWO IN A MANNER IN WHICH THE PROPOSED MODIFIED BUILDING AND DEVELOPMENT ENVELOPES WILL CONFORM TO STANDARDS AND POLICIES OF THE COUNTY LAND USE AND DEVELOPMENT CODE.

2. PROJECT ADDRESS: 785 TORO CANYON RD. (APN 155–230–017) & 805 TORO CAYON RD. (APN 155–230–007 & –018).

3. LEGAL DESCRIPTION: BEING PARCEL ONE (APN 155–230–017) AND PARCEL TWO (APN 155–230–007 & –018) OF PARCEL MAP NO. 14,534 AS SHOWN ON MAP RECORDED IN BOOK 57, PAGES 64–66 OF PARCEL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SANTA BARBARA COUNTY.

4. TOPOGRAPHIC INFORMATION:

TOPOGRAPHIC INFORMATION SHOWN HEREON IS BASED ON A COMBINATION OF AERIAL PHOTOGRAPHIC COMPILATIONS AND SUPPLEMENTAL FIELD SURVEYS PERFORMED BY L & P CONSULTANTS IN FEBRUARY 2019.

5. BOUNDARY INFORMATION:

BOUNDARY INFORMATION AS SHOWN AND DEPICTED HEREON IS COMPILED FROM RECORD BOUNDARY DOCUMENTS AND MAPS, AND IS BASED UPON FIELD SURVEY LOCATIONS OF RECORD BOUNDARY MONUMENTS.

6. ZONING & LAND USE DESIGNATIONS:

EXISTING ZONING: 10–E–1 (SINGLE FAMILY RESIDENTIAL, 10 ACRES MINIMUM PARCEL SIZE)

EXISTING LAND USE: INNER RURAL, RESIDENTIAL SRR 0.1 (0.1 UNITS/ACRE, 10 ACRE MINIMUM PARCEL SIZE)

7. STREET AND DRIVEWAY ACCESS:

ACCESS TO THE ADJUSTED LOTS AS SHOWN HEREON IS BY MEANS OF TORO CANYON ROAD, AN PAVED AND IMPROVED PUBLIC STREET. ACCESS TO BUILDING AND DEVELOPMENT ENVELOPES IS BY MEANS OF EXISTING UNPAVED DRIVEWAYS AS SHOWN HEREON. DRIVEWAYS WILL BE PAVED TO MEET CARPINTERIA–SUMMENRLAND FIRE DISTRICT DEVELOPMENT STANDARDS FOR SUCH ACCESS.

8. UTILITIES:

THE EXISTING SURFACE UTILITIES AS SHOWN HEREON HAVE BEEN LOCATED BY THIS FIELD SURVEY. SUBSURFACE UTILITIES ARE INDICATED FROM THE RECORDS OF VARIOUS PUBLIC AND PRIVATE ENTITIES. THE SURVEYOR DOES NOT ACCEPT ANY RESPONSIBILITY FOR INDICATED SIZES, LOCATIONS, CAPACITIES OR AVAILABILITY OF USE, OR LACK OF SAID INFORMATION HEREON.

WASTE WATER DISPOSAL: WASTE WATER WILL BE DISPOSED BY INDIVIDUAL ONSITE WASTEWATER TREATMENT SYSTEMS (OWTS) DESIGNED PURSUANT TO COUNTY OF SANTA BARBARA PUBLIC HEALTH DEPARTMENT, ENVIRONMENTAL HEALTH SERVICES DIVISION, OWTS ORDINANCE STANDARDS, INCLUDING THE INSTALLATION OF ADVANCED TREATMENT MODULES FOR SECONDARY TREATMENT OF EFFLUENT FOR USE IN SHALLOW IRRIGATION OF LANDSCAPE.

WATER AND FIRE FLOW:

MONTECITO WATER DISTRICT, 583 SAN YSIDRO LANE, SANTA BARBARA, CA 93108 (805) 969–2271

POTABLE WATER SUPPLY FOR THE LOTS SHOWN HEREON IS PROVIDED THROUGH EXISTING MONTECITO WATER DISTRICT METERS. FIRE SUPPRESSION SUPPLY IS PROVIDED THROUGH MONTECITO WATER DISTRICT MAINS AND FIRE HYDRANTS AS SHOWN HEREON.

ELECTRICAL SERVICE:

EDISON COMPANY, 333 DAVID LOVE PLACE. SANTA BARBARA, CA 93117 (805) 683–5229

NATURAL GAS SERVICE:

GAS COMPANY, P.O. BOX 818, SANTA BARBARA, CA 93116 (805) 681–8209

TELEPHONE SERVICE: VERIZON, P.O. BOX 339, SANTA BARBARA, CA 93102 (805) 966–0432

CATV SERVICE:

NO CATV SERVICE AVAILABLE IN THE AREA.

EASEMENTS:

(A) TWENTY (20.00) FOOT WIDE EASEMENT FOR PUBLIC ROAD PURPOSES AS DEDICATED TO THE COUNTY OF SANTA BARBARA PER PARCEL MAP NO. 14,534 RECORDED IN BOOK 57, PAGES 64–66 OF PARCEL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY.

(B) VARIABLE WIDTH ACCESS EASEMENT FOR THE BENEFIT OF PARCEL TWO OF PARCEL MAP NO. 14,534, PER PARCEL MAP NO. 14,534 RECORDED IN BOOK 57, PAGES 64–66 OF PARCEL MAPS, IN THE OFFICE OF THE COUNTY RECORDER OF SAID COUNTY (TO BE EXTINGUISHED).

PARCEL AND LOT DATA

R1 PARCEL AND ENVELOPE AREAS (ACRES)

LOT NO.	AREA (GROSS & NET)	BUILDING/DEVELOPMENT ENVELOPE	DEVELOPMENT ENVELOPE
A	2.00 & 1.94	0.29	0.04
B	10.67 & 10.34	0.37	0.12
TOTALS	12.67 & 12.28	0.66	0.16

ADJUSTED LOT AND MODIFIED ENVELOPE AREAS (ACRES)

LOT NO.	AREA (GROSS & NET)	BUILDING ENVELOPE	DEVELOPMENT ENVELOPE
1	2.00 & 1.94	0.45	0.28
2	10.67 & 10.34	0.57	0.43
TOTALS	12.67 & 12.28	1.03	0.71

LEGEND:

- (P) ADJUSTED LOT LINE
- (E) LOT LINE TO BE ADJUSTED
- (E) PARCEL BOUNDARY LINE
- (E) ASSESSOR'S PARCEL LINE
- 810 MAJOR CONTOUR LINE
- MINOR CONTOUR LINE
- (E) BUILDING & DEVELOPMENT ENVELOPE
- (P) BUILDING ENVELOPE
- (P) DEVELOPMENT ENVELOPE
- (E) FIRE FULE MANAGEMENT LIMITS LINE
- (P) FIRE FULE MANAGEMENT LIMITS LINE
- 20% – 30% SLOPE LIMITS LINE
- 20% OR LESS SLOPE LIMITS LINE
- W WATER PIPELINE
- U SCE, VERIZON & CATV CONDUITS
- G NATURAL GAS PIPELINE

R1 INDICATES RECORD PER PARCEL MAP NO. 14,534, 57 PMB 64–66
CF INDICATES CALCULATED FROM

OWNER'S CERTFICATE

I, KEVIN FRAMPTON, HEREBY APPLY FOR APPROVAL OF THE RECORD MAP MODIFICATION OF REAL PROPERTY SHOWN ON THIS PLAT AND CERTIFY THAT WE ARE THE LEGAL OWNERS OR AUTHORIZED AGENTS OF THE LEGAL OWNERS OF SAID PROPERTY AND THAT THE INFORMATION SHOWN HEREON IS TRUE AND CORRECT TO THE BEST OF OUR KNOWLEDGE AND BELIEF.

SIGNED: _____ DATED: _____

KEVIN FRAMPTON
12250 LINDA FLORA
OJAI, CA 93023
(805) 500–5762

SURVEYOR'S CERTFICATE

THIS LOT LINE ADJUSTMENT MAP AND THE LAND PLANNING REPRESENTED HEREBY, ALONG WITH INFRASTRUCTURE DESIGN DEPICTIONS FOR PLANNING PURPOSES, WAS PREPARED UNDER THE PROFESSIONAL DIRECTION AND RESPSONSIBILITY OF MARK LLOYD.

SIGNED: _____ DATED: _____

MARK LLOYD PLS 5470

PROFESSIONAL LAND SURVEYOR
MARK H. LLOYD
NO. 5470
EXPIRES 09–30–20
DATED _____
STATE OF CALIFORNIA

RECORD MAP MODIFICATION
19RMM–00000–00001

BEING A RECORD MAP MODIFICATION OF BUILDING AND DEVELOPMENT ENVELOPES FOR PARCEL ONE (APN 155–230–017) AND PARCEL TWO (APNs 155–230–007 &–018) OF PARCEL MAP NO. 14,534, BOOK 57, PAGES 64–66 OF PARCEL MAPS, IN THE COUNTY OF SANTA BARBARA, STATE OF CALIFORNIA

SHEET 1 OF 1 SCALE: 1" = 30' SEPTEMBER 2019

L&P CONSULTANTS
3 WEST CARRILLO STREET
SUITE 205
SANTA BARBARA, CA 93101
(805) 962–4611

16–014.01 RMM

BIOLOGICAL EVALUATION OF APNs 153-230-017 AND 153-230-018, TORO CANYON ROAD, SANTA BARBARA COUNTY, CALIFORNIA

View from southern edge of proposed building envelope on Lot 2, looking north. 10 December 2018.

Prepared for:

Kevin Frampton
c/o L&P Consultants
3 West Carrillo Street, Suite 205
Santa Barbara, CA 93101

Contact: Kevin Frampton
(805) 448-8055

Prepared by:

Hunt & Associates Biological Consulting Services
5290 Overpass Road, Ste. 108
Santa Barbara, CA 93111

Contact: Lawrence E. Hunt
(805) 689-7423

31 January 2019

Table of Contents

Biological Evaluation of APNs 153-230-017 and 153-230-018, Toro Canyon Road, Santa Barbara County, California

1.0 Project Description. The project is a Lot Line Adjustment between two (2) existing lots in the 10-E-1 zone district located at 785 (Lot 1) and 805 (Lot 2) Toro Canyon Road and includes reconfiguring the existing Building and Development Envelopes, redefining access corridors and modifying the 100-foot Fire Fuel Management Zones on each lot as previously established by the approval and recordation of Parcel Map 14,534 (Table 1).

Table 1. Size of Lots and Building/Development Envelopes.

Lot	Gross Area	Building Envelope	Development Envelope	FFMZ
1 (785 Toro Cyn Rd)	2.0 acres	0.45 acres	0.72 acres	0.39 acres
2 (805 Toro Cyn Rd)	10.2 acres	0.60 acres	1.00 acres	0.73 acres

2.0 Methods. The subject parcels were visited on 28 November 2018 to familiarize the biologist (Hunt) with the site and the proposed building and development envelopes. Another detailed site visit was conducted on 10 December 2018 between 1130 hrs and 1615 hrs to evaluate habitats on and around the parcels for special-status and unregulated wildlife, characterize existing conditions and land use, and to map vegetation in order to determine potential impacts on biological resources that may result from the proposed project and establish measures to mitigate such impacts, if necessary. The seasonal timing of the survey was not optimal for detecting annual plants, but was adequate for mapping vegetation and surveying for perennial species. The survey focused on those portions of the lots covered by the proposed Building Envelopes, Development Envelopes, the 100-foot fire fuel management zones (FFMZ) for both lots, and a 50-100-foot wide swath around the FFMZs. Due to winter dormancy, native grass occurrence was mapped and visually estimated as "greater than or less than 10% cover", the cover threshold used in County of Santa Barbara (2008) as classifying vegetation as "native grassland". The California Natural Diversity Data Base (CNDDB) records for the USGS 7.5-minute quadrangles on and surrounding the project site were consulted for special-status plant and wildlife records (CDFW, 2018). The coordinates of special-status plant and wildlife observations were mapped in the field to an accuracy of eight feet using a Garmin hand-held GPS unit (Model GPSmap 60CSx). Site photographs of the project area are included in Appendix 1.

3.0 Existing Conditions.

3.1 Location and Land Use. The subject parcels are located at 785 and 805 Toro Canyon Road, approximately 0.5 air miles northeast of its intersection with East Valley Road in the foothills of the south slope of the Santa Ynez Mountains, and in the upper watershed of Toro Canyon Creek at an elevation of approximately 845 feet above sea level (Fig. 1). The parcels are within a low-density residential, semi-rural neighborhood zoned "Inner-Rural" (10-E-1), with a minimum parcel size of 10 acres, and are subject to the Toro Canyon Community Plan Area policies and development standards (County of Santa Barbara, 2004). A residence with outbuildings and access roads formerly occupied portions of both proposed building/development envelopes.

These structures were removed in May 2004, per SB County Demolition Permit 04CNP -00412, as shown by aerial photographs.

3.2 Soils and Geology. A soils and geologic report, including a site-specific slope stability analysis, has been prepared for these properties (Coastal Geoscience, Inc., n.d.). Lodo-Sespe complex soils cover the steeper portions of both lots. These soils form in material weathered from sandstone or shale bedrock in foothill regions of the Santa Ynez Mountains. The lowest elevation portions of both lots, adjacent to Toro Canyon Road, are mapped as Todos clay loam, which has a similar origin and characteristics of Lodo-Sespe soils (Shipman, 1981). Toro Canyon Creek and its associated riparian vegetation runs along the east side of Toro Canyon Road, opposite the lots. Alluvial soils associated with this drainage do not occur on the subject lots.

3.3 Toro Canyon Creek. The Toro Canyon Creek watershed is one of the major drainages of this portion of the south slope of the Santa Ynez Mountains. The watershed is steeply inclined, going from a maximum elevation of 3,170 feet above sea level to sea level in about 3.8 air miles, a 16% average slope. Surface flows throughout the main stem are intermittent as a result of groundwater extraction for agricultural and municipal purposes. The reach opposite the subject lots is seasonal, experiencing 'flashy' surface flows only during the rainy season. The subject lots slope to the southeast and although located 220 to 310 feet west of this drainage, they drain to Toro Canyon Creek via existing drainage swales and culverts installed along Toro Canyon Road.

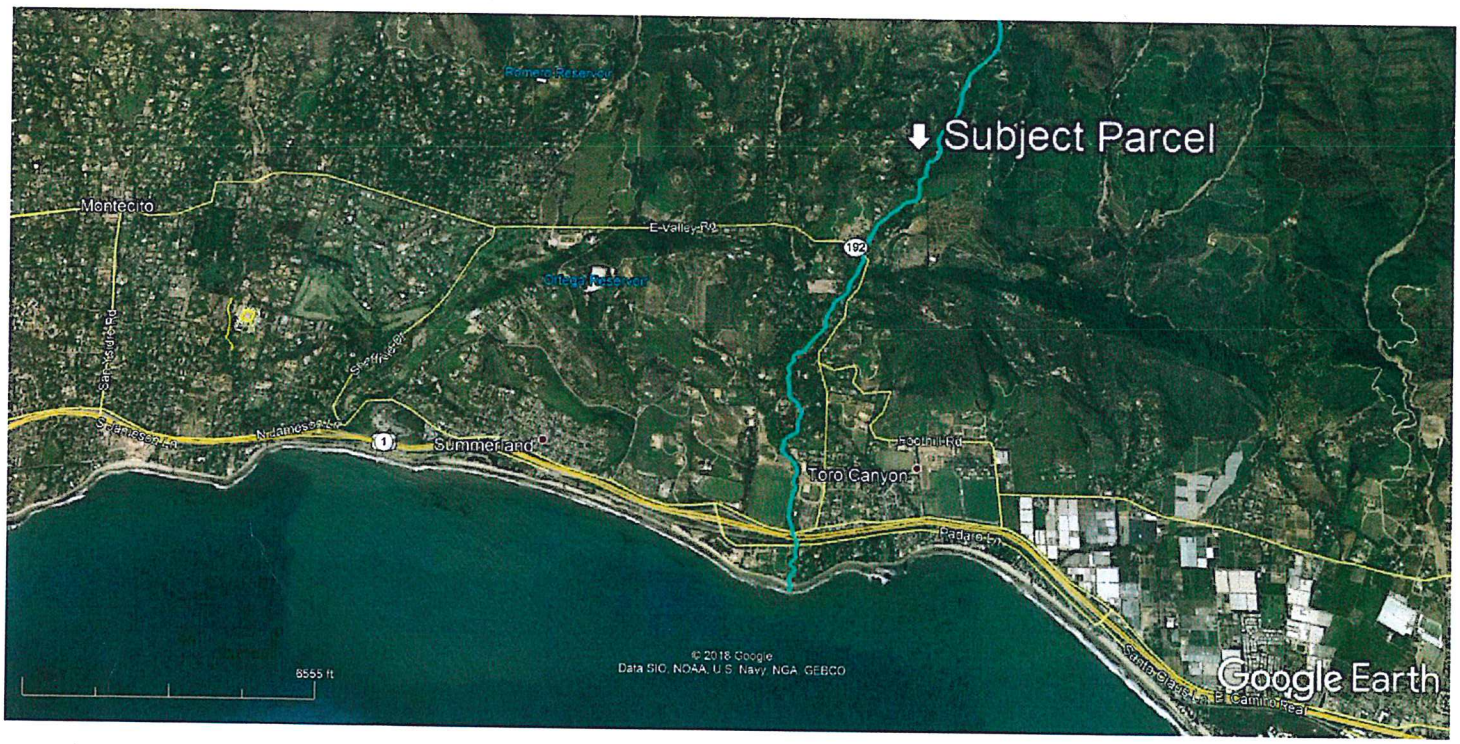


Figure 1. Project location off upper Toro Canyon Road in Montecito. Main stem of Toro Canyon Creek is shown by the blue line; creek contacts Pacific Ocean just west of Loon Point. Carpinteria is at lower right. Imagery dated 12 April 2018.

4.0 Biological Resources. The proposed Building and Development Envelopes on both lots have limited value as habitat for plants and animals because they are vegetated with weedy, non-native annual grassland that appears to be maintained by mowing. The FFMZs of both lots extend well into areas characterized as eucalyptus woodland with ruderal non-native grasses understory interspersed with coastal sage scrub vegetation that, although disturbed by previous road grading and tree removal, retains a high level of high biological diversity that provides habitat for a number of special-status plants and animals (Table 2). Coastal sage scrub has local and State protection (County of Santa Barbara, 2004; 2008; Sawyer et al., 2008).

4.1 Vegetation. Two discrete plant communities/wildlife habitats are present on the subject lots: **non-native annual grassland** and **coastal sage scrub** (nomenclature of Holland, 1986). These plant communities are mapped in Figure 2 as vegetative alliances based on dominant and sub-dominant species richness and cover (Sawyer et al., 2009). Appendix 2 lists plants observed on 10 December 2018 during the site survey of both lots.

Non-native annual grassland covers most of the proposed Building and Development Envelopes on both of the proposed lots (Fig. 2). These areas are currently maintained by periodic mowing. Based on dominant and sub-dominant species, this vegetation is classified as ***Bromus diandrus* Semi-Natural Herbaceous Stand**, per the alliance-based scheme developed by Sawyer et al. (2008). The dominant species observed here includes ripgut brome (*Bromus diandrus*) and red brome (*Bromus rubens*), with a diverse, non-native forb component dominated by redstem filaree (*Erodium cicutarium*). Black mustard (*Brassica nigra*) is a dominant forb in grassland within the FFMZ west of the development envelope on Lot 1. Plants found in this plant community on 10 December 2018 are listed in Appendix 2. Approximately 87,710 (2.01 acres) of non-native annual grassland occurs within the Building and Development Envelopes and FFMZs of Lots 1 and 2.

Coastal sage scrub occurs in the FFMZs on both of the proposed lots (Fig. 2). This vegetation type is classified as ***Malosma laurina* Shrubland Alliance** based on its species composition: laurel sumac (*Malosma laurina*), coast sagebrush (*Artemisia californica*), California buckwheat (*Eriogonum fasciculatum*), and black sage (*Salvia mellifera*), with a number of other woody shrubs. Coast live oak (*Quercus agrifolia*), elderberry (*Sambucus nigra*), Southern California black walnut (*Juglans californica*) are scattered throughout this community as single trees or small clumps of trees. Native needle grass (*Stipa* sp.), is a common understory plant, especially along the interface between scrub and grassland on-site.

Coastal sage scrub here is highly disturbed. A large number of invasive, non-native trees, including two species of eucalyptus (*Eucalyptus globulus* and an unidentified eucalypt tentatively identified as red ironbark, *E. sideroxylon*), Victorian box (*Pittosporum undulatum*), European olive (*Olea europaea*), and pepper tree (*Schinus molle*). These trees are scattered throughout coastal sage scrub on both lots, with eucalyptus being the most common species. Most of the eucalypts and other trees here were scorched in the Thomas Fire (December 2017) and are dead or severely diseased (see photos in Appendix 1). Plants found in this plant community are listed in Appendix 2.

oast Live Oaks. Coast live oak trees are scattered throughout coastal sage scrub on both lots and occur as isolated trees or clumps of trees interspersed with blue gum eucalyptus trees along the eastern and northern portions of Lot 2 (Fig. 2). The understory in these isolated oak patches is mostly barren but supports a few native shrubs, such as toyon (*Heteromeles arbutifolia*) and Southern California black walnut (see photos in Appendix 1). Many of the trees in both areas exceed 4 inches dbh (trunk diameter at breast height [4 ft above ground]) and thus are considered sensitive biological resources by County statute (County of Santa Barbara, 2004; 2008).

Ornamental Vegetation. A few ornamental species are patchily distributed across both lots as a result of either escaping from cultivation or having been intentionally planted as landscaping. Many of the non-native tree species that were originally planted as ornamentals have escaped cultivation and are spreading through coastal sage scrub habitat west and northwest of the proposed building envelopes on both lots (e.g., two species of *Eucalyptus*, pepper tree, Victorian box, and myoporum) (Fig. 2). Appendix 2 lists ornamental species found on the two proposed lots.

4.2 Environmentally Sensitive Habitat (ESH).

Coastal Sage Scrub. The Toro Canyon Community Plan lists coastal sage scrub as Environmentally Sensitive Habitat (ESH) on the ESH Area-Toro Canyon (ESH-TCP) Overlay for inland areas (County of Santa Barbara, 2004). Additionally, coastal sage scrub (Diegan series), which occurs on-site, is considered 'sensitive' by the State of California (Holland, 1986). Coastal sage scrub habitat on-site also supports stands of Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*), a California Native Plant Society (CNPS) List 1B.1 species (rare, threatened, or endangered in California) (Table 3; Fig. 4; Tibor, 2001). As noted in the previous section, coastal sage scrub here is fragmented and disturbed and has been invaded by non-native trees (eucalyptus, Victorian box, etc.). Coastal sage scrub does not occur within the Building and Development Envelopes on either Lot 1 or Lot 2, but an area encompassing approximately 29,445 sf (0.68 acres) within the FFMZs for both lots supports a mixture of patches of disturbed coastal sage scrub and these non-native trees (Fig. 3).

Native Grasses. The Santa Barbara County Planning & Development Department (2004; 2008), defines native grasslands on the basis of relative percent cover, *"Native grasslands which are dominated by perennial bunch grasses such as purple needlegrass (Stipa pulchra) tend to be patchy (the individual plants and groups of plants tend to be distributed in patches). Therefore, for example, where a high density of small patches occurs in an area of one acre, the whole acre should be delineated if native grassland species comprise 10 percent or more of the total relative cover, rather than merely delineating the patches that would sum to less than one acre." Removal or disturbance to a patch or patches of native grasses less than 0.25 acres, which is clearly isolated and is not part of a significant native grassland or an integral component of a larger ecosystem, is usually considered insignificant."* (County of Santa Barbara, 2008). Needle grass populations that meet the County's relative cover criteria for 'native grassland', i.e., greater than 10% cover of native grasses, have previously been documented in Toro Canyon, including several acres along upper Toro Canyon Road (800 and 900 blocks) (Philbrick, 1990, as cited in County of Santa Barbara, 2004). These areas are not shown on the ESH map in the Toro Canyon Community Plan because of the scale of the mapping effort.

Figure 2. Vegetation on subject lots (Lot 1 at left; Lot 2 in center and right): non-native annual grassland (white) and coastal sage scrub (purple). Uncolored area on right side of image is open, eucalyptus-dominated woodland with scattered coast live oaks and a patchy understory of ruderal, non-native annual grassland and coastal sage scrub. Individual coast live oaks around proposed Building Envelopes are indicated by white dots. Vista Linda Lane is at left; Toro Canyon Road runs along bottom of image. North is to upper right. Imagery dated 12 April 2018.

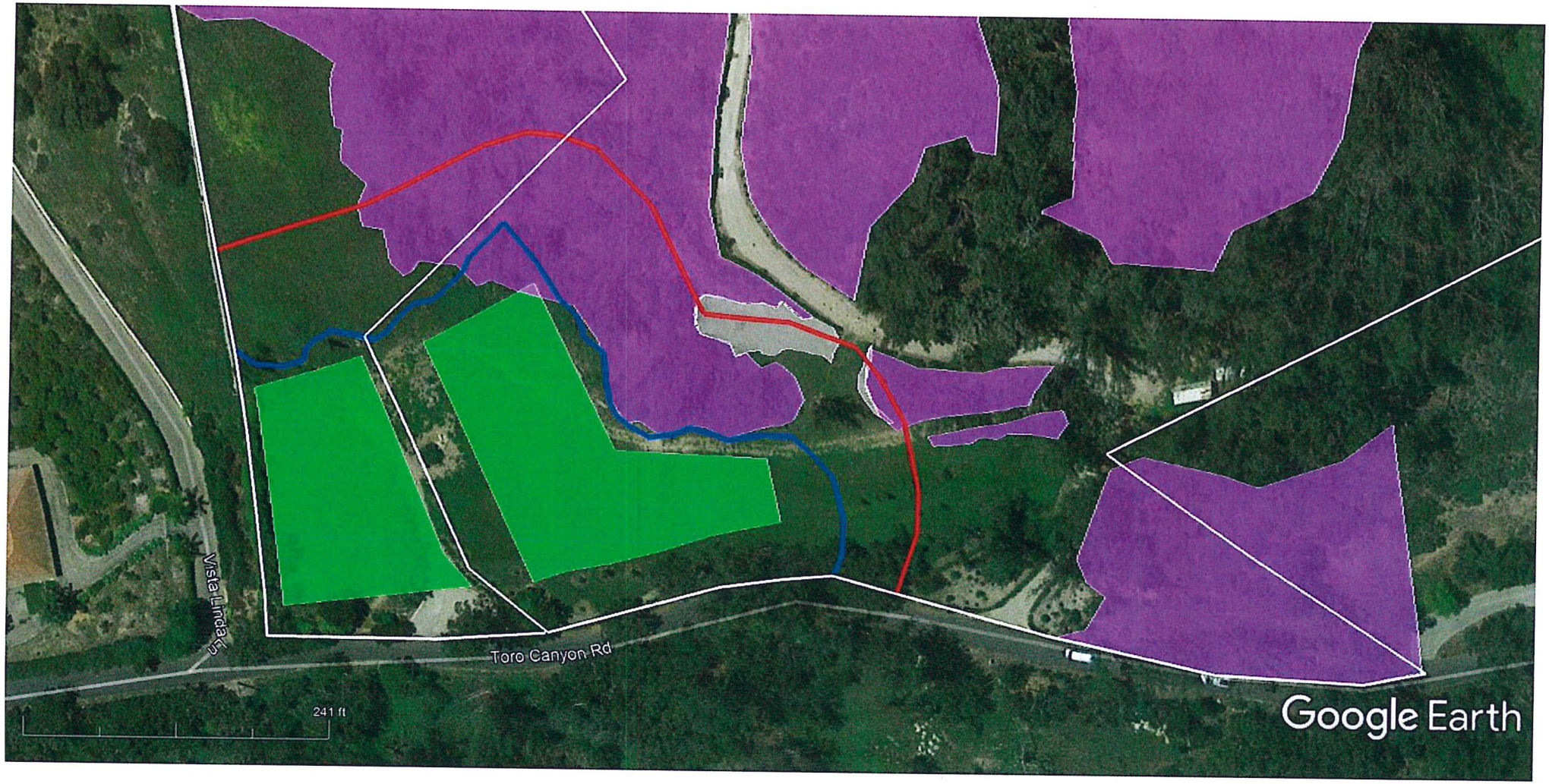


Figure 3. Occurrence of ESH in vicinity of subject lots (Lot 1 at left; Lot 2 at right): coastal sage scrub (purple); needle grass (*Stipa* sp.) (white polygons). Uncolored areas on right side of image are open, eucalyptus-dominated woodland with scattered coast live oaks and a patchy understory of ruderal, non-native annual grassland and coastal sage scrub. Building Envelopes are shown in green; Development Envelopes are outlined in blue. The 100-foot fire fuel management zone around Building Envelopes is indicated by the red line. Parcel boundaries are indicated by the white lines. Toro Canyon Road runs along bottom of image. North is to upper right. Imagery dated 12 April 2018.

Needle grass was not found within the Building and Development Envelope or FFMZ on Lot 1 (Fig. 3; Table 2). Patches that appear to exceed the minimum percent cover for classification as 'native grassland' and Environmentally Sensitive Habitat (ESH) occur within the FFMZ on Lot 2, and total approximately 2,110 sf (0.05 acres) (Fig. 3; Table 2).

Table 2. Occurrence of Needle Grass (*Stipa* sp.) on Lots 1 and 2 (Fig. 3).

Lot	Occurrence w/in Building Envelope	Occurrence w/in Development Envelope	Occurrence w/in 100-foot FFMZ	Total
1	0	0	0	**0**
2	0	Individual plants (not ESH)	2,110 sf (0.05 acres) (ESH)	**2,110 sf (0.05 acres) (ESH)**

4.3 Special-Status Species. Table 3 lists special-status plants and wildlife found in the project region (CDFW, 2018).

Table 3. Special-Status Plants and Animals in Project Region.

COMMON NAME	SCIENTIFIC NAME	REGULATORY STATUS (*)	HABITAT ASSOCIATIONS	LIKELIHOOD OF OCCURRENCE IN PROJECT AREA
PLANTS				
Santa Barbara locoweed	*Astragalus trichopodus* var. *trichopodus*	Locally Sensitive	Oak-sycamore riparian woodland; coastal bluff scrub	Low potential; lack of suitable habitat.
White-veined monardella	*Monardella hypoleuca* ssp. *hypoleuca*	1B	Occurs in woodland and chaparral from 165-4,700 feet.	Moderate potential in coastal sage scrub; found in chaparral at San Marcos Pass and in woodland and chaparral above Santa Barbara and Montecito (CNDDB, 2018).
South Coast branching phacelia	*Phacelia ramosissima* var. *austrolitoralis*	3	Occurs in coastal sage scrub and woodland/chaparral from 15-1,000 feet.	Moderate potential in coastal sage scrub; found in scrub and woodland/chaparral above Santa Barbara and Montecito (CNDDB, 2018).
Michael's rein orchid	*Piperia michaelii*	4	Coastal sage scrub and chaparral from 10-3,000 feet.	Moderate potential in coastal sage scrub.
Sonoran maiden fern	*Thelypteris puberula* var. *sonorensis*	2B	Occurs along creeks and mesic canyons from 160-2,000 feet.	Low potential in coastal sage scrub.
Plummer's baccharis	*Baccharis plummerae*	List 4	Coastal sage scrub, chaparral, oak woodland, typically on cool-moist, north-facing slopes, but found in many shaded canyons on south slope of	Coyote bush (*B. pilularis*) occurs on-site; *B. plummerae* prefers cool, shaded canyons. Low to no potential.

			Santa Ynez Mtns.	
Long-spined spineflower	*Chorizanthe polygonoides* var. *longispina*	1B	Occurs in dry, open chaparral from 100-4,500 feet.	Low potential in coastal sage scrub; found in chaparral above Montecito (CNDDB, 2018; CalFlora, 2018).
Mesa horkelia	*Horkelia cuneata* subsp. *puberula*	List 1B	Chaparral, oak woodland, coastal sage scrub, and sandhill scrub on sandy soils along South Coast and sand dunes in western Santa Barbara County	Low to moderate potential; soils on-site generally not suitable.
Santa Barbara bedstraw	*Galium cliftonsmithii*	List 4	Chaparral and oak woodland	Low to moderate potential for occurring in open oak woodland in coastal sage scrub on-site.
Santa Barbara honeysuckle	*Lonicera subspicata* var. *subspicata*	List 1B	Coastal sage scrub and oak woodlands, endemic to south slope of Santa Ynez Mountains	**Observed.** Extensive patches of this species are scattered throughout coastal sage scrub on Lot 2.
South Coast Range morning-glory	*Calystegia collina* ssp. *venusta*	List 4	Oak woodland, chaparral, and coastal scrub	Moderate to high potential of occurring in chaparral on-site.
Nuttall's scrub oak	*Quercus dumosa*	List 1B	Coastal sage scrub and chaparral along south coast of Santa Ynez Mountains from Montecito to Goleta area	No scrub oaks observed in coastal sage scrub or grassland on either lot; moderate potential elsewhere in CSS on Lot 2.
Hoffmann's gooseberry	*Ribes amarus* var. *hoffmannii*	List 3	Chaparral and riparian woodland along south slope Santa Ynez Mtns from Montecito to Gaviota Pass	Low potential in coastal sage scrub on-site.
Humboldt lily	*Lilium humboldtii* ssp. *ocellatum*	List 4	Chaparral, coastal sage scrub, and riparian woodland	Low potential for occurring in coastal sage scrub on-site.
INVERTEBRATES				
Monarch butterfly	*Danaus plexippus*	CSC (State Insect)	Overwinters (October-April) in dense roosts in eucalyptus woodland and, to a lesser degree, sycamore-oak woodland, generally in association with drainages; several known overwintering and autumnal roosts in region, but none reported from near project area	No autumnal or overwintering roosts known from vicinity; no monarchs observed on-site during survey. Eucalyptus trees on-site in or near development envelope and FFMZ on Lots 1 and 2 are single trees. Dense clump of eucalyptus occurs in northern portion of Lot 2 but trees were severely damaged by Thomas Fire in 2017 and are dead or dying.
Shoulderband snails	*Helminthoglypta* spp.	Locally Sensitive	Occurs in leaf/stick litter and other mesic microhabitats in coastal sage scrub and oak woodland	One or more species likely to occur in coastal sage scrub on-site, but status of these species is poorly known.
AMPHIBIANS				
South Cost newt	*Taricha torosa torosa*	CSC	Resident in scour pools and runs in several perennial drainages along South Coast; restricted to upper watersheds in developed areas.	Known from upper watersheds of several creeks in Montecito area (CDFW, 2018), and may occur in upper watershed of Toro Cyn Creek; no potential to occur on-site due to distance from Toro Canyon Creek.

California red-legged frog	*Rana draytonii*	FT; CSC	Resident in perennial streams, seeps in several South Coast drainages.	Known from upper watersheds of several creeks in Montecito area (CDFW, 2018), and may occur in upper watershed of W Fork Toro Cyn Creek; low to no potential to occur on-site due to distance from Toro Canyon Creek.
REPTILES				
California legless lizard	*Anniella pulchra* (= *A. stebbinsi*)	CSC	Known from sandstone-derived soils in Santa Barbara area	Low potential for occurring generally on-site because soils are too dense, but may occur in woodrat nest in SE corner of Lot 2 where looser soils are found.
Two-striped garter snake	*Thamnophis hammondii*	CSC	Resident in perennial and seasonal aquatic habitats in riparian woodland, riparian scrub, and adjacent scrub habitats	Likely occurs in Toro Canyon Creek riparian corridor and may range into woodland and scrub habitats on-site.
BIRDS				
White-tailed kite	*Elanus leucurus*	FP	Resident in grassland and oak savanna in region; may form communal roosts in oak and willow woodland	Fall/winter communal roosts observed in oak woodland in upper watershed of Toro Canyon Creek in 1990s (Holmgren and Rindlaub, as cited in County of Santa Barbara, 2004), but current status unknown. No suitable roosting habitat on-site.
Cooper's hawk	*Accipiter cooperi*	CSC	Resident in oak riparian woodland throughout region	Expected to occur on-site (foraging and possible nesting) in oaks and eucalyptus trees, especially on Lot 2.
Sharp-shinned hawk	*Accipiter striatus*	CSC	Winter visitor to oak and riparian woodlands throughout region	May occur in oaks and eucalyptus woodland on-site during fall and winter months (Sept-Apr)
Allen's hummingbird	*Selasphorus sasin*	CSC (nesting)	Uncommon spring migrant to shrublands and woodlands along south slope of Santa Ynez Mtns.	Moderate to high potential to feed and possibly nest in coastal sage scrub and ornamental vegetation on-site.
Pacific slope flycatcher	*Empidonax difficilis*	CSC	Uncommon to fairly common spring and summer migrant to riparian woodland throughout region	Moderate to high potential to occur and nest in oaks in coastal sage scrub vegetation on-site.
MAMMALS				
Red bat	*Lasiurus blossevillii*	CSC	Migratory species; may overwinter along coast	Moderate potential to occur on-site in fall and winter; known from temporary (daytime) roosts at several locations in Montecito (CDFW, 2018).
San Diego desert woodrat	*Neotoma lepida intermedia*	CSC	Rock outcrops in open chaparral and coastal sage scrub along coastal slope of Santa Ynez Mtns	Known from area, but no suitable habitat on-site. Occupied big-eared woodrat (*N. macrotis*) nest found in SE corner of Lot 2.
American badger	*Taxidea taxus*	CSC; FPF	Several observations along south slope of Santa Ynez Mountains	Moderate potential of occurrence in coastal sage scrub and open woodland habitat on and around site; no sign (tracks, scat, burrows, digs) found on-site.
Ringtail	*Bassariscus astutus*	FPF	Occurrence poorly known because of secretive habits, but likely occurs in middle	Moderate to high potential of occurring on-site in coastal sage scrub and open woodland.

			and upper portions of coastal watersheds throughout the south slope of the Santa Ynez Mtns.	
Mountain lion	*Felis concolor*	FPF	Relatively common, but highly secretive, in middle and upper watersheds along south slope of Santa Ynez Mtns.	Known from several recent sightings in Montecito and Carpinteria foothills; moderate to high potential of occurring on-site as part of larger home range.

(*) Key:

Plants: CNPS (California Native Plant Society; Tibor, 2001):

List 1B = plants considered rare, threatened, or endangered in California and elsewhere by CNPS and CDFW
List 2 = plants rare, threatened, or endangered in California but more common elsewhere by CNPS and CDFW
List 3 = Uncommon to rare species for which more information is needed to determine regulatory status.
List 4: Plants of limited distribution; a "watch" list
Locally Sensitive Plants: plants with limited local distributions (*Smith, 1998 and Santa Barbara Botanic Garden, 1988).*

Animals:

FT = Listed as Threatened under the Federal Endangered Species Act (U.S. Fish and Wildlife Service)
CSC: California Species of Special Concern (California Department of Fish and Wildlife), and protected by the California Environmental Quality Act
FP = Fully Protected (California Department of Fish and Wildlife)
FPF: Fully Protected Furbearer – California Department of Fish and Wildlife Code.

Sources: CNDDB (2018) for the Carpinteria, Santa Barbara, Old Man Mountain, and Wheeler Springs quadrangles; relevant environmental documents for region; L.E. Hunt field observations and www.calflora.org.

Plants. Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*), a CNPS List 1B species (rare, threatened, or endangered in California and elsewhere), is scattered throughout coastal sage scrub habitat on Lot 2, and as individual plants north of the development envelope on Lot 2 (Fig. 4; Appendix 1). Individual mature coast live oaks are considered to be sensitive resources in the Toro Canyon Community Plan (County of Santa Barbara, 2004; 2008a).

Wildlife. No special-status wildlife were observed during the site visit, but a number of species may occur there based on the presence of suitable habitat on-site and known observations in the vicinity of the project site (Table 3). Despite habitat fragmentation on-site and low-density residential development in the area, a large amount of open space and relatively undisturbed habitat occurs within and around the project site. The large number of mature coast live oaks, eucalyptus, and other ornamental trees on both lots provides suitable roosting and possibly nesting habitat for raptors, such as Cooper's hawk, sharp-shinned hawk, white-tailed kite, and owls. However, the Thomas Fire in December 2017 scorched or burned a large number of eucalyptus trees across both lots and these trees are dead or dying (see photos in Appendix 1).

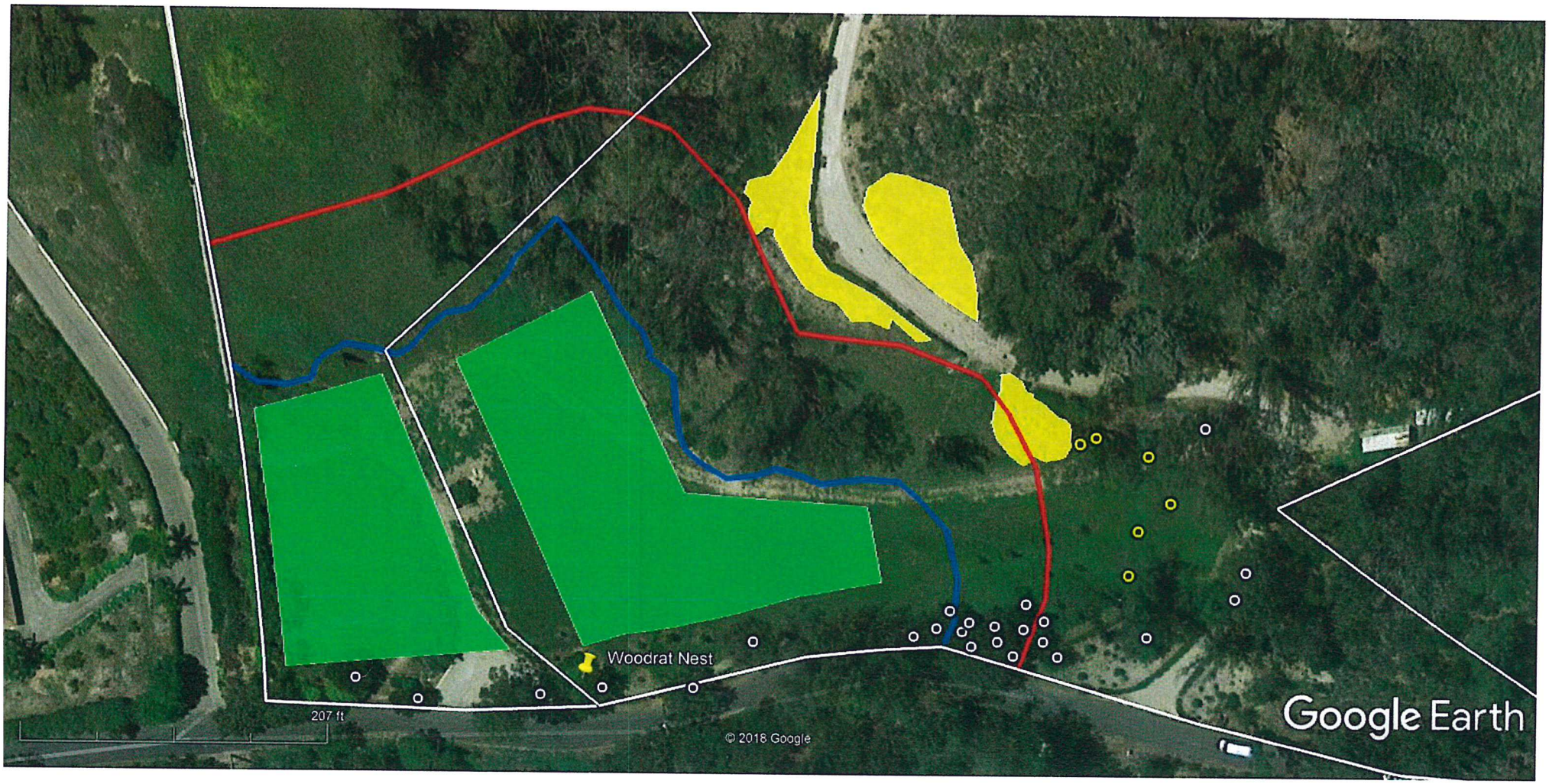


Figure 4. Occurrence of special-status species in vicinity of proposed lots (Lot 1 at left; Lot 2 at center and right): Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*) (yellow polygons and yellow dots); coast live oaks (*Quecus agrifolia*) (white dots); big-eared woodrat (*Neotoma macrotis*) nest shown by marker in SE corner of Lot 2. Occurrence of SB honeysuckle on entirety of Lot 2 was not mapped, only those patches within 50-100 feet of the FFMZ. Approximately 420 sf of SB honeysuckly occurs within the 100-foot FFMZ on Lot 2. Coast live oaks are scattered throughout coastal sage scrub habitat west and north of the development envelope on both lots, but cannot be distinguished from eucalyptus trees at this scale. Building envelopes are shown in green; development envelopes are outlined in blue. The 100-foot fire fuel management zone around the building envelopes is indicated by red line. Parcel boundaries are indicated by white lines. Toro Canyon Road runs along bottom of image. North is to upper right. Imagery dated 12 April 2018.

A large stick nest constructed by the big-eared woodrat (*Neotoma macrotis*), a common inhabitant of woodland and scrub habitats throughout the region, occurs in the SE corner of Lot 2 (Fig. 4; see photos in Appendix 1). The size of the nest indicates that it has been here for years. Although not protected by local or State statutes, the nest of this species, particularly long-standing nests such as this occurrence, provides suitable microhabitat for a number of special-status species, such as shoulderband snails (*Helminthoglypta* spp.), legless lizards (*Anniella* sp.), two-striped garter snake (*Thamnophis hammondii*), as well as a refuge for a host of other commensal species. As such, these nests are foci of local biodiversity (Hunt, pers. observ.), and thus qualify as a special-status habitat feature, per County guidelines (County of Santa Barbara, 2008).

5.0 Impact Analysis and Mitigation Measures. Build-out of the proposed Building and Development Envelopes on Lots 1 and 2 will not directly impact sensitive biological resources because these envelopes have been sited in non-native annual grassland that has been disturbed by previous development. Potentially significant impacts may arise from required fire fuel management practices. The Development Envelope on Lot 2 abuts coastal sage scrub habitat that has been fragmented and disturbed by invasive, non-native trees, so the required 100-foot Fire Fuel Management Zone (FFMZ) around the Building Envelope on Lot 2 has the potential to significantly impact special-status plants and Environmentally Sensitive Habitat (ESH).

Impact BIO-1: ***Grading, construction, and/or fire fuel management practices on Lot 2 could disturb or eliminate at least 420 sf of Santa Barbara honeysuckle, a List 1B.1 species that is classified as rare, threatened, or endangered in California and elsewhere by the California Native Plant Society and California Department of Fish and Wildlife) (Fig. 4). This is a Class II impact (significant, but can be mitigated to less than significant levels).***

Mitigation Measure BIO-1a (Map Species Occurrence on Construction Plans): The location and extent of SB honeysuckle plants (see Fig. 4), shall be shown on all construction plans and landscaping plans and flagged for avoidance during construction and landscaping.

Mitigation Measure BIO-1b (Delimit work areas): The limits of the Development Envelope and the 100-foot FFMZ around the Development Envelope shall be fenced with orange construction fence prior to any ground disturbance.

Mitigation Measure BIO-1c (Species Avoidance During Fire Fuel Management Activities): Because SB honeysuckle patches are discrete and not distributed throughout the FFMZ on Lot 2, fire fuel management practices should avoid removing this species (Fig. 4). The limits of the 100-foot FFMZ shall be permanently staked with rebar or other permanent markers in the field so that personnel conducting fire fuel management activities do not exceed the vegetation management boundaries. SB honeysuckle stands shall be permanently staked or fenced for avoidance during vegetation management.

Impact BIO-2: ***Fire fuel management practices on Lot 2 will impact disturbed coastal sage scrub within a 0.68-acre area, and up to 2,110 sf (0.05 acres) of native needle grass that appears to meet the criteria for classification as 'native grassland'. Both of these habitats are listed as Environmentally Sensitive Habitat (ESH) by the County of Santa Barbara (2004;***

2008) and by the California Department of Fish and Wildlife (2018), because they support high biodiversity, including a number of special-status species. This is a Class II impact (significant, but can be mitigated to less than significant levels).

Additionally, fire fuel management practices used to create and maintain a 100-foot wide "defensible space" around the Building Envelopes on each lot could significantly impact native plant communities by creating conditions favoring the spread of invasive, non-native species, particularly fountain grass (*Pennisetum* sp.), which already occurs on-site. If not controlled, fountain grass and other non-native grasses could proliferate. Once established, these non-native grasses prevent native shrubs and grasses from re-colonizing. Habitats dominated by non-native, annual grasses are significantly more prone to fire than coastal sage scrub and of substantially lower habitat quality for native plants and wildlife.

Mitigation Measure BIO-2a (Delineate FFMZs): Prior to Land Use Permit issuance, the limits of the 100-foot fire fuel management zone (FFMZ) on both lots shall be permanently marked with rebar or other metal stakes to delineate the zone during future fire fuel management activities.

Mitigation Measure BIO-2b (Fire Fuel Management and Habitat Improvement Plan): Fire fuel management practices that are indiscriminately applied to Lot 2 could disturb up to 0.68 acres within the 100-foot FFMZ that supports disturbed coastal sage scrub (including patches of SB honeysuckle--see Impact BIO-1), and 0.05 acres of needle grass grassland. Both of these habitats are listed as Environmentally Sensitive Habitat by the County of Santa Barbara (2004; 2008). Policy BIO-TC-1 in the Toro Canyon Community Plan requires mitigating impacts to ESH at a 3:1 ratio, which equals approximately 2.04 acres of coastal sage scrub and 0.15 acres of native grassland. Coastal sage scrub habitat on Lots 1 and 2 are thoroughly infested with dead and dying eucalyptus trees and other non-native trees, as well as non-native grasses. These invasive species are degrading the value of these habitats for native plants and wildlife.

Prior to Land Use Permit issuance, a qualified biologist shall prepare a Fire Fuel Management and Habitat Improvement Plan that specifically addresses the methods to be used to protect ESH (coastal sage scrub habitat, SB honeysuckle, and native grassland) within the FFMZ during fire fuel management operations. The Plan shall address how native vegetation within the FFMZs on both lots will be modified, methods and measures to be implemented to selectively remove and control the spread of invasive, non-native grasses and shrubs, and selective removal of dead and dying non-native trees. Plan goals shall balance maximizing habitat values with fire safety.

The Plan shall include procedures for improving the quality of coastal sage scrub habitat by removal and control of non-native grasses and shrubs and selective removal of dead and dying eucalyptus and other non-native trees. Non-native vegetation shall be controlled so that native shrubs and trees can naturally recolonize these areas. The goal of the Plan shall be improving habitat quality of coastal sage scrub by removing dead and dying non-native trees and controlling invasive, non-native grasses, in order to allow native, locally-occurring shrubs and trees to recolonize areas formerly infested with non-native vegetation. There is more than enough disturbed coastal sage scrub on Lot 2 to meet the 3:1 mitigation requirement. The Plan shall be

submitted to County P&D for review and comment and the Plan should be reviewed by the local Fire Marshall for consistency with fire fuel management practices.

Mitigation Measure BIO-2c (Landscaping Species): Prior to issuance of the land use permit, a qualified biologist shall review the proposed species palette on all landscaping plans to ensure that native, locally-occurring species are incorporated into the landscaping plan and that the planting palettes do not include invasive, non-native species.

Impact BIO-3: ***Construction and/or landscaping could destroy a large woodrat nest located in the SE corner of Lot 2. The nests of this native mouse provides suitable microhabitat for a number of special-status wildlife species, including shoulderband snails, California legless lizards, and/or two-striped garter snakes. This is a Class II impact (significant, but can be mitigated to less than significant levels).***

Mitigation Measure BIO-3a: If the nest can be avoided, it shall be surrounded with orange construction fence for the duration of construction and landscaping under the supervision of a qualified biologist. If not, a qualified biologist shall be retained to dismantle the nest and capture and relocate all inhabitants to suitable habitat nearby.

Impact BIO-4: ***Construction, landscaping, and/or fire fuel management practices could remove or damage mature coast live oak trees, eucalyptus trees, and other ornamental trees that may be used as foraging, roosting, and/or nesting habitat, particularly Cooper's hawk, sharp-shinned hawk, Allen's hummingbird, white-tailed kite, Pacific Slope flycatcher, and red bats, which are known to occur in the project region. This is a Class II impact (significant, but can be mitigated to less than significant levels).***

Mitigation Measure BIO-4a: A qualified biologist shall survey any mature trees that are proposed for removal or trimming prior to commencing work. Particular trees that are routinely used by these species as roosting or nesting habitat or that contain active nests, shall be avoided.

Mitigation BIO-4b: A qualified biologist shall conduct a pre-construction survey of both lots no more than one week prior to initial vegetation grubbing and shall monitor initial grubbing and grading to salvage wildlife disturbed by this activity.

6.0 References.

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APPENDIX 1. SITE PHOTOGRAPHS
(all photographs taken on 10 December 2018)

Proposed Lot 1 (southern) parcel, looking east from western edge of proposed development envelope. Toro Canyon Road is visible at driveway entrance. Parcel supports ruderal, non-native annual grassland; hedges surrounding parcel and driveway are mainly composed of ornamental species, such as European olive and myoporum.

Proposed Lot 1, looking northwest from center of parcel. Proposed development envelope extends approximately to the Italian cypress in distance; 100-foot fire fuel management zone around envelope extends upslope into ruderal grassland and coastal sage scrub vegetation and trees in distance.

Southwestern portion of proposed Lot 2 (northern) parcel, looking west from center of parcel. Primary vegetation type on parcel is ruderal, non-native annual grassland. Proposed development envelope extends westward to boundary of woody vegetation in background; fire fuel management zone extends well into woodland.

Southwestern portion of proposed Lot 2, looking east from west of development envelope. Lot 1 is off right side of photo. Proposed building envelope ends at boundary between mowed grassland in background and unmowed grassland in foreground; development envelope extends eastward to about the bottom of the photograph.

Northern half of proposed Lot 2, looking north from center of parcel, showing primary vegetation: ruderal, non-native annual grassland. Proposed development envelope extends northward to beyond the staked trees at right and borders the vegetation at left.

Lo 2, looking south from approximate center of building envelope. Vegetation in building envelope and development envelope is classified as non-native annual grassland.

Five-foot high nest of big-eared woodrat (*Neotoma macrotis*) in dense clump of Southern California black walnut (*Juglans californica)* and toyon (*Heteromeles arbutifolia*) in SE corner of Lot 2 where driveway meets Toro Canyon Road (Fig. 4).

Sparse needle grass (*Stipa* sp.) growing in northern portion of proposed development envelope of Lot 2. This density does not meet minimum percent cover criterion of 10% and is not classifiable as Native Grassland.

Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*), a CNPS List 1B species, growing north of proposed development envelope boundaries of Lot 2.

Coast live oak woodland/eucalyptus woodland with coastal sage scrub understory west of proposed development envelope on Lot 2. Fire fuel management zone around proposed building envelope extends well into this habitat. Woody shrubs visible in lower left foreground and center background around trees are Santa Barbara honeysuckle, a CNPS List 1B species. Vegetation clearing and mulching is evident in foreground.

Patches of needle grass growing with non-native annual grasses west (upslope) of proposed development envelope in Lot 2 showing higher density of individual clumps that potentially meet relative percent cover criterion for classification as Native Grassland (ESH). These patches are in the 100-foot fire fuel management zone around the building envelope on Lot 2.

APPENDIX 2. PLANTS OBSERVED ON-SITE (10 December 2018)

Appendix 2. Plants Observed During Site Visits. The following plant species were observed on one or both of the proposed lots during the site visit conducted on 10 December 2018. Species are listed alphabetically by scientific name; native species are bolded.

***Bromus diandrus* Semi-Natural Herbaceous Stand (Non-Native Annual Grassland of Holland, 1986):**

***Asclepias fasciculatus* (narrow-leaved milkweed)**
Asphodelus fistulosus (onionweed)
Brassica nigra (black mustard)
Bromus diandrus (ripgut brome)
Bromus rubens (red brome)
Carduus pycnocephalus (Italian thistle)
Convolvulus arvensis (bindweed)
Cynodon dactylon (Bermuda grass)
Erodium cicutarium (redstem filaree)
Foeniculum vulgare (sweet fennel)
***Heterotheca grandiflora* (telegraph weed)**
***Lonicera subspicata* var. *subspicata* (Santa Barbara honeysuckle)**
Malva nicaeensis (bull mallow)
Marrubium vulgare (horehound)
Oxalis pes-caprae (sour-grass)
Pennisetum sp. (fountain grass)
Picris echioides (bristly ox-tongue)
Piptatherum miliaceum (rice grass)
Plantago lanceolata (English plantain)
Raphanus sativa (wild radish)
Ricinus communis (castor bean)
***Stipa* sp. (needle grass)**
Trifolium sp. (non-native clover)

***Malosma laurina* Shrubland Alliance (Diegan Coastal Sage Scrub of Holland, 1986)**

***Artemisia californica* (coast sagebrush)**
***Artemisia douglasiana* (mugwort)**
***Baccharis pilularis* (coyote bush)**
Bromus diandrus (ripgut brome)
Bromus rubens (red brome)
Carduus pycnocephalus (Italian thistle)
***Ceanothus megacarpus* (bigpod ceanothus)**
***Eriogonum fasciculatum* (California buckwheat)**
Eucalyptus globulus (blue gum)
Eucalyptus cf. E. sideroxylon (red ironbark)
***Hazardia squarrosa* var. *squarrosa* (sawtooth goldenbush)**
***Heteromeles arbutifolia* (toyon)**
***Juglans californica* (Southern California black walnut)**
***Lonicera subspicata* var. *subspicata* (Santa Barbara honeysuckle)**
***Malacothamnus fasciculatus* (chaparral mallow)**
***Malosma laurina* (laurel sumac)**
Olea europaea (European olive)
Pittosporum undulatum (Victorian box)
***Quercus agrifolia* (coast live oak)**
***Rhus integrifolia* (lemonade berry)**
***Salvia mellifera* (black sage)**
***Sambucus nigra* (elderberry)**

Schinus molle (pepper tree)
***Stipa* sp. (needle grass)**
***Toxicodendron diversilobum* (poison oak)**

Ornamental Vegetation (Planted and/or escaped):

Crassula ovata (jade plant)
Cupressus sempervirens (Mediterranean cypress)
Eucalyptus globulus (blue gum)
Eucalyptus cf. E. sideroxylon (red ironbark)
Hedera helix (European ivy)
Myoporum laetum (myoporum)
Nerium oleander (oleander)
Olea europaea (European olive)
Osteospermum sp. (African daisy)
Pelargonium sp. (geranium)
Pinus sp. (unidentified pine)
Pittosporum undulatum (Victorian box)
Schinus molle (pepper tree)
Unidentified hedge-forming shrub
Vinca sp. (periwinkle)

Hunt & Associates
Biological Consulting Services

Kevin Frampton c/o
L&P Consultants, Inc.
3 West Carrillo Street, Suite 205
Santa Barbara, California 93101

4 April 2019

Subject: Modifications to Environmentally Sensitive Habitat (ESH) Areas and Recommendations for Fire Fuel Management Practices, APNs 155-230-007 and -018, Toro Canyon Road, Santa Barbara County, California.

Hunt & Associates prepared a Biological Evaluation for a proposed lot split of the subject parcels on 31 January 2019. That document mapped vegetation within the proposed development envelopes and within the 100-foot fire fuel management zones around the envelopes. Approximately 29,445 square feet (0.68 acres) of coastal sage scrub, a plant community classified as Environmentally Sensitive Habitat (ESH) by the County and California Department of Fish and Wildlife (CDFW), was mapped within these areas at that time (January 2019) (Table 1). The distribution and phenology of vegetation at that time was still strongly influenced by the combined effects of the Thomas Fire of December 2017 and severe, multi-year drought (2011-2019).

Vegetation within these fire fuel management areas was re-mapped based on a site visit on 4 April 2019 (Fig. 1), for two reasons: a) to update and more accurately portray the distribution of plant communities, particularly coastal sage scrub (ESH), at the height of the growing season during an above-average rainfall year, and; b) because recent removal of dead eucalyptus trees and eucalyptus duff (bark, branches, leaves) from a portion of the fire fuel management zone revealed little or no understory of coastal sage scrub, as originally reported in the Biological Evaluation.

Table 1. Updated areal estimate of ESH (coastal sage scrub and native grasses).

Vegetation Type	Biological Evaluation (December 2018 and January 2019)	Current Conditions (4 April 2019)
Coastal Sage Scrub (ESH)	29,445 sf (0.68 acres)	11,100 sf (0.25 acres)
Native Grasses (ESH)	2,110 sf (0.05 acres)	2,110 sf (0.05 acres)

Areas mapped as supporting concentrations of native grasses (*Stipa* sp.) remain unchanged from January 2019 to the present time. However, the extent of coastal sage scrub (ESH) within the 100-foot fire fuel management zone around the Building Envelopes on Lots 1 and 2 has significantly decreased. Areas north of the BE on Lot 2 supported remnants of what appeared to

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Figure 1. Revised ESH map based on conditions existing on 4 April 2019. Lot boundaries are shown by white lines (Lot 1 at left; Lot 2 at right); Building Envelopes are shown in green; Development Envelope boundaries are shown by blue line; 100-foot Fire Fuel Management limits from Building Envelopes is shown by red line. Vegetation: coastal sage scrub (ESH): purple; native grass concentrations (ESH): white; uncolored areas show non-native vegetation (ruderal, ornamental, eucalyptus-dominated woodland with scattered coast live oaks and a patchy understory of coastal sage scrub. Toro Canyon Road runs along bottom of image. North is to upper right. Imagery dated. 12 April 2018.

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be coastal sage scrub shrubs in January 2019 and these were mapped as coastal sage scrub (ESH). It was thought that these remnant shrubs would re-sprout in time. They did not and these areas are now dominated by non-native annual grasses.

Areas northwest and west of the BEs on Lots 1 and 2 supported a very sparse understory of coastal sage scrub shrubs beneath a canopy dominated by eucalyptus trees. These trees produced a thick duff (bark, leaves, and branches) that prevented native shrubs from colonizing these areas. This duff layer was removed by hand in March 2019 to reveal little to no native shrub understory—bare soil. This area was re-mapped as non-native eucalyptus woodland (Fig. 1), not as ESH. Table 1 gives an updated estimate of the extent of coastal sage scrub (ESH) on Lots 1 and 2 and concludes:

> a) No ESH occurs within the proposed BEs or DEs of either Lot, per conclusions in the 2019 Biological Evaluation, and;
> b) The amount of ESH found within the FFMZs on Lots 1 and 2 is reduced from 29,445 sf (0.68 acres) to 11,100 sf (0.25 acres). Coastal sage scrub is patchy and supports a sparse to dense canopy of eucalyptus that continue to degrade the quality of ESH here.

Recommendations for Protecting ESH within the FFMZs. The Lot Line Adjustment Map prepared by L&P Consultants and dated February 2019, shows the 35-foot, 70-foot, and 100-foot fire fuel management zones around the Building Envelopes on Lots 1 and 2. Recent removal of eucalyptus duff from portions of the FFMZs formerly mapped as ESH (coastal sage scrub) is consistent with habitat restoration efforts recommended in the Biological Evaluation (Hunt & Associates, 2019) and is considered a ***Class IV (beneficial) impact***. The following recommendations supplement those made in the Biological Evaluation regarding fire fuel management activities:

a) A qualified biologist should prepare a Fire Fuel Management Plan for review and comment by the County Fire Marshall. The Plan should contain the following elements:
    a. Specific recommendations on how to manage native vegetation within the 0-35-foot, 35-70-foot, and 70-100-foot fire fuel management zones. Vegetation management should balance fire safety with maintaining habitat quality for native plants and wildlife.
    b. Specific recommendations for the removal and control of eucalyptus trees in coastal sage scrub both within and outside of the FFMZs on both lots. Removal of these invasive, non-native species will greatly enhance native habitat quality. Eucalyptus should be cut at ground level and the stumps left in place to avoid unnecessary soil disturbance. Eucalyptus trunks should be scattered on-site to stabilize soils on steep slopes and to create valuable microhabitat for wildlife.
    c. Eucalyptus duff should be removed by hand (e.g., raking) in order to create sites where native coastal sage scrub shrubs and native trees (e.g., coast live oak) can re-colonize. These cleared areas should be monitored to eradicate and control invasive, non-native herbaceous vegetation.

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b) A qualified biologist should survey eucalyptus and other non-native trees to be removed for nesting birds, per standards developed by the California Department of Fish and Wildlife.
c) Dead or dying coast live oaks that do not present a safety hazard should be left in place as nesting and roosting habitat for a variety of birds.

Literature Cited

Hunt & Associates Biological Consulting Services. 2019. Biological evaluation of APNs 153-230-017 and 153-230-018, Toro Canyon Road, Santa Barbara County, California. Prep. for Kevin Frampton, Ojai, CA and L&P Consultants, Santa Barbara, CA. 31 January. 27 pp.

Sincerely,

Lawrence Hunt

Lawrence E. Hunt

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NATIVE AMERICAN HERITAGE COMMISSION

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April 13, 2020

Travis Lee, Planner
County of Santa Barbara

Via Email to: trlee@countyofsb.org

Re: Native American Tribal Consultation, Pursuant to the Assembly Bill 52 (AB 52), Amendments to the California Environmental Quality Act (CEQA) (Chapter 532, Statutes of 2014), Public Resources Code Sections 5097.94 (m), 21073, 21074, 21080.3.1, 21080.3.2, 21082.3, 21083.09, 21084.2 and 21084.3, Frampton Lot Line Adjustment & Recorded Map Modification Project, Santa Barbara County

Dear Mr. Lee:

Pursuant to Public Resources Code section 21080.3.1 (c), attached is a consultation list of tribes that are traditionally and culturally affiliated with the geographic area of the above-listed project. Please note that the intent of the AB 52 amendments to CEQA is to avoid and/or mitigate impacts to tribal cultural resources, (Pub. Resources Code §21084.3 (a)) ("Public agencies shall, when feasible, avoid damaging effects to any tribal cultural resource.")

Public Resources Code sections 21080.3.1 and 21084.3(c) require CEQA lead agencies to consult with California Native American tribes that have requested notice from such agencies of proposed projects in the geographic area that are traditionally and culturally affiliated with the tribes on projects for which a Notice of Preparation or Notice of Negative Declaration or Mitigated Negative Declaration has been filed on or after July 1, 2015. Specifically, Public Resources Code section 21080.3.1 (d) provides:

Within 14 days of determining that an application for a project is complete or a decision by a public agency to undertake a project, the lead agency shall provide formal notification to the designated contact of, or a tribal representative of, traditionally and culturally affiliated California Native American tribes that have requested notice, which shall be accomplished by means of at least one written notification that includes a brief description of the proposed project and its location, the lead agency contact information, and a notification that the California Native American tribe has 30 days to request consultation pursuant to this section.

The AB 52 amendments to CEQA law does not preclude initiating consultation with the tribes that are culturally and traditionally affiliated within your jurisdiction prior to receiving requests for notification of projects in the tribe's areas of traditional and cultural affiliation. The Native American Heritage Commission (NAHC) recommends, but does not require, early consultation as a best practice to ensure that lead agencies receive sufficient information about cultural resources in a project area to avoid damaging effects to tribal cultural resources.

The NAHC also recommends, but does not require that agencies should also include with their notification letters, information regarding any cultural resources assessment that has been completed on the area of potential effect (APE), such as:

1. The results of any record search that may have been conducted at an Information Center of the California Historical Resources Information System (CHRIS), including, but not limited to:

- A listing of any and all known cultural resources that have already been recorded on or adjacent to the APE, such as known archaeological sites;
- Copies of any and all cultural resource records and study reports that may have been provided by the Information Center as part of the records search response;
- Whether the records search indicates a low, moderate, or high probability that unrecorded cultural resources are located in the APE; and
- If a survey is recommended by the Information Center to determine whether previously unrecorded cultural resources are present.

2. The results of any archaeological inventory survey that was conducted, including:

- Any report that may contain site forms, site significance, and suggested mitigation measures.

  All information regarding site locations, Native American human remains, and associated funerary objects should be in a separate confidential addendum, and not be made available for public disclosure in accordance with Government Code section 6254.10.

3. The result of any Sacred Lands File (SLF) check conducted through the Native American Heritage Commission was positive. Please contact all the tribes on the attached list for more information.

4. Any ethnographic studies conducted for any area including all or part of the APE; and

5. Any geotechnical reports regarding all or part of the APE.

Lead agencies should be aware that records maintained by the NAHC and CHRIS are not exhaustive and a negative response to these searches does not preclude the existence of a tribal cultural resource. A tribe may be the only source of information regarding the existence of a tribal cultural resource.

This information will aid tribes in determining whether to request formal consultation. In the event that they do, having the information beforehand will help to facilitate the consultation process.

If you receive notification of change of addresses and phone numbers from tribes, please notify the NAHC. With your assistance, we can assure that our consultation list remains current.

If you have any questions, please contact me at my email address: Sarah.Fonseca@nahc.ac.gov.

Sincerely,

Sarah Fonseca
Cultural Resources Analyst

Attachment