

ATTACHMENT E

California Environmental Quality Act Findings of Fact for the Calle Real Campus Master Plan Final Environmental Impact Report

**FINAL ENVIRONMENTAL IMPACT REPORT (EIR)
(SCH # 2023100576)
FOR THE
CALLE REAL CAMPUS MASTER PLAN
PROJECT #21010 (RFQ# 21010-1)**

Prepared for:

County of Santa Barbara



Santa Barbara County – General Services Department – Capital Project Division
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April 2025
Project: 7208



Full Disclosure

The Board of Supervisors finds and certifies that the Final Environmental Impact Report for the Calle Real Master Plan dated April 2025 constitutes a complete, accurate, adequate and good faith effort at full disclosure under the California Environmental Quality Act.

Location of Record Proceedings

The documents and other materials which constitute the record of proceedings upon which this decision is based are in the custody of the General Services Department, Capital Division, 260 N. San Antonio Road, Santa Barbara, CA 93110.

Environmental Reporting and Monitoring Program

Public Resources Code §21081.6 requires the County to adopt a reporting or monitoring program for measures it has adopted or made a condition of approval to mitigate or avoid significant effects on the environment. The project description and mitigation measures described in the Final Environmental Impact Report, with the corresponding monitoring requirements entitled "Mitigation, Monitoring, and Reporting Program" is incorporated herein. As part of this approval, the Board of Supervisors adopts the Mitigation Monitoring and Reporting Program.



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I. Introduction



I. INTRODUCTION

In accordance with California Environmental Quality Act (CEQA) Guidelines Section 15089, the County of Santa Barbara, the Lead Agency, must prepare a Final Environmental Impact Report (EIR) before approving a project. The purpose of a Final EIR is to provide an opportunity for the lead agency to respond to comments made by the public and agencies regarding the County of Santa Barbara Calle Real Campus Master Plan Project Draft EIR. Pursuant to CEQA Guidelines Section 15132, this Final EIR includes revisions to the Draft EIR; a list of persons, organizations, and agencies that provided comments on the Draft EIR; comments and recommendations received regarding the Draft EIR; and responses to significant environmental points raised in the comments received. The Final EIR also includes a Mitigation Monitoring and Reporting Program.

This Final EIR constitutes the second part of the EIR for the project and is intended to be a companion to the Draft EIR. The Draft EIR for the project, which circulated for public review and comment from October 26, 2024 to December 06, 2024, constitutes the first part of the EIR and is incorporated by reference and bound separately.

1.1 Organization of the Final EIR

This Final EIR is organized into the following four sections:

Section I. Introduction—This section describes the purpose of the Final EIR, outlines the contents of the Final EIR, summarizes the Final EIR process, and provides a summary of the proposed project.

Section II. Responses to Comments—This section provides a matrix depicting those individuals and entities that commented on the Draft EIR and the issues that they raised. This matrix is followed by verbatim numbered copies of the comments followed by numbered responses to each of the written comments made about the Draft EIR.

Section III. Revisions, Clarifications, and Corrections—This section provides a list of revisions made to the Draft EIR based on public comments and other items requiring revision.

These changes are minor and do not add significant new information that would affect the analysis or conclusions presented in the Draft EIR. Section 15088.5(a) of the CEQA Guidelines specifically states:

New information added to an EIR is not “significant” unless the EIR is changed in a way that deprives the public of a meaningful opportunity to comment upon a substantial adverse environmental effect of the project or a feasible way to mitigate or avoid such an effect (including a feasible project alternative) that the project’s proponents have declined to implement. “Significant new information” requiring recirculation include, for example, a disclosure showing that:

- A new significant environmental impact would result from the project or from a new mitigation measure proposed to be implemented.*
- A substantial increase in the severity of an environmental impact would result unless mitigation measures are adopted that reduce the impact to a level of insignificance.*



- *A feasible project alternative or mitigation measure considerably different from others previously analyzed would clearly lessen the significant environmental impacts of the project, but the project's proponents decline to adopt it.*
- *The draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.*

CEQA Guidelines Section 15088.5(b) states that “recirculation is not required where the new information added to the EIR merely clarifies or amplifies or makes insignificant modifications in an adequate EIR.”

As detailed in this Final EIR the comments submitted on the Draft EIR, the responses to these comments, the corrections and additions presented in Section III of this Final EIR, do not constitute new significant information warranting recirculation of the Draft EIR as set forth in CEQA Guidelines Section 15088.5. Rather, the Draft EIR is comprehensive and has been prepared in accordance with CEQA.

Section IV. Mitigation Monitoring and Reporting Program (MMRP)—This section provides the full MMRP for the proposed project. The MMRP lists project design features and mitigation measures by environmental topic and identifies the level of significance after mitigation, the responsible party/monitoring party and the implementation stage.

This Final EIR includes the following appendices:

Appendix FEIR-1	NOA Calle Real Campus Master Plan
Appendix FEIR-2	NOA –Email Blast
Appendix FEIR-3	NOA- Press Release
Appendix FEIR-4	NOA - County Clerk Recorder Posting
Appendix FEIR-5	NOA - Newspaper Publication Proof
Appendix FEIR-6	DEIR Public Hearing Agenda, Sign-in Sheet, and Presentation
Appendix FEIR-7	Revised Appendix D1 Air Quality and Greenhouse Gas Emissions Calculations

- **Appendix FEIR-1: NOA Calle Real Campus Master Plan Draft EIR** — This appendix to the Final EIR includes a copy of the NOA for Calle Real Campus Master Plan Draft EIR.
- **Appendix FEIR-2. NOA Email Blast**— This appendix to the Final EIR includes the email that was sent to commentors/interested parties, agencies, and organizations about the availability of the Draft EIR for public review.
- **Appendix FEIR-3. NOA Press Release** — This appendix to the Final EIR includes the County’s Press Release that was published on their website about the availability of the Draft EIR for public review.
- **Appendix FEIR-4: NOA - County Clerk Recorder Posting**— This appendix to the Final EIR includes the copy of the NOA posted by the County Clerk about the availability of the Draft EIR for public review.



- **Appendix FEIR-5: The Santa Barbara Independent Newspaper Publication Proof** — This appendix to the Final EIR includes the Newspaper proof of publishing the project's NOA on October 18, 2024.
- **Appendix FEIR-6: DEIR Public Hearing Agenda, Sign-in Sheet and Presentation** — This appendix to the Final EIR includes copies of the DEIR Public Hearing Agenda, Sign-in Sheet and Presentation that was delivered to the public.
- **Appendix FEIR-7 Revised Appendix D1 Air Quality and Greenhouse Gas Emissions Calculations** – This appendix to the Final EIR includes revised air quality and greenhouse gas emissions data and calculations presented in revised Appendices D.1.1 through D.1.18 to support the response to Comment Letter A.4.

1.2 Public Review Process

In accordance with CEQA, the environmental review process for the project commenced with solicitation of comments from identified responsible and trustee agencies, as well as interested parties on the scope of the DEIR, through a Notice of Preparation (NOP) process. The NOP was circulated for public comment to the State Clearinghouse, Office of Planning and Research, responsible agencies, owners, local addresses, and other interested parties from October 23, 2023 through December 8, 2023. The NOP also provided notice that a scoping meeting for the proposed project was scheduled to occur on November 8, 2023, at 5:30 PM at the Santa Barbara County Employee University located at 267 Camino del Remedio on the Calle Real campus. The NOP was Appendix A2 in the Draft EIR and the public comments received on the Initial Study were included as Appendix C2 in the Draft EIR.

Consistent with the requirements of Section 15087 of the CEQA Guidelines, the Draft EIR was submitted to the State Clearinghouse, Office of Planning and Research for distribution to state agencies and was circulated for a 45-day public review commencing on October 18, 2024, and ending on December 6, 2024. A Notice of Availability of the Draft EIR was emailed to those interested parties who attended the scoping meeting and/or requested notice. A press release describing the EIR and public review thereof was published in the Santa Barbara Independent, a news website, on October 18, 2024. The Draft EIR was made available for review on Santa Barbara County's website (<https://content.civicplus.com/api/assets/be163860-85c5-409a-ada6-5bf1871f9bdc?cache=1800>) and at the Santa Barbara County's Clerk of the Board Office located at 105 E. Anapamu, 4th Floor, Santa Barbara, CA 93101. Following the Draft EIR public comment period, this Final EIR has been prepared and includes responses to the comments raised regarding the Draft EIR.

1.3 Overview of the Project

1.3.1 Project Location

The Calle Real Campus project site is located in an unincorporated area of Santa Barbara County, approximately five miles northwest of downtown Santa Barbara and just west of the City of Santa Barbara. The 323-acre site extends from Hollister Avenue on the south to Cathedral Oaks Road on the north and is bisected by US Highway 101. Access to the campus is available via US-101 through El Sueno Road to the east and Turnpike Road to the west, with local access provided by Calle Real and Cathedral Oaks Road. The site includes facilities used by 14 County departments, encompassing public health, public safety, and public works. The area is bordered by residential areas and contains



103 buildings across 791,700 square feet, with most structures located in the northeast and southwest quadrants, while the northwest and southeast areas are largely undeveloped.

1.3.2 Proposed Uses

The proposed Master Plan includes a phased approach involving the demolition of select existing structures (7.35 acres), renovation of others, and the addition of approximately 540,000 square feet of new construction. This plan also includes relocating certain County functions currently based at the downtown Santa Barbara campus to the Calle Real campus. Serving as a strategic framework, the Master Plan will guide development and improvements at Calle Real over the next 20 years.

The Santa Barbara County General Plan designation for the project site is Institution/Government Facility, with zoning classifications of 308 acres for Recreational use and 15 acres for Professional and Institutional use.

The Calle Real site is divided into five campuses, described below and mapped on **Figure 1.3-1**. The project is summarized below in **Table 1.3-1** by square footages of existing buildings; of buildings to be demolished, renovated, or left remaining; of new or expanded buildings; total at project completion; and net increase, for each of the five campuses. Net increases in building areas per campus are categorized by type of use in **Table 1.3-2** below.

Public Safety Campus: The Public Safety Campus is the area north of Cathedral Oaks Road, and includes the Emergency Operations Center (EOC), Fire Department headquarters, and the County Education Office.

The County Public Works Department uses approximately 4.2 acres of the central part of the Public Safety Campus for stockpiling, sorting, and loading sediment and debris from debris flows and floods; this area is known as the Materials Processing and Sorting (MPS) Site. The proposed project includes expansion of the MPS site by 3.3 acres to a total of 7.5 acres. The project includes improvements to the MPS site: temporary lighting, portable restrooms, fencing, and traffic control.

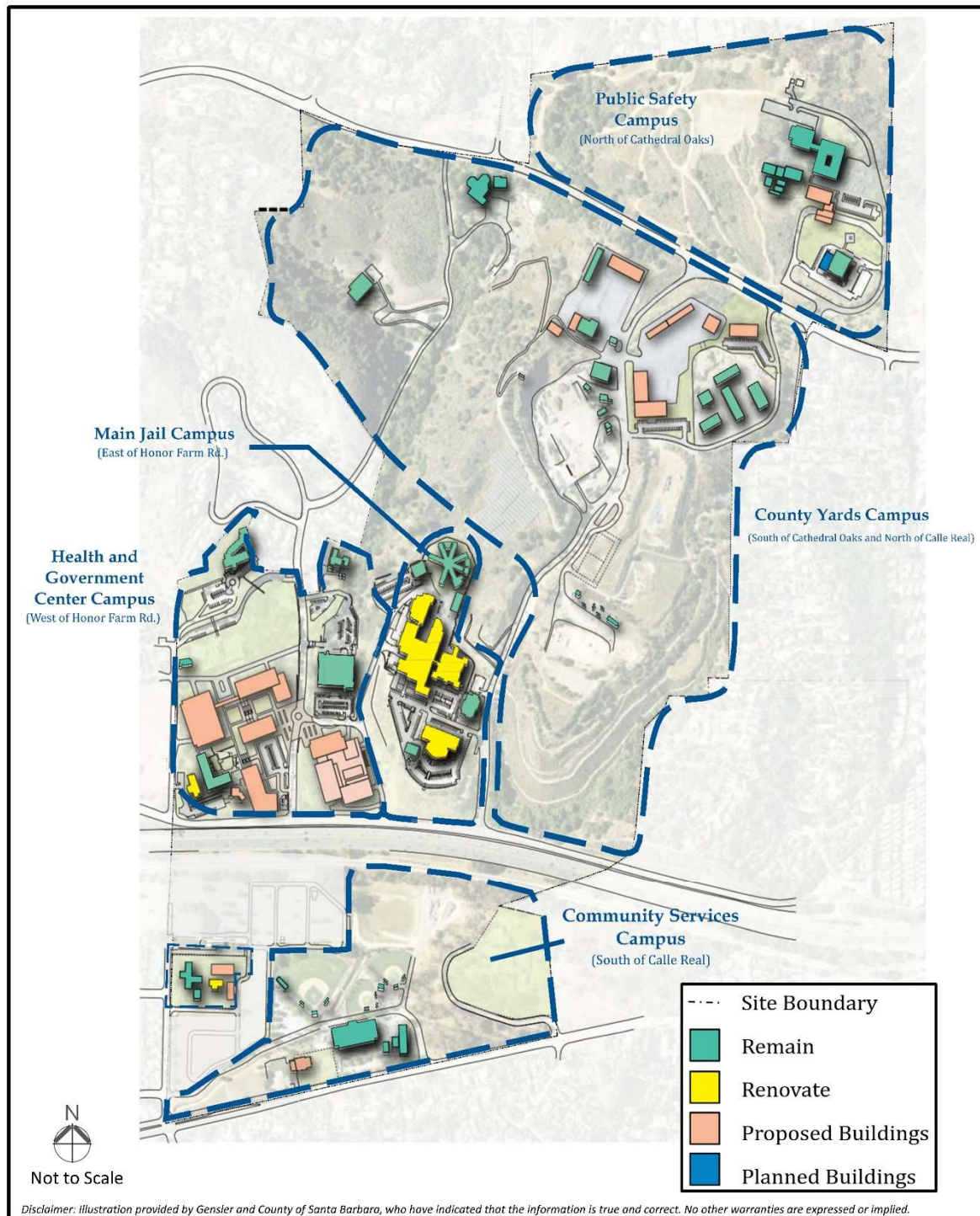
County Yards Campus: The County Yards Campus is the area just south of Cathedral Oaks, including the Public Works, Community Services (Parks) and General Services yards, as well as the Transfer Station.

Health and Government Center Campus: The Health and Government Center Campus is the area of the project site just north of Calle Real and west of Honor Farm Road. This includes Public Health, Behavioral Wellness services and facilities, the Department of Social Services Main Office, the proposed new Commons Building and Service Center, and a site earmarked for the potential relocation of the County government functions currently located in Downtown Santa Barbara in the County Administration Building and County Engineering Building.

Jail Campus: The Jail Campus is the area of the project site just north of Calle Real and east of Honor Farm Road. This portion includes the Sheriff headquarters and County Main Jail facilities.

Community Services Campus: The Community Services Campus is south of Calle Real, bordered by Hollister to the south and the U.S. 101 to the north. This includes the former juvenile detention center, the Ben Page Youth Center, and Fire Station 13.

**Figure 1.3-1
PROJECT SITE OVERVIEW**



**Calle Real Campus
Master Plan**

Project Site Overview



**Table 1.3-1
PROJECT SUMMARY**

Campus	Gross Square Feet					
	Existing	Demolition	Remaining or Renovation	Expansion/ New	Total at Buildout	Net Increase
Public Safety	69,151	13,612	55,539	27,630	83,169	14,018
County Yards	124,360	46,914	77,446	81,605	159,051	34,691
Health and Government Center	307,648	204,865	102,783	391,000	493,783	186,135
Jail	198,548	1,107	197,441	21,100	218,441	19,893
Community Services	92,035	39,800	52,235	17,500	69,735	-22,300
Total¹	791,700	306,300	485,400	538,800	1,024,200	232,500

¹ All totals rounded to nearest 100

Source: Gensler, 2022

**Table 1.3-2
SUMMARY OF NEW AND EXPANDED BUILDINGS BY TYPE OF USE
FOR CONSTRUCTION IMPACTS**

Campus	Proposed Project Activities	Gross Square Feet				
		Institutional: Health Care, Medical Office, etc.	Institutional: Detention	Office, Training,	Infrastructure, Maintenance, Storage, and Other	Total
Public Safety	New and Expanded Buildings	0	0	27,630	0	27,630
	Demolition	0	0	7,612	6,000	13,612
	Net Change	0	0	20,018	-6000	14,018
County Yards	New and Expanded Buildings	0	0	40,800	40,805	81,605
	Demolition	0	0	22,416	24,498	46,914
	Net Change	0	0	18,384	16,307	34,691
Health and Government Center	New and Expanded Buildings	128,500	0	262,500	0	391,000
	Demolition	146,811	0	40,395	17,659	204,865
	Net Change	-18,311	0	222,105	-17,659	186,135
Jail	New and Expanded Buildings	0	0	21,100	0	21,100
	Demolition	0	707	400	0	1,107



	Net Change	0	-707	20,700	0	19,993
Community Services	New and Expanded Buildings	6,000	0	3,500	8,000 ¹	17,500
	Demolition	0	22,462 ²	10,858 ²	6,480	39,800
	Net Change	6,000	0	-7,358	1,520	-22,300
Total¹	New and Expanded Buildings	134,500	0	355,530	48,805	538,835
	Demolition	146,811	23,169	81,681	54,637	306,300
	Net Change	-12,311	-23,169	273,849	-5,832	232,500

¹ The new fire station 13 is classified here as infrastructure/storage/other, as it doesn't fit other categories.

² Note that demolition of the juvenile hall (22,462 square feet) is excluded from operations impact analysis, as it is vacant.

² This number includes the Fire Battalion Chief Office Bunk, which is understood to be office use.

Source: Gensler, 2022

1.4 Probable Residential Development

The adopted Santa Barbara County Housing Element Update (HEU) for the 2023-2031 planning period identifies seven sites within the Calle Real campus for housing development within the 2023-2031 period. Four of the sites are within the Community Services Campus and three are within the Health and Government Center Campus. The number of *potential* dwelling units on the seven sites totals 259, as shown below in **Table 1.4-1**. The actual number of housing units that may be developed on the seven sites within the Calle Real project site is currently unknown. For a conservative analysis, the environmental analysis in this PEIR assumes that all 259 units would be built.

Table 1.4-1
HOUSING SITES WITHIN CALLE REAL CAMPUS

	Potential Dwelling Units	Density	Acres
Community Services Campus			
Juvenile Hall	75	30-40	unknown
Food Bank	14	40-50	0.67
Between Page and Fire Station	18	40-50	0.72
Hollister Lofts	36	20-30	0.57
Subtotal	143	Not applicable	1.96 + unknown
Health and Government Center Campus			
Archives Parking lot	59	40-50	1.49
Children and Family Services	18	40—50	0.47
Above Be Well Building Parking	39	40-50	0.98
Subtotal	116	Not applicable	2.94
Total	259	Not applicable	=4.90 + unknown

Source: Santa Barbara County, 2023



1.5 Potential Phasing

The preliminary phasing plan for Master Plan implementation consists of seven phases described below in **Table 1.5-1**.

Table 1.5-1
POTENTIAL PROJECT PHASING

Phase	Campus	New or Expanded Buildings	Demolition
1	Health and Government Center	New Behavioral Wellness Building New Behavioral Wellness Program Building	Casa Nueva Annex Environmental Health Modular Agriculture/Weights and Measures Department Office Employee University
	Community Services	Purchase temporary structure(s) for Sheriff Annex relocation	
2	Health and Government Center	New Commons Building	Mental Health Clinic County Archives Building
	Community Services	New Fire Station 13	Sheriff's Annex Fire Battalion Chief Office Bunk
3	Health and Government Center	New Public Health Administration Building	Boiler Room Crisis Stabilization Unit
	County Yards	New Shared Shop and Office Building	Storage Building Relocation of Sheriff Impound Lot Relocation of County Auction Lot
	Community Services		Old Fire Station 13
4	Health and Government Center	New Health Care Building New Parking Structure/Workforce Housing Opportunity	Psychiatric Health Building (part of Public Health Dept. building) San Antonio Building Public Health Dept. Admin Building #8
	County Yards	New Public Works Flood Control Office and Shop	Park Shop Buildings
5	Health and Government Center		Public Health Clinic Bldg. Women's Center Trailers (BWell Adult Services)
	County Yards	New Yard Dry Storage Building Addition to Fleet Operations Building	Public Works Flood Control Storage Facilities Shop Storage Building
	Community Services	New Coroner's Office	Sheriff Coroner's Office Annex
	Jail	Sheriff Administration Building Addition	



Phase	Campus	New or Expanded Buildings	Demolition
6	County Yards	New Water Resources and Permits Building	Public works Permits Bldg. Storage Bldgs. (2 bldgs.)
	Community Services	Renovate Old Coroner's Office/New Sheriff Annex Building	Juvenile Hall
7	Public Safety	New Fire Headquarters	Fire Dept. Admin Building Fire Dept. Admin Warehouse
	Health and Government Center	New Government Building and Parking Structure	VA Clinic/Elections Building

Source: Gensler, 2022

1.6 Discretionary Actions

The proposed project includes applications for the following discretionary approvals by Santa Barbara County:

- Self-administered site development permit
- Joint agreement with local energy company for operation of solar arrays

3.1.1 Other Permits and Approvals

Following the County's certification of the EIR, the following permits/approvals, as shown in **Table 1.6-1**, would be required prior to construction.

Table 1.6-1
PERMITS AND APPROVALS

Agency	Permit or Approval
Santa Barbara County Building & Safety Division	Grading and Building Permits
Santa Barbara County Planning and Development Department	Site Development Permit
Santa Barbara County Air Pollution Control District	Permit to construct Permit to operate
Santa Barbara County Fire Department	Building plan check and approval. Review for compliance with the current California Fire Code, current California Building Code, California Health & Safety Code and Santa Barbara County Code of Ordinances. Plans for fire detection and alarm systems, and automatic sprinklers.
Central Coast Regional Water Quality Control Board (Region 3)	Water quality permits

1.7 Areas of Concern

Based on the comment letters received regarding the Draft EIR, which are included in **Section 2.3** of this Final EIR, issues known to be of concern include, but are not limited to: air quality, greenhouse



gas emissions, hazards and hazardous materials, land use and planning, noise, transportation and wildfire. Comments were also provided regarding other environmental topics addressed in the Draft EIR.

II. Responses to Comments



II. RESPONSES TO COMMENTS

2.1 Introduction

Sections 21091(d) and 21092.5 of the Public Resources Code (PRC) and CEQA Guidelines Section 15088 govern the lead agency's responses to comments on a Draft EIR. CEQA Guidelines Section 15088(a) states: "The lead agency shall evaluate comments on environmental issues received from persons who reviewed the draft EIR and shall prepare a written response. The Lead Agency shall respond to comments raising significant environmental issues received during the noticed comment period and any extensions and may respond to late comments." In compliance with these requirements, this section of the Final EIR provides the responses to each of the written comments received with regard to the Draft EIR.

Section 2.2, Matrix of Comments Received in Response to the Draft EIR, includes a matrix that provides a summary of the environmental issues raised by each commenter regarding the Draft Environmental Impact Report for the County of Santa Barbara Calle Real Campus Master Plan Project. Copies of the original comment letters are provided in **Section 2.3** below. Additionally, **Section 2.4** below provides a response to each written comment raised in the comment letters received in response to the Draft EIR.



2.2 Summary Matrix of Comments Received in Response to the Draft EIR

Letter ID	COMMENTER	Date Comment Received	EXECUTIVE SUMMARY	PROJECT DESCRIPTION	ENVIRONMENTAL SETTING	AESTHETICS	AIR QUALITY	BIOLOGICAL RESOURCES	CULTURAL RESOURCES (INCLUDING HISTORICAL RESOURCES)	GEOLOGY AND SOILS	GREENHOUSE GAS EMISSIONS	HAZARDS AND HAZARDOUS MATERIALS	LAND USE AND PLANNING	NOISE	POULATION AND HOUSING	PUBLIC SERVICES- POLICE PROTECTION	PUBLIC SERVICES- FIRE PROTECTION	PUBLIC SERVICES- SCHOOLS	PUBLIC SERVICES- LIBRARIES	PUBLIC SERVICES- PARKS AND RECREATION	TRANSPORTATION	TRIBAL CULTURAL RESOURCES	UTILITIES- WASTEWATER	UTILITIES- STORMWATER	UTILITIES- SOILD WASTE	WILDFIRE	ENERGY	ALTERNATIVES	GENERAL/OTHER
A.1	Leana Tolentino Associate Aviation Planner Division of Aeronautics leana.tolentino@dot.ca.gov Division of Aeronautics- M.S. #40 1120 N Street , P. O. Box 942874 , Sacramento, CA 94274-0001 Phone: (916) 654-4959 Fax: (916) 653-9531 TTY 711 www.dot.ca.gov	November 27, 2024										X	X	X															
A.2	Shelby Fredrick Local Development Review Coordinator Caltrans, District 5 – Transportation Planning Shelby.fredrick@dot.ca.gov	December 4, 2024																		X									
A.3	Jason Johnston Supervising Environmental Health Specialist, Santa Barbara County Public Health Department, Environmental Health Services jjohnston@sbcphd.org (805) 346-7348	December 4, 2024										X												X					
A.4	Bryan Wong Air Quality Specialist Planning Division Santa Barbara County Air Pollution Control District (805) 979-8050	December 10, 2024					X				X																		
A.5	Trey Powell, Northern District Deputy California Geologic Energy Management Division (916) 445-5986											X																	
C.1	Rick M. Merrifield, 11630 Side Hill Circle, Nevada City, CA 95959 rmerrifieldz@gmail.com	November 02, 2024											X															X	X

Letter ID	COMMENTER	Date Comment Received	EXECUTIVE SUMMARY	PROJECT DESCRIPTION	ENVIRONMENTAL SETTING	AESTHETICS	AIR QUALITY	BIOLOGICAL RESOURCES	CULTURAL RESORUCES (INCLUDING HISTORICAL RESOURCES)	GEOLOGY AND SOILS	GREENHOUSE GAS EMISSIONS	HAZARDS AND HAZARDOUS MATERIALS	LAND USE AND PLANNING	NOISE	POULATION AND HOUSING	PUBLIC SERVICES- POLICE PROTECTION	PUBLIC SERVICES- FIRE PROTECTION	PUBLIC SERVICES- SCHOOLS	PUBLIC SERVICES- LIBRARIES	PUBLIC SERVICES- PARKS AND RECREATION	TRANSPORTATION	TRIBAL CULTURAL RESOURCES	UTILITIES- WASTEWATER	UTILTIES- STORMWATER	UTILITIES- SOILD WASTE	WILDFIRE	ENERGY	ALTERNATIVES	GENERAL/OTHER
C.2	Melinda Budin 450 Camino del Remedio #D Santa Barbara, CA 93110 iolite34@gmail.com	December 6, 2024																			X					X			
C.3	Peter Ysebrands pysebrands@aol.com	December 6, 2024				X		X						X							X		X	X	X	X			X



2.3 Bracketed Comment Letters

2.3.1 Comment Letter A.1

LETTER A.1

CALIFORNIA STATE TRANSPORTATION AGENCY

GAVIN NEWSOM, GOVERNOR

California Department of Transportation

DIVISION OF AERONAUTICS - M.S. #40
1120 N STREET
P. O. BOX 942874
SACRAMENTO, CA 94274-0001
PHONE (916) 654-4959
FAX (916) 653-9531
TTY 711
www.dot.ca.gov



November 27, 2024

Mr. Ashton Ellis
Senior Project Manager
County of Santa Barbara
260 N San Antonio Rd
Santa Barbara, CA 93110

Electronically Sent <aellis@countyofsb.org>

Re: SCH 2023100576 – Calle Real Campus Master Plan

Dear Mr. Ashton Ellis:

The California Department of Transportation (Caltrans), Division of Aeronautics (Division) has reviewed the Program Environmental Impact Report (PEIR) & Calle Real Campus Master Plan. One of the goals of the Division is to assist cities, counties, and Airport Land Use Commissions (ALUC) or their equivalent, to understand and comply with the State Aeronautics Act pursuant to the California Public Utilities Code (PUC), Section 21001 et seq. Caltrans encourages collaboration with our partners in the planning process and thanks you for including the Division of Aeronautics in the review of the PEIR.

A.1-1

The proposal is for the Calle Real Campus Master Plan. The purpose of the Calle Real Campus Master Plan is to develop a long-range vision for the future of the campus. Goals of the Calle Real Campus Master Plan include: eliminate buildings beyond their useful lives, identify departmental synergies to streamline services and maximize current vacant space. The project site is located approximately 2.8 miles of the Santa Barbara Airport.

A.1-2

Compliance with Airport Land Use Compatibility Plan (ALUCP)

Part of the proposed Project site, the Community Services Campus, is in the Airport Influence Area (Review Area 2), of the Santa Barbara Airport and therefore must adhere to the safety criteria and restrictions defined in the Airport Land Use Compatibility Plan (ALUCP) adopted by the ALUC pursuant to the PUC, Section 21674. The Santa Barbara County should consider Airport Influence Area Compatibility policies stipulated in the ALUCP or Handbook.

A.1-3

Hazards to Flight

Compatibility concerns regarding airport obstructions and hazards to flight (such as wildlife attractants, lighting, or glare i.e., solar, etc.) should also be considered for further review upon

A.1-4

"Provide a safe and reliable transportation network that serves all people and respects the environment"



Mr. Ashton Ellis, Senior Project Manager
November 27, 2024
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site specific updates or projects. Proposed structures that exceed FAA Regulations Part 77 height criteria are subject to an Obstruction Evaluation/Airspace Analysis for determination.

Closing Statements

An ALUCP is crucial in minimizing noise nuisance and safety hazards around airports while promoting the orderly development in the vicinity of airports, as declared by the California Legislature. A responsibility of the ALUC is to assess potential risk to aircraft and persons in airspace and people occupying areas within the vicinity of the airport.

A.1-5

These comments reflect the areas of review by Caltrans Division of Aeronautics with respect to airport-related noise, safety, and land use planning issues. Thank you for the opportunity to review and comment. If you have any questions, please contact me by email at leana.tolentino@dot.ca.gov.

A.1-6

Sincerely,

Leana Tolentino

Leana Tolentino
Associate Aviation Planner
Division of Aeronautics

c: State Clearing House <state.clearinghouse@opr.ca.gov>
Matthew Friedman, Chief Office of Aviation Planning, <matthew.friedman@dot.ca.gov>
Nirupama Stalin, Senior Transportation Planner <Nirupama.stalin@dot.ca.gov>

"Provide a safe and reliable transportation network that serves all people and respects the environment"



2.3.2 Comment Letter A.2

LETTER A.2

From: Fredrick, Shelby@DOT <Shelby.Fredrick@dot.ca.gov>
Sent: Wednesday, December 4, 2024 11:05 AM
To: Ashton Ellis <aellis@countyofsb.org>
Subject: Caltrans Comments on the Calle Real Campus Master Plan DEIR

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Good morning Ashton,

Please see the following comments from Caltrans on the Calle Real Master Plan Draft Environmental Impact Report:

1. Given the scale of the development and the expected increase in the number of trips, the project needs to provide a Traffic Impact Analysis detailing traffic circulation as well as how traffic to and from the site would be handled. A.2-1
- a. The US 101 Southbound Off-Ramp to El Sueno Road is close to one of the Campus access points. This off-ramp has had multiple safety investigations. The traffic impact study must demonstrate whether this off-ramp requires improvements to accommodate the increased trips from this project. A.2-2
2. A portion of Calle Real, between County Road and El Sueno Rd, is failing. With the increased trips projected from the Campus build-out, it is recommended that a barrier or retaining wall be installed within County right-of-way to mitigate the road failure and to prevent any vehicular crossovers between Calle Real and the US 101. A.2-3

Thank you for considering these comments and let us know if there are any questions.

Sincerely,

Shelby Fredrick (she/her)
Local Development Review Coordinator
Caltrans, District 5 – Transportation Planning
Mon-Fri 7:30 AM- 4:00 PM





2.3.3 Comment Letter A.3

LETTER A.3



Mouhanad Hammami Director
Gustavo A. Mejia, CPA Chief Financial Officer
Lars Seifert Deputy Director
Dana Gamble, LCSW Deputy Director
Dr. Josephine Proclado Chief Medical Officer
Dr. Henning Ansong Health Officer

Environmental Health Services

225 Camino del Remedio • Santa Barbara, CA 93110
805/681-4900 • FAX 805/681-4901

2125 S. Centerpointe Pkwy. #333 • Santa Maria, CA 93455-1340
805/346-8460 • FAX 805/346-8485

Lars Seifert Director of Environmental Health

December 4, 2024

Ashton Ellis, Project Manager
County of Santa Barbara
260 N. San Antonio Road,
Santa Barbara, CA 93110
aellis@countyofsb.org

Subject: Draft Program EIR, Calle Real Campus Master Plan, Project #21010

Dear Ms. Ellis,

Santa Barbara County Public Health Department, Environmental Health Services (EHS) appreciates the opportunity to provide comments on the Draft Program Environmental Impact Report (PEIR) for the Calle Real Campus Master Plan. The proposed project is to develop a long-range vision for the existing campus of 15 parcels containing approximately 323 acres with approximately 782,000 gross square feet of existing County facilities. The proposed project would demolish, renovate, or construct new buildings including approximately 475,000 square feet of existing building to remain with renovations, and 539,000 square feet of new or expanded space added over the 2025-2050 time period, with a total building square footage of 1,024,279 square feet.

A.3-1

EHS staff reviewed the Draft PEIR and have the following comments:

1. *Section 4.8.5, Operation, Phase 1 and Entire Master Plan* notes:

Santa Barbara County Environmental Health Services (EHS) regulates medical waste generators, transporters, transfer stations, and treatment facilities within the County under the authority of the Medical Waste Management Act (California Health and Safety Code Sections 117600 et seq.)...

A.3-2

EHS does not regulate Medical Waste and these activities and this section should be revised to reflect the correct regulatory agency, the California Department of Public Health.

2. EHS recommends expanding or augmenting the *Regulatory Requirements* contained in *Section 4.8 – Hazards and Hazardous Materials, RR HAZ-1 Continue to conduct LFG monitoring and period inspections under regulatory agency for the former landfill,*

A.3-3



Calle Real Master Plan – Draft Program EIR
December 4, 2024
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to incorporate the requirements of California Code of Regulation (CCR), Title 27 including but not limited to § 21190 for all uses on or within 1,000 feet of the disposal areas. These regulations are designed to prevent hazards to public health and safety, and the environment from closed landfills, including protection of the integrity of the final cover, monitor and mitigate landfill gas, and mitigate the effects of subsidence in the waste area.

Please note, 27 CCR § 21190 requires submittal to, and approval by, the Enforcement Agency (EA). Dependent on the work occurring, other agencies approval may also be required.

- For all work proposed within 1,000 feet of the disposal areas, EHS as the designated Local Enforcement Agency (LEA) for Santa Barbara County by CalRecycle shall review and approve proposed postclosure land uses, construction, and any other work that may affect the final cover.
- EHS recommends figures be prepared to accurately depict the waste boundaries and the 1,000-foot areas to clearly identify areas subject to these State laws and regulations.

3. *Section 4.8 – Hazards and Hazardous Materials, Mitigation Measure **MM HAZ-1*** includes conducting a Phase II Subsurface Investigation prior to demolition or construction. EHS recommends incorporating the below comments in this mitigation measure:

- EHS recommends submitting workplans prior to conducting work, and all Phase II reports, for review and comment to an applicable regulatory oversight agency such as EHS' Site Mitigation Unit (SMU), the Regional Water Quality Control Board (RWQCB), or the Department of Toxic Substance Control (DTSC).
- If the subsurface investigation(s) identify a release, it shall be reported to EHS in accordance with Santa Barbara County Code 18C-54. The Tier 1 San Francisco Bay Water Board Environmental Screening Levels (ESLs) shall be included and used as the investigation level referenced in all Phase II reports.
- If contaminants are identified, they shall be vertically and laterally delineated to concentrations below their respective Tier 1 ESLs.

A.3-4

4. *Section 4.8 – Hazards and Hazardous Materials, Mitigation Measure **MM HAZ-2** and **MM HAZ-3*** includes the preparation of a Soil Management Plan (SMP) prior to demolition or construction. EHS recommends incorporating the below comment in this mitigation measure:

- EHS recommends submitting SMPs for review and comment to an applicable regulatory oversight agency such as EHS' Site Mitigation Unit, the Regional Water Quality Control Board (RWQCB), or the Department of Toxic Substance Control (DTSC).

A.3-5

Healthy people, healthy community, healthy environment.



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Please note a SMP is only appropriate for areas without identified contamination, or incidental work such as utility repairs in an area of known contamination. If corrective action such as excavation and offsite disposal is proposed in an area of known contamination, then a corrective action/remedial action plan shall be submitted for review and comment to an applicable regulatory oversight agency such as EHS' Site Mitigation Unit, the Regional Water Quality Control Board (RWQCB), or the Department of Toxic Substance Control (DTSC). Please also note, Santa Barbara County Air Pollution Control District has requirements for projects that include contaminated soil cleanup.

A.3-6

EHS thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency in carrying out their responsibilities in the CEQA process. With the incorporation of the above comments, it is EHS' opinion that the level of significance does not change from that contained in section 4.8.7 *Level of Significance After Mitigation*, of ...*less than significant after implementation of Mitigation Measures HAZ-1 through HAZ-3 and regulatory requirement RR HAZ-1*.

A.3-7

EHS requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project. If the environmental document is adopted during a public hearing, EHS requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, EHS requests 10 days advance notification of the date of the adoption and proposed project approval by the decision-making body.

A.3-8

If you have any questions regarding these comments, please contact myself at 805-346-7348 or jjohnston@sbcphd.org, Norma Campos Bernal at 805-681-4942 or NCamposBernal@sbcphd.org for questions related to solid waste, or Thomas Rejzek at 805-346-8216 or TRejzek@sbcphd.org for questions related to remedial oversight and site assessment.

Sincerely,

Jason Johnston
Supervising Environmental Health Specialist

ec: Gina Weber, CalRecycle
Joddi Leipner, Santa Barbara County Public Works, Resource Recovery and Waste
Management Division (RRWMD)
Norma Campos Bernal, LEA
Thomas Rejzek, EHS



2.3.4 Comment Letter A.4



December 10, 2024

Ashton Ellis, Project Manager
County of Santa Barbara
260 N. San Antonio Road
Santa Barbara, CA 93110

Sent Via Email: aellis@countyofsb.org

Re: Santa Barbara County Air Pollution Control District Comments on the Draft Program Environmental Impact Report for the Calle Real Master Plan Project

Dear Ashton Ellis:

The Santa Barbara County Air Pollution Control District (District) has reviewed the Draft Program Environmental Impact Report (PEIR) for the Calle Real Campus Master Plan. The County proposes the long-term development of the County's Calle Real Campus over the next twenty-five years (2025-2050), which would divide the Campus into five smaller campuses: Public Safety Campus, County Yards Campus, Jail and Government Center Campus, Health Campus, and Community Services Campus. The project also includes the potential buildout of 259 residential units. The proposed project would demolish, renovate, or construct new buildings at all five campuses. A total of 103 buildings/structures are present on the campus comprising 791,700 square feet (SF) of building area on a footprint of approximately 14.9 acres. The Master Plan calls for the demolition of 306,300 SF of existing buildings, while 485,400 SF of existing buildings will remain or be renovated, in addition to new construction of approximately 540,000 SF of total building area. Project construction may begin as early as April 2026 and last until December 2050. The total building square footage at the project site at complete buildout would be approximately 1,024,200 SF. The Santa Barbara County General Plan land use designation for the project site is Institution/Government Facility, while the zoning is Recreational (307 acres), and Professional and Institutional (15 acres). The County's Calle Real Campus includes 17 parcels and is located near the border of the City of Santa Barbara and the City of Goleta, encompassing approximately 323 acres from Hollister Avenue, south of US 101, to an area north of Cathedral Oaks.

The District has the following general comment on the project and Draft PEIR:

1. **Regulatory Requirements/CEQA:** If the proposed project includes equipment or operations that require a District permit, the District will be a responsible agency under the California Environmental Quality Act (CEQA) and will seek to rely on the County's CEQA determination. In order to avoid additional CEQA documentation related to District permit issuance, the County's environmental analysis of the project should include adequately analyze all potential air quality and greenhouse gas impacts (including health risk from toxic air contaminants) and include mitigation as appropriate to reduce the impacts. District permits are required for diesel generators (rated 50 bhp and greater), hot water heaters/boilers (rated more than 2.00 MMBtu/hr), and contaminated soil cleanup activities. Other District regulatory requirements and prohibitory rules may apply to proposed operations and activities. The applicant should refer to the District's website at <https://www.ourair.org/engineering-programs/> and <https://www.ourair.org/current-rules-and-regulations/> for more information. Please consult with the District as needed to ensure regulatory compliance.

A.4-1

Aeron Arlin Genet, Air Pollution Control Officer

(805) 979-8050 | 260 N. San Antonio Rd., Ste. A Santa Barbara, CA 93110 | ourair.org | @OurAirSBC



District Comments on the Draft Program Environmental Impact Report for the Calle Real Master Plan Project
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The District has the following specific comments on the analysis included in the Draft PEIR:

2. **Section 4.2 Air Quality – Emission Thresholds, Page 4.2-24 and 4.2-30, and Section 4.7 Greenhouse Gas Emissions - Thresholds of Significance, Pages 4.7-7 through 4.7-11:** The following comments pertain to the application of emission thresholds.

a. **Motor Vehicle Threshold:** The County's significance threshold for motor vehicle-related emissions is 25 pounds per day of NO_x or ROC. Therefore, the second bullet point on page 4.2-24 that discusses the mobile emissions threshold should be changed to state: "NO_x or ROC emissions from motor vehicle trips alone are less than 25 pounds per day."

A.4-2

b. **Adopted Thresholds:** Please revise the discussion on page 4.2-24 and Table 4.2-8 on page 4.2-30 to reflect that the thresholds used for the significance determination are Santa Barbara County's adopted CEQA thresholds and not SBCAPCD's thresholds.

A.4-3

c. **Greenhouse Gas Thresholds:** The EIR refers to "SBCAPCD" greenhouse gas thresholds. However, the thresholds referenced are the County of Santa Barbara's. Please revise the discussion to reflect that the thresholds used are Santa Barbara County CEQA thresholds and not SBCAPCD thresholds.

A.4-4

3. **Section 4.2 Air Quality - Short-Term Construction, Page 4.2-29:** This section states that "*The SBCAPCD considers all short-term construction emissions insignificant...*" This statement is inaccurate and does not represent SBCAPCD policy or guidance. While the District does not currently have quantitative thresholds of significance in place for short-term or construction emissions, impacts from construction-phase activities and emissions should be evaluated under CEQA and a determination of the significance of the environmental effect should be made by the lead agency. Please revise this discussion and provide alternative support/substantiation the determination that impacts from construction-related emissions are less than significant.

A.4-5

4. **Section 4.2 Air Quality – Long-Term Operational Emissions, Pages 4.2-29 through 4.2-30:** The EIR assesses impacts of the proposed project based on a comparison of emissions from the existing project in year 2025 and the emissions resulting from the full build-out of the project in year 2050. The District strongly advises that the analysis be revised to include an assessment of impacts from each phase of the project. Limiting the impact evaluation to only consider impacts at full build-out, some 25 years after commencement of construction activities, would ignore potential impacts that will occur as each phase of the project becomes operational. Additionally, given the project's size and phased construction schedule, it is likely that the project will result in concurrent construction and operational emissions. When analyzing impacts from each phase of development, construction-related emissions should be combined with operational emissions for all phases where construction and operations overlap. If the analysis determines that proposed project activities exceeds the significance thresholds, mitigation should be applied to reduce those emissions as appropriate under CEQA. Please revise the analysis as recommended.

A.4-6

5. **Section 4.2 Air Quality – Air Toxics Health Risk Assessment, Page 4.2-23 and Pages 4.2-32 through 4.2-33:** There are several inaccuracies or mischaracterizations in the discussion and analysis of health risk that should be amended.

A.4-7



- a. **Construction Health Risk:** Page 4.2-23 states that “According to the SBCAPCD’s Modeling Guidelines for Health Risk Assessments, Form-15i, the District’s policy is that a health risk assessment performed under CEQA should not include emissions from construction activities (SBCAPCD, 2023b, p.2)” and Page 4.2-32 states “As noted above, the SBCAPCD’s policy is that a health risk assessment for CEQA should not include emissions from site grading, welding, vehicle combustion emissions, or other activities associated with construction.” This is a mischaracterization of the District’s recommendations. The cited document, *Form-15i Modeling Guidelines for Health Risk Assessments*, pertains to new or existing stationary sources that are either undergoing the District’s New Source Review (NSR) permitting program or AB 2588 Air Toxics “Hot Spots” Program. Guidance is included for new/proposed stationary sources that are undergoing CEQA, and either are concurrently or in the future will be undergoing the District’s NSR permitting program. The District’s HRA guidance is currently focused on the evaluation of operational-phase emissions. However, the County of Santa Barbara is the lead agency under CEQA for the proposed land use development project. In this context, the District routinely recommends that the lead agency evaluate impacts from all project phases and sources of emissions, including construction and operational-phase activities and equipment. The inaccurate statements regarding SBCAPCD policy should be removed from the EIR and the analysis should include an evaluation of potential health risk associated with construction of the project. A.4-7
(cont'd)
- b. **Impacts of Project TAC Emissions on the Community:** In referring to diesel particulate matter from heavy duty trucks, this section concludes that “The increase of 0.40 pound per day would have a negligible impact on cancer and noncancer risk.” TAC emissions cannot be directly correlated to the project’s potential health risk without a health risk screening or refined health risk assessment. The EIR should be revised to include an alternative basis for its conclusions regarding potential health risk impacts from the project. A.4-8
- c. **Health Risk from Proposed Generator:** According to the project description, the new Communication Prefab Facility will house a generator. If the proposed generator is diesel-fueled, an equipment-specific Health Risk Assessment (HRA) will be required as part of District permit issuance. If the generator will be diesel-fueled and the applicant is able to identify a reasonable worst-case operational scenario for its operation (e.g. brake-horsepower, engine Tier rating, etc.), the District advises that the EIR be revised to include an equipment-specific HRA to ensure that the engine will not present a significant health risk to nearby receptors. The applicant should refer to the District’s website at www.ourair.org/dice-atcm for more information on diesel engine permitting. A.4-9
6. **Section 4.2 Air Quality – MM AQ-1: Reduce Residential Exposure to Roadway TAC, Page 4.2-33:** To ensure the long-term effectiveness of air filtration systems described on page 4.2-33, regular operation of the HVAC system and regular maintenance/replacement of air filters are required, both of which result in effort and cost to the resident or facility. Therefore, A.4-10



District Comments on the Draft Program Environmental Impact Report for the Calle Real Master Plan Project
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the District suggests that MM AQ-1 be expanded upon to require that the facility provide regular maintenance of air filters; or at a minimum a brochure notifying the future residents of the need to maintain the filter screens shall be prepared and provided at the time of leasing or ownership exchange.

A.4-10
(cont'd)

7. **Section 4.7 Greenhouse Gas Emissions – Table 4.7-1 Project Construction GHG Emissions, Pages 4.7-9 through 4.7-10:** The “*Project Completion Total*” in this table has not accurately summed the annual subtotals, resulting in an underestimation of CO₂e emissions. Specifically, the EIR cites a total of 5,824.02 MT CO₂e, whereas the District calculates the total as 6,364.87 MT CO₂e). Please review and adjust the analysis and discussion as necessary.

A.4-11

8. **Appendix D1 Air Quality and Greenhouse Gas Emissions Calculations:** The Project Description and discussion of proposed residential units on page 2-27 of the EIR states that, “*For a conservative analysis, the environmental analysis in this PEIR assumes that all 259 units would be built.*” However, the CalEEMod analysis and emission estimates for the project do not include assessment of the residential units. As it appears that the scope of the CEQA analysis for the proposed project includes the development of the residential units, the CalEEMod analysis and project emissions estimates should be revised to include the residential components.

A.4-12

We hope you find our comments useful. Please contact me at (805) 979-8302 or via email at wongb@sbcapcd.org if you have any questions.

Sincerely,

Bryan Wong,
Air Quality Specialist
Planning Division

cc: Planning Chron File



2.3.5 Comment Letter A.5



California
Department of Conservation
Geologic Energy Management Division

Letter A.5

Gavin Newsom, Governor
Gabe Tiffany, Acting Director
715 P Street, MS 1803
Sacramento, CA. 95814
T: (916) 445-5986

12/12/2024

County: Santa Barbara - General Services
Ashton Ellis
260 N San Antonio Road, Santa Barbara, CA 93110, USA
aellis@countyofsb.org

Construction Site Well Review (CSWR) ID: 1013130

Assessor Parcel Number(s): 059140023, 059140029, 059120003, 061040024, 061040012, 061040040,
061040048, 061040049, 061040031, 061040038, 061040015, 061040016, 061040027, 061040047,
061040023, 059120004

Property Owner(s): County of Santa Barbara

Project Location Address: County Road and Calle Real Santa Barbara, California 93110

Project Title: Calle Real Campus Master Plan SCH Number 2023100576

Public Resources Code (PRC) § 3208.1 establishes well reabandonment responsibility when a previously plugged and abandoned well will be impacted by planned property development or construction activities. Local permitting agencies, property owners, and/or developers should be aware of, and fully understand, that significant and potentially dangerous issues may be associated with development near oil, gas, and geothermal wells.

The California Geologic Energy Management Division (CalGEM) has received and reviewed the above referenced project dated 12/9/2024. To assist local permitting agencies, property owners, and developers in making wise land use decisions regarding potential development near oil, gas, or geothermal wells, the Division provides the following well evaluation.

The project is located in Santa Barbara County, within the boundaries of the following fields:

Any Field

A.5-1



There are several hundred plugged and abandoned oil wells located in the Santa Barbara area. According to CalGEM records, the nearest plugged and abandoned well to the project is "Santa Barbara County" 1 (API 0408304231). This well is near the solar array on county road. The next closest plugged and abandoned well is "County" 1 (API 0408304217). This well is located approximately 220 feet east of county road. CalGEM recommends that any wells in close proximity to the property be researched to verify the location and ensure that any construction does not impede access. If any well locations are found to differ from CalGEM records, an updated plot plan identifying the well locations relative to the proposed structure(s) is expected to be provided, prior to conducting construction. CalGEM's online well mapping tool, Well Finder, can be accessed at <https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx>

A.5-2

Our records indicate there are 4 known oil or gas wells located within the project boundary as identified in the application.

- Number of wells Not Abandoned to Current Division Requirements as Prescribed by Law and Projected to Be Built Over or Have Future Access Impeded by this project: 0
- Number of wells Not Abandoned to Current Division Requirements as Prescribed by Law and Not Projected to Be Built Over or Have Future Access Impeded by this project: 4
- Number of wells Abandoned to Current Division Requirements as Prescribed by Law and Projected to Be Built Over or Have Future Access Impeded by this project: 0
- Number of wells Abandoned to Current Division Requirements as Prescribed by Law and Not Projected to Be Built Over or Have Future Access Impeded by this project: 0

A.5-3

The Division categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access including, but not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, roadways, and decking. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure.

A.5-4

There are no guarantees a well abandoned in compliance with current Division requirements as prescribed by law will not start leaking in the future. It always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. The Division acknowledges wells plugged and abandoned to the most current Division requirements as prescribed by law have a lower probability of leaking in the future, however there is no

A.5-5



guarantees that such abandonments will not leak.

I A.5-5
(cont'd)

The Division advises that all wells identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations should be provided to the Division in Latitude and Longitude, NAD 83 decimal format. The Division expects any wells found leaking to be reported to it immediately.

A.5-6

Failure to plug and reabandon the well may result in enforcement action, including an order to perform reabandonment well work, pursuant to PRC § 3208.1, and 3224.

I A.5-7

PRC § 3208.1 give the Division the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment, or if the well is not accessible or visible. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for reabandonment as:

1. The property owner - If the well was plugged and abandoned in conformance with Division requirements at the time of abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to reabandon the well and be responsible for the reabandonment.

2. The person or entity causing construction over or near the well - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be reabandoned, or to follow the advice of the supervisor or district deputy not to undertake the construction, then the person or entity causing the construction over or near the well shall obtain all rights necessary to reabandon the well and be responsible for the reabandonment.

A.5-8

3. The party or parties responsible for disturbing the integrity of the abandonment - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the reabandonment.



No well work may be performed on any oil, gas, or geothermal well without written approval from the Division. Well work requiring approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other re-abandonment work. The Division also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR §1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below grade. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from the Division is required before work can start.

A.5-9

The Division makes the following additional recommendations to the local permitting agency, property owner, and developer:

1. To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, the Division recommends that information regarding the above identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.

A.5-10

2. The Division recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.

As indicated in PRC § 3106, the Division has statutory authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil, gas, and geothermal deposits; and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to the Division's authority to order work on wells pursuant to PRC §§ 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC §§ 3236, 3236.5, and 3359 for violations within the Division's jurisdictional authority. The Division does not regulate grading, excavations, or other land use issues.

A.5-11

If during development activities, any wells are encountered that were not part of this review, the property owner is expected to immediately notify the Division's construction site well review engineer in the Northern district office, and file for Division review an amended site plan with well casing diagrams. The District office will send a follow-up well evaluation letter to the property owner and local permitting agency.

A.5-12

Should you have any questions, please contact me at (805) 937-7246 or via email at Trey.Powell@conservation.ca.gov.



Sincerely,

Trey Powell
Northern District Deputy

cc: Ashton Ellis - Plan Checker



Wells Not Abandoned to Current Division Requirements as Prescribed by Law & Not Projected to be Built Over or Have Future Access Impeded

The wells listed below are not abandoned to current Division requirements as prescribed by law, and based upon information provided, are not projected to be built over or have future access impeded.

A.5-13

API	Well Designation	Operator	Well Evaluations
0408304541	Core Hole 1	Chevron U.S.A. Inc.	1. Hole fluid is not to current standards (CCR section 1723. (b)). 2. Surface plug is not to current standards (CCR section 1723.5).
0408304209	Santa Barbara County 1	Chevron U.S.A. Inc.	1. Hole fluid is not to current standards (CCR section 1723. (b)). 2. Freshwater protection plug is not to current standards (CCR § 1723.2). 3. Casing shoe plug is not to current standards (CCR section 1723.3). 4. Surface plug is not to current standards (CCR section 1723.5).
0408304231	1	Chevron U.S.A. Inc.	Well was converted to water well in 1930, no further documentation after conversion report.
0408304217	County 1	Security Land & Royalty Co.	1. Hole fluid is not to current standards (CCR section 1723. (b)). 2. Freshwater protection plug is not to current standards (CCR § 1723.2). 3. Casing shoe plug is not to current standards (CCR section 1723.3).



❖ RESPONSES TO COMMENTS ❖

			4. Surface plug is not to current standards (CCR section 1723.5).
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A.5-13
(cont'd)



2.3.6 Comment Letter C.1

LETTER C.1

From: Rick Merrifield <rmerrifieldz@gmail.com>

Sent: Saturday, November 2, 2024 4:27 PM

To: Ashton Ellis <aellis@countyofsb.org>

Subject: Public Comment: Calle Real Campus Master Plan Program EIR – Submitted 11/02/2024

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Dear Mr. Ellis:

Please consider the following comments during the review of the environmental document for the Calle Real Campus Master Plan. I worked on this campus for a number of years for Environmental Health Services. I think it's important to recognize that the Calle Real Campus is an extremely valuable asset to the County that, in my opinion, has not been as well utilized over the years as it could have been. This master plan is long overdue and will hopefully improve efficiency of County services.

C.1-1

1. The first priority for the master plan should be to enhance, improve and maintain County services. Additional housing or offices for non-County entities should not be included on this particular site. It is and should be maintained as a government service center. Some of us recall the experience of Ventura County as they planned and then built their government center. It was initially controversial but ended up being one of their smartest moves to consolidate scattered county offices.
2. There should be serious consideration given to moving County services such as Planning and Building to the Calle Real Campus. It has never made sense to me for the County to keep these offices in downtown Santa Barbara, an entirely separate jurisdiction with limited parking and where their clients do not live.
3. Buildings should be durable and permanent. I worked for many years for Environmental Health Services in a "temporary" structure consisting of three or four modular units. "Temporary" tends to become permanent.

C.1-2

C.1-3

C.1-4

Thank you for the opportunity to comment.

Yours truly,

Richard M. Merrifield

11630 Side Hill Circle

Nevada City, CA 95959

rmerrifieldz@gmail.com



2.3.7 Comment Letter C.2

Letter C.2

From: MM Budin <iolite34@gmail.com>
Sent: Friday, December 6, 2024 5:18:27 PM
To: Ashton Ellis <aellis@countvofsb.org>
Subject: Re: Public Comment: Calle Real Campus Master Plan Program EIR-Submitted 12/06/2024

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

Did my comment go through? I know it was last minute, but this 550 page document is more complicated than I anticipated. Anyways my clock said that it was 4:59 p.m. I hope that's okay. I haven't gotten a confirmation email yet. Sorry about all the dictation typos.
thank you.

Sincerely,

Melinda Budin
450 Camino del Remedio unit D
Santa Barbara, CA 93110

On Fri, Dec 6, 2024, 5:01 PM MM Budin <iolite34@gmail.com> wrote:
Ashton Ellis,

I'm commenting on the Calle Real campus master plan eir.

First the fire safety risk seems to be downgraded in the EIR. It says nothing about how the people living in the recommended 223 new housing units to be built, not including the Builder's bonus which could be applied, and the extra staff being moved from Downtown Santa Barbara to the this campus, would evacuate in a fire. There is only one road from Camino Del remedio to Calle Real that leads to the freeway on ramp. understand that El sueno Road also doesn't connect to Cathedral Oaks on the North End. Although the report states that Camino Del remedio connects North to to Cathedral Oaks, the section of the road past the shooting range has had soil collapse from the Hillside many times and erosion on the Creekside, narrowing it to an unsafe width for cars. It also has been locked at the south end of alpha schools driveway for many years. There's a high density of existing housing that would all be funneled in to one two lane road, Calle real, in a fire evacuation. The report also states that there are several stop signs on Cathedral Oaks which is not true. Between Turnpike Road to the east where there's a stop light, according to online Street View maps there's no stop sign on Cathedral Oaks until at least Highway 154. There are stop signs for connecting streets that lead into Cathedral Oaks.

Next, the reason given for not moving the planning Department from Downtown Santa Barbara to the Health Complex is the need for retail and offices? All I keep reading about is the difficulty in keeping retail storefronts filled downtown. And I'm not reading of any shortages of Office Space.

C.2-1

C.2-2



Although in the December 6th meeting, it was said that there was no specific number of units to be built, I see that in table 5.3-2 it shows that 223 units are proposed, not taking into account bonus density units ., with only 268 new parking spaces. There's an increase of 540 County parking spaces recommended for county staff, versus the 927 recommended in the maximum buildup proposal. Going by the square feet proposed in the maximum development, the increase in parking spaces should be proportional, I.E the 927 spaces. Also, according to the map, it looks like the housing or offices will be built on top of a large parking lot, and I'm not finding that taken into consideration.

In the map showing the southern section, north of Calle Real, the Wildlife Urban interface map excludes this project. I think the Bobcats, Whitetailed Kites, bluebirds, and monarch butterflies, the latter of which I saw daily this year, for many months within only a 10 minute period from my patio daily, would dispute that. This would further break up wildlife corridors .

and in the fire safety map 4.14-2 it shows a moderate risk part of the project, not .

Thank you

C.2-3

C.2-4

Melinda Budin

450 Camino del Remedio unit D, Santa Barbara, CA 93110



2.3.8 Comment Letter C.3

Letter C.3

From: pysebrands@aol.com <pysebrands@aol.com>
Sent: Friday, December 6, 2024 9:09 PM
To: Ashton Ellis <aellis@countyofsb.org>
Subject: Public Comment on Calle Real Master Plan

Caution: This email originated from a source outside of the County of Santa Barbara. Do not click links or open attachments unless you verify the sender and know the content is safe.

To: Ashton Ellis

I am responding to the Draft PEIR for the Calle Real Master Plan. I have lived in the area for 60 years and believe that the PEIR has not adequately evaluated several of the environmental issues that will impact the residential and recreational area. Specifically they are the Aesthetics, Biological Resources, Noise, Transportation, Utilities/Service Systems and Wildfire. The PEIR uses specific terminology to evaluate impacts that seem to be guided by laws and regulations designed to set minimum thresholds. The ones that I believe are most troubling are termed, "Less than significant" and "Less than significant impact with mitigation incorporated".

C.3-1

{ An impact is considered less than significant if the analysis concludes that the project would cause no substantial adverse change to the environment and requires no mitigation.}

C.3-2

The complete report is extremely lengthy and technical. References to the technical data are so complex that its almost impossible to understand. When I am able to look at some of the analysis it has me seriously wondering if the minimum was done to justify the evaluation. For example please help to understand the Appendix D10 Noise Hourly Data. It indicates that only 3 sites were evaluated for the entire project, ie (NS1, NS2 & NS3). How can only 3 sites be an adequate representation of the entire project?

C.3-3

The report indicates that there will be several large expansions to some of the buildings. Homeowners in the area already have several of their views blocked by county buildings including large flood lights that are on all night. Building taller and larger structures will eliminate more of the views that have contributed to the values of their properties.

C.3-4

The report includes a Biological Resource analysis that indicates only 2 days, May 9th and 15th, were spent in the field to evaluate ground based resources. With such a large area and the dynamics of yearly migration and breeding cycles I find it hard to believe that a comprehensive study can be accomplished. In the past 30 years I have had many additional species of wildlife on my property that would never be counted in a 2 day survey.

C.3-5

The transportation routs that provide egress and access to these areas are limited and completely inadequate to any further expansion to the campus which will include

C.3-6



more employees and services to the community. Appendix D12 clearly shows an increase. None of the "priority objectives" or "other objectives" identify improving transportation routes in the area. Cathedral Oaks is a 2 lane road with a very unsafe bike route that serves a direct access to several public schools.

C.3-6
(cont'd)

It is obvious that Utilities and Service Systems will be needed as part of the Calle Real Campus Master Plan and will place an extra burden on the system. The additional demand will result in higher costs to existing homeowners as a result of increased usage and system upgrades.

C.3-7

Wildfire threat in the area has been a historical fact for several years. Additional construction and population without any additional fire stations and egress infrastructure is a poor choice. Several yeas ago the Fire Department Headquarters housed a Engine Company because response times were inadequate. During the Paint, Jesusita and Cave fire, just to name a few, the ability to evacuate is severely impeded because of only two routes that give access to the freeway. Highway 154 and Turnpike are the only means to get out of the area.

C.3-8

I would like to request an additional public hearing on the Draft Program Environmental Impact Report to describe in layman's terms how some of the assessment was done to evaluate the impacts of the report and what specific mitigation measures would be needed to address them. I have spoken to several homeowners in my area that also have the same concurs and believe that the term "Significant Impact" has more then one meaning depending on who it impacts.

C.3-9

Sincerely,
Peter Ysebrands



2.4 Letter Comments and Responses

2.4.1 Comment Letter A.1

COMMENT LETTER A.1

Leana Tolentino
Associate Aviation Planner
Division of Aeronautics- M.S. #40
1120 N Street , P. O. Box 942874 , Sacramento, CA 94274-0001

Comment A.1-1:

The California Department of Transportation (Caltrans), Division of Aeronautics (Division) has reviewed the Program Environmental Impact Report (PEIR) & Calle Real Campus Master Plan. One of the goals of the Division is to assist cities, counties, and Airport Land Use Commissions (ALUC) or their equivalent, to understand and comply with the State Aeronautics Act pursuant to the California Public Utilities Code (PUC), Section 21001 et seq. Caltrans encourages collaboration with our partners in the planning process and thanks you for including the Division of Aeronautics in the review of the PEIR.

Response to Comment A.1-1:

Comment A.1-2:

The proposal is for the Calle Real Campus Master Plan. The purpose of the Calle Real Campus Master Plan is to develop a long-range vision for the future of the campus. Goals of the Calle Real Campus Master Plan include: eliminate buildings beyond their useful lives, identify departmental synergies to streamline services and maximize current vacant space. The project site is located approximately 2.8 miles from the Santa Barbara Airport.

Response to Comment A.1-2:

The comment accurately summarizes some of the project's purpose and goals. Note, the project site is located 2.8 miles east of the Santa Barbara Airport.

Comment A.1-3:

Compliance with Airport Land Use Compatibility Plan (ALUCP)

Part of the proposed project site, the Community Services Campus, is in the Airport Influence Area (Review Area 2), of the Santa Barbara Airport and therefore must adhere to the safety criteria and restrictions defined in the Airport Land Use Compatibility Plan (ALUCP) adopted by the ALUC pursuant to the PUC, Section 21674. The Santa Barbara County should consider Airport Influence Area Compatibility policies stipulated in the ALUCP or Handbook.

Response to Comment A.1-3:

Figure 4-2 of the 2023 Santa Barbara Airport Land Use Compatibility Plan shows the project site outside of safety zones for Santa Barbara Municipal Airport (SBCAG, 2023). Per the statement on



page 4.9-5 of the Initial Study (included as Appendix A5 of the PEIR), "The project site is outside of zones surrounding Santa Barbara Municipal Airport where land uses are regulated to minimize aviation-related hazards to persons on the ground" is correct. No further response is needed.

Comment A.1-4:

Hazards to Flight: Compatibility concerns regarding airport obstructions and hazards to flight (such as wildlife attractants, lighting, or glare i.e., solar, etc.) should also be considered for further review upon site specific updates or projects. Proposed structures that exceed FAA Regulations Part 77 height criteria are subject to an Obstruction Evaluation/Airspace Analysis for determination.

Response to Comment A.1-4:

The project site is outside of 14 CFR Part 77 Imaginary Airspace Surfaces mapped on Figure 4.3 of the 2023 Santa Barbara Airport Land Use Compatibility Plan (SBCAG, 2023). Imaginary airport surfaces do not apply to the project site.

Comment A.1-5:

Closing Statements: An ALUCP is crucial in minimizing noise nuisance and safety hazards around airports while promoting the orderly development in the vicinity of airports, as declared by the California Legislature. A responsibility of the ALUC is to assess potential risk to aircraft and persons in airspace and people occupying areas within the vicinity of the airport.

Response to Comment A.1-5:

The comment describes the purposes of the ALUCP and the ALUC and does not address the adequacy of the EIR. No response is needed.

Comment A.1-6:

These comments reflect the areas of review by Caltrans Division of Aeronautics with respect to airport-related noise, safety, and land use planning issues. Thank you for the opportunity to review and comment. If you have any questions, please contact me by email at leana.tolentino@dot.ca.gov.

Response to Comment A.1-6:

Santa Barbara County appreciates the comments.

2.4.2 Comment Letter A.2

COMMENT LETTER A.2

Shelby Fredrick
Local Development Review Coordinator
Caltrans, District 5 – Transportation Planning



Comment A.2-1:

Given the scale of the development and the expected increase in the number of trips, the project needs to provide a Traffic Impact Analysis detailing traffic circulation as well as how traffic to and from the site would be handled.

Response to Comment A.2-1:

The Draft EIR is a Program EIR and is intended to address the impacts of a project that will be implemented over 25 years (2025-2050). A TIA, which is not required by CEQA is not appropriate for this type of document, as trip generation, mode choice, trip assignment, and trip distribution cannot be estimated with sufficient accuracy to make a TIA useful.

Although not required under CEQA, TIAs will be required for some development projects undertaken pursuant to the Master Plan, for purposes of identifying public improvements and fair share contribution if appropriate. Mitigation Measure TRANS-2 is hereby added to Section 4.11, Transportation, page 4.11-15, of the DPEIR. Added text is shown underlined.

MM TRANS-2 Before Santa Barbara County Board of Supervisors considers individual development projects undertaken under the Master Plan for approval, the County shall retain a registered transportation engineer, or civil engineer who shall estimate operational trip generation. For each development project estimated to generate over 100 trips in a peak hour, a Transportation Impact Analysis (TIA) shall be completed before the County Board of Supervisors considers the project for approval. The TIA shall conform with the guidelines set forth in Transportation Impact Study Requirements issued by Santa Barbara County in 2007.

- For projects estimated to generate 100 to 499 trips in a peak hour, the study area may tend to be confined to the street or streets on which access is proposed but should be extended to at least the first major intersection in each direction.
- For projects estimated to generate 500 or more trips in a peak hour, the study area may extend beyond the streets onto which access is proposed (reference Santa Barbara County Transportation Impact Study Requirements, 2007).

Each TIA prepared pursuant to this Mitigation Measure shall include an assessment of direct and cumulative impacts on the safety and operation of the US 101 Northbound Off-Ramp to El Sueno Road (Comment A.2-2 erroneously referred to this off-ramp as the Southbound Off-Ramp).

Reference:

Santa Barbara County, 2007. Transportation Impact Study Requirements. Received via email from Ashton Ellis, Project Manager, Santa Barbara County General Services Department, December 18, 2024.

Comment A.2-2:

The US 101 Southbound Off-Ramp to El Sueno Road is close to one of the Campus access points. This off-ramp has had multiple safety investigations. The traffic impact study must demonstrate whether this off-ramp requires improvements to accommodate the increased trips from this project.



Response to Comment A.2-2:

The US 101 off-ramp at El Sueno Road is for northbound 101 only. The off-ramp terminates at the intersection of El Sueno Road and Calle Real, which is all-way-stop controlled. TIAs required under Mitigation Measure TRANS-2 set forth in the preceding response shall address direct and cumulative impacts on the safety and operation of the US 101 Northbound Off-Ramp to El Sueno Road.

Comment A.2-3:

A portion of Calle Real, between County Road and El Sueno Rd, is failing. With the increased trips projected from the Campus build-out, it is recommended that a barrier or retaining wall be installed within County right-of-way to mitigate the road failure and to prevent any vehicular crossovers between Calle Real and the US 101.

Response to Comment A.2-3:

Mitigation Measure TRANS-3 is hereby added to Section 4.11, Transportation, of the DPEIR, page 4.11-15; added text is shown underlined.

MM TRANS-3: Before Santa Barbara County issues a Certificate of Occupancy for the first project in Phase 1 of the Master Plan to require a TIA (pursuant to Mitigation Measure TRANS-2 set forth in this PEIR), the Santa Barbara County General Services Department shall have a civil engineer assess the roadway condition on the segment of Calle Real between County Road and El Sueno Road, and recommend a measure (such as a barrier or retaining wall) to remedy the roadway condition; and the Santa Barbara County Public Works Department or its contractor(s) shall implement said recommendation.

2.4.3 Comment Letter A.3

COMMENT LETTER A.3

Jason Johnston
Supervising Environmental Health Specialist, Santa Barbara County Public Health Department,
Environmental Health Services

Comment A.3-1:

Santa Barbara County Public Health Department, Environmental Health Services (EHS) appreciates the opportunity to provide comments on the Draft Program Environmental Impact Report (PEIR) for the Calle Real Campus Master Plan. The proposed project is to develop a long-range vision for the existing campus of 15 parcels containing approximately 323 acres with approximately 782,000 gross square feet of existing County facilities. The proposed project would demolish, renovate, or construct new buildings including approximately 475,000 square feet of existing building to remain with renovations, and 539,000 square feet of new or expanded space added over the years 2025-2050 time period, with a total building square footage of 1,024,279 square feet.

Response to Comment A.3-1:

The comment accurately summarizes the project description.



Comment A.3-2:

EHS staff reviewed the Draft PEIR and have the following comments:

1. Section 4.8.5, Operation, Phase 1 and Entire Master Plan notes:

Santa Barbara County Environmental Health Services (EHS) regulates medical waste generators, transporters, transfer stations, and treatment facilities within the County under the authority of the Medical Waste Management Act (California Health and Safety Code Sections 117600 et seq.)...

EHS does not regulate Medical Waste and these activities and this section should be revised to reflect the correct regulatory agency, the California Department of Public Health.

Response to Comment A.3-2:

Section 4.8, Hazardous Materials, page 4.8-13 is hereby revised as follows; deleted text is shown in ~~strikeout~~ and added text is shown underlined: ~~Santa Barbara County Environmental Health Services (EHS)~~ The California Department of Public Health (CDPH) regulates medical waste generators, transporters, transfer stations, and treatment facilities within the County.

Comment A.3-3:

2. EHS recommends expanding or augmenting the Regulatory Requirements contained in Section 4.8 – Hazards and Hazardous Materials, RR HAZ-1 Continue to conduct LFG monitoring and period inspections under regulatory agency for the former landfill, to incorporate the requirements of California Code of Regulation (CCR), Title 27 including but not limited to § 21190 for all uses on or within 1,000 feet of the disposal areas. These regulations are designed to prevent hazards to public health and safety, and the environment from closed landfills, including protection of the integrity of the final cover, monitor and mitigate landfill gas, and mitigate the effects of subsidence in the waste area.

Please note, 27 CCR § 21190 requires submittal to, and approval by, the Enforcement Agency (EA). Dependent on the work occurring, other agencies' approval may also be required.

- For all work proposed within 1,000 feet of the disposal areas, EHS as the designated Local Enforcement Agency (LEA) for Santa Barbara County by CalRecycle shall review and approve proposed post-closure land uses, construction, and any other work that may affect the final cover.
- EHS recommends figures be prepared to accurately depict the waste boundaries and the 1,000-foot areas to clearly identify areas subject to these State laws and regulations.

Response to Comment A.3-3:

Section 4.8, Hazards and Hazardous Materials, page 4.8-8, under the heading "Closed Landfills (County Yards Campus)" is hereby revised as follows: deleted text is shown in ~~strikeout~~ and added text is shown underlined:

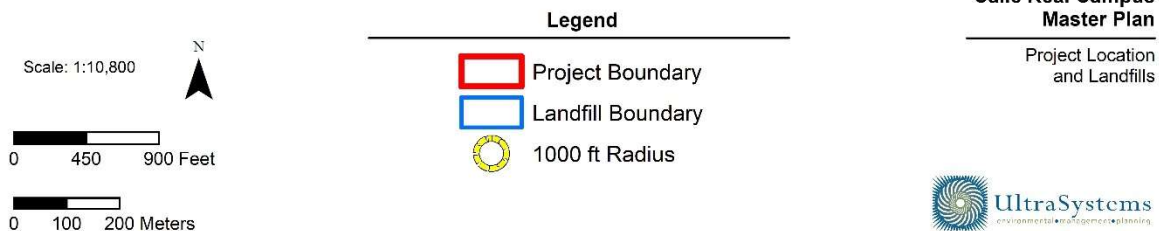
Two closed landfills are present on or next to the County Yards Campus. See Figure 4.8-2.

Figure 4.8-2
CLOSED LANDFILLS AND 1,000-FT RADIUS



Path: \\GIS\vr\GIS\Projects\7208_Santa_Barbara_MP_EIR\IMX\De\7208_CalleRealCampus_Landfill_Buffers_2025_02_27.mxd
Service Layer Credits: Sources: Esri, HERE, Garmin, USGS, Intermap, INCREMENT P, NRCan, Esri Japan, METI, Esri China (Hong Kong), Esri Korea, Esri (Thailand), NGCC, (c) OpenStreetMap contributors, and the GIS User Community, Esri, HERE, Garmin, (c) OpenStreetMap contributors, Esri, HERE, Garmin, (c) OpenStreetMap contributors, and the GIS user community, Source: Esri, Maxar, Earthstar Geographics, and the GIS User Community Santa Barbara County, 2020; UltraSystems Environmental, Inc., 2025.

February 27, 2025





Section 4.8, Hazards and Hazardous Materials, page 4.8-19, RR HAZ-1 is hereby revised as follows: deleted text is shown in ~~strikeout~~ and added text is shown underlined:

Continue to conduct LFG monitoring and period inspections under regulatory agency for the former landfill, to incorporate the requirements of California Code of Regulation (CCR), Title 27 including but not limited to § 21190 for all uses on or within 1,000 feet of the disposal areas. These regulations are designed to prevent hazards to public health and safety, and the environment from closed landfills, including protection of the integrity of the final cover, monitor and mitigate landfill gas, and mitigate the effects of subsidence in the waste area. 27 CCR § 21190 requires submittal to, and approval by, the Enforcement Agency (EA). Dependent on the work occurring, other agencies' approval may also be required.

Comment A.3-4:

3. Section 4.8 – Hazards and Hazardous Materials, Mitigation Measure MM HAZ-1 includes conducting a Phase II Subsurface Investigation prior to demolition or construction. EHS recommends incorporating the below comments in this mitigation measure:

- EHS recommends submitting workplans prior to conducting work, and all Phase II reports, for review and comment to an applicable regulatory oversight agency such as EHS' Site Mitigation Unit (SMU), the Regional Water Quality Control Board (RWQCB), or the Department of Toxic Substance Control (DTSC).
- If the subsurface investigation(s) identify a release, it shall be reported to EHS in accordance with Santa Barbara County Code 18C-54. The Tier 1 San Francisco Bay Water Board Environmental Screening Levels (ESLs) shall be included and used as the investigation level referenced in all Phase II reports.
- If contaminants are identified, they shall be vertically and laterally delineated to concentrations below their respective Tier 1 ESLs.

Response to Comment A.3-4:

Section 4.8, Hazards and Hazardous Materials, page 4.8-19, MM HAZ-1 is hereby revised as follows: deleted text is shown in ~~strikeout~~ and added text is shown underlined:

Prior to beginning of demolition or construction, a qualified environmental remediation firm shall conduct a Phase II Subsurface Investigation... The oil wells may be required to be abandoned to current CalGEM standards and building codes prior to any future development. Prior to conducting the Phase II investigation, the environmental remediation firm shall submit workplans for review and comment to EHS' Site Mitigation Unit (SMU). The remediation firm shall also submit all Phase II investigation reports to SMU. If the Phase II investigation(s) identify a release, it shall be reported to EHS in accordance with Santa Barbara County Code 18C-54. The Tier 1 San Francisco Bay Water Board Environmental Screening Levels (ESLs) shall be included and used as the investigation level referenced in all Phase II reports. If contaminants are identified, they shall be vertically and laterally delineated to concentrations below their respective Tier 1 ESLs.



Comment A.3-5:

4. Section 4.8 – Hazards and Hazardous Materials, Mitigation Measure MM HAZ-2 and MM HAZ-3 includes the preparation of a Soil Management Plan (SMP) prior to demolition or construction. EHS recommends incorporating the below comment in this mitigation measure:

- EHS recommends submitting SMPs for review and comment to an applicable regulatory oversight agency such as EHS' Site Mitigation Unit, the Regional Water Quality Control Board (RWQCB), or the Department of Toxic Substance Control (DTSC).

Response to Comment A.3-5:

Section 4.8, Hazards and Hazardous Materials, page 4.8-19, MM HAZ-2 is hereby revised as follows: deleted text is shown in ~~strikeout~~ and added text is shown underlined:

Prior to beginning of demolition or construction, a qualified environmental remediation firm shall prepare and begin implementation of a Soil Management Plan (SMP) for the Public Works Transportation Road Yard and the former Corporate Yard area by the current fueling station. The remediation firm shall submit workplans for review and comment to EHS' Site Mitigation Unit (SMU).

Comment A.3-6:

Please note a SMP is only appropriate for areas without identified contamination, or incidental work such as utility repairs in an area of known contamination. If corrective action such as excavation and offsite disposal is proposed in an area of known contamination, then a corrective action/remedial action plan shall be submitted for review and comment to an applicable regulatory oversight agency such as EHS' Site Mitigation Unit, the Regional Water Quality Control Board (RWQCB), or the Department of Toxic Substance Control (DTSC). Please also note, Santa Barbara County Air Pollution Control District has requirements for projects that include contaminated soil cleanup.

Response to Comment A.3-6:

Section 4.8, Hazards and Hazardous Materials, page 4.8-19, MM HAZ-3 is hereby added, shown in underline:

Mitigation Measure MM HAZ-3 is added below MM HAZ-2

MM HAZ-3 If corrective action such as excavation and offsite disposal is proposed in an area of known contamination, then the qualified environmental remediation firm shall submit a corrective action/remedial action plan for review and comment to an applicable regulatory oversight agency such as EHS' Site Mitigation Unit, the Regional Water Quality Control Board (RWQCB), or the Department of Toxic Substance Control (DTSC).

Existing MM HAZ-3 is revised to MM HAZ-4

The following text is added below MM HAZ-4: In addition, MM HAZ-3 shall be implemented.



Comment A.3-7:

EHS thanks the Lead Agency for the opportunity to review and comment on the environmental document and hopes that this comment letter will be useful to the Lead Agency in carrying out their responsibilities in the CEQA process. With the incorporation of the above comments, it is EHS' opinion that the level of significance does not change from that contained in section 4.8.7 Level of Significance After Mitigation, of ...less than significant after implementation of Mitigation Measures HAZ-1 through HAZ-3 and regulatory requirement RR HAZ-1.

Response to Comment A.3-7:

The Santa Barbara County General Services Department acknowledges the comment.

Comment A.3-8:

EHS requests copies of any subsequent environmental documents, copies of public notices and any Notices of Determination for this proposed project. If the environmental document is adopted during a public hearing, EHS requests 10 days advance notice of this hearing. If the document is adopted without a public hearing, EHS requests 10 days advance notification of the date of the adoption and proposed project approval by the decision-making body.

Response to Comment A.3-8:

General Services will provide subsequent documents and notices as requested and will comply with the requested lead times.

2.4.4 Comment Letter A.4

COMMENT LETTER A.4

Bryan Wong
Air Quality Specialist
Planning Division
Santa Barbara County Air Pollution control District

The comments below were received in the form of a letter attached to an email from Bryan Wong, sent on December 10, 2024.

Comment A.4-1:

Regulatory Requirements/CEQA: If the proposed project includes equipment or operations that require a District permit, the District will be a responsible agency under the California Environmental Quality Act (CEQA) and will seek to rely on the County's CEQA determination. In order to avoid additional CEQA documentation related to District permit issuance, the County's environmental analysis of the project should include adequately analyze all potential air quality and greenhouse gas impacts (including health risk from toxic air contaminants) and include mitigation as appropriate to reduce the impacts. District permits are required for diesel generators (rated 50 bhp and greater), hot water heaters/boilers (rated more than 2.00 MMBtu/hr), and contaminated soil cleanup activities. Other District regulatory requirements and prohibitory rules may apply to proposed operations and activities. The applicant should refer to the District's website at



<https://www.ourair.org/engineering-programs/> and <https://www.ourair.org/current-rules-and-regulations/> for more information. Please consult with the District as needed to ensure regulatory compliance.

Response to Comment A.4-1:

Comment noted.

Comment A.4-2:

Motor Vehicle Threshold: The County's significance threshold for motor vehicle-related emissions is 25 pounds per day of NO_x or ROC. Therefore, the second bullet point on page 4.2-24 that discusses the mobile emissions threshold should be changed to state: "*NO_x **or ROC** emissions from motor vehicle trips alone are less than 25 pounds per day.*"

Response to Comment A.4-2:

The text in the Draft EIR section has been changed to include ROC in the discussion of motor vehicle trip emissions. See Section III of this document.

Comment A.4-3:

Adopted Thresholds: Please revise the discussion on page 4.2-24 and Table 4.2-8 on page 4.2-30 to reflect that the thresholds used for the significance determination are Santa Barbara County's adopted CEQA thresholds and not SBCAPCD's thresholds.

Response to Comment A.4-3:

The change has been made in the EIR text and thresholds are attributed to Santa Barbara County instead of the Santa Barbara County Air Pollution Control District. See Section III of this document.

Comment A.4-4:

Greenhouse Gas Thresholds: The EIR refers to "SBCAPCD" greenhouse gas thresholds. However, the thresholds referenced are the County of Santa Barbara's. Please revise the discussion to reflect that the thresholds used are Santa Barbara County CEQA thresholds and not SBCAPCD thresholds.

Response to Comment A.4-4:

The text in the EIR referencing Greenhouse gas thresholds have been changed to reflect the County Santa Barbara, instead of the Santa Barbara County Air Pollution Control District. See Section III of this document.

Comment A.4-5:

Section 4.2 Air Quality - Short-Term Construction, Page 4.2-29: This section states that "*The SBCAPCD considers all short-term construction emissions insignificant...*" This statement is inaccurate and does not represent SBCAPCD policy or guidance. While the District does not currently have quantitative thresholds of significance in place for short-term or construction emissions, impacts from construction-phase activities and emissions should be evaluated under CEQA and a



determination of the significance of the environmental effect should be made by the lead agency. Please revise this discussion and provide alternative support/substantiation the determination that impacts from construction-related emissions are less than significant.

Response to Comment A.4-5:

The first paragraph of Section 4.2.6, Environmental Impact Analysis, Threshold B, page 4.2-29 has been revised to clarify that the project's short-term impacts will be evaluated under CEQA and the significance determination will be made by the lead agency. A justification for determining that criteria pollutants generated from short-term construction activities will not result in a significant impact under Threshold B of the CEQA Guidelines was included. See Section III of this document.

Comment A.4-6:

Section 4.2 Air Quality – Long-Term Operational Emissions, Pages 4.2-29 through 4.2-30: The EIR assesses impacts of the proposed project based on a comparison of emissions from the existing project in year 2025 and the emissions resulting from the full build-out of the project in year 2050. The District strongly advises that the analysis be revised to include an assessment of impacts from each phase of the project. Limiting the impact evaluation to only consider impacts at full build-out, some 25 years after commencement of construction activities, would ignore potential impacts that will occur as each phase of the project becomes operational. Additionally, given the project's size and phased construction schedule, it is likely that the project will result in concurrent construction and operational emissions. When analyzing impacts from each phase of development, construction-related emissions should be combined with operational emissions for all phases where construction and operations overlap. If the analysis determines that proposed project activities exceeds the significance thresholds, mitigation should be applied to reduce those emissions as appropriate under CEQA. Please revise the analysis as recommended.

Response to Comment A.4-6:

Yearly construction and operation emissions have been analyzed for each year from 2025 through 2051. The net emissions (given year minus no-project case) from ongoing construction and concurrent project operations are below Santa Barbara County's adopted daily trigger for offsets for any given year while the project is being built. See revised **Appendices D.1.1 through D.1.18** for the analysis (included herein as **Appendix FEIR-7**).

Comment A.4-7:

Section 4.2 Air Quality – Air Toxics Health Risk Assessment, Page 4.2-23 and Pages 4.2-32 through 4.2-33: There are several inaccuracies or mischaracterizations in the discussion and analysis of health risk that should be amended.

Construction Health Risk: Page 4.2-23 states that "*According to the SBCAPCD's Modeling Guidelines for Health Risk Assessments, Form-15i, the District's policy is that a health risk assessment performed under CEQA should not include emissions from construction activities (SBCAPCD, 2023b, p.2)*" and Page 4.2-32 states "*As noted above, the SBCAPCD's policy is that a health risk assessment for CEQA should not include emissions from site grading, welding, vehicle combustion emissions, or other activities associated with construction.*" This is a mischaracterization of the District's recommendations. The cited document, *Form-15i Modeling Guidelines for Health Risk Assessments*, pertains to new or existing stationary sources that are either undergoing the District's New Source Review (NSR) permitting



program or AB 2588 Air Toxics “Hot Spots” Program. Guidance is included for new/proposed stationary sources that are undergoing CEQA, and either are concurrently or in the future will be undergoing the District’s NSR permitting program. The District’s HRA guidance is currently focused on the evaluation of operational-phase emissions. However, the County of Santa Barbara is the lead agency under CEQA for the proposed land use development project. In this context, the District routinely recommends that the lead agency evaluate impacts from all project phases and sources of emissions, including construction and operational-phase activities and equipment. The inaccurate statements regarding SBCAPCD policy should be removed from the EIR and the analysis should include an evaluation of potential health risk associated with construction of the project.

Response to Comment A.4-7:

The paragraph under the heading Construction on page 4.2-23 was deleted and replaced with a reference to a later section where the issue of the health risk of diesel particulate matter emissions during construction is discussed in detail. See Section III of this document.

Comment A.4-8:

Impacts of Project TAC Emissions on the Community: In referring to diesel particulate matter from heavy duty trucks, this section concludes that *“The increase of 0.40 pound per day would have a negligible impact on cancer and noncancer risk.”* TAC emissions cannot be directly correlated to the project’s potential health risk without a health risk screening or refined health risk assessment. The EIR should be revised to include an alternative basis for its conclusions regarding potential health risk impacts from the project.

Response to Comment A.4-8:

UltraSystems has done several detailed health risk assessments that included emissions from onroad diesel truck traffic. In all cases, the cancer risk and hazard index along roadways was far below the threshold of 10 in one million and 10, respectively. The main reason for this is that the trucks spend at most a few seconds as they pass each sensitive receptor. In addition, the 0.4 pound per day emission increment is not all emitted on one roadway; trucks may take several routes to and from the project area. Thus, the dose to which roadside receptors are exposed is even smaller. This contrasts with sensitive receptors near stationary sources which, according to local wind patterns, may be directly downwind from concentrated emissions sources for hours at a time. The EIR was not changed in response to this comment.

Comment A.4-9:

Health Risk from Proposed Generator: According to the project description, the new Communication Prefab Facility will house a generator. If the proposed generator is diesel-fueled, an equipment-specific Health Risk Assessment (HRA) will be required as part of District permit issuance. If the generator will be diesel-fueled and the applicant is able to identify a reasonable worst-case operational scenario for its operation (e.g. brake-horsepower, engine Tier rating, etc.), the District advises that the EIR be revised to include an equipment-specific HRA to ensure that the engine will not present a significant health risk to nearby receptors. The applicant should refer to the District’s website at www.ourair.org/dice-atcm for more information on diesel engine permitting.



Response to Comment A.4-9:

A health risk assessment (HRA) is normally conducted as part of the permit application review process. It is our experience that CEQA documents do not ordinarily include emissions analyses for pieces of equipment that require permits from the air pollution control district. If the District's new source review finds that the equipment will result in health risks that exceed thresholds set by the district, then the district will include permit conditions that reduce the emissions and health risk to acceptable levels. In addition, since the type of generator that would be used is unknown at this time, it would be speculative to analyze any such impacts with an HRA. Therefore, pursuant to Section 15145 of the state CEQA Guidelines, the requested health risk assessment will not be prepared.

Comment A.4-10:

Section 4.2 Air Quality – MM AQ-1: Reduce Residential Exposure to Roadway TAC, Page 4.2-33:

To ensure the long-term effectiveness of air filtration systems described on page 4.2-33, regular operation of the HVAC system and regular maintenance/replacement of air filters are required, both of which result in effort and cost to the resident or facility. Therefore, the District suggests that MM AQ-1 be expanded upon to require that the facility provide regular maintenance of air filters; or at a minimum a brochure notifying the future residents of the need to maintain the filter screens shall be prepared and provided at the time of leasing or ownership exchange.

Response to Comment A.4-10:

Section 4.2 Air Quality – MM AQ-1: Reduce Residential Exposure to Roadway TAC, page 4.2-33, is hereby revised as follows; added text is underlined: The following bullet was inserted after the first original bullet for this mitigation measure:

- The County shall provide regular maintenance of the air filtration systems, including replacement (when necessary) of the particulate filters. As an alternative, the County shall, at minimum, prepare a brochure notifying future residents of the need to maintain the filter screens. This brochure shall be provided at the time of leasing or ownership exchange.

Comment A.4-11:

Section 4.7 Greenhouse Gas Emissions – Table 4.7-1 Project Construction GHG Emissions, Pages 4.7-9 through 4.7-10: The "Project Completion Total" in this table has not accurately summed the annual subtotals, resulting in an underestimation of CO₂e emissions. Specifically, the EIR cites a total of 5,824.02 MT CO₂e, whereas the District calculates the total as 6,364.87 MT CO₂e. Please review and adjust the analysis and discussion as necessary.

Response to Comment A.4-11:

The Project Completion Total and 30-Year Amortized Emissions values in Table 4.7-1 have been corrected. See Section III of this document.

Comment A.4-12:

Appendix D1 Air Quality and Greenhouse Gas Emissions Calculations: The Project Description and discussion of proposed residential units on page 2-27 of the EIR states that, "*For a conservative analysis, the environmental analysis in this PEIR assumes that all 259 units would be built.*" However,



the CalEEMod analysis and emission estimates for the project do not include assessment of the residential units. As it appears that the scope of the CEQA analysis for the proposed project includes the development of the residential units, the CalEEMod analysis and project emissions estimates should be revised to include the residential components.

Response to Comment A.4-12:

The CalEEMod analyses for Phase 4 and Phase 6 of the project have been revised to include 259 residential units. The construction and operational results of these revised runs were used in the overlapping yearly emissions analysis in **Appendix D.1.18** (see **Appendix FEIR-7**). The CalEEMod run for 2050 buildout operational emissions was also revised to include the residential units. Table 4.2-7, Maximum Daily Regional Construction Emissions, and Table 4.2-8, Maximum Daily Project Operational Emissions, have been updated to show the results of the revised CalEEMod runs. The construction and operational emissions increased in both phases. However, short-term impacts do not violate CEQA's significance thresholds nor do the operational impacts trigger Santa Barbara County's daily offset thresholds. The revised CalEEMod runs are included in **Appendices D.1.1 through D.1.9** (see **Appendix FEIR-7**). Also, further environmental review of potential additional housing sites is being conducted separately under the Housing Element Update Program EIR.

2.4.5 Comment Letter A.5

COMMENT LETTER A.5

Trey Powell, Northern District Deputy
California Geologic Energy Management Division

Comment A.5-1:

The project is located in Santa Barbara County, within the boundaries of the following fields:

Any Field

Response to Comment A.5-1:

Project impacts on oil and gas wells are addressed in the Initial Study, included as Appendix A5, Section 4.12, *Mineral Resources*. The project site is not identified within a designated oil field in the Initial Study. The generic identification of the site ("any field") in the comment accords with the description of the site in the Initial Study, and no revision is needed.

Comment A.5-2:

There are several hundred plugged and abandoned oil wells located in the Santa Barbara area. According to CalGEM records, the nearest plugged and abandoned well to the project is "Santa Barbara County" 1 (API 0408304231). This well is near the solar array on county road. The next closest plugged and abandoned well is "County" 1 (API 0408304217). This well is located approximately 220 feet east of county road. CalGEM recommends that any wells in close proximity to the property be researched to verify the location and ensure that any construction does not impede access. If any well locations are found to differ from CalGEM records, an updated plot plan identifying the well locations relative to the proposed structure(s) is expected to be provided, prior to



conducting construction. CalGEM's online well mapping tool, Well Finder, can be accessed at: <https://www.conservation.ca.gov/calgem/Pages/WellFinder.aspx>

Response to Comment A.5-2:

The Initial Study, **Section 4.12, Mineral Resources**, identifies four dry hole oil wells and two core hole wells present onsite: the four dry holes are in the central part of the site; and the two core holes are in the northern part of the site (one north, and one south, of Cathedral Oaks Road).

DPEIR **Section 4.8, Hazards and Hazardous Materials**, states: "Four oil wells drilled between the 1930s and 1950s and that have been subsequently abandoned were identified as within the County Yards Campus. The potential for methane and potential dumping of drilling muds is considered an REC [recognized environmental condition]."

Mitigation Measure HAZ-1 set forth in Section 4.8 states, in part: "The oil wells may be required to be abandoned to current CalGEM standards and building codes prior to any future development."

The Initial Study acknowledges the plugged and abandoned well mentioned in the comment, and no revision to the EIR is needed.

Comment A.5-3:

Our records indicate there are 4 known oil or gas wells located within the project boundary as identified in the application.

- Number of wells Not Abandoned to Current Division Requirements as Prescribed by Law and Projected to Be Built Over or Have Future Access Impeded by this project: 0
- Number of wells Not Abandoned to Current Division Requirements as Prescribed by Law and Not Projected to Be Built Over or Have Future Access Impeded by this project: 4
- Number of wells Abandoned to Current Division Requirements as Prescribed by Law and Projected to Be Built Over or Have Future Access Impeded by this project: 0
- Number of wells Abandoned to Current Division Requirements as Prescribed by Law and Not Projected to Be Built Over or Have Future Access Impeded by this project: 0

Response to Comment A.5-3:

The four wells *Not Abandoned to Current Division Requirements* identified in the comment correspond to four of the wells identified in DPEIR Section 4.8: see response to Comment A.5-2.

The Initial Study, **Section 4.12, Mineral Resources**, page 4.12-1, stated that six wells, consisting of four dry hole oil wells and two core hole wells, are present within the project site. That is an error. Initial Study, **Section 4.12, Mineral Resources**, page 4.12-1 is hereby revised as follows; added text is underlined and deleted text shown in ~~strikeout~~. Four dry hole oil wells and two core hole wells are present onsite: the four dry holes are in the central part of the site; and the two core holes are in the northern part of the site (one north, and one south, of Cathedral Oaks Road). Four wells are present within the project site: three of the wells are plugged dry holes and one, a plugged core hole; all are in the County Yards campus.



Comment A.5-4:

The Division categorically advises against building over, or in any way impeding access to, oil, gas, or geothermal wells. Impeding access to a well could result in the need to remove any structure or obstacle that prevents or impedes access including, but not limited to, buildings, housing, fencing, landscaping, trees, pools, patios, sidewalks, roadways, and decking. Maintaining sufficient access is considered the ability for a well servicing unit and associated necessary equipment to reach a well from a public street or access way, solely over the parcel on which the well is located. A well servicing unit, and any necessary equipment, should be able to pass unimpeded along and over the route, and should be able to access the well without disturbing the integrity of surrounding infrastructure.

Response to Comment A.5-4:

Santa Barbara County is aware of the four wells onsite and acknowledges the recommendation about maintaining access to wells stated in the comment. None of the four wells onsite are in areas where Santa Babara County is proposing new or expanded buildings or other improvements.

Comment A.5-5:

There are no guarantees a well abandoned in compliance with current Division requirements as prescribed by law will not start leaking in the future. It always remains a possibility that any well may start to leak oil, gas, and/or water after abandonment, no matter how thoroughly the well was plugged and abandoned. The Division acknowledges wells plugged and abandoned to the most current Division requirements as prescribed by law have a lower probability of leaking in the future, however there is no guarantees that such abandonments will not leak.

Response to Comment A.5-5:

Santa Barbara County appreciates the caution about the possibility of abandoned wells leaking in the future. See responses to comments A.5-2 and A.5-4.

Comment A.5-6:

The Division advises that all wells that are identified on the development parcel prior to, or during, development activities be tested for liquid and gas leakage. Surveyed locations should be provided to the Division in Latitude and Longitude, NAD 83 decimal format. The Division expects any wells found leaking to be reported to it immediately.

Response to Comment A.5-6:

Santa Barbara County appreciates the caution about the possibility of abandoned wells leaking in the future and requiring testing for liquid and gas leakage. See responses to comments A.5-2 and A.5-4. None of the four wells onsite are in areas where Santa Babara County is proposing new or expanded buildings or other improvements. Therefore, the County does not expect to identify or test for leakage any wells within the footprint of an area proposed for development under the Calle Real Master Plan Project.



Comment A.5-7:

Failure to plug and reabandon the well may result in enforcement action, including an order to perform reabandonment well work, pursuant to PRC § 3208.1, and 3224.

Response to Comment A.5-7:

Santa Barbara County acknowledges the statutory requirement to plug and reabandon wells. Such requirement is acknowledged in DPEIR Section 4.8 MM Haz-1; see response to comment A.5-2.

Comment A.5-8:

PRC § 3208.1 gives the Division the authority to order or permit the re-abandonment of any well where it has reason to question the integrity of the previous abandonment, or if the well is not accessible or visible. Responsibility for re-abandonment costs may be affected by the choices made by the local permitting agency, property owner, and/or developer in considering the general advice set forth in this letter. The PRC continues to define the person or entity responsible for reabandonment as:

1. The property owner - If the well was plugged and abandoned in conformance with Division requirements at the time of abandonment, and in its current condition does not pose an immediate danger to life, health, and property, but requires additional work solely because the owner of the property on which the well is located proposes construction on the property that would prevent or impede access to the well for purposes of remedying a currently perceived future problem, then the owner of the property on which the well is located shall obtain all rights necessary to reabandon the well and be responsible for the reabandonment.
2. The person or entity causing construction over or near the well - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and the property owner, developer, or local agency permitting the construction failed either to obtain an opinion from the supervisor or district deputy as to whether the previously abandoned well is required to be reabandoned, or to follow the advice of the supervisor or district deputy not to undertake the construction, then the person or entity causing the construction over or near the well shall obtain all rights necessary to reabandon the well and be responsible for the reabandonment.
3. The party or parties responsible for disturbing the integrity of the abandonment - If the well was plugged and abandoned in conformance with Division requirements at the time of plugging and abandonment, and after that time someone other than the operator or an affiliate of the operator disturbed the integrity of the abandonment in the course of developing the property, then the party or parties responsible for disturbing the integrity of the abandonment shall be responsible for the reabandonment.

Response to Comment A.5-8:

Santa Barbara County acknowledges that, as both the landowner and the project proponent, the County would be responsible for any needed reabandonment. See also response to comment A.5-2.



Comment A.5-9:

No well work may be performed on any oil, gas, or geothermal well without written approval from the Division. Well work requiring approval includes, but is not limited to, mitigating leaking gas or other fluids from abandoned wells, modifications to well casings, and/or any other re-abandonment work. The Division also regulates the top of a plugged and abandoned well's minimum and maximum depth below final grade. CCR §1723.5 states well casings shall be cut off at least 5 feet but no more than 10 feet below grade. If any well needs to be lowered or raised (i.e. casing cut down or casing riser added) to meet this regulation, a permit from the Division is required before work can start.

Response to Comment A.5-9:

Santa Barbara County acknowledges the requirement for approval from CalGEMS for any work on an oil, gas, or geothermal well. See response to comment A.5-4.

Comment A.5-10:

The Division makes the following additional recommendations to the local permitting agency, property owner, and developer:

- To ensure that present and future property owners are aware of (a) the existence of all wells located on the property, and (b) potentially significant issues associated with any improvements near oil or gas wells, the Division recommends that information regarding the above identified well(s), and any other pertinent information obtained after the issuance of this letter, be communicated to the appropriate county recorder for inclusion in the title information of the subject real property.
- The Division recommends that any soil containing hydrocarbons be disposed of in accordance with local, state, and federal laws. Please notify the appropriate authorities if soil containing significant amounts of hydrocarbons is discovered during development.

Response to Comment A.5-10:

The project site is owned by Santa Barbara County; the project does not include sale of land. Nevertheless, the County will review the title records for the affected parcels to ensure that the records include information about the wells.

Comment A.5-11:

As indicated in PRC § 3106, the Division has statutory authority over the drilling, operation, maintenance, and abandonment of oil, gas, and geothermal wells, and attendant facilities, to prevent, as far as possible, damage to life, health, property, and natural resources; damage to underground oil, gas, and geothermal deposits; and damage to underground and surface waters suitable for irrigation or domestic purposes. In addition to the Division's authority to order work on wells pursuant to PRC §§ 3208.1 and 3224, it has authority to issue civil and criminal penalties under PRC §§ 3236, 3236.5, and 3359 for violations within the Division's jurisdictional authority. The Division does not regulate grading, excavations, or other land use issues.



Response to Comment A.5-11:

Santa Barbara County acknowledges CalGEMS' statutory authority stated in the comment.

Comment A.5-12:

If during development activities, any wells are encountered that were not part of this review, the property owner is expected to immediately notify the Division's construction site well review engineer in the Northern district office, and file for Division review an amended site plan with well casing diagrams. The District office will send a follow-up well evaluation letter to the property owner and local permitting agency.

Response to Comment A.5-12:

Santa Barbara County acknowledges CalGEMS's requirement that the County notify CalGEMS immediately if the County finds wells not identified in the comment letter during project implementation.

Comment A.5-13:

The comment consists of CalGEMS database information for the four wells within the project site. See response to Comment A.5-2. The comment does not address the adequacy of the EIR and no further response is needed.

2.4.6 Comment Letter C.1

COMMENT LETTER C.1

Rick Merrifield
11630 Side Hill Circle
Nevada City, CA 95959

This comment below was received in the form of an email from Rick Merrifield, sent on November 2, 2024.

Comment C.1-1:

Please consider the following comments during the review of the environmental document for the Calle Real Campus Master Plan. I worked on this campus for a number of years for Environmental Health Services. I think it's important to recognize that the Calle Real Campus is an extremely valuable asset to the County that, in my opinion, has not been as well utilized over the years as it could have been. This master plan is long overdue and will hopefully improve efficiency of County services.

Response to Comment C.1-1:

The commenter, with a prior connection to the campus, expresses support for the project, noting that due to their familiarity with the campus's current state, they believe an update is long overdue.



Comment C.1-2:

The first priority for the master plan should be to enhance, improve and maintain County services. Additional housing or offices for non-County entities should not be included on this particular site. It is and should be maintained as a government service center. Some of us recall the experience of Ventura County as they planned and then built their government center. It was initially controversial but ended up being one of their smartest moves to consolidate scattered county offices.

Response to Comment C.1-2:

The commenter advocates that the master plan should prioritize enhancing and maintaining county services, arguing that additional housing or office space for non-county entities should not be included on the site, which should remain dedicated to government functions. They reference Ventura County's experience in consolidating its scattered offices into one government center.

Comment C.1-3:

There should be serious consideration given to moving County services such as Planning and Building to the Calle Real Campus. It has never made sense to me for the County to keep these offices in downtown Santa Barbara, an entirely separate jurisdiction with limited parking and where their clients do not live.

Response to Comment C.1-3:

The commenter suggests that County services, such as Planning and Building, should be relocated to the Calle Real Campus, as they believe is inefficient to keep these offices in downtown Santa Barbara, a separate jurisdiction with limited parking and where clients do not reside.

Comment C.1-4:

Buildings should be durable and permanent. I worked for many years for Environmental Health Services in a "temporary" structure consisting of three or four modular units. "Temporary" tends to become permanent.

Response to Comment C.1-4:

The commenter emphasizes that buildings on the campus should be durable and permanent, drawing from their experience working for Environmental Health Services in a "temporary" structure made of modular units, which ultimately became permanent.

2.4.7 Comment Letter C.2

Melinda Budin
450 Camino del Remedio unit D
Santa Barbara, CA 93110

This letter below was received via email from Melinda Budin, on December 6, 2024.



Comment C.2-1:

First the fire safety risk seems to be downgraded in the EIR. It says nothing about how the people living in the recommended 223 new housing units to be built, not including the Builder's bonus which could be applied, and the extra staff being moved from Downtown Santa Barbara to the this campus, would evacuate in a fire. There is only one road from Camino Del remedio to Calle Real that leads to the freeway on ramp. understand that El sueno Road also doesn't connect to Cathedral Oaks on the North End. Although the report states that Camino Del remedio connects North to to Cathedral Oaks, the section of the road past the shooting range has had soil collapse from the Hillside many times and erosion on the Creekside, narrowing it to an unsafe width for cars. It also has been locked at the south end of alpha schools driveway for many years. There's a high density of existing housing that would all be funneled in to one two lane road, Calle real, in a fire evacuation. The report also states that there are several stop signs on Cathedral Oaks which is not true. Between Turnpike Road to the east where there's a stop light, according to online Street View maps there's no stop sign on Cathedral Oaks until at least Highway 154. There are stop signs for connecting streets that lead into Cathedral Oaks.

Response to Comment C.2-1:

Regarding the statement "There is only one road from Camino Del Remedio to Calle Real that leads to the freeway on ramp", four north-south roadways pass through much of the part of the site north of Calle Real and intersect with Calle Real: from east to west, County Road, Honor Farm Road, Camino del Remedio, and San Antonio Road (the last roadway forms the west site boundary).

El Sueno Road does intersect with Cathedral Oaks Road. The commenter is correct: a locked gate is present on the southern approach to the intersection of El Sueno Road and Cathedral Oaks Road. El Sueno Road does not provide access to or from the project site, and no response is required.

The report does not state that Camino del Remedio connects with Cathedral Oaks Road.

Regarding stop signs on Cathedral Oaks Road, Section 4.11, Transportation, page 4.11-4, states "The intersections of Cathedral Oaks Road and Calle Real with local roadways identified above are all controlled by cross-street stops.", which is correct. *Cross-street stops* mean stop signs are present on the cross-street approaches to the intersection but not on the main roadway approaches. No revision is needed.

The proposed housing units that would be built on the part of the project site the comment addresses (north of Calle Real) number 116 units, not the 226 the comment mentions. Those 116 units would be in the Health and Government Center campus. Three emergency evacuation routes would be available from the proposed residential units to Calle Real: from east to west, Honor Farm Road, Camino del Remedio, and San Antonio Road. The comment does not assert that emergency evacuation from proposed residences within the Health and Government Center campus would be inadequate, and no revision is needed.

Three additional housing developments are proposed within the Community Services Campus south of US 101. Emergency evacuation from the proposed housing developments within the Community Services Campus would be via several internal roadways within the Community Services Campus, as well as Hollister Road.



Comment C.2-2:

Next, the reason given for not moving the planning Department from Downtown Santa Barbara to the Health Complex is the need for retail and offices? All I keep reading about is the difficulty in keeping retail storefronts filled downtown. And I'm not reading of any shortages of Office Space.

Response to Comment C.2-2:

The comment addresses the real estate market in downtown Santa Barbara and is outside of the purview of CEQA, which addresses impacts on the physical environment.

Comment C.2-3:

Although in the December 6th meeting, it was said that there was no specific number of units to be built, I see that in table 5.3-2 it shows that 223 units are proposed, not taking into account bonus density units, with only 268 new parking spaces. There's an increase of 540 County parking spaces recommended for county staff, versus the 927 recommended in the maximum buildup proposal. Going by the square feet proposed in the maximum development, the increase in parking spaces should be proportional, I.E the 927 spaces. Also, according to the map, it looks like the housing or offices will be built on top of a large parking lot, and I'm not finding that taken into consideration.

Response to Comment C.2-3:

The three options considered in project planning described in Table 5.3-2 are simply that: options considered during Master Plan development. Parking is no longer considered an environmental impact under CEQA. All written comments, including this one, will be considered by the Board of Supervisors before the Board considers the Final PEIR for certification.

Comment C.2-4:

In the map showing the southern section, north of Calle Real, the Wildlife Urban interface map excludes this project. I think the Bobcats, Whitetailed Kites, bluebirds, and monarch butterflies, the latter of which I saw daily this year, for many months within only a 10 minute period from my patio daily, would dispute that. This would further break up wildlife corridors. and in the fire safety map 4.14-2 it shows a moderate risk part of the project, not .

Response to Comment C.2-4:

The *Wildlife Urban interface map* referenced in the comment is actually the *Wildland-Urban Interface map (DEIR Figure 4.14-3)*; wildland-urban interface (WUI) is the line or zone of transition between vacant land and human development. **Figure 4.14-3** shows most of the project site in WUI. WUI is not related to wildlife corridors or habitat. DEIR Figure 4.14-2, *Fire Hazard Severity Zone - Local Responsibility Area*, shows parts of the project site in moderate, high, and very high fire hazard severity zones. The comment does not claim an inadequacy of the DEIR and no further response is needed.

2.4.8 Comment Letter C.3

Peter Ysebrands

Comment letter C.3 was received via email from Peter Ysebrands on December 6, 2024.



Comment C.3-1:

I am responding to the Draft PEIR for the Calle Real Master Plan. I have lived in the area for 60 years and believe that the PEIR has not adequately evaluated several of the environmental issues that will impact the residential and recreational area. Specifically they are the Aesthetics, Biological Resources, Noise, Transportation, Utilities/Service Systems and Wildfire. The PEIR uses specific terminology to evaluate impacts that seem to be guided by laws and regulations designed to set minimum thresholds. The ones that I believe are most troubling are termed, "Less than significant" and "Less than significant impact with mitigation incorporated".

Response to Comment C.3-1:

Significance determinations are explained in Initial Study (Appendix A-5) Section 1.6, *Impact Terminology*, page 1-3.

Impacts on aesthetics, biological resources, noise, transportation, utilities and service systems, and wildfire are addressed in DPEIR sections 4.1, 4.3, 4.10, 4.11, 4.13, and 4.14, respectively.

Comment C.3-2:

An impact is considered less than significant if the analysis concludes that the project would cause no substantial adverse change to the environment and requires no mitigation.

Response to Comment C.3-2:

The comment correctly states the definition of less than significant from *Initial Study* page 1-3.

Comment C.3-3:

The complete report is extremely lengthy and technical. References to the technical data are so complex that its almost impossible to understand. When I am able to look at some of the analysis it has me seriously wondering if the minimum was done to justify the evaluation. For example please help to understand the Appendix D10 Noise Hourly Data. It indicates that only 3 sites were evaluated for the entire project, ie (NS1, NS2 & NS3). How can only 3 sites be an adequate representation of the entire project?

Response to Comment C.3-3:

The noise sampling points shown in Figure 4.10-1 of the DEIR were for two days of 24-hour continuous noise monitoring. These sites were chosen for two purposes: (1) to obtain an idea of existing long-term noise levels and (2) to compare with predicted future operational noise levels. Monitoring location site NS 1 was chosen to be in a residential area near the US Highway 101 freeway, The other two 24-hour measurement sites were chosen to be in residential areas farther from the freeway and closer to areas of major onsite activity.

The three 24-hour sites were not used for the noise impact analysis. For construction, we chose seven sites, of which three were south of the US Highway 101 freeway and one was in a residential area south of Hollister Avenue. For the traffic noise analysis, we chose ten "noise assessment locations" (NALs), of which four were for onsite sensitive noise receivers, such as housing. For the existing traffic levels, we decided to estimate both existing and future noise levels using the HUD methods



described in the DEIR. We did not use the measured 24-hour noise levels because they were “snapshots in time,” while the HUD method uses annual average daily traffic values.

Comment C.3-4:

The report indicates that there will be several large expansions to some of the buildings. Homeowners in the area already have several of their views blocked by county buildings including large flood lights that are on all night. Building taller and larger structures will eliminate more of the views that have contributed to the values of their properties.

Response to Comment C.3-4:

DPEIR **Section 4.1, Aesthetics**, analysis of threshold C (project impacts on visual character or quality of public views; and impacts regarding zoning or regulations respecting scenic quality) includes the following text:

The proposed demolition of four buildings, and construction of two new buildings, in the south- central part of the Health and Government Center campus, would change the visual character of only a small part of the Health and Government Center campus.

The proposed Behavioral Wellness building would be three stories, and the Behavioral Wellness Program building would be one story. Several other existing buildings nearby on the Health and Government Center campus are three stories high; thus, the proposed Behavioral Wellness building would conform with the scale of existing buildings. The designs of the two proposed buildings would comply with Calle Real design guidelines recommending creation or expansion of landscaped areas (courtyards or open space).

New and expanded buildings would be sited and designed in accordance with the design guidelines cited above. Building sites would be chosen near existing buildings (in some cases within the footprints of existing buildings); would continue or create landscaped areas; and would form new architectural edges framing new or existing open spaces.

The analysis supports the *less than significant* impact determination, and no revision to the EIR is needed.

Comment C.3-5:

The report includes a Biological Resource analysis that indicates only 2 days, May 9th and 15th, were spent in the field to evaluate ground-based resources. With such a large area and the dynamics of yearly migration and breeding cycles I find it hard to believe that a comprehensive study can be accomplished. In the past 30 years I have had many additional species of wildlife on my property that would never be counted in a 2 day survey.

Response to Comment C.3-5:

The field survey conducted as part of the Biological Assessment of the project site by Wildscape Restoration met industry standards for general biological resources assessments (two days each by two biologists). The biological assessment used several other methods including analyzing presence of suitable habitat for special-status species; and review of records of special-status species previously observed in the project region. The methodology of the Biological Assessment is discussed



further in **Appendix D2, Biological Assessment**, Section 4.0, *Methodology*. No revision to the EIR is needed.

Comment C.3-6:

The transportation routes that provide egress and access to these areas are limited and completely inadequate to any further expansion to the campus which will include more employees and services to the community. Appendix D12 clearly shows an increase. None of the "priority objectives" or "other objectives" identify improving transportation routes in the area. Cathedral Oaks is a 2 lane road with a very unsafe bike route that serves a direct access to several public schools.

Response to Comment C.3-6:

The comment is correct regarding project trip generation: **Appendix D12** shows that estimated net increase in trip generation is 7,255 trips per day. DPEIR **Section 4.11, Transportation**, determined that project impacts (specifically, construction impacts) on roadway design hazards and emergency access would be significant without mitigation; mitigation measure TRANS-1 requires preparation and implementation of a Construction Management Plan to reduce impacts on both roadway design hazards and emergency access. Such impacts would be less than significant after implementation of MM TRANS-1.

The comment is correct regarding the project objectives stated in **Section 2, Project Description** omitting improvements to transportation routes. However, two of the **Priority Objectives** involve relocating functions within the Calle Real campus to reduce the need for internal trips:

- Identify departmental synergies, potentially developing "precincts" within the Calle Real campus in order to streamline services internally and externally.
- Explore potential for a one-stop service center.

The EIR addresses the transportation and traffic safety concerns expressed in the comment, and no revision is needed.

Comment C.3-7:

It is obvious that Utilities and Service Systems will be needed as part of the Calle Real Campus Master Plan and will place an extra burden on the system. The additional demand will result in higher costs to existing homeowners as a result of increased usage and system upgrades.

Response to Comment C.3-7:

Impacts on utilities and service systems are addressed in DPEIR **Section 4.13, Utilities and Service Systems**. The DPEIR determined that, while project implementation would increase utility demands, that adequate supplies and facilities are present to meet project demands. Utilities costs are outside the purview of CEQA. No revision to the DPEIR is needed.

Comment C.3-8:

Wildfire threat in the area has been a historical fact for several years. Additional construction and population without any additional fire stations and egress infrastructure is a poor choice. Several



years ago the Fire Department Headquarters housed an Engine Company because response times were inadequate. During the Paint, Jesusita and Cave fire, just to name a few, the ability to evacuate is severely impeded because of only two routes that give access to the freeway. Highway 154 and Turnpike are the only means to get out of the area.

Response to Comment C.3-8:

Project impacts regarding wildfire risks are addressed in DPEIR **Section 4.14**, *Fire Protection Services and Wildfire Hazards*. Section 4.14 determined that impacts on emergency response planning and emergency evacuation would be significant without mitigation; and that implementation of mitigation measure TRANS-1 would reduce such impacts to less than significant (see Response to Comment C.3-6). No revision to the EIR is needed.

Comment C.3-9:

I would like to request an additional public hearing on the Draft Program Environmental Impact Report to describe in layman's terms how some of the assessment was done to evaluate the impacts of the report and what specific mitigation measures would be needed to address them. I have spoken to several homeowners in my area that also have the same concerns and believe that the term "Significant Impact" has more than one meaning depending on who it impacts.

Response to Comment C.3-9:

The commenter's request for an additional public hearing on the DPEIR is noted. The circulation period for the DPEIR has ended. The Santa Barbara County Board of Supervisors will consider the Final PEIR for certification, in addition to taking action on the proposed project at a noticed public hearing at a later date. Notice of the hearing will be provided to all those who requested such notice, as well as all those who submitted written comments on the DPEIR and provided contact information.



2.5 Public Meeting Comments and Responses

A public meeting for the project was held on Wednesday, November 20, 2024, 5:30 PM to 7:00 PM at the County of Santa Barbara Employee University on the Calle Real Campus 267 Camino Del Remedio, Santa Barbara, 93110. Copies of the agenda, sign-in sheet, and presentation are included in **Appendix FEIR-6**.

2.5.1.01 Commentor #1

The road going up to that gate is very eroded and I have not seen any cars go through it in years.

Response to Comment 2.5.1.01

Thank you for that comment, we will make a note of that.

2.5.1.02 Commentor #1

So, you just said it might require another CEQA, they may say there is no mitigation or impacts. So, is that going to be based on this?

Response to Comment 2.5.1.02

Yes, in terms of comparison, it will be based on this. But every time there is a new project, that specific project will have its own project description. And that project description will be compared to this one. Right now, we do not have the level of detail for the design of the buildings, circulation, etc. We don't have that type of detail right now since this is an overview of the project. But once we look at individual projects, there will be detailed architectural drawings and at that time we will compare how do those proposed features compare with this EIR and these project features. And if there are major deviations, that will require another level of review and more mitigation to address those issues.

2.5.1.03 Commentor #1

So, I guess my question is, has it already been rezoned for housing? Is that correct?

Response to Comment 2.5.1.03

That is part of the housing element and that is not part of this EIR process. For zoning, and this area in particular, the County is exempt from specifically the state and zoning that this area is. So, the requirements of the recreational zoning are not applicable on County owned land.

Different requirements under a particular zone, for example setbacks, height restrictions, etc. the County is exempt from those requirements. However, the County would make every effort for covenant development. They would not propose something completely out of line because it is not possible to do that. And that is where the CEQA review helps, because when we do a review like that the impacts could be potentially significant, and they won't be mitigable. So, we can assume that it could be covenant, but the specific requirements under zoning, the County is exempt in their own land.



2.5.1.04 Commentor #1

So, they [County] have to do a CEQA? And if they are exempt, could they just not?

Response to Comment 2.5.1.04

Yes, CEQA is required. All local and state agencies are required to complete the CEQA review for every project.

That [exemption] is just for zoning, so they are not exempt from the CEQA process. Zoning is a County policy. Zoning is different from CEQA.

2.5.2.01 Commentor #2

All these people living there going home now have to go through Calle Real and then imagine everyone else coming out of there...I don't want to be caught in that.

South of the gate is eroded.

Another thing it says is that there are stop signs, several stop signs along that area where [inaudible] meets and I don't know I didn't have time to read all of it. I don't recall there being one stop sign and it mentions more.

Response to Comment 2.5.2.01

Project traffic impacts are addressed in Section 4.11, *Transportation*, of the Draft EIR. The comment does not assert an inadequacy of the DEIR and thus no substantive response is needed. The Board of Supervisors will consider the commenter's concern about traffic on Calle Real before the Supervisors consider the DEIR for certification.

Both Camino del Remedio and Honor Farm Road are blocked by locked gates, so it is not clear which roadway the comment addresses. The comment about an eroded roadway does not address the adequacy of the EIR. The Board of Supervisors will consider the comment before the Supervisors consider the DEIR for certification.

The comment about stop signs does not specify the roadway involved. If the comment is regarding Cathedral Oaks Road, the statement in the EIR references cross-street stops, not stop signs on Cathedral Oaks Road (see the response to comment C.2-1). No revision is needed.

2.5.3.01 Commentor #3

I had a question about the slides. You know it had a section where it said things will be mitigated. Where is it on how things that need to be mitigated are going to be mitigated?

Response to Comment 2.5.3.01

That is the mitigation monitoring and reporting program. So once this EIR is certified, that program basically becomes a conditional approval for the project and the county will have to abide. So, every development under this master plan will have to abide by those conditions. Because they are no longer mitigation measures anymore, they become conditions. And the mitigation monitoring and



reporting program in section 11 of the EIR details by resource area what will be the CEQA threshold, impact, and proposed mitigation. It also identifies who will implement the mitigation measure and who will enforce it and at what time.

2.5.3.02 Commentor #3

So, in other words, it would be down the road. For example, transportation needs to be mitigated, but it will not be in the EIR.

Response to Comment 2.5.3.02

Right, so let me also give you a little bit of a background with this EIR. This is a Master Plan and the document we are doing is a Program EIR, so now there are going to be several projects that will be built out in 25 years, A lot is going to change in terms of traffic also in those 25 years. So, every time there is a project proposed under this Master Plan there will be a separate analysis under CEQA that will be required and at that time it will be a project level analysis. This is program level, which is like the bigger picture but then every time there is a specific project, there will be a CEQA project level analysis and at that time the county will evaluate whether further traffic analysis is required or not given the baseline conditions then. For example, if a project is proposed 10 years from now, traffic would have changed a lot by then, and if it is required, then that traffic analysis would be required for that project; then the traffic analysis would be performed at that given time. And right now, we have a VMT impact analysis which is the standard under CEQA which is vehicle miles traveled and what we analyzed. And we also have, as part of our mitigation measures, the development of a transportation plan during construction like road closures and emergency situations, which would address those issues, so they are mitigated. However, there would be more that would be required as specific projects get implemented.

2.5.3.03 Commentor #3

The other thing on one of the first slides, there were plans of the project [Master Plan].

They really just seem to take into account buildings, revamping and maybe maximizing use of space. Is it possible to have other goals included in it? Or are those only items that are looked at as things that might need to be mitigated?

Response to Comment 2.5.3.03

No, so these are the goals of the plan and document itself. These are the needs of the County to develop. There are more goals that we did have, but I can share those with you later. Are you stating that there should be other considerations?

2.5.3.04 Commentor #3

When you look at impact, it is probably based on what you are trying to do. And if you are just trying to do one or two things then what you are trying to mitigate might be less than if you are looking at something beyond. Revamping buildings, all this construction has to do with County facilities. One thing you may want to look at is what are the demographics of the population, what are these County facilities and where they are coming from. The County is a big area and if 90% of the people that are



working in these facilities are coming from Santa Maria then it might not be a good idea to revamp here. Maybe a better option to revamp somewhere else. Just a thought.

Response to Comment 2.5.3.04

I understand where that is coming from. We looked at this campus as an opportunity to redefine the programs that are here. Not to say this campus Master Plan could not happen on another area. But this is just focusing on the needs of this area. Thank you though.

2.5.3.05 Commentor #3

Is there any information out of all the buildings that are going to be redeveloped, what percentage of them are being built for existing facilities and services versus moving services from another location into this zone?

Response to Comment 2.5.3.05

So, I can tell you that the majority are already on this campus. This proposed set of buildings [points at map] is proposed to be the current administration building and engineering building that are on the downtown campus. And this is proposed to be the very last phase, if and when that ever happens. And that is why it is shaded in a different color, because that would require a lot more internal discussions and County discussions on what that would look like if we moved out of downtown.

2.5.3.06 Commentor #3

Is part of the overall enhancement plan a long-term goal to move the county seat of government that is downtown out?

Response to Comment 2.5.3.06

So, that would be this building if and when that happens. And that is in 20 years. That is the phase that is 20-30 years down the road. That is a question that has been asked a lot.

2.5.3.07 Commentor #3

And as far as creating these synergies is there already discussion or documentation, we can find on what type of services the county is thinking of bringing together?

Response to Comment 2.5.3.07

The campus Master Plan identifies a lot of that. For instance, for this area in particular (Health Campus), we are potentially trying to consolidate or co-locate the services that are offered on the campus as a whole. One of the departments has 11 different locations of programs on this campus and it is inefficient. So, we are proposing to bring them together, so it makes it a little easier for the constituents to navigate the campus

The idea here is to bring similar programs to specific locations so it can be easier to provide services.



I don't know if you can see, the text is a little small but across the 101, the community services campus is tied in function with the campuses up above.

2.5.3.08 Commentor #3

So are the individual departments, the one that are submitting requests on expansion? For example, the Public Safety is being proposed as what? And the regional training center?

Response to Comment 2.5.3.08

Not all buildings are being proposed for demolition or redevelopment or anything. The blue? So that is at the completion of the project right now. And that is an expansion of the current EOC.

2.5.3.09 Commentor #3

So, the thing that is being done on that [blue] proposed?

Response to Comment 2.5.3.09

All the salmon-colored buildings [Master Plan] are proposed redevelopment. So, this is a new fire headquarters at its current location where headquarters is located. Replacement.

A lot of these buildings are approaching, if not surpassing 100 years old. So, the amount of expense it costs to upkeep some of these older buildings that were never meant to house some of these programs in the first place is one of the reasons why we looked at developing a long-range plan for this campus.

So, on the public safety campus really the only new building would be the entire County Fire which would replace the one that is there.

2.5.3.10 Commentor #3

Has an EIR been done on the regional dispatch center?

Response to Comment 2.5.3.10

It is a categorical exemption, which is not uncommon, it has no significant impact.

So, there are different types of CEQA documents, the EIR is the highest level of review under CEQA, but not all projects require an EIR. Some of them we just do an initial study for and if we know after doing the initial study that all impacts could be mitigated and the project is not of the size where it has a lot of impacts then we can just do a mitigated negative declaration. Here we say that if we implement such and such mitigative measures, impacts will be reduced. And I think in this case that is what was prepared.

2.5.3.11 Commentor #3

So, we can find out if an EIR was required or not.



Response to Comment 2.5.3.11

In the initial study, if there were less than significant impacts, then we determine what level of work we would be doing. And that one I believe was a mitigated negative declaration.

To add on, there are other EIR's that could be taking some of the other projects around this campus that are included in this EIR. The housing element is doing their own EIR, for that piece and so that was removed from this EIR project.

Because there are several housing projects that are proposed within this area and those are covered under the EIR being prepared by the housing element.

2.5.3.12 Commentor #3

To me it seems the whole area is surrounded by residential, and you have existing housing facilities, some of which are being remodeled. But the idea of expanding a long-term plan of moving the County seat of government, there is going to be significant impact on various levels.

Response to Comment 2.5.3.12

And that is what we look at. And once that becomes a project, we will look at that and make the determination at that time on how to proceed

2.5.3.13 Commentor #3

And to repeat, the deadline for the comments is December 6 and will be included in the EIR to be certified. Once they get certified, is there a way to go backwards?

Response to Comment 2.5.3.13

Well, there is a 30-day statute of limitations once that notice of determination is filed. After that point that really is your last opportunity. Keep in mind that every time there is an individual project, that project will be evaluated and CEQA is required at a project level also. And then at that time the County would determine what level of CEQA review is required. So, if it is something really small which has already been identified and mitigated for is part of this EIR then you can just prepare an Addendum and say this is not significant. However, if it is something that will involve more impact, a very good example, this building for the County office that will be relocated from the City. Something that will involve a higher level of review. It could be an IS/MND or an EIR. That really depends on the baseline conditions at that point. Say 15 years from now, we have to be mindful of the baseline conditions, or what exists at this point. It might be higher traffic then, but if we analyze impacts now, they will not be relevant 20 years from now when things change.

2.5.3.14 Commentor #3

Can anyone speak more specifically about the storm debris location on the north side of Cathedral Oaks and what the future might be like.



Response to Comment 2.5.3.14

So, I work for Public Works, and we supported this part of the analysis, that is why we joined the meeting today. So, that is the managerial processing sorting site (MPS) in the document. That is an existing location where we have sorted and stored emergency sediments that come down the watersheds during floods like we've had in the past few years. But the Master Plan does contemplate the continuation of that MPS site and the potential expansion of it by an addition 0.2 acres within that public safety campus.

2.5.3.15 Commentor #3

How would that [storm debris] impact the mitigated in your opinion?

Response to Comment 2.5.3.15

The mitigation measures for this are known because existing activity is included on the EIR. Those mitigation measures are working hours, installation of new native landscaping around perimeter of the site, traffic control.

For traffic control, we have a significant mitigation measure which is traffic control and transportation management plans. And if you look at mitigation measures in the EIR, it details what is in the transportation management plan.

2.5.3.16 Commentor #3

So, it [transportation management plan] is not temporary, there is not a stop date as far as continuation of that...

Response to Comment 2.5.3.16

No there is not a stop date, it is just an existing operation that falls within the scope of the Master Plan. So, it would have to be in cycle with the Master Plan and 20-year projection. As conditions change, with operations changing, it would have to undergo through supplemental review.

Right, any major deviations from what we have identified in the project description will need another CEQA review and maybe more mitigation to address the concerns at that point. For that reason, the project description is important because it addresses the type of impact we look at.

2.5.3.17 Commentor #3

So, when this is implemented, there is no impact on population and housing? But it is not set in stone. So CEQA says that there are no impacts, and no mitigation required, so we don't have to do that.

Response to Comment 2.5.3.17

Right. At the program level, which is at the bigger level, there is no impact. But when we look at one particular housing project that is proposing 100 units, then we would look at details on how many people will live in those units, how much traffic will be generated by these people, utility consumption, schools, etc. And if we find impact, then mitigation measures will be implemented.



2.5.3.18 Commentor #3

Does that mean the water requirements will also be assessed too?

Response to Comment 2.5.3.18

Yes, so public utilities and service systems require analyzing water supplies, water generation, and solid waste. And for this particular project we look at water needs. Like is there enough water available to service this project? And they also coordinate with specific utilities and agencies who are responsible for providing water. This is brought to their knowledge.

2.5.3.19 Commentor #3

Is habitat or wildlife something you look at? How do you determine that?

Response to Comment 2.5.3.19

There are certain species of plants and wildlife that are listed for protection. There are state and local agencies.

2.5.3.20 Commentor #3

Did you find any [protected species]?

Response to Comment 2.5.3.20

I think there was the monarch butterfly, but there are many other species. For the most part, the good thing is that the proposed development is in areas that are already developed. So, we are not disturbing those native areas.

2.5.3.21 Commentor #3

How do you determine where they [protected species] are?

Response to Comment 2.5.3.21

Our biologists go out on the site and survey the whole area. Two biologists from Wildscape Restoration spent two days each (May 9 and May 15, 2023) conducting the field surveys..

The document is also on the County website.

2.5.3.22 Commentor #3

So, someone is actually in charge of looking at all of that [habitat surveying].

Response to Comment 2.5.3.22

You can find it in section D-2 of the EIR. It also includes the methodology and impacts. Everything you are asking about is detailed in the report. It also includes field logs of observations.



2.5.3.23 Commentor #3

Are the technical studies available online?

Response to Comment 2.5.3.23

You can scan the QR code in the presentation or find it online at:

<https://www.countyofsb.org/3885/23382/Calle-Real-Campus-Master-Plan>

2.5.3.24 Commentor #3

And you said in the beginning there were some levels of determination, of doing nothing. Would this go back to the County Board of Supervisors. Could they just decide not to do anything?

Response to Comment 2.5.3.24

Yes, it could be.

They could also implement a no project alternative, stated in the EIR.

2.5.3.25 Commentor #3

You mentioned the remodeling of the headquarters, I thought there was some talk about creating a training facility up there?

Response to Comment 2.5.3.25

For fire? No there is not.

2.5.3.26 Commentor #3

And you talked about that area that is used for storm creek erosion? And that is going to be permanent?

Response to Comment 2.5.3.26

For the lifetime of this master plan yes, beyond that, they will do another meeting like this.

2.5.3.27 Commentor #3

We all thought it [storm creek erosion area] was going to be for emergency use only and at some point, it will be shut down. But is it ongoing and are there other locations?

Response to Comment 2.5.3.27

Yes, the current operational needs of the district are such that we need a suitable site to provide public safety to the community.

Yes, certainly. But it is important to have a distribution of those services available in case of flooding like in 2023. All of those sites can be mobilized, it really depends on the needs of that



particular season, what site might be activated. And we are trying to be sensitive to areas that are residential, they are not our first preference, but it is important to have access to them.

2.5.3.28 Commentor #3

I think all our neighbors understand for emergency situations it is fine, but to become a permanent ongoing heavy equipment, dirt, sifting, year after year.

Response to Comment 2.5.3.28

Yes, we understand, we are trying to be sensitive about presenting this out for public review. We welcome more discussion on it. It is not meant to be a continuous operation; it will operate sporadically.

2.5.3.29 Commentor #3

Is everything that goes in supposed to go out?

Response to Comment 2.5.3.29

No. The project description of the EIR does contemplate using some of the material onsite, to flatten and expand the operational area to improve access and other purposes. Other would be sorted and exported for reuse for the public or other projects.

2.5.3.30 Commentor #3

I know there is a lot of fill that is taking place too.

Response to Comment 2.5.3.30

Yes, so the fill that is there currently is suitable for ongoing use. Future contemplation is not to lower that but build for screening and to flatten the area.

2.5.3.31 Commentor #3

As far as general services goes, would the facility at the road yard and flood control and all those, are you thinking all that would just be redeveloped?

Response to Comment 2.5.3.31

There are no plans to do that.

If you look at the plan, all the green buildings are the ones that will remain. Those in salmon will be redeveloped, but they are current buildings.

2.5.3.32 Commentor #3

Yeah, we get a lot of light from the county school auditorium that shines up the foothills. You guys have flood control and the radio lights which shine all night into the foothills



Response to Comment 2.5.3.32

At that site I cannot speak on flood control, but the lights come on for purposes of safety. But it is low dim lighting.

In regard to the auditorium, three years ago, when we activated the MPS, they were working 24/7, they had portable lights. There was noise from construction. Since you went right from two years ago, activating the AOC. I apologize, because of the situation right here. We have had to leave it right there. If I get your name and number, they can give you a call.

2.5.3.33 Commentor #3

Do you know what the attendance for the last meeting was?

Response to Comment 2.5.3.33

It was a larger attendance, both online and in person.

2.5.3.34 Commentor #3

The plan with all the non-government facilities. Are some of their facilities going to be redeveloped, and if so, are they going to continue to stay on those facilities?

Response to Comment 2.5.3.34

We have had conversations with them, and they are going to be with the healthcare programs that we have on the campus to consolidate before relocation.

2.5.3.35 Commentor #3

Are these other non-county agencies involved in the process?

Response to Comment 2.5.3.35

Yes, and when we went through the Master Plan process, we discussed what their needs are. A lot of them, we aren't going to disturb at all. Everything is pretty much staying as is. Most of the non-county agencies will not be moving or proposed to relocate to anything.

2.5.3.36 Commentor #3

Was there a study done to determine the cost of all this new construction versus maintenance?

Response to Comment 2.5.3.36

We looked at the costs for maintenance and repairs, and when you are dealing with 100+ year old buildings that need maintenance, all that went into consideration.

It is not only the maintenance, but also the utility usage, which is a heavy lift on old buildings.



2.5.3.37 Commentor #3

Has the number of employees also been analyzed? Like County employees?

Response to Comment 2.5.3.37

Yes, that is addressed in the Initial Study (Appendix A5 to the DEIR), page 4.14-5. County employment onsite was estimated at 467 in 2019. Total County employment onsite at project completion is estimated at 1,150 including 433 additional County workers plus approximately 250 to be transferred to the site from the County's downtown Santa Barbara facilities.

2.5.3.38 Commentor #3

So, they [County employees] would basically stay there except for any other county agencies that are brought in.

Response to Comment 2.5.3.38

Right, with the exception of the downtown admin building. This is why this is phased over multiple years. You have to build new stuff before we can tear something else down. So, we have to come up with some swing space to house some folks and then we can continue from there

2.5.3.39 Commentor #3

Have you guys thought of improving some of the roads around this project? I know everyone who is already working there will go through here. Like just working with County roads to build a better traffic point. Ideally, we save money in the long run.

Response to Comment 2.5.3.39

We are looking at circulation on the campus, north, south, east, and west entry points. We are thinking and looking at that right now.

2.5.3.40 Commentor #3

You got Hollister, the freeway, Calle Real, and Cathedral Oaks. And then the school, which is a nightmare at 8 in the morning. It is great to remodel facilities, but it would also be nice to consider there is a deficit in the infrastructure.

Response to Comment 2.5.3.40

I cannot speak on any future plans to expand or do anything with the roads.

2.5.3.41 Commentor #3

Is the County Road Department getting any buildings?

Response to Comment 2.5.3.41

I think one of those.



So that is this building over here. But once again, it is not adding to the existing number of employees.

2.5.3.42 Commentor #3

You can get to the pumps from Cathedral Oaks. So, you really are only adding use back and forth around Turnpike.

Response to Comment 2.5.3.42

That is something that has been talked about. The EIR doesn't look into that.

2.5.3.43 Commentor #3

What kind of construction because if we build a high fire hazard district...first of all, everybody's Homeowners Insurance got canceled because of the state doesn't want to ensure new construction in that area and it's in the footprint of the pink (fire hazard district). What are you guys looking into that?

Response to Comment 2.5.3.43

We aren't expanding. But we are taking into consideration the higher fire zones that there are up in this area.

2.5.3.44 Commentor #3

In the EIR you talk about significance. What is the benchmark of significance?

Response to Comment 2.5.3.44

The CEQA guidelines is updated every year and includes the thresholds. This is the reference point, and these guidelines include Appendix G which shows what the thresholds are. For certain areas like air quality there will be a threshold. But when you look at the analysis in the EIR, it tells you how the threshold was interpreted and what are the industry acceptable practices. So, every analysis has a methodology which explains how the analysis was done with respect to that threshold.

2.5.3.45 Commentor #3

Does that tell you how to do the analysis?

Response to Comment 2.5.3.45

No, it does not tell us the details. For every area it is different, and each has different protocols. And then there are local agencies and documents that may be applicable to one species. We first identify the species and then look at all the documents applicable to that species.

2.5.4.01 Commentor #4

The pink buildings on the lower left [Master Plan]. I am curious, is one of the buildings against the creek?



Response to Comment 2.5.4.01

This is the current location of the VA clinic as well as the Elections and Mental Health Clinic. So, all of it is going towards the creek is this area which is not being developed.

2.5.4.02 Commentor #4

And then to the left is that the main healthcare building?

Response to Comment 2.5.4.02

This is proposed to be a new parking structure. This is the proposed behavioral wellness complex. The public health admin building and public healthcare clinic are these three buildings.

2.5.4.03 Commentor #4

So, the building has a parking lot in front of it?

Response to Comment 2.5.4.03

As you can see, it is really faint, but it is right here. So, this is the current road that crosses the campus from San Antonio to Camino Del Remedio. This is where all the parking is and where it wraps around to Camino Del Remedio. So, there is also a smaller parking lot right here. And this is the building itself.

2.5.4.04 Commentor #4

So, all those buildings below that, is here [points at map]?

Response to Comment 2.5.4.04

So, where we are standing right now is about right here [points at map]. So, as part of the Master Plan we do have an image with an overlay of the existing buildings with an outline of buildings where they are proposed.

Yes, that is in the project description section, Section 2 of the EIR. If you look at the maps in that section for each area, it shows what is existing and the map right after shows what is proposed and if you compare the two you will be able to tell what's the proposed for demolition and what will be the new construction.

2.5.4.05 Commentor #4

It is also weird that it's address is Calle Real, but they are all the way up there.

Response to Comment 2.5.4.05

And that is also not part of this EIR but signage strategies are looked at as well for wayfinding. But that is also a different conversation.



2.5.4.06 Commentor #4

I think one of these parking lots would be safe for the clean air buses to park on because right now they park on Camino Del Remedio and if you are going south, you are just blinded. You have no idea who is going out of the parking lot.

Response to Comment 2.5.4.06

Nothing a part of this discusses that. We have been in discussion about removing parking from the roads which we have done a pretty good job, but not when it comes to the clean air buses because that is the location that they use for drop offs.

2.5.5.01 Commentor #5

Yeah, I think what you are bringing up [observation of sensitive species] is a habitat concern because we just paid over a few million dollars to secure the floodplain preserve and there is a natural corridor habitat that runs through cathedral oaks and down through the canyon. And it is not uncommon I have had bobcats or red tail hawks. I don't know if they are going through the orchards or trash cans, but they are there. There are also coyotes that run around at 3 am in the morning. I would like to look at the report to see what they analyzed in the area. You know for a few hours a week you are probably not going to capture the true significance of what is out there.

Response to Comment 2.5.5.01

Project impacts on biological resources are addressed in Section 4.3, *Biological Resources*, of the EIR. The durations of the field surveys by Wildscape Restoration (two days, May 9 and May 15, 2023, by two biologists each), and their documentation of land cover types and plant and animal species observed, met industry standards for such surveys and documentation. No revision is needed.

III. Revisions, Clarifications, and Corrections to the Draft EIR



III. REVISIONS, CLARIFICATIONS, AND CORRECTIONS TO THE DRAFT EIR

This section of the Final EIR provides changes to the Draft EIR that have been made to revise, clarify, or correct the environmental analysis for the Calle Real Campus Master Plan Project. Changes in this section are a result of comments received in response to the Draft EIR. The changes detailed in this section do not result in the project creating any new or increased significant environmental impacts.

Added text is shown underlined and deleted text in ~~strikeout~~.

3.1 Corrections and Additions to Draft EIR Sections and Appendices

3.1.2 Draft EIR Section 4.2, Air Quality

Section 4.2.5, Methodology, under Toxic Air Contaminants, page 4.2-23.

Construction

~~According to the SBCAPCD's Modeling Guidelines for Health Risk Assessments, Form-15i, the District's policy is that a health risk assessment performed under CEQA should not include emissions from construction activities (SBCAPCD, 2023b, p. 2). The only potentially significant TAC from construction activities is diesel particulate matter (DPM). DPM emissions were conservatively assumed to equal emissions of PM₁₀. Health risks of construction phase emissions of DPM are discussed in Section 4.2.6 under Threshold C.~~

Section 4.2.6, Environmental Impact Analysis, under Threshold B, page 4.2-24, first paragraph.

~~The SBACPD Santa Barbara County~~ has not established numerical significance thresholds for short-term construction emissions (County of Santa Barbara, 2021, p. 20).

Section 4.2.6, Environmental Impact Analysis, under Emission Thresholds for Regional Air Quality Impact, page 4.2-24, third paragraph.

~~The SBCAPCD Santa Barbara County~~ has various criteria for determining if a project's operational emissions will have a significant impact...

- NO_x ~~or ROC~~ emissions from motor vehicle trips alone are less than 25 pounds per day.

Section 4.2.6, Environmental Impact Analysis, Threshold B, pages 4.2-28 and 4.2-29, Table 4.2-6 Construction Schedule, under Master Plan Phase 7.

Construction Phase	Type of Activity	Start	End
Master Plan Phase 7			
1	Demolition	October 1 <u>September 10, 2046</u>	April 18, 2047 <u>December 14, 2046</u>
2	Site Preparation	April 19, 2047 <u>December 14, 2046</u>	June 7, 2047 <u>January 8, 2047</u>



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3	Grading	June 8 <u>January 9, 2047</u>	August 27 <u>February 15, 2047</u>
4	Building Construction	August 28 <u>February 16, 2047</u>	December 29, 2050 <u>March 16, 2050</u>
5	Paving	December 30, 2053 <u>March 17, 2050</u>	June 26, 2054 <u>June 13, 2050</u>
6	Architectural Coating	June 27, 2054 <u>June 14, 2050</u>	December 24, 2054 <u>September 8, 2050</u>

Section 4.2.6, Environmental Impact Analysis, Threshold B, Short-Term Construction, page 4.2-29, Table 4.2-7.

Table 4.2-7
MAXIMUM DAILY REGIONAL CONSTRUCTION EMISSIONS

Phase	Maximum Pounds per Day of Emissions				
	ROG	NO _x	CO	PM ₁₀	PM _{2.5}
1	12.18 <u>11.66</u>	39.02	33.34	10.51	5.64
2	20.98 <u>9.37</u>	20.78	25.66	3.76	2.09
3	15.58 <u>5.13</u>	7.32	9.66	2.45	1.32
4	9.14 <u>15.06</u>	10.40 <u>19.21</u>	13.53 <u>23.23</u>	3.16 <u>8.51</u>	1.66 <u>4.64</u>
5	19.88 <u>8.89</u>	7.88	11.54	3.05	1.56
6	6.91 <u>52.71</u>	4.01 <u>13.37</u>	7.03 <u>18.14</u>	2.26 <u>8.20</u>	1.15 <u>4.35</u>
7	32.11 <u>14.33</u>	12.09	17.70	8.14	4.30
Max	32.11 <u>52.71</u>	39.02	33.34	10.51	5.64

Source: Calculated by UltraSystems with CalEEMod (Version 2022.1.1.21) (CAPCOA, 2022).

Section 4.2.6, Environmental Impact Analysis, Threshold B, Short-Term Construction, page 4.2-29, first paragraph.

The SBCAPCD considers all short-term construction emissions insignificant due to the fact that ozone precursors make up only a small portion of the total NO_x emissions inventory for the county, and that all discretionary construction activities are required to follow dust control measures. NO_x emissions from construction equipment comprise 6 percent of the county-wide 1990 emission inventory for NO_x, which the county deems insignificant (County of Santa Barbara, 2021). Santa Barbara County does not have quantitative thresholds of significance for short-term construction emissions, so impacts from construction-phase activities and emissions were evaluated under CEQA and the significance of the environmental effect will be determined by the lead agency, the County of Santa Barbara. The District does require that all discretionary construction activities follow dust control measures. Santa Barbara County is in attainment for ROG, NO_x, CO and PM_{2.5}. Therefore increases of these criteria pollutants generated from short-term construction activities will not result in a significant impact under Threshold B of the CEQA Guidelines. Since Santa Barbara County is not in attainment for PM₁₀, all construction and demolition activities are required to comply with SBCAPCD Rule 345, which contains fugitive dust limiting measures (SBCAPCD, 2024c).



Section 4.2.6, Environmental Impact Analysis, Threshold B, Long-Term Operational Emissions, page 4.2-30, second paragraph.

As seen in **Table 4.2-8**, the project will result in a decrease in maximum daily emissions of ROG, NO_x and CO, and an increase in particulate matter emissions. Net emissions of ROG, NO_x, and PM₁₀ at project buildout would be below the SBCAPCD County of Santa Barbara's offset daily trigger thresholds for offsets. In addition, when construction emissions are added to operational emissions for each year of construction, the net emissions of these pollutants over no-project levels will be below the daily offset trigger thresholds in each year. Calculations supporting these conclusions are provided in Appendix D and summarized in Appendix D.1.18 (included in Appendix FEIR-7).

Section 4.2.6, Environmental Impact Analysis, Threshold B, Long-Term Operational Emissions, page 4.2-30, Table 4.2-8 Maximum Daily Project Operational Emissions.

**Table 4.2-8
MAXIMUM DAILY PROJECT OPERATIONAL EMISSIONS**

Emission Source	Pollutant (lbs/day)				
	ROG	NO _x	CO ^a	PM ₁₀	PM _{2.5} ^a
Existing Conditions					
Mobile Sources	114.51 <u>115.12</u>	89.45	698.43	116.07	30.22
Area Sources	27.69 <u>23.67</u>	0.29	34.43	0.06	0.05
Energy Sources	0.31	5.65	4.74	0.43	0.43
Total Emissions	142.51 <u>139.1</u>	95.39	737.6	116.56	30.7
Project Buildout Conditions (2050)					
Mobile Sources	67.50 <u>69.66</u>	38.81 <u>39.89</u>	437.37 <u>448.99</u>	147.99 <u>151.34</u>	37.74 <u>38.59</u>
Area Sources	36.02 <u>42.36</u>	0.56 <u>0.63</u>	66.64 <u>74.79</u>	0.12	0.09
Energy Sources	0.40 <u>0.44</u>	7.30 <u>7.96</u>	6.14 <u>6.41</u>	0.56 <u>0.61</u>	0.56 <u>0.61</u>
Total Emissions	103.92 <u>112.46</u>	46.67 <u>48.48</u>	510.15 <u>530.19</u>	148.67 <u>152.07</u>	38.39 <u>39.29</u>
Net Change					
Mobile Sources	(47.01) <u>(45.46)</u>	(50.64) <u>(47.63)</u>	(261.06) <u>(249.44)</u>	31.92 <u>35.27</u>	7.52 <u>8.37</u>
Area Sources	8.33 <u>18.69</u>	0.27 <u>0.34</u>	32.21 <u>40.36</u>	0.06	0.04
Energy Sources	0.09 <u>0.13</u>	1.65 <u>2.31</u>	1.4 <u>1.67</u>	0.13 <u>0.18</u>	0.13 <u>0.18</u>
Total Change in Emissions	(38.59) <u>(26.64)</u>	(8.72) <u>(44.98)</u>	(227.45) <u>(207.41)</u>	32.11 <u>35.51</u>	7.69 <u>8.59</u>



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Emission Source	Pollutant (lbs/day)				
	ROG	NO _x	CO ^a	PM ₁₀	PM _{2.5} ^a
<i>SBCAPCD Santa Barbara County's adopted Daily Trigger for Offsets</i>	55	55	-	80	-
Significant (Yes or No)	No	No	No	No	No

Source: UltraSystems, September 2022 January 2024.

^aThere is no daily operational threshold for CO and PM_{2.5} since they are attainment pollutants.

Section 4.2.6, Environmental Impact Analysis, Threshold B, page 4.2-31, first (incomplete) paragraph.

for PM₁₀. NO_x emissions from motor trips only will decrease by 50.64 ~~44.98~~ pounds per day, which is less than an increase of 25 pounds per day. Due to the project's phased construction schedule, it is likely that construction and operational impacts will happen concurrently as each phase of the project becomes operational. An assessment of construction-related emissions combined with operational emissions for each year that construction and operations overlap is included in Appendix D.1.18 (see Appendix FEIR-7). This assessment accounts for the project's construction and operational emissions calculated from the CalEEMod analyses included in Appendices D.1.1 through D.1.9 (see Appendix FEIR-7). To ensure that operational emissions from the project's demolished areas are subtracted from existing or baseline (no-project) conditions, operational emissions of the demolition area of each phase were calculated using CalEEMod and are included in Appendices D.1.11 through D.1.17 (see Appendix FEIR-7). The assessment of yearly concurrent construction and operations emissions from 2025 to 2051 concluded that the net emissions (given year minus no-project case) from ongoing construction and concurrent project operations are below Santa Barbara County's adopted daily trigger for offsets for any given year while the project is being built.

The project's operational emissions will not result in a violation of federal or state ambient air quality standards, nor exceed the SBCAPCD adopted health risk public notification thresholds and will stay consistent with adopted federal and state air quality plans.

Section 4.2.6, Environmental Impact Analysis, Threshold D, page 4.2-32, Air Toxics Risk Assessment, make the following deletions and additions:

Air Toxics Health Risk Assessment

As noted above, the SBCAPCD's policy is that a health risk assessment for CEQA should not include emissions from site grading, welding, vehicle combustion emissions, or other activities associated with construction. An air toxics health risk assessment for project construction was not prepared, for the following reasons.

The draft environmental impact report for the City of Los Angeles' Citywide Housing Element 2021-2029 (City of Los Angeles, 2021) included an extensive discussion of health risks during the construction phase of large housing developments. None of the 54 developments whose CEQA documents were reviewed had significant construction impacts related to toxic air contaminant emissions. Construction activities for many of those developments were of the same or larger scope as those which will take place for the Calle Real project. The only one that had a potentially significant



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TAC impact included demolition of an existing structure and construction of 210 multi-family residential units, 136 hotel rooms, and approximately 12,570 square feet of commercial uses on a 1.16-acre site, with export of 120,000 cubic yards of soil. The EIR found that the unmitigated cancer risk would be 10.4 in one million, and that this could be reduced to 0.47 in one million with appropriate mitigation measures (City of Los Angeles 2021, pp. 4.2-60-4.2-61).

Given this finding, and the uncertainty in the actual nature and timing of the proposed construction for the Calle Real Project, as well as the uncertainty in the location and density of sensitive receptors surrounding the project site, it would not be useful to conduct a programmatic health risk assessment. Instead, as part of the CEQA analysis for individual projects on the different campuses, the projects will be screened as follows:

- A detailed health risk assessment will not be required for projects located farther than 500 feet from the nearest sensitive receptor and/or whose construction will last for less than 18 months.
- If a project is 500 feet or less from the nearest sensitive receptor and has a construction duration of 18 months or more, it will be evaluated with a U.S. Environmental Protection Agency-approved screening dispersion model.
- If the screening analysis indicates that the maximum individual cancer risk is 10 in one million or above, or that the hazard index is 1.0 or above, then a detailed HRA will be conducted.

If the detailed HRA indicates a potentially significant health impact, then project design feature **AQ-PDF-1** (see **Section 4.2.5**) and mitigation measure **MM AQ-2** will be implemented for the individual project.

Section 4.2.7, Mitigation Measures, MM AQ-1, page 4.2-33, insert after first bullet:

- The County shall provide regular maintenance of the air filtration systems, including replacement (when necessary) of the particulate filters. As an alternative, the County shall, at minimum, prepare a brochure notifying future residents of the need to maintain the filter screens. This brochure shall be provide at the time of leasing or ownership exchange.

Section 4.2.7, Mitigation Measures, page 4.2-34, insert after the last bullet of MM AQ-1:

MM AQ-2: Control of Diesel Particulate Matter Emissions: The County shall require in all construction contracts for a specific project the following diesel exhaust emissions requirements.

- During construction, for equipment rated 50 horsepower or greater, use ARB Tier 4 Final or U.S. Environmental Protection Agency Tier 4 offroad equipment. A copy of each equipment unit's certified tier specification or model year specification and ARB or SBCAPCD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.
- On-road heavy-duty equipment with model year 2010 engines or newer should be used to the maximum extent feasible.
- Diesel-powered equipment should be replaced by electric equipment whenever feasible. Electric auxiliary power units should be used to the maximum extent feasible.



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- Equipment/vehicles using alternative fuels, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel, should be used onsite where feasible.
- Catalytic converters shall be installed on gasoline-powered equipment, if feasible.
- All construction equipment shall be maintained per the manufacturer's specifications.
- The engine size of construction equipment shall be the minimum practical size. The number of pieces of construction equipment operating simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.
- Proposed truck routes should minimize, to the extent feasible, impacts to residential communities and other sensitive receptors.
- Construction staging areas should be located away from sensitive receptors such that exhaust and other construction emissions do not enter the fresh air intakes of buildings, air conditioners, and windows.

3.1.3 Draft EIR Section 4.7, Greenhouse Gases

Section 4.7.5 Environmental Impact Analysis, County of Santa Barbara Environmental Thresholds and Guidelines, page 4.7-7, first paragraph.

The ~~SBCAPCD~~ The County of Santa Barbara established different GHG significance thresholds for industrial sources and non-industrial, commercial sources. On May 19, 2015, the ~~SBCAPCD~~ County adopted a numerical, bright-line threshold of significance for GHG emissions from industrial stationary source facilities and on January 26, 2021, the ~~SBCAPCD~~ County adopted interim GHG emissions thresholds of significance (interim thresholds) for non-industrial stationary source projects under CEQA. These thresholds represent the ~~SBCAPCD's~~ County of Santa Barbara's efforts to reduce GHG emissions, including the Energy and Climate Action Plan (ECAP) which aimed to reduce countywide emissions by 15 percent below the 2007 baseline emissions inventory by the year 2020. In July 2020, the Board of Supervisors (Board) affirmed its target to reduce GHG emissions in unincorporated County areas by 50 percent below 2007 levels by 2030. This target correlates with the State's goal of reducing statewide emissions by 40 percent below 1990 levels by 2030.

Section 4.7.5 Environmental Impact Analysis, Table 4.7-1, page 4.7-10, last two rows of table.

Project Completion Total	5,824.02 <u>6,364.87</u>
30-Year Amortized Emissions	194.13 <u>212.16</u>

Section 4.7.5 Environmental Impact Analysis, Threshold A, page 4.7-11, first paragraph.

The net annual GHG emissions increase would be **1,450.54** metric tons per year. This value exceeds the ~~SBCAPCD~~ County's screening threshold of 300 MTCO_{2e}/year so it must be compared against the threshold of 3.8 MTCO_{2e} per service population. The Calle Real Campus had a headcount of 467 in 2019 and a projected headcount of 515 in 2029 (Gensler, 2022, pg. 79). This can be interpolated to an estimated existing employee headcount of 491 in year 2024. The estimated employment population at project buildout is 1,150 as provided by the client. The estimated net change in employee population is 659 so the estimated net increase in emissions per service population is **2.2**



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MTCO₂e. The project will not exceed the ~~SBCAPCD's~~ Santa Barbara County's efficiency GHG threshold and will not have a potentially significant impact under this criterion.

3.1.4 Draft EIR Section 4.8, Hazards and Hazardous Materials

Section 4.8.4, Environmental Impact Analysis, under threshold a), Impact Analysis, Hazards from Routine Use of Hazardous Materials, page 4.8-13, third paragraph.

~~The California Department of Public Health (CDPH) Santa Barbara County Environmental Health Services (EHS)~~ regulates medical waste generators, transporters, transfer stations, and treatment facilities within the County

Section 4.8.5, Mitigation Measures, under RR HAZ-1, page 4.8-19, second paragraph.

RR HAZ-1 Continue to conduct LFG monitoring and period inspections under regulatory agency for the former landfill, to incorporate the requirements of California Code of Regulation (CCR), Title 27 including but not limited to § 21190 for all uses on or within 1,000 feet of the disposal areas. These regulations are designed to prevent hazards to public health and safety, and the environment from closed landfills, including protection of the integrity of the final cover, monitor and mitigate landfill gas, and mitigate the effects of subsidence in the waste area. 27 CCR § 21190 requires submittal to, and approval by, the Enforcement Agency (EA). Dependent on the work occurring, other agencies approval may also be required.

Section 4.8.5, Mitigation Measures, under MM HAZ-1, page 4.8-19, third paragraph.

MM HAZ-1 Prior to beginning of demolition or construction, a qualified environmental remediation firm shall conduct a Phase II Subsurface Investigation ...The oil wells may be required to be abandoned to current CalGEM standards and building codes prior to any future development. Prior to conducting the Phase II investigation, the environmental remediation firm shall submit workplans for review and comment to EHS' Site Mitigation Unit (SMU). The remediation firm shall also submit all Phase II investigation reports to SMU. If the Phase II investigation(s) identify a release, it shall be reported to EHS in accordance with Santa Barbara County Code 18C-54. The Tier 1 San Francisco Bay Water Board Environmental Screening Levels (ESLs) shall be included and used as the investigation level referenced in all Phase II reports. If contaminants are identified, they shall be vertically and laterally delineated to concentrations below their respective Tier 1 ESLs.

Section 4.8.5, Mitigation Measures, under MM HAZ-2, page 4.8-19, fourth paragraph.

MM HAZ-2 Prior to beginning of demolition or construction, a qualified environmental remediation firm shall prepare and begin implementation of a Soil Management Plan (SMP) for the Public Works Transportation Road Yard and the former Corporate Yard area by the current fueling station. The remediation firm shall submit workplans for review and comment to EHS' Site Mitigation Unit (SMU).

Section 4.8.5, Mitigation Measures, new MM HAZ-3 below MM HAZ-2, page 4.8-19, new fifth paragraph.



MM HAZ-3 If corrective action such as excavation and offsite disposal is proposed in an area of known contamination, then the qualified environmental remediation firm shall submit a corrective action/remedial action plan for review and comment to an applicable regulatory oversight agency such as EHS' Site Mitigation Unit, the Regional Water Quality Control Board (RWQCB), or the Department of Toxic Substance Control (DTSC).

Section 4.8.5, Mitigation Measures, existing MM HAZ-3, page 4.8-19, new fifth paragraph.

Existing MM HAZ-3 is renumbered as MM HAZ-4; and text is added below MM HAZ-4. deleted text is shown in ~~strikeout~~ and added text is shown underlined:

MM HAZ-34 Prior to beginning of demolition or construction, a qualified environmental remediation firm shall prepare and begin implementation of a Soil Management Plan (SMP) for the Santa Barbara County Fire Station #13.

The following text is added below MM HAZ-4: In addition, MM HAZ-3 shall be implemented.

3.1.5 Draft EIR Section 4.11, Transportation

Section 4.11, Transportation, page 4.11-15, new second paragraph.

MM TRANS-2 Before Santa Barbara County Board of Supervisors considers individual development projects undertaken under the Master Plan for approval, the County shall retain a registered transportation engineer, or civil engineer shall estimate operational trip generation. For each development project estimated to generate over 100 trips in a peak hour, a Transportation Impact Analysis (TIA) shall be completed before the County Board of Supervisors considers the project for approval. The TIA shall conform with the guidelines set forth in Transportation Impact Study Requirements issued by Santa Barbara County in 2007.

- For projects estimated to generate 100 to 499 trips in a peak hour, the study area may tend to be confined to the street or streets on which access is proposed but should be extended to at least the first major intersection in each direction.
- For projects estimated to generate 500 or more trips in a peak hour, the study area may extend beyond the streets onto which access is proposed (reference Santa Barbara County *Transportation Impact Study Requirements*, 2007).

Each TIA prepared pursuant to this Mitigation Measure shall include an assessment of direct and cumulative impacts on the safety and operation of the US 101 Northbound Off-Ramp to El Sueno Road (Comment A.2-2 erroneously referred to this off-ramp as the Southbound Off-Ramp).

Section 4.11, Transportation, page 4.11-15, new third paragraph.

MM TRANS-3: Before Santa Barbara County issues a Certificate of Occupancy for the first project in Phase 1 of the Master Plan to require a TIA (pursuant to Mitigation Measure TRANS-2 set forth in this PEIR), the Santa Barbara County Public Works Department shall have a civil engineer assess the roadway condition on the segment of Calle Real between County Road and El Sueno Road, and recommend a measure (such as a barrier or retaining wall) to remedy the roadway condition; and



the Santa Barbara County Public Works Department or its contractor(s) shall implement said recommendation.

3.1.6 Draft EIR Section 4.13, Utilities and Service Systems

Section 4.13.4, Environmental Impact Analysis, under Thresholds of Significance, page 4.13-11, second paragraph.

The initial study for the proposed project included in **Appendix A5** of this Draft PEIR substantiates that the project impacts associated with **the significance thresholds C, D, and E** would be less than significant and those thresholds were screened from further analysis in this Draft PEIR. Therefore, the impact analysis in this section focuses only on **significance thresholds A (respecting water, electric power, and natural gas facilities)** and B.

Section 4.13.4, Environmental Impact Analysis, under Analysis of Project Impacts, page 4.13-14, new paragraphs under Table 4.13-6.

Electric Power

Southern California Edison (SCE) currently provides electricity to the project site (CEC, 2023). The County will expand the solar array on the Calle Real Campus to accommodate the new buildings' electrical usage. Solar may be placed at various locations on the Calle Real Campus to meet the need of the proposed buildings. All new construction and additions will be net zero energy. As discussed in Section 4.5, *Energy*, the continued use of energy resources during each of the project phases is consistent with the anticipated growth within the county and the general vicinity and would not result in energy consumption requiring a significant increase in energy production for the energy provider and thus the energy demand by project operation would be less than significant. Therefore, no new or expanded electric generation facilities would be required for the project.

The proposed project is in a developed area and the infrastructure for providing electric power to the area is well established. As discussed in Section 4.5, *Energy*, SCE will provide electricity to the project site from existing electrical service lines. The project site is currently surrounded by development with electric power service. The developed areas and existing buildings on the project site currently receive electric power service via SCEs existing electric power facilities. Development of each phase would require construction of new utility lines to proposed and expanded buildings from existing utility mains onsite and in roadways within and abutting the project site. However, construction of these new utility lines is also consistent with anticipated growth within the general vicinity of the project site. Therefore, impacts would be less than significant regarding electric power facilities.

Natural Gas

The Southern California Gas Company (SCGC) currently provides natural gas to the project site by (CEC, 2023). As discussed in Section 4.5, *Energy*, the per capita value for natural gas use is negative, indicating a decrease from existing conditions at project buildout. The continued use of energy resources during each of the project phases is consistent with the anticipated growth within the county and the general vicinity and would not result in energy consumption requiring a significant increase in energy production for the energy provider and thus the energy demand by project operation would be less than significant. Therefore, no new or expanded natural gas production or storage facilities would be required for the project.



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The project site is currently surrounded by development with natural gas service. The developed areas and existing buildings on the project site also currently receive natural gas via existing SCGC utility lines. Development of each phase would require construction of new utility lines to proposed and expanded buildings from existing natural gas mains onsite and in roadways within and abutting the project site. However, construction of new natural gas lines on the project site is also consistent with anticipated growth in the area. As stated in Section 4.5, *Energy*, with the current energy infrastructure, there is ample capacity to support the project, and no adverse impacts would result. Therefore, impacts would be less than significant regarding natural gas facilities.

3.1.7 Draft EIR Appendices

Appendix A5 Initial Study

Appendix A5, Initial Study, **Section 4.12, Mineral Resources**, page 4.12-1, is hereby revised as follows; added text is underlined and deleted text shown in ~~strikeout~~. Four dry hole oil wells and two core hole wells are present onsite; the four dry holes are in the central part of the site; and the two core holes are in the northern part of the site (one north, and one south, of Cathedral Oaks Road). Four wells are present within the project site: three of the wells are plugged dry holes and one a plugged core hole; all are in the County Yards campus.

Appendix D1 Air Quality and Greenhouse Gas Emissions Calculations

The following changes were made to the contents of **Appendix D1** included herein as **Appendix FEIR-7**:

- Revised architectural coating limits in Appendix D.1.1 CalEEMod Construction Phase 1
- Revised architectural coating limits in Appendix D.1.2 CalEEMod Construction Phase 2
- Revised architectural coating limits in Appendix D.1.3 CalEEMod Construction Phase 3
- Revised architectural coating limits and added residential units in Appendix D.1.4 CalEEMod Construction Phase 4
- Revised architectural coating limits in Appendix D.1.5 CalEEMod Construction Phase 5
- Revised architectural coating limits and added residential units in Appendix D.1.6 CalEEMod Construction Phase 6
- Revised architectural coating limits in Appendix D.1.7 CalEEMod Construction Phase 7
- Revised architectural coating limits in Appendix D.1.8 CalEEMod Existing Operations
- Revised architectural coating limits and added residential units in Appendix D.1.9 CalEEMod Project Buildout Operations
- No change to Appendix D1.10 GHG Emissions from Operation of Materials Processing and Sorting Facility
- New Appendix D.1.11 CalEEMod Demolished Area Operations Phase 1
- New Appendix D.1.12 CalEEMod Demolished Area Operations Phase 2
- New Appendix D.1.13 CalEEMod Demolished Area Operations Phase 3
- New Appendix D.1.14 CalEEMod Demolished Area Operations Phase 4
- New Appendix D.1.15 CalEEMod Demolished Area Operations Phase 5
- New Appendix D.1.16 CalEEMod Demolished Area Operations Phase 6
- New Appendix D.1.17 CalEEMod Demolished Area Operations Phase 7
- New Appendix D.1.18 Yearly Concurrent Construction and Operations Emissions

IV. Mitigation Monitoring and Reporting Program



IV. MITIGATION MONITORING AND REPORTING PROGRAM

4.1 Introduction

This Mitigation Monitoring and Reporting Program (MMRP) has been prepared pursuant to Public Resources Code Section 21081.6, which requires a Lead Agency to adopt a “reporting or monitoring program for the changes made to the project or conditions of project approval, adopted in order to mitigate or avoid significant effects on the environment.” Additionally, Section 15097(a) of the State CEQA Guidelines requires that a public agency adopt a program for monitoring or reporting mitigation measures and project revisions, which it has required to mitigate or avoid significant environmental effects. This MMRP has been prepared in compliance with the requirements of CEQA, Public Resources Code Section 21081.6 and Section 15097 of the State CEQA Guidelines. This MMRP has been updated based on changes made earlier in this Final EIR. New text is shown in underline and deleted text is shown in ~~strikeout~~ in the MMRP below.

The County of Santa Barbara is the Lead Agency for the project and is therefore responsible for administering and implementing the MMRP. A public agency may delegate reporting or monitoring responsibilities to another public agency or to a private entity that accepts the delegation; however, until mitigation measures have been completed, the Lead Agency remains responsible for ensuring implementation of mitigation measures in accordance with the MMRP.

An Environmental Impact Report (EIR) has been prepared to address the potential environmental impacts of the project. The evaluation of the project’s impacts in the EIR applies mitigation measures (MMs) needed to avoid or reduce potentially significant environmental impacts. This MMRP allows for monitoring implementation of the MMs required for the project.

4.2 Organization

As shown on the following pages, each identified PDF and MM for the project is organized by environmental impact area, with the following details:

- Responsible Party—the party that is responsible for implementing the project design feature or mitigation measure.
- Monitoring Party—the agency to which reports involving feasibility, compliance, implementation, and development are made.
- Implementation Stage—the phase of the project during which mitigation measure shall be monitored.

The environmental areas requiring mitigation are:

- Air Quality
- Biological Resources
- Cultural Resources
- Geology and Soils/Paleontological Resources
- Hazards and Hazardous Materials
- Noise
- Transportation



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- Tribal Cultural Resources
- Fire Protection Services and Wildfire Hazards

Those environmental topics for which there would be less than significant impacts without mitigation are discussed in their respective sections included in this document but are not included in the table below because no mitigation is warranted. Those environmental topics include:

- Aesthetics
- Energy
- Greenhouse Gas Emissions
- Hydrology and Water Quality
- Utilities and Services



4.3 Mitigation Monitoring and Reporting Program

Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
4.2 Air Quality				
Threshold C: Would the project expose sensitive receptors to substantial pollutant concentrations?	<p>MM AQ-1: Reduce Residential Exposure to Roadway TAC Housing facilities must be developed a minimum of 500 away from U. S. Highway 101 to the maximum extent feasible. In cases where it is not feasible to locate housing development beyond the 500-foot limits, project design measures must be implemented. These measures may include:</p> <ul style="list-style-type: none">• Heating, ventilation, and air conditioning (HVAC) systems must be installed within the facility to circulate and purify outdoor air sources, thereby reducing diesel particulate matter and vehicle emissions. These HVAC systems should incorporate air filtration systems, such as the Lennox PureAir system, equipped with particulate filters rated at a minimum efficiency reporting value (MERV) of 12. This ensures enhanced particulate removal efficiency, capable of eliminating a significant portion of the sub-1.0 micrometer-sized particles, a product of diesel combustion, as specified by the American Society of Heating, Refrigerating and Air Conditioning Engineers (ASHRAE) Standard 52.2 (USEPA, 2024).• <u>The County shall provide regular maintenance of the air filtration systems, including replacement (when necessary) of the particulate filters. As an alternative, the County shall, at minimum, prepare</u>	Less Than Significant	Project Architect, Project Engineer and Project Construction Contractor/ Project Applicant and County of Santa Barbara	During design of individual projects under the Calle Real Master Plan and Prior to beginning of demolition or project construction activities



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p><u>a brochure notifying future residents of the need to maintain the filter screens. This brochure shall be provide at the time of leasing or ownership exchange.</u></p> <ul style="list-style-type: none">• Prevent placing operable windows on the side of the building that faces U.S. Highway 101.• Using dual-pane windows on all openings to ensure the building's exterior is tightly sealed and limits air infiltration. The outer surface of the units must be sealed to attain a tested air leakage rate of no more than 3.0 unit volumes per hour, measured by a leak test.• Wherever feasible, position vents, roof penetrations, and air intakes away from U.S. Highway 101, including doors and entryways. <p>The effectiveness and feasibility of the proposed measures should be recorded on grading and building plans before the issuance of grading permits. Measures must be successfully implemented before certificates of occupancy are issued. Santa Barbara County's Planning & Development department shall ensure the implementation of the measures.</p>			
	<p><u>MM AQ-2: Control of Diesel Particulate Matter Emissions:</u></p> <p><u>The County shall require in all construction contracts for a specific project the following diesel exhaust emissions requirements.</u></p>	Less Than Significant	Project Architect, Project Engineer and Project Construction Contractor/ Project Applicant and County of Santa Barbarba	During preparation of construction contracts for of individual projects under



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<ul style="list-style-type: none">• <u>During construction, for equipment rated 50 horsepower or greater, use ARB Tier 4 Final or U.S. Environmental Protection Agency Tier 4 offroad equipment. A copy of each equipment unit's certified tier specification or model year specification and ARB or SBCAPCD operating permit (if applicable) shall be available upon request at the time of mobilization of each applicable unit of equipment.</u>• <u>On-road heavy-duty equipment with model year 2010 engines or newer should be used to the maximum extent feasible.</u>• <u>Diesel-powered equipment should be replaced by electric equipment whenever feasible. Electric auxiliary power units should be used to the maximum extent feasible.</u>• <u>Equipment/vehicles using alternative fuels, such as compressed natural gas (CNG), liquefied natural gas (LNG), propane, or biodiesel, should be used onsite where feasible.</u>• <u>Catalytic converters shall be installed on gasoline-powered equipment, if feasible.</u>• <u>All construction equipment shall be maintained per the manufacturer's specifications.</u>• <u>The engine size of construction equipment shall be the minimum practical size. The number of pieces of construction equipment operating</u>			the Calle Real Master Plan and Prior to beginning of demolition or project construction activities



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p><u>simultaneously shall be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.</u></p> <ul style="list-style-type: none">• <u>Proposed truck routes should minimize, to the extent feasible, impacts to residential communities and other sensitive receptors.</u>• <u>Construction staging areas should be located away from sensitive receptors such that exhaust and other construction emissions do not enter the fresh air intakes of buildings, air conditioners, and windows.</u>			
4.3 Biological Resources				
Threshold A: Would the project have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or	MM BR-1: Habitat Assessment Survey <i>Purpose:</i> To determine the presence of sensitive natural communities and habitat suitability for special status species within impact areas for individual projects. <i>Requirement:</i> A qualified biologist shall conduct a literature search, including a review of CNDDB, IPaC, and current aerial imagery, to evaluate the potential of sensitive natural communities and/or special status species to occur within a specific project impact area. The biologist shall also review recent biological survey reports (from within the preceding	Less Than Significant	Project Applicant/ County of Santa Barbara	Prior to commencement of project construction



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	<p>five years) for other projects within five miles of the project impact area.</p> <p>Following the literature search, a qualified biologist shall conduct at least one biological reconnaissance-level survey to identify and map vegetation communities and assess potential habitat for the likelihood of supporting special status species in and within 500 feet of the project construction footprint, including temporary work and other temporary impact areas. The biologist conducting the survey shall be familiar with the habitat requirements, vegetation types, and appropriate timing of habitat assessments for each special status species with a potential to occur at the site.</p> <p>If suitable habitat for a special status species is observed or otherwise recorded within the project impact areas, the County will consult with CDFW and/or USFWS to determine the additional surveys, take avoidance measures, and permitting that may be required.</p> <p><i>Documentation:</i></p> <p>The qualified biologist shall prepare a biological resources survey report documenting the literature search and results of the reconnaissance-level survey, including figures of vegetation communities that depicts the locations of sensitive natural communities and/or suitable habitats for special status species observed, known locations of recorded special-status species from the CNDDDB, IPaC, and citizen science groups, waters of the U.S. and State, including riparian habitat, nearest to the project impact areas, and other figures that are necessary to support the</p>			



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>finding of the biological resources survey report. The report shall also include any observations of special status plants or wildlife within the habitat assessment survey area, and shall answer the threshold questions in CEQA Appendix G, Section IV, and will be of a quality capable of supporting any CEQA document, including addendums, that are required for project and permitting approval.</p> <p><i>Timing:</i></p> <p>A qualified biologist shall submit the findings of the literature review and biological resources survey to the County as part of an individual project application. Subsequent focused and/or protocol surveys (BR-2 – BR-3) and resulting agency consultations shall occur prior to final project approval.</p> <p><i>Monitoring:</i></p> <p>The County shall ensure that a recent (two years or less) biological resources survey report is submitted and reviewed prior to final project approval. The County shall review and confirm that all recommendations for the protection of sensitive natural communities and special status species, including additional focused surveys, are completed prior to the issuance of a grading permit.</p>			
	<p>MM BR-2: Focused Surveys for Special Status Wildlife</p> <p>Focused and/or protocol level surveys are recommended for wildlife species with potential to occur within or adjacent to the BSA if suitable habitat is observed within or</p>	Less Than Significant	Project Applicant/ County of Santa Barbara	Prior to commencement of project construction



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>adjacent to project permanent or temporary impact areas at any time.</p> <p>Focused surveys shall be conducted by a qualified biologist familiar with the appropriate techniques and timing for the species of interest. If the CDFW and/or USFWS require species-specific collection or survey permits, including Memorandums of Understanding (MOUs), the qualified biologist shall possess the required permits/MOUs in good standing. If the CDFW and/or USFWS provide survey protocols or guidance for certain species of interest, the qualified biologist must follow these protocols.</p> <p><i>Purpose:</i></p> <p>To determine the presence/absence of special status wildlife species for avoidance of project-related impacts.</p> <p><i>Requirement:</i></p> <p>Where literature searches and reconnaissance-level biological surveys (BR-1) indicate that individual project impact areas encroach upon potentially suitable habitat for special status species, a qualified biologist shall conduct focused surveys for the potentially-occurring species, utilizing applicable agency-recommended survey protocols or guidance. The timing of surveys is usually species-specific. The qualified biologist should consult with the appropriate resource agency prior to conducting such surveys.</p> <p>If the presence of a special status species is documented within or adjacent to the project temporary or permanent impact areas, the County will consult with the appropriate</p>			



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>agency or agencies (CDFW and/or USFWS) for recommended take avoidance measures and additional permitting requirements and prepare a Special Status Species Avoidance and Protection plan (BR-4).</p> <p>While focused and protocol surveys following the CDFW and/or USFWS protocols are considered most effective for detecting the target species, they may fail to detect individuals present on or adjacent to a project site due to season, time of day, and other survey limitations. The County, after consultation with the appropriate resource agencies (CDFW and/or USFWS) may choose to assume presence of certain species based on the presence of high-quality habitat in lieu of, or in addition to, presence/absence surveys.</p> <p><i>Documentation:</i></p> <p>The qualified biologist shall prepare a report documenting the results of the survey(s), including a map depicting locations of the suitable habitats and individuals observed.</p> <p><i>Timing:</i></p> <p>Protocol level surveys and resulting agency consultations shall occur prior to the approval and/or the issuance of a grading permit for any project sites within the Calle Real Master Plan.</p> <p><i>Monitoring and Reporting:</i></p> <p>The qualified biologist shall report the results of any protocol surveys to the County and appropriate regulatory agencies, following all applicable protocol standards. If special status species are documented within or adjacent to</p>			



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	Project impact areas, the County will consult with CDFW and USFWS for recommended take avoidance measures and required permitting.			
	<p>MM BR-3: Focused Surveys for Special Status Plants</p> <p><i>Purpose:</i></p> <p>Avoidance of impacts to populations of special status native plants that may occur within the BSA.</p> <p><i>Requirement:</i></p> <p>Prior to the approval of projects proposed within the Calle Real Master Plan Area, a qualified biologist shall conduct a thorough, floristic-based assessment of special status plants and natural communities within the footprint of potential disturbance and contiguous adjoining habitat areas. The surveys should follow CDFW <i>Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities</i> (CDFW, 2018), or current CDFW/USFWS protocols or guidance.</p> <p>The qualified biologist shall prepare a botanical survey report documenting the results of the survey(s). The report shall include literature search results, survey dates, methods, specific geographic locations of any special status plants and/or natural communities observed, population counts or estimates, and additional information about phenology and site characteristics. The report shall also include an assessment of potential impacts to special status plants and natural communities and recommended measures to mitigate potential impacts.</p>	Less Than Significant	Project Applicant/ County of Santa Barbara	Prior to commencement of project construction



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>If impacts cannot be avoided, a habitat restoration plan to mitigate project impacts will be required (see BR-6) and developed in consultation with the appropriate regulatory agencies.</p> <p><i>Documentation:</i></p> <p>The qualified biologist shall prepare a botanical survey report as described above, per the CDFW guidelines (2018), or current CDFW/USFWS protocols or guidance.</p> <p><i>Timing:</i></p> <p>The botanical field surveys should be conducted at times of year when potentially occurring special status plants would be evident and identifiable, e.g., during flowering or fruiting periods. Multiple surveys, strategically conducted throughout flowering/fruiting periods of potentially occurring species, may be required depending on species and protocols and/or guidance. Appendix D2 includes the bloom period of potentially occurring special status plant species.</p> <p><i>Monitoring and Reporting:</i></p> <p>The qualified biologist shall report the results of any botanical surveys to the County and appropriate regulatory agencies. If special status species are documented within or adjacent to Project impact areas, the County will consult with CDFW and USFWS for recommended take avoidance measures and required permitting. A Special Status Species Avoidance and Protection Plan (see BR-4, below) documenting appropriate protective measures and required monitoring shall be required.</p>			



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>MM BR-4: Special Status Species Avoidance and Protection Plan</p> <p><i>Purpose:</i></p> <p>Protection of any special-status species occurring within or moving through the project impact areas.</p> <p><i>Requirement:</i></p> <p>If the literature search and reconnaissance-level biological survey (BR-1) and/or subsequent surveys (BR-2 and BR-3) indicate the presence of a special status species, a qualified biologist shall notify the appropriate regulatory agencies (CDFW and/or USFWS) and prepare a Special Status Species Avoidance and Protection Plan.</p> <p>Depending on the project site, specifications, and anticipated areas of temporary and permanent impacts, the plan may include the following elements:</p> <ul style="list-style-type: none">- Timing considerations for temporal avoidance- Required pre-construction surveys and construction monitoring- Humane relocation and exclusion methods to remove and/or exclude wildlife from the project site (handling of some species may require a permit from CDFW or USFWS)- Translocation plan and procedures for special status plants- Protective fencing to avoid impacts to adjacent plants, vegetation communities or wildlife- Best Management Practices and/or implementation of appropriate mitigation measures for minimizing the	Less Than Significant	Project Applicant/ County of Santa Barbara	Prior to commencement of project construction



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>effects of noise, human activity, dust, lighting, and ground vibrations during construction</p> <ul style="list-style-type: none">- On and/or off-site mitigation measures to compensate for lost or disturbed habitat- Required post-mitigation monitoring <p><i>Documentation:</i></p> <p>The qualified biologist shall prepare the Special Status Species Avoidance and Protection Plan, as described above, and submit it to the County and the appropriate regulatory agencies (CDFW and/or USFWS).</p> <p><i>Timing:</i></p> <p>The Special Status Species Avoidance and Protection Plan shall be submitted to and approved by the County and appropriate regulatory agencies (CDFW and/or USFWS) prior to the issuance of a grading permit.</p> <p><i>Monitoring and Reporting:</i></p> <p>The County shall review the Special Status Species Avoidance and Protection Plan and ensure that all applicable mitigation measures are implemented prior to, during, and post-completion of project activities, as required.</p>			
	<p>MM BR-5: Bat Avoidance and Protection</p> <p><i>Purpose:</i></p> <p>Avoidance of impacts to bats that may occur within the BSA.</p> <p><i>Requirement:</i></p>	Less Than Significant	Project Applicant/ County of Santa Barbara	Prior to commencement of project construction



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>Prior to the approval and/or the issuance of a grading permit for any project sites within the Calle Real Master Plan, a qualified bat biologist familiar with bat species and their habitat requirements shall conduct a daytime habitat assessment of the project impact area. The biologist will identify potential daytime, nighttime, wintering, and hibernation roost habitat within the project footprint and a 100-foot buffer. If suitable bat habitat is observed, the qualified biologist shall conduct appropriately timed bat surveys, assisted by acoustic recognition technology (e.g. AnaBat or similar), to identify bat species and potential roost and maternity roost sites within the survey area. Based on the survey results, a Bat Avoidance and Protection Plan (BAPP), shall be developed in consultation with the CDFW. Depending on bat species present, the project site, and project specifications, the plan may include the following elements:</p> <ul style="list-style-type: none">- Required pre-construction surveys and monitoring- Timing considerations for temporal avoidance- Humane relocation and exclusion methods to remove and/or exclude bats from roosting sites within structures or vegetation slated for removal- Protective fencing or signage to avoid impacts to potential roosting habitat that will remain on site- Best Management Practices for minimizing the effects of noise, human activity, dust, lighting, and ground vibrations on bats- On and/or off-site mitigation measures to compensate for lost roosting habitat, including installation of alternative roosting habitat.- Mitigation monitoring to evaluate the effectiveness of bat-related mitigation			



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p><i>Documentation:</i></p> <p>The qualified biologist shall prepare and submit to the County a report documenting the results of the habitat assessment and recommendations for additional surveys, if they are warranted. The bat biologist conducting nighttime surveys and/or passive acoustic monitoring shall provide to the County and CDFW a report of survey results, including any species detected and a map of identified roost sites.</p> <p>If suitable habitat is present, the qualified biologist shall submit a BAPP to the County and CDFW.</p> <p><i>Timing:</i></p> <p>The daytime habitat assessment can be conducted at any time of the year. Additional surveys and monitoring shall be conducted at the timing recommended by the bat specialist based on the potential habitat observed and species likely to occur.</p> <p><i>Monitoring and Reporting:</i></p> <p>The County shall review the BAPP and ensure that all applicable mitigation measures are implemented prior to, during, and post-completion of project activities, as required. If the installation of alternative habitat is required to offset the loss of roosting sites, a qualified biologist shall monitor the alternative habitat for the duration recommended in the BAPP.</p>			
	MM BR-6: Breeding and Nesting Bird Avoidance, Survey, and Protection	Less Than Significant	Project Applicant/ County of Santa	Prior to commencement of project



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>Breeding and nesting birds protected under state and federal law may be impacted by construction, if construction takes place during the typical breeding and nesting season (February 1 through September 15, but as early as January 1 for some raptors). The proposed projects could affect breeding and nesting birds through vegetation modification, increased human activity, noise, and artificial lighting, dust, and ground disturbance. However, these potential impacts can be mitigated through timing of construction activities, preconstruction surveys, and avoidance.</p> <p><i>Purpose:</i></p> <p>Protection of breeding and nesting birds.</p> <p><i>Requirement:</i></p> <ol style="list-style-type: none">1. Initial grubbing, grading, and construction should be scheduled to occur outside of the nesting bird season as defined by the CDFW, if feasible. Regardless of timing, a qualified biologist will conduct nesting bird surveys three to seven days before any project activities, including fencing, staging, trimming or clearing of vegetation, or ground-disturbing activities are scheduled to occur.2. The biologist must be familiar with nesting ecology and chronology of migratory species and, if required, hold any required permits that allow them to survey for nests of threatened, and endangered species.		Barbara	construction



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>3. If initial vegetation clearance, grubbing, grading, and construction activities are scheduled to occur during the CDFW-defined nesting season, qualified biologists will conduct a breeding and nesting bird survey within the projects' BSA no more than 7 days and no less than 3 days before construction activities (including, but not limited to, staging, and installation of security fencing) begin.</p> <p>4. If the biologist observes breeding activity and/or active nests within the BSA, and determines that these areas may potentially be affected by construction activities, the biologists will establish a 100- foot no-work buffer zone for passerine nests and a 300-foot no-work buffer zone for raptor nests.</p> <p>5. The biologist should clearly mark the no-work buffer zones in the field in areas with high-visibility fencing (orange construction fencing or similar).</p> <p>6. If the breeding and nesting bird survey does not identify breeding areas or nest sites that will be impacted by construction activities, then vegetation clearance, grubbing, and grading may proceed.</p> <p>7. No work will occur within a no-work buffer zone under any circumstance, unless authorized in writing by the CDFW, or until</p>			



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>the qualified biologists have determined that the fledglings are no longer dependent on the nest, or until the biologists otherwise determine that the nesting cycle is complete, or the nest is inactive.</p> <p>8. If the qualified biologists determine that a reduction of the no-work buffer zone is feasible without affecting breeding behavior, the nest or its occupants, they shall prepare and submit a letter requesting a reduction to the CDFW along with any necessary information and a statement of justification for the CDFW to make an informed decision whether or not to allow the reduction. CDFW no-work buffer zone reduction approvals must be provided to the County of Santa Barbara Planning Department, who will provide a copy to the qualified biologists.</p> <p>9. In circumstances when activities are scheduled to occur between a no-work buffer zone and a reduced no-work buffer zone, a qualified biologist shall monitor the nest before, during, and after the activities, to ensure that the nest, or breeding behavior, is not being affected. If construction activities adversely affect breeding behavior, a nest or its occupants, the biologist has the authority to stop work in the area and consult with the appropriate agencies to determine whether the original buffer should be replaced.</p>			



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>10. The only activities that shall be allowed between the original buffer and the reduced buffer are those that generate noise levels less than 60 dBA, the level of normal conversation, as measured at the nest site. The biologist shall record noise levels using a digital sound level meter (40 - 130 dB) every hour and has the authority to stop any activities that exceed 60 dBA if the biologist determines that it is affecting or has the potential to affect a nest.</p> <p>11. CDFW and the County of Santa Barbara Planning Department shall be notified immediately if project activities result in take of a nesting bird, eggs, or nest.</p> <p><i>Documentation:</i></p> <p>The qualified biologist shall prepare a letter report documenting the findings of the preconstruction surveys, including surveys with negative results. This report shall be submitted to the County of Santa Barbara Planning Department.</p> <p>The biologist shall prepare daily monitoring logs documenting the results of the nesting bird surveys and daily monitoring. Daily logs shall be compiled into weekly monitoring reports, which shall include maps of each breeding and/or nest site, extent of applied buffers, and photos of each nest observed. The biologist shall submit nesting bird reports to the County of Santa Barbara Planning Department, as described below (Monitoring and Reporting).</p>			



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p><i>Timing:</i></p> <p>If initial project activities (including but not limited to vegetation clearance, grubbing, grading) and other construction activities are scheduled to occur during the CDFW defined nesting season, the biologist should conduct breeding and nesting bird surveys no more than 7 days and no less than 3 days prior to the commencement of construction activities, as described in this measure.</p> <p><i>Monitoring and Reporting:</i></p> <p>A qualified biologist shall monitor any active nests occurring within or adjacent to the permanent and temporary project work areas daily. The biologist shall compile weekly monitoring reports and submit them to the County of Santa Barbara Planning Department, documenting the status of monitored nests. A Final Nesting Bird Monitoring Report will be prepared when construction is complete. This report will summarize all nesting bird monitoring activities, issues, and solutions that occurred during construction. This report shall be sent to the County of Santa Barbara Planning Department at the end of the construction phase of the project.</p>			
	<p>MM BR-7: Pre-Construction Survey and Site Clearance</p> <p><i>Purpose:</i></p> <p>Protection of any special status plant or wildlife species occurring within or moving through the area through avoidance and relocation.</p> <p><i>Requirement:</i></p>	Less Than Significant	Project Applicant/ County of Santa Barbara	Prior to commencement of project construction



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>A qualified biologist shall conduct a site clearance survey one to three days before any fencing, staging, clearing, grubbing, or grading activities occur in areas of temporary and permanent disturbance associated with projects proposed pursuant to the Master Plan. Grading activities shall occur no more than 3 days after site clearance surveys occur. If grading is discontinued for a period of more than 3 days, additional site clearance surveys shall be required prior to restarting work.</p> <p>Areas containing special-status species, or habitat for special-status species, will be staked and flagged off as “No Entry/No Construction” areas to be avoided until construction is completed. If special status plants cannot be avoided, they shall be transplanted and/or replaced according to the Special Status Species Avoidance and Protection Plan (BR-4).</p> <p>If special status wildlife are observed during the pre-construction survey and cannot be avoided, they shall be humanely moved off site by a qualified (and permitted, as necessary) biologist and subsequently excluded from the project impact area following the Special Status Species Avoidance and Protection Plan (BR-4).</p> <p>If a special-status species is observed within areas of temporary or permanent impact and cannot be humanely relocated or legally relocated without a permit, then the qualified biologist will consult with the responsible agencies for the appropriate course of action.</p> <p><i>Documentation:</i></p>			



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>The qualified biologist shall prepare a report documenting the pre-construction survey results and site clearance activities. The original and final locations of any wildlife or plant relocations will be recorded and mapped.</p> <p><i>Timing:</i></p> <p>The pre-construction survey and site clearance shall be conducted one to three days prior to the start of ground disturbance.</p> <p><i>Monitoring and Reporting:</i></p> <p>The County shall ensure that a pre-construction survey and site clearance are completed within three days prior to the start of ground-disturbing activities. The qualified biologist shall submit a pre-construction survey report to the County. The County will provide this report to CDFW and/or USFWS, as required by the resource agencies.</p>			
	<p>MM BR-8: Biological Monitoring</p> <p><i>Purpose:</i></p> <p>Protection of any special status plant or wildlife species occurring within or moving through the area through avoidance and relocation during construction, and ensuring the implementation of applicable mitigation measures.</p> <p><i>Requirement:</i></p> <p>A qualified biologist shall be present each day during vegetation removal, grubbing, and grading to the first 24 inches of soil depth, and at least weekly (or as required by other mitigation measures) during other construction</p>	Less Than Significant	Project Applicant/ County of Santa Barbara	Prior to commencement of project construction



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>activities to ensure that mitigation measures are implemented. If special status wildlife species are observed within the work area, the monitor has the authority to halt work until the animal leaves the area of its own volition, or is humanely captured (as authorized by CDFW/USFWS regulations) and relocated to suitable habitat outside of the work area by a qualified biologist.</p> <p>If a special-status species is observed within areas of temporary or permanent impact and cannot be humanely relocated or legally relocated without a permit, then the qualified biologist will consult with the responsible agencies for the appropriate course of action.</p> <p><i>Documentation:</i></p> <p>The biological monitor shall prepare daily field notes of monitoring activities, which will be summarized in a final monitoring report when construction activities have been completed at a particular site. The date and original and final locations of any wildlife relocations shall be recorded and mapped.</p> <p><i>Timing:</i></p> <p>Monitoring shall be conducted daily during initial ground-disturbing activities and on a weekly basis during all other construction activities, unless greater frequency is required in a protection plan developed for special status species (BR-4), bats (BR-5), or nesting birds (BR-6).</p> <p><i>Monitoring and Reporting:</i></p> <p>The County shall ensure that biological monitoring occurs as required by this mitigation measure, or as stipulated for</p>			



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	the protection of special status species (BR-4), bats (BR-5), and/or nesting birds (BR-6), whichever is most frequent. The biological monitor shall submit a final monitoring report to the County. The County will provide this report to CDFW and/or USFWS, as required by any regulatory permits.			
Threshold B: Would the Project have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or US Fish and Wildlife Service?	Reference MM BR-1 through MM BIO-8 above			
	MM BR-9: Jurisdictional Delineation <i>Purpose:</i> Avoidance of impacts to Waters of the U.S. and State, and riparian habitat. <i>Requirement:</i> A qualified biologist shall conduct a jurisdictional delineation survey of all waters and wetlands within 500 feet. of specific project temporary and permanent impact areas to determine and map the extent of USACE, RWQCB, and CDFW jurisdictional areas, and to adequately assess potential impacts to waters of the U.S. and State, including riparian and wetland habitats. The delineation shall incorporate information from the USFWS National Wetlands Inventory, and other resources to identify potential water features and riparian areas. A field survey according to the guidelines provided in most recent versions of the documents listed below shall be conducted to determine the boundaries of wetlands and other waters that may qualify as Waters of the U.S. and/or the State.	Less Than Significant	Project Applicant/ County of Santa Barbara	Prior to commencement of project construction



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	<ul style="list-style-type: none">- 1987 Corps of Engineers Wetlands Delineation Manual (Environmental Laboratory, 1987),- Regional Supplement to the Corps of Engineers Wetland Delineation Manual: Arid West Region, Version 2.0 (USACE, 2008),- The National Ordinary High Water Mark Field Delineation Manual for Rivers and Streams: Interim Version (David et. al, 2021),- A Field Guide to the Identification of the Ordinary High Water Mark (OHWM) in the Arid West Region of the Western United States (Lichvar and McColley, 2008),- The State Wetland Definition and Procedures for Discharges of Dredged or Fill Material to Waters of the State (SWRCB, 2021). <p>The surveyor will also map the limits of water features potentially under the jurisdiction of the CDFW, which are typically defined by the tops of the stream banks, or outer edge riparian vegetation, whichever is wider.</p> <p><i>Documentation:</i></p> <p>Based on the background research and field delineation survey, the biologist shall prepare a jurisdictional delineation report that includes a discussion of observed soils, vegetation, and hydrology used to delineate the boundaries of potential jurisdictional waters on the site. If detailed project plans are available, the jurisdictional delineation report shall include an impact analysis with estimated areas of temporary and permanent impacts to different jurisdictional areas. The jurisdictional delineation report shall be submitted to USACE, Los Angeles District Office, Central Coast RWQCB (Region 3), and CDFW South</p>			



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>Coast Region (5) and used to determine the required permits for the project.</p> <p><i>Timing:</i></p> <p>The jurisdictional delineation shall be completed and required permits/authorization from the regulatory agencies shall be obtained prior to approval of grading plans for any project conducted pursuant to this EIR.</p> <p><i>Monitoring and Reporting:</i></p> <p>Additional monitoring and reporting may be required as conditions of regulatory permits.</p>			
	<p>MM BR-10: Habitat Mitigation Plan</p> <p><i>Purpose:</i></p> <p>To offset the loss of habitat, including riparian habitat, due to Project development within the ESH or other sensitive areas.</p> <p><i>Requirement:</i></p> <p>In cases where adverse impacts to ESH or other biological resources cannot be avoided after impacts have been minimized, compensatory mitigation shall be required. The County shall provide restoration and/or replacement habitat as compensatory mitigation such that no overall net loss of habitat results from the development. Per the EGVCP (County of Santa Barbara, 2015), a minimum replacement ratio of 2:1 shall be required to compensate for the destruction of native habitat areas or biological resources. The restoration and/or replacement habitat shall be 'in</p>	Less Than Significant	Project Applicant/ County of Santa Barbara	Prior to commencement of project construction



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>kind' (i.e., same type) and provide habitat of comparable or higher biological value than that which was lost. Onsite restoration of native habitat may include protection and enhancement of native vegetation and control of invasive non-native plants. Where onsite restoration is infeasible or not beneficial for long-term habitat preservation, offsite mitigation, in the form of an easement and/or restoration providing long-term preservation of an adequate quantity and quality of habitat shall be required.</p> <p>The County shall develop a Habitat Mitigation Plan in consultation with all agencies that have jurisdiction over the biological resource damaged or lost. Components of the Plan shall include but are not limited to the locations and acreages of compensatory mitigation sites, habitat restoration and enhancement activities, mitigation success criteria, and a monitoring schedule.</p> <p>Post construction site visits by biologists and/or arborists shall be required to check for any unanticipated impacts, loss of habitat and any impacts to trees.</p> <p><i>Documentation:</i></p> <p>The County shall include this measure as part of the proposed Project.</p> <p><i>Timing:</i></p> <p>The Habitat Mitigation Plan should be submitted to and approved by the County and any other agencies with jurisdiction over the affected biological resource prior to final project approval.</p>			



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<i>Monitoring and Reporting:</i> The County shall ensure that monitoring of the mitigation site(s) is conducted at least annually for at least five years following initial mitigation implementation to track the progress of the site towards established success criteria and adjust maintenance activities accordingly. Annual monitoring reports shall be submitted to all agencies that have jurisdiction over the resource.			
Threshold C: Would the Project have a substantial adverse effect on state or federally protected wetlands (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	Reference MM BR-9 and MM BR-10 above			
Threshold D: Would the Project interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established	Reference MM BR-1 through MM BR-10 above			
	MM BR-11: Low Impact Lighting Plan <i>Purpose:</i>	Less Than Significant	Project Applicant/ County of Santa Barbara	Prior to commencement of project construction



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
native resident or migratory wildlife corridors, or impede the use of native nursery sites?	<p>Mitigate adverse impacts of artificial lighting on wildlife habitat use and movement in and adjacent to the Project site.</p> <p><i>Requirement:</i></p> <p>The County shall develop and implement a Low Impact Lighting Plan for proposed development to meet the security and safety needs of the site, while reducing impacts to wildlife.</p> <p>The Plan should document measures taken to limit artificial lighting to areas and times it is needed, to shield lights to prevent casting light beyond desired areas, and to limit the duration night-time lighting through the use of timers and motion-sensors, when feasible to do so (Longcore et al. 2016).</p> <p><i>Documentation:</i></p> <p>The County shall include this measure as part of the proposed Project.</p>			
Threshold E: Would the Project conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	<p>MM BR-12: Arborist Report and Tree Protection and Mitigation Plan</p> <p><i>Purpose:</i></p> <p>To document protected trees on-site that may be impacted during construction; compensate for the removal of protected trees, minimize adverse impacts of development/construction activities encroaching within the Tree Protection Zone (TPZ) of protected trees, and to</p>	Less Than Significant	Project Applicant/ County of Santa Barbara	Prior to commencement of project construction



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>prevent inadvertent or indirect impacts to trees outside of but adjacent to the disturbance area.</p> <p><i>Requirement:</i></p> <p>A certified arborist will survey trees that may be impacted during construction, prepare a Tree Report, and as needed, create the Tree Protection and Mitigation Plan.</p> <ul style="list-style-type: none">• If impacts to trees (including, but not limited to, trimming or removal) are proposed in the final design, a certified arborist will inventory all trees that will be affected when an application for the development is submitted.• The arborist will prepare a report and tree protection plan indicating locations of trees to be removed, trees that will be encroached upon, and trees outside of but adjacent to the construction footprint that require protective fencing to prevent inadvertent impacts.• The report/plan will also indicate which trees will be transplanted and designated transplant and replacement planting locations for on-site mitigation.• Onsite tree protection measures will be installed prior to start of construction activities.• Removed or damaged protected trees shall be replaced at 10:1 ratio. <p><i>Documentation:</i></p>			



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>The County shall include this measure as part of any proposed project within the Calle Real Master Plan Area.</p> <p><i>Timing:</i></p> <p>Protective measures shall be installed after tree survey and report, and mitigation plan. Protective measures must be installed before construction and approved by an arborist.</p> <p><i>Monitoring and Reporting:</i></p> <p>Construction monitoring of trees that may or will be impacted shall occur to ensure compliance with the Tree Protection and Mitigation Plan. Long-term monitoring of impacted trees and/or trees transplanted or replaced with new plantings shall be performed in compliance with the Tree Protection and Mitigation Plan.</p>			
4.4 Cultural Resources				
Threshold A: Would the Project cause a substantial adverse change in the significance of a historical resource pursuant to § 15064.5?	MM CUL-1: As the Calle Real Campus Master Plan progresses and segments are initiated at the Calle Real Campus, segment-specific pedestrian surveys will be conducted by a Secretary of the Interior qualified archaeologist.	Less Than Significant	Project Construction Contractor/Project Applicant/ County of Santa Barbara	Prior to commencement of project construction and throughout the duration of construction activities
	MM CUL-2:	Less Than Significant	Project Construction Contractor/Project	Prior to commencement



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>If historical or unique archaeological resources are discovered during construction activities, the contractor shall halt construction activities in a 30-foot radius and notify the project proponent. A Secretary of the Interior qualified archaeologist (Principal Archaeologist) shall be notified and afforded the necessary time to recover, analyze, and curate the find(s). The Principal Archaeologist shall recommend the extent of archaeological monitoring necessary to ensure the protection of any other resources that may be in the area. Construction activities may continue on other parts of the project site while evaluation and treatment of historical or unique archaeological resources takes place.</p> <p>The Principal Archaeologist, depending on the type and extent of the finds, may prepare an Archaeological Resources Treatment Plan (ARTP) to guide future monitoring, the recovery of cultural resources, analysis and reporting of the finds, and curation of the finds. The ARTP shall be submitted to the County and the project proponent for approval.</p>		Applicant/ County of Santa Barbara	of project construction and throughout the duration of construction activities
Threshold B: Would the Project cause a substantial adverse change in the significance of an archaeological resource pursuant to § 15064.5?	Reference MM CUL-1 and MM CUL-2 above			
	MM CUL-3: If a local Native American tribal organization(s) request that a tribal monitor and/or a qualified archaeologist monitor construction at the project location, then the project proponent shall retain and schedule any required monitors during all subsurface excavations into native soil. At the	Less Than Significant	Project Construction Contractor/Project Applicant/ County of Santa Barbara	Prior to commencement of project construction and throughout the duration of



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	discretion of the monitoring archaeologist, excavation or other ground-disturbing activities must be halted when an archaeological artifact or feature is observed. Tribal monitors may request the archaeological monitor to halt ground-disturbing activities if they observe potential cultural finds. Native American monitors will be required to complete and submit daily monitoring logs while at the project site to the project proponent's lead archaeologist.			construction activities
Threshold C: Would the project disturb human remains, including those interred outside of dedicated cemeteries?	MM CUL-4: If human remains are encountered during excavations associated with this project, all work shall stop within a 30-foot radius of the discovery and the Santa Barbara County Coroner will be notified (§ 5097.98 of the Public Resources Code). The coroner will determine whether the remains are recent human origin or older Native American ancestry. If the coroner, with the aid of the supervising archaeologist, determines that the remains are prehistoric, they will contact the Native American Heritage Commission (NAHC). The NAHC will be responsible for designating the Most Likely Descendant (MLD). The MLDS (either an individual or sometimes a committee) will be responsible for the ultimate disposition of the remains, as required by § 7050.5 of the California Health and Safety Code. The MLD will make recommendations within 24 hours of their notification by the NAHC. These recommendations may include scientific removal and nondestructive analysis of human remains and items associated with Native American burials (§ 7050.5 of the Health and Safety Code).	Less Than Significant	Project Construction Contractor/Project Applicant/ County of Santa Barbara	Throughout the duration of project construction activities



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
4.6 Geology and Soils/Paleontological Resources				
Threshold F: Would the project directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	<p>MM PAL-1: Fossils could be present in native soils onsite. A qualified paleontologist shall be retained for each project undertaken pursuant to the Master Plan involving excavation and grading prior to excavation and grading activities.</p> <ul style="list-style-type: none">• Prior to the earth-moving activities, the paleontologist shall develop a site-specific Paleontological Resources Impact Mitigation Program (PRIMP) to be implemented in support of the Project in order to mitigate potential adverse impacts to paleontological resources. The PRIMP shall follow guidelines developed by the Society for Vertebrate Paleontology and shall include monitoring of ground disturbance activities in sediments that are likely to include paleontological resources, specimen recovery, and screen washing; preparation of any collected specimens to the point of identification; curation of any collected specimens to a museum repository with permanent, retrievable storage; and preparation of a final paleontological survey report that would provide details of monitoring, fossil identification, and repository arrangements. Santa Barbara County shall then comply with the recommendations of the Project paleontologist and requirements of the PRIMP.• Before the mitigation program begins, the paleontologist or monitor shall coordinate with the appropriate construction contractor personnel to provide information regarding County of Santa Barbara	Less Than Significant	Project Applicant and Qualified Project Paleontologist/County of Santa Barbara	Prior to commencement of project construction and throughout the duration of project grading activities



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>requirements, as applicable, for the protection of paleontological resources. Contractor personnel shall be briefed on procedures to be followed in the event that fossil remains and a previously unrecorded fossil site are encountered by earth-moving activities, particularly when the monitor is not on site.</p> <ul style="list-style-type: none">• The qualified paleontologist shall perform periodic inspections of excavation and grading activities at the Project Site to determine the presence of fossiliferous soils. The frequency and location of inspections shall be specified in the PRIMP and shall depend on the depth of excavation and grading activities and the materials being excavated. If fossils are encountered, the paleontologist shall temporarily divert or redirect grading and excavation activities in the area of the exposed material to facilitate evaluation and, if necessary, salvage. The authority of the paleontologist to temporarily halt construction in part of the project site shall be included on project grading and construction plans. Copies of the paleontological survey report shall be submitted to the Santa Barbara Natural History Museum and to the Santa Barbara County Department of Planning and Development. Any fossils recovered during mitigation shall be deposited in an accredited and permanent scientific institution for the benefit of current and future generations.			
4.8 Hazards and Hazardous Materials/4.12 Transportation/4.15 Fire Protection Services and Wildfire Hazards				
Threshold D: Would the project be	MM HAZ-1: County Yards Campus	Less Than	Project Construction Contractor/ Project	Prior to beginning of



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located on a site which is included on a list of hazardous materials sites compiled pursuant to Government Code § 65962.5 and, as a result, would it create a significant hazard to the public or the environment;	<p>Prior to beginning of demolition or construction, a qualified environmental remediation firm shall conduct a Phase II Subsurface Investigation to determine if the observed heavy staining at the Public Works Transportation Road Yard Buildings and the Transfer Station; the spray booth at the General Services area; the three-stage clarifier at the Transfer Station; the former oil wells throughout the County Yards Campus; and the former USTs at the Transfer Station have impacted the subsurface at the Site. The oil wells may be required to be abandoned to current CalGEM standards and building codes prior to any future development.</p> <p>Prior to conducting the Phase II investigation, the environmental remediation firm shall submit workplans for review and comment to EHS' Site Mitigation Unit (SMU). The remediation firm shall also submit all Phase II investigation reports to SMU. If the Phase II investigation(s) identify a release, it shall be reported to EHS in accordance with Santa Barbara County Code 18C-54. The Tier 1 San Francisco Bay Water Board Environmental Screening Levels (ESLs) shall be included and used as the investigation level referenced in all Phase II reports. If contaminants are identified, they shall be vertically and laterally delineated to concentrations below their respective Tier 1 ESLs.</p>	Significant	Applicant and County of Santa Barbara	demolition or project construction activities
	<p>MM HAZ-2: County Yards Campus</p> <p>Prior to beginning of demolition or construction, a qualified environmental remediation firm shall prepare and begin implementation of a Soil Management Plan (SMP) for the Public Works Transportation Road Yard and the former Corporate Yard area by the current fueling station. The</p>	Less Than Significant	Project Construction Contractor/ Project Applicant and County of Santa Barbara	Prior to beginning of demolition or project construction activities



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	remediation firm shall submit workplans for review and comment to EHS' Site Mitigation Unit (SMU).			
	MM HAZ-3: Corrective Action/Remedial Action Plan If corrective action such as excavation and offsite disposal is proposed in an area of known contamination, then the qualified environmental remediation firm shall submit a corrective action/remedial action plan for review and comment to an applicable regulatory oversight agency such as EHS' Site Mitigation Unit, the Regional Water Quality Control Board (RWQCB), or the Department of Toxic Substance Control (DTSC).	Less Than Significant	Project Construction Contractor/ Project Applicant and County of Santa Barbara	Prior to beginning of demolition or project construction activities
	MM HAZ-4: Community Services Campus Prior to beginning of demolition or construction, a qualified environmental remediation firm shall prepare and begin implementation of a Soil Management Plan (SMP) for the Santa Barbara County Fire Station #13. <u>In addition, MM HAZ-3 shall be implemented.</u>	Less Than Significant	Project Construction Contractor/ Project Applicant and County of Santa Barbara	Prior to beginning of demolition or project construction activities
4.10 Noise				
Threshold B: Would the project result in generation of excessive groundborne vibration or groundborne noise	MM NOI-1: During the design phase of all specific onsite projects, the County shall conduct a site-specific noise study that documents the existing noise conditions in the surrounding area and recommends attenuation strategies and techniques to address sensitive receptors and achieve acceptable operational noise levels under County standards.	Less Than Significant	Project Construction Contractor/ Project Applicant and County of Santa Barbara	During demolition and project construction activities



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levels?	<p>The study shall be performed by an acoustical engineer. The noise study shall measure and report the existing ambient Average Day-Night (L_{dn} or CNEL) noise environment within 500 feet of the project site, including transportation noise sources and any transient or nuisance noise sources. Based on project details, the noise study shall identify and quantify the potential project-related noise sources from operations. All noise control techniques and recommendations in this report shall be incorporated into the project design to reduce exterior noise to at or below 65 dBA and interior noise to at or below 45 dBA.</p> <p>Operational noise shall consider both stationary noise, including HVAC and utilities, and transportation noise, including permanent increases in roadway noise and periodic peak noise from trucks and other services, and airport noise. To address operational and transportation noise, the noise study shall:</p> <ul style="list-style-type: none">• Use a standard traffic noise model, such as the FHWA's Traffic Noise Model (TNM) or HUD's online Day-Night Noise Level (DNL) Estimator tool to determine whether sensitive receptors within 500 feet of the project site would be exposed to traffic noise exceeding 65 dBA CNEL or L_{dn} during normal project operations.• Include in the project design permanent acoustic barriers on the project site that will attenuate offsite exposures to below 65 dBA CNEL or L_{dn}.			
	MM NOI-2:	Less Than Significant	Project Construction Contractor/ Project	During demolition and



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>During the design phase of specific onsite residential projects, the County shall conduct a site-specific noise study that documents the existing noise conditions onsite and recommends attenuation strategies and techniques to address sensitive receptors and achieve acceptable noise levels under County standards. An onsite noise study shall be performed by an acoustical engineer. The noise study shall measure and report the existing ambient average day-night (L_{dn} or CNEL) noise environment within the project site, including transportation noise sources and any transient or nuisance noise sources. Based on project details, the noise study shall identify and quantify the potential project-related noise sources from operation. All noise control techniques and recommendations in this report shall be incorporated into the project design to reduce exterior noise to at or below 65 dBA and interior noise to at or below 45 dBA.</p> <p>Operational noise shall consider both stationary noise, including HVAC and utilities, and transportation noise, including permanent increases in roadway noise and periodic peak noise from trucks and other services, and airport noise. To address operational and transportation noise, the noise study shall document that the proposed project is not within 1,000 feet of a highway or major roadway, 3,000 feet of a railroad, or two miles of an airport. If the project is within any of these distances, then either:</p> <ul style="list-style-type: none">• Provide documentation showing the ambient noise level in all areas of the project site would be at or below 65 dB L_{dn}, or• Provide documentation showing that there is an effective noise barrier or noise attenuating feature of the project		Applicant and County of Santa Barbara	project construction activities



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	<p>that reduces the ambient noise level in all areas of the project site at or below 65 dB Ldn, or</p> <ul style="list-style-type: none">• Provide documentation showing the ambient noise level in areas of the project site that would contain sensitive receptors, including residences and recreational areas, would be below 75 dB Ldn and identifying noise attenuation requirements that will bring the interior noise level to 45 dB Ldn and/or exterior noise level to 65 dB Ldn. Include the feasibility of noise barriers, site design, building orientation, and other features to meet prescribed exterior noise standards. An analysis of the noise insulation effectiveness of the proposed construction shall be documented, showing that the building design and construction specifications are adequate to meet the prescribed interior noise standard. <p>The required noise study shall be prepared by the applicant and submitted as part of project application materials. P&D shall review and confirm that all recommendations of the noise study are reflected in project plans and permit requirements. All requirements shall be printed on all building and grading plans.</p> <p>P&D shall ensure that the noise study is included as part of the project application and that all recommendations of the noise study are reflected in project plans. Building inspectors shall ensure that all noise control measures have been built or incorporated according to the approved plans. If an acoustical survey is required, P&D compliance monitoring staff will ensure that recommended onsite noise levels have been reached before the Final Building Inspection Clearance.</p>			



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	MM NOI-3: During construction, the contractor shall ensure that trucks and other heavy vehicles traveling on public streets in the project vicinity, do not come closer than 60 feet to existing offsite sensitive receptors.	Less Than Significant	Project Construction Contractor/ Project Applicant and County of Santa Barbara	During demolition and project construction activities
Threshold A: Would the project result in generation of a substantial temporary or permanent increase in ambient noise levels in the vicinity of the project in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	MM NOI-4: Construction Hours. The Owner /Applicant, including all contractors and subcontractors shall limit construction activity, including equipment maintenance and site preparation, to the hours between 7:00 a.m. and 4:00 p.m. <i>[or 8:00 a.m. and 5:00 p.m. for additional restriction in sensitive areas, or as otherwise specified in Community Plan/Area: Montecito 7:00 a.m. and 4:30 p.m.; Hope Ranch 8:00 a.m. and 5:00 p.m.; Eastern Goleta Valley 8:00 a.m. and 5:00 p.m. if within 1,600 feet of a sensitive receptor; Toro Canyon 8:00 a.m. and 5:00 p.m. if within 1,600 feet of a residential receptor; Orcutt 7:00 a.m. and 4:00 p.m.; Los Alamos 7:00 a.m. and 4:00 p.m. or 8:00 a.m. and 5:00 p.m. if project is within 1,600 ft. of a sensitive receptor]</i> 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.	Less Than Significant	Project Construction Contractor/ Project Applicant and County of Santa Barbara	Prior to the start project construction activities and throughout the duration of project construction



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>Plan Requirements: The Owner/Applicant shall provide and post a sign stating these restrictions at all construction site entries.</p> <p>Timing: Signs shall be posted prior to commencement of construction and maintained throughout construction.</p> <p>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.</p>			
4.11 Transportation				
Threshold C: Would the Project substantially increase hazards due to a geometric design feature (e.g., sharp curves or dangerous intersections) or incompatible uses (e.g., farm equipment)?	<p>MM TRANS-1:</p> <p>Prior to construction, the General Contractor for each construction project undertaken pursuant to the Master Plan shall submit a detailed Construction Management Plan to be reviewed and approved by the Santa Barbara County Department of Public Works Transportation Division. The Construction Management Plan shall specify that the Construction Manager will schedule truck traffic and employee shifts to avoid creating trips during the peak traffic periods, as is feasible for construction operations. All measures, including identified truck routes and designated employee parking areas, shall be included in the Construction Management Plan. The Plan shall include but is not limited to the following provisions:</p>	Less Than Significant	Project Construction Contractor/ Project Applicant and County of Santa Barbara	During demolition and project construction activities



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<ul style="list-style-type: none">• Specification for routing and controlling of traffic during the construction phase, including which lane(s) of traffic will be temporarily blocked off for construction work.• Specification of permitted hours for construction-related deliveries and removal of heavy equipment and material.• Specification of where construction workers would park their personal vehicles during project construction with a requirement that at no time shall construction worker vehicles block any driveways. If complaints are received by the project applicant regarding issues with construction worker vehicle parking, the project applicant shall identify alternative parking options for construction workers so as not to interfere with any commercial and residential parking availability.• Identification of how emergency access to and around the project site will be maintained during project construction.• Specification of haul routes for delivery or removal of heavy and/or oversized equipment or material loads. Where feasible, delivery or removal of oversized equipment or material loads shall be conducted during off-peak traffic periods.• Maintain pedestrian and bicycle connections around the project site and designate safe crossing locations for all pedestrian detours.• Maintain the security of the project site by erecting temporary fencing during the construction phase of the project. Any onsite night lighting used during the			



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	<p>construction phase of the project shall comply with Santa Barbara County lighting requirements.</p> <ul style="list-style-type: none">• If temporary lane closures are necessary for the installation of utilities, emergency access must be maintained at all times.• Flag persons and/or detours shall be provided as needed to ensure safe traffic operations.• Construction signs shall be posted to advise of reduced construction zone speed limits.			
	<p>MM TRANS-2 Transportation Impact Analyses</p> <p>Before Santa Barbara County Board of Supervisors considers individual development projects undertaken under the Master Plan for approval, the County shall retain a registered transportation engineer, or civil engineer shall estimate operational trip generation. For each development project estimated to generate over 100 trips in a peak hour, a Transportation Impact Analysis (TIA) shall be completed before the County Board of Supervisors considers the project for approval. The TIA shall conform with the guidelines set forth in Transportation Impact Study Requirements issued by Santa Barbara County in 2007.</p> <ul style="list-style-type: none">• For projects estimated to generate 100 to 499 trips in a peak hour, the study area may tend to be confined to the street or streets on which access is proposed but should be extended to at least the first major intersection in each direction.• For projects estimated to generate 500 or more trips in a peak hour, the study area may extend beyond the streets onto which access is proposed	Less Than Significant	County of Santa Barbara	Before Santa Barbara County Board of Supervisors considers individual development projects undertaken under the Master Plan for approval



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Issue Area	Mitigation Measures (MMs)	Level of Significance After Mitigation	Responsible Party/Monitoring Party	Implementation Stage
	<p>(reference Santa Barbara County <i>Transportation Impact Study Requirements</i>, 2007).</p> <p>Each TIA prepared pursuant to this Mitigation Measure shall include an assessment of direct and cumulative impacts on the safety and operation of the US 101 Northbound Off-Ramp to El Sueno Road (Comment A.2-2 erroneously referred to this off-ramp as the Southbound Off-Ramp).</p>			
	<p><u>MM TRANS-3: Roadway Improvement, Calle Real</u></p> <p><u>Before Santa Barbara County General Services Department (DGS) issues a Certificate of Occupancy for the first project in Phase 1 of the Master Plan to require a TIA (pursuant to Mitigation Measure TRANS-2 set forth in this PEIR), the Santa Barbara County Public Works Department, in collaboration with DGS, shall have a civil engineer assess the roadway condition on the segment of Calle Real between County Road and El Sueno Road, and recommend a measure (such as a barrier or retaining wall) to remedy the roadway condition; and the Santa Barbara County Public Works Department or its contractor(s) shall implement said recommendation.</u></p>	Less Than Significant	County of Santa Barbara	<u>Before Santa Barbara County issues a Certificate of Occupancy for the first project in Phase 1 of the Master Plan to require a TIA (pursuant to Mitigation Measure TRANS-2 set forth in this PEIR)</u>
Threshold D: Would the Project result in inadequate emergency access?	Refer to MM TRANS-1 above			



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4.12 Tribal Cultural Resources				
Threshold A: Would the project cause a substantial adverse change in the significance of a tribal cultural resource, defined in 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: (i) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public	MM-TCR-1: The CBCN will establish a Cultural Resource Treatment Plan to collaborate throughout the course of the 25 year project.	Less Than Significant	CBCN/Project Applicant/County of Santa Barbara	Prior to commencement of project construction and throughout the duration of construction
	MM-TCR-2: The CBCN will be present at project kick off meeting to brief the contractor and bring items of archeological significance for example of items to look out for.	Less Than Significant	CBCN/Project Applicant/County of Santa Barbara	Prior to commencement of project construction and throughout the duration of construction
	MM-TCR-3: The County will collaborate with tribe during the development of a landscaping plan to assist in bringing back indigenous plant species to campus.	Less Than Significant	CBCN/Project Applicant/County of Santa Barbara	Prior to commencement of project construction and throughout the duration of construction



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Resources Code § 5020.1(k); or (ii) 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 Resource Code § 5024.1. In applying the criteria set forth in subdivision (c) of Public Resources Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American Tribe.				
4.14 Fire Protection Services and Wildfire Hazards				
Threshold A: If located in or near state responsibility areas or lands classified as very	Refer to MM TRANS-1 above.			



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high fire hazard severity zones, would the project substantially impair an adopted emergency response plan or emergency evacuation plan?				