

COASTAL CONSERVANCY

Staff Recommendation  
February 2, 2023

**City of Santa Barbara Hazardous Fuels Reduction Project**

Project No. 22-072-01  
Project Manager: Rachel Couch

**RECOMMENDED ACTION:** Authorization to disburse up to \$525,000 to the City of Santa Barbara to reduce wildland vegetation fuels on approximately 283 acres in up to seven high fire hazard areas in Santa Barbara, purchase equipment needed for the project, prepare planning and biological resource documents, conduct community outreach and education activities, and build capacity to implement their Community Wildfire Protection Plan through hiring additional staff; and adoption of findings under the California Environmental Quality Act.

**LOCATION:** Multiple open space areas within the City of Santa Barbara

---

EXHIBITS

- Exhibit 1: [Project Location Map](#)
- Exhibit 2: [Photos](#)
- Exhibit 3: [Park Aerial Photos](#)
- Exhibit 4: [Project Letters](#)
- Exhibit 5: [Community Wildfire Protection Plan Final Program Environmental Impact Report](#) and [Public Draft Program Environmental Impact Report](#)

---

**RESOLUTION AND FINDINGS**

Staff recommends that the State Coastal Conservancy adopt the following resolution and findings.

Resolution:

The State Coastal Conservancy hereby authorizes a grant of an amount not to exceed five hundred and twenty-five thousand dollars (\$525,000) to the City of Santa Barbara to reduce wildland vegetation fuels on approximately 283 acres in up to seven high fire hazard areas in Santa Barbara, purchase equipment needed for the project, prepare planning and biological

resource documents, conduct community outreach and education activities, and build capacity to implement their Community Wildfire Protection Plan through hiring additional staff.

Prior to commencement of the project, the grantee shall submit for the review and written approval of the Executive Officer of the Conservancy (Executive Officer) the following:

1. A detailed work program, schedule, and budget.
2. Names and qualifications of any contractors to be retained in carrying out the project.
3. A plan for acknowledgement of Conservancy funding.
4. Evidence that all permits and approvals required to implement the project have been obtained.
5. Evidence that the grantee has entered into agreements sufficient to enable the grantee to implement, operate, and maintain the project.

Findings:

Based on the accompanying staff recommendation and attached exhibits, the State Coastal Conservancy hereby finds that:

1. The proposed authorization is consistent with Chapter 3 of Division 21 of the Public Resources Code, regarding the Climate Ready Program.
2. The proposed project is consistent with the current Conservancy Project Selection Criteria.
3. The Conservancy has independently reviewed and considered the “Community Wildfire Protection Plan Program Environmental Impact Report” (PEIR) attached as Exhibit 5 to the accompanying staff recommendation, which was certified by the City of Santa Barbara on February 9, 2021, pursuant to the California Environmental Quality Act (CEQA). The proposed project is part of the City’s larger Community Wildfire Protection Plan (Plan or CWPP).
  - a) The Conservancy finds that the project will have “potentially significant” effects in the areas of Aesthetics/Visual Resources, Air Quality, Biological Resources, Cultural and Tribal Cultural Resources; Geology and Soils; Hazards, Hazardous Materials, and Wildfire; Hydrology and Water Quality; Noise; and Recreation. With regards to these impacts, the Conservancy finds that the project, as modified by the incorporation of the mitigation measures identified in the PEIR, avoids, reduces, or mitigates all possible significant environmental effects of the project to less-than-significant levels except for the potentially significant impacts identified in finding 3b below.
  - b) The Conservancy further finds that the project may result in “significant and unavoidable” cumulative impacts to Aesthetics/Visual Resources, Air Quality, and Biological Resources, but environmental and other benefits of the proposed project as described in the accompanying staff recommendation outweigh or render acceptable these unavoidable adverse environmental impacts.

## **STAFF RECOMMENDATION**

### **PROJECT SUMMARY:**

Staff recommends the Conservancy authorize a \$525,000 grant to the City of Santa Barbara to reduce wildland vegetation fuels on approximately 283 acres in up to seven high fire hazard areas in Santa Barbara, purchase equipment needed for the project, prepare planning and biological resource documents, conduct community outreach and education activities, and build capacity to implement their Community Wildfire Protection Plan through hiring additional staff (See Exhibit 1).

Santa Barbara has experienced several catastrophic wildfires in the past two decades which have destroyed residential and commercial property, resulting in loss of life, economic impacts, and community-wide trauma. The City of Santa Barbara adopted a Community Wildfire Protection Plan (CWPP), and the City's Fire Department is responsible for implementing the plan. The Fire Department and the Parks and Recreation Department have lacked the resources to closely manage and maintain the High Fire Hazard Areas and specified Vegetation Management Units (VMU) identified in the CWPP. These are areas that are recognized in the CWPP to have unique hazards and include or are adjacent to community assets threatened by wildfire, have the potential for extreme fire behavior, and pose various challenges for fire protection. Currently, City fire crews respond to management needs on a short-term, as-needed, rapid response basis, without the necessary resources in place for a comprehensive response; although the Parks and Recreation Department conducts vegetation management activities to meet defensible space requirements, a comprehensive, sustainable approach is needed.

This project aims to reduce fire risk while avoiding disruption of the natural ecosystem through the following activities: maintaining defensible space around homes adjacent to High Fire Hazard Areas (HFHAs); maintaining and improving the necessary fire access roads and fuel breaks to access HFHAs; vegetation management targeted at high-fire risk invasive species removal and associated native plant restoration efforts; fuel load reduction in at-risk areas; and community outreach and education around fuels management. The project would provide the necessary resources to the City to support a long-range, comprehensive approach to implementing the CWPP.

Before implementing hazardous fuels reduction projects, the City will prepare planning documents called for in the CWPP including a Biological Resources Assessment Report, which includes a literature review, vegetation mapping, habitat suitability assessment, and a rare plant survey. These assessments will be conducted by biological consultants under contract with the City. These site-specific assessments will be used to develop site-specific work plans and guide long range planning and management of open space within the City. The assessments, to be completed before site work can occur, will also establish the baseline for existing biological resources and provide recommendations for native habitat restoration consistent with wildland fire management objectives.

Upon completion of necessary planning documents, hazardous fuels reduction work will begin. The methods used at each park would be determined based on the results of the biological

assessment(s) and could include vegetation trimming via hand-cutting; weed whipping; tree removal focused on hazardous deadwood and high-fire risk non-native invasive species; chipping; grazing; cutting of mosaic pattern to change the fuel continuity; and native plant restoration. The Fire Department will need to hire between six and eight hourly personnel to carry out the handwork required to minimize disturbance to open space habitats. The Fire Department may purchase a chipper to reduce the cost of outsourcing heavy equipment.

The City Fire Department and Parks and Recreation Department meet monthly to discuss priority areas for fuels treatment, visit sites, and plan fuels reduction work. These recurring collaborative meetings are anticipated to continue for the length of the project and beyond. The proposed project will institutionalize this collaborative open space/VMU management in accordance with the CWPP and would serve as a template and guide for future open space management going forward. In particular, the natural resources planning documents will guide the site-specific work plans to be accomplished as part of this project, and future vegetation management work plans in the years to come. The City Fire Department will continue to seek grant funding to see the implementation phase of this project through to completion and continue with successful implementation of all CWPP objectives.

On-site community meetings will be held at each location with both Fire Department and Parks and Recreation staff present. At least one meeting at each project site will be held after the biological assessments are complete and as the site-specific work plan is being developed. These meetings will provide an opportunity for the Fire Department to educate the public on priority areas and hazardous fuel reduction methods, will allow the Parks and Recreation Department to speak to the balanced approach taken to reduce fire risk while avoiding disruption of the natural ecosystem, and will allow for a site walk with the opportunity for site-specific questions and public input on the work plan.

City online resources regarding fire-wise communities will be improved to encourage and demonstrate to homeowners the importance of maintaining defensible space around their homes, increase knowledge about fire patterns, and increase awareness of the management efforts being taken in each open space park.

**Site Description:** All seven open spaces served by the project are in residential neighborhoods of varying densities and proximities to larger wildland areas. Six of the seven open spaces are owned, managed and maintained by the City of Santa Barbara Parks and Recreation Department, part of a network of 1,765 acres of coastal and inland parks and open spaces within the City. Elings Park is partially owned by the City with the remainder and operated as a privately-owned park. The open spaces are described in detail below.

- Parma Park is a 200-acre open space park, situated in the extreme foothill zone of the High Fire Hazard Area within the City. The park is composed primarily of native vegetation communities including oak woodland, chaparral, coastal sage scrub, and native grasslands; non-native vegetation includes the non-native grassland community, a historically maintained olive grove, and various patches of invasive / escaped ornamentals throughout. Parma Park is enjoyed by the community for its hiking trails and horseback riding, with creekside habitats teeming with wildlife. Parma Park is surrounded by residential development.

- Honda Valley Park is an approximately 48-acre open space park, located in the coastal interior zone of the High Fire Hazard Area within the City. This park is composed of a dense mix of native and non-native vegetation communities; eucalyptus woodland stands, which shed bark that could lead to a buildup of understory ladder fuels, are prevalent in this park. Honda Valley Park is situated in a valley with 5-10% slopes, surrounded by residential development.
- Elings Park is an approximately 230-acre park located in the interior coastal zone of the High Fire Hazard Area within the City. The south parcel, designated undeveloped open space, is owned by the Elings Park Foundation and is composed of a mix of native and non-native vegetation communities, primarily scrubland and grassland. The open space area of Elings Park is popular among mountain bikers and hikers, and also hosts hang gliding and remote-control airplanes. The north parcel, owned by the City of Santa Barbara and leased to the Elings Park Foundation, hosts a variety of sports facilities including softball, soccer, BMX, and tennis, as well as outdoor spaces for weddings and other private gatherings. There are approximately 25-30 homes that border the eastern boundary of the south parcel. Its terrain is moderately steep.
- Hale Park is an approximately 13-acre park located in the foothill zone of the High Fire Hazard Area within the City. Hale Park is composed primarily of the oak woodland and eucalyptus woodland vegetation communities. Hale Park offers walking trails where dogs are allowed off-leash and is visited primarily by the community within close proximity of the park. It is surrounded by residential development on all sides.
- Franceschi Park is an approximately 17-acre park located in the foothill zone of the High Fire Hazard Area within the City. This park houses a diverse botanical collection, primarily consisting of ornamental vegetation, and offers unmatched views of the cityscape below. Franceschi Park is situated on a steep, south facing slope that has stands of eucalyptus trees.
- Stevens Park is an approximately 26-acre park located in the foothill zone of the High Fire Hazard Area. This park is composed of a dense mix of native and non-native vegetation communities. The native oak woodland community makes up a majority of the park space, but native riparian communities, and dense ornamental stands of eucalyptus, acacia, and Peruvian pepper are interspersed as well. Stevens Park runs along San Roque Creek and has steep slopes on either side. Stevens has a playground, picnic area, and trail system that connects to Jesusita and Arroyo Burro trails to the north. Stevens Park is surrounded by residential development to the east, south, and west, and borders the Cater Water Treatment Plant, a CWPP “Critical Facility,” at its northern end.
- Douglas Family Preserve is an approximately 60-acre open space preserve located in the coastal zone of the High Fire Hazard Area within the City. This open space is composed of oak woodland, coastal sage scrub, and eucalyptus stand vegetation communities. The park is known within the Santa Barbara community for its trails and scenic ocean view and is especially popular amongst dog owners as dogs are permitted off-leash. Douglas Family Preserve is adjacent to residential development to the east and west, borders

Elings Park to the north, and borders the Pacific Ocean to the south. Douglas Family Preserve gets the most community use of the seven open space sites listed here.

**Grant Applicant Qualifications:** Since 2010, the City Fire Department has received over \$600,000 in grant funding and provided over \$100,000 in matching or in-kind funds. Projects, services, and programs included in these grants included fuels reduction on over 80 acres of both public and private property, large hazardous tree removal, chipping services, educational and outreach materials, and the creation of the CWPP and associated PEIR. Both in-house staffing and contractual work were included in the grants. All of the grant activities, projects, and programs were completed within the required timeframes and within the allotted budget.

**CONSISTENCY WITH CONSERVANCY'S PROJECT SELECTION CRITERIA:**

The proposed project is consistent with the Conservancy's Project Selection Criteria, last updated on September 23, 2021, in the following respects:

**Selection Criteria**

**1. Extent to which the project helps the Conservancy accomplish the objectives in the Strategic Plan.**

See the "Consistency with Conservancy's Strategic Plan" section below.

**2. Project is a good investment of state resources.**

The proposed project will accelerate the City's high priority fire hazard reduction projects to increase fire resiliency in Wildland-Urban Interface areas of City-owned and privately-owned park lands that are located within CAL FIRE identified high fire severity risk zones. The project will treat approximately 283 acres of high priority area in seven parks and open spaces within the City and protect significant resources on public land. The project will also increase capacity in the City's Fire and Parks Departments to complete biological resource assessments. The project furthers goals in the California Wildfire and Forest Resilience Action Plan (January 2021) and the City of Santa Barbara Community Wildfire Protection Plan (January 2021).

The project is feasible, has a reasonable budget, relies on best available science, and builds on well-established partnerships. Working with the Parks and Recreation Department, which manages the open spaces, and the surrounding neighbors and community, the Fire Department will implement environmentally sensitive vegetation management on City-owned and private park lands. The project will protect natural and cultural resources, expand landscape-level ecological resilience to fire hazard conditions and a changing climate, and facilitate ecologically sensitive wildland fire response and training while enhancing public safety and education.

**3. Project benefits will be sustainable or resilient over the project lifespan.**

The project aims to reduce fire risk while avoiding disruption of the natural ecosystem, taking an active step in making the City of Santa Barbara a more fire-wise and resilient community. The project's vision and approach is long term. This project will support a comprehensive and sustainable approach to hazardous fuels management, particularly through creation of the

biological planning documents and site-specific work plans that will guide and inform work within City open space parks for years to come.

**4. Project delivers multiple benefits and significant positive impact.**

The proposed project will reduce fire risk for the surrounding community, protect escape routes, and improve the ecological health of City open spaces by sensitively decreasing heavy vegetation fuel loads and high-fire risk non-native invasive species. The project contributes to regional benefits by reducing catastrophic fire risk that can indirectly yet significantly impact under-resourced communities when severe smoke spreads throughout the larger region, as was evident in recent fires, causing people to shelter at home and exposing many to high levels of particulate matter. Finally, the project actively responds to community concerns regarding fire safety.

**5. Project planned with meaningful community engagement and broad community support.**

CWPP development included creation of a Public Outreach and Engagement Plan to guide community engagement and coordination with other key stakeholders throughout the planning process. The City’s central engagement goal was to develop a CWPP that builds on input from key stakeholders, including community members, City departments, neighboring jurisdictions (e.g., Santa Barbara County Fire Department, the U.S. Forest Service), and CAL FIRE. Community input was sought to better understand the vulnerability of City residents, businesses, and resources to wildfire, to promote awareness of the City’s wildland fire hazard and propose workable solutions to reduce the risk of wildfire, and to provide a forum for the community to discuss how to best mitigate wildfire risk in the City. Engagement strategies included a website with project information in Spanish and English, social media distribution of news releases and updates, and public meetings held throughout the CWPP development phase. Two public workshops were held (February and April 2020) to obtain community feedback on the preliminary analysis and scoping of the CWPP. Additional public meetings were held at the City Planning Commission and City Council to provide updates on the development of the CWPP.

The City will confer with Chumash community members regarding how the project will achieve fuels management objectives while supporting natural ecosystems. The project will include onsite community meetings with City staff in each open space area to provide information on the project and will include a site walk to allow community input on the work plans. The City will also improve its online and distributed information regarding creating a more fire-wise community.

**PROJECT FINANCING**

<b>Coastal Conservancy</b>	<b>\$525,000</b>
<b>Project Total</b>	<b>\$525,000</b>

The anticipated source of Conservancy funding is the Fiscal Year 2022/23 appropriation from the General Fund to the Conservancy for the purpose of wildfire risk reduction (Budget Act of 2022, as amended by AB 178 (2022)). The proposed project is consistent with this funding source because it will help reduce the risk of wildfire.

The City will provide in-kind staff time to implement the site-specific work plans to be developed as part of the project. The value of this in-kind service is estimated at \$87,800.

Unless specifically identified as “Required Match,” the in-kind contributions described above are estimates. The Conservancy does not typically require matching funds or in-kind services, nor does it require documentation of expenditures from other funders or of in-kind services. Typical grant conditions require grantees to provide any funds needed to complete a project.

**CONSISTENCY WITH CONSERVANCY’S ENABLING LEGISLATION:**

The recommended project would be undertaken pursuant to Section 31113 of Chapter 3 of Division 21 of the Public Resources Code, which authorizes the Conservancy to address the impacts and potential impacts of climate change on resources within the Conservancy’s jurisdiction (Section 31113(a)).

Pursuant to Section 31113(b) and (c), the Conservancy is authorized to award grants to nonprofit organizations and public agencies to undertake Climate Ready projects, including those that reduce greenhouse gas emissions, or address extreme weather events, sea level rise, flooding, and other coastal hazards that threaten coastal communities, infrastructure, and natural resources.

Pursuant to Section 31113(c), the Conservancy must prioritize grants for projects that maximize public benefits and have one of several purposes, including reducing emissions of greenhouse gases, preserving and enhancing natural lands, conserving biodiversity, and providing recreational opportunities.

Consistent with these sections, the proposed project will restore the health and resilience of California forests, grasslands, and natural lands and reduce fire risk to communities. The project will help California’s natural lands to be more resilient to catastrophic wildfires which may ultimately reduce greenhouse gas emissions released from increased wildfires due to climate change.

The proposed project addresses resources within the Conservancy’s jurisdiction by improving forest health and reducing the risks of wildfire that would adversely impact water quality and habitat in a coastal watershed (Chapter 5.5 of Division 21 of the Public Resources Code).

**CONSISTENCY WITH CONSERVANCY’S [2023-2027 STRATEGIC PLAN](#) GOAL(S) & OBJECTIVE(S):**

Consistent with **Goal 4.2** of the Conservancy’s 2023-2027 Strategic Plan, the proposed project includes wildfire resilience planning (metric 4.2.1) and will implement wildfire resilience projects on approximately 283 acres (metric 4.2.2).

**CEQA COMPLIANCE:**

The proposed project will implement elements of The City’s Community Wildfire Protection Plan (CWPP), which updates the City’s 2004 Wildland Fire Plan (2004 Plan). The relevant



environmental impact analysis for the portion of the project under the CWPP is discussed below.

Potential environmental impacts of the project are addressed in the City of Santa Barbara Community Wildfire Protection Plan Program Environmental Impact Report (CWPP PEIR) dated January 2021 and certified by the City Council on February 9, 2021. The CWPP PEIR assesses the environmental effects of activities necessary to manage vegetation and reduce wildland fire risk in the City. The CWPP is designed to protect lives, property, and natural resources threatened by wildland fire through identification of at-risk community values and implementation of wildland fire hazard mitigation projects to protect those values. This is achieved through a comprehensive program that includes activities such as vegetation trimming and removal, chipping, use of grazing animals, and prescribed fire and burning practices designed to reduce fuels on both public and private lands.

The CWPP updates the City of Santa Barbara's (City) 2004 Wildland Fire Plan, consistent with the federal Healthy Forests Restoration Act of 2003 and subsequent guidance booklet, "Preparing a Community Wildfire Protection Plan; A Handbook for Wildland Urban Interface Communities" issued in 2004, accounting for changes in the City's fire environment and work completed under the 2004 Plan. Activities conducted by the Santa Barbara Fire Department under the 2004 Plan were analyzed in the Program Environmental Impact Report (2004 PEIR) for the 2004 Plan, which is incorporated into the 2021 CWPP PEIR by reference.

The CWPP PEIR addresses new proposed policies and actions in the CWPP that could result in impacts to the environment, which consist of the following categories: 1) proposed modifications to the High Fire Hazard Area (HFHA); 2) proposed modifications to the Vegetation Management Units (VMUs) including defensible space, road clearing, Community Fuels Treatment Network, and neighboring jurisdiction vegetation management areas; 3) proposed modifications to the vegetation management methods; and 4) community facility maintenance. The CWPP also includes policies and actions that do not involve any physical impacts to the environment, including public education, interagency coordination, acquisition of funding, data gathering and management, acquisition of firefighting equipment, and evacuation planning.

The CWPP PEIR identifies a number of potentially significant environment effects of these activities that can be mitigated to "less than significant" through the mitigation measures set forth in the CWPP Mitigation Monitoring and Reporting Program (Exhibit 5). In addition, the project will result in significant cumulative environmental effects in the areas of Aesthetics/Visual Resources, Air Quality, and Biological Resources that cannot be mitigated. These are summarized below and assessed in detail in the CWPP PEIR.

### **Findings for Significant Effects that can be Mitigated to Less-Than-Significant Levels**

The majority of the potentially significant effects identified in the PEIR can be mitigated and reduced to less-than-significant levels. Most of the impacts arise from vegetation removal and the related use of vehicles and equipment. Potentially significant effects that can be reduced to less than significant were identified in the areas of Aesthetics/Visual Resources, Air Quality, Biological Resources, Cultural and Tribal Cultural Resources; Geology and Soils; Hazards,

Hazardous Materials, and Wildfire; Hydrology and Water Quality; Noise; and Recreation. Each of these areas and associated mitigation is summarized below.

#### Aesthetic/Visual Resources

Designation of additional HFHA zones and VMUs and vegetation management activities within VMUs will result in visual changes in existing vegetation in areas designated as valued scenic resources, such as hillside areas, open space, creeks, and mountain areas where proposed VMUs may be visible from scenic vistas and highways. Potentially significant impacts to aesthetics and visual resources within the City could result from these actions. To mitigate these impacts, the recommended mitigation measure from the 2004 PEIR has been carried forward to the proposed CWPP. MM-AES-1 requires that the following measures shall be implemented when conducting vegetation management on private and public parcels to the extent feasible: 1) Straight line boundaries and other strong linear configurations that tend to detract from the natural appearance of the landscape shall be avoided; 2) Vegetation removal or thinning shall follow natural or existing landscape features such as stream courses, vegetation type lines, ridgetops, and existing roads; and 3) Vegetation removal or thinning shall be feathered into the natural landscape, with brush cuttings used to disguise the lines and maintain a natural appearance. With implementation of MM-AES-1, the natural appearance of HFHA zones and VMUs would be retained to the extent feasible. Impacts to scenic vistas, impacts to scenic resources within a state scenic highway or locally designated scenic route, and impacts concerning conflicts with regulations governing scenic quality would be reduced to a less than significant level.

#### Air Quality

Vegetation management activities associated with prescribed burning and vehicle and equipment use in the CWPP would exceed the Santa Barbara County Air Pollution Control District) operational criteria pollutant emissions thresholds for reactive organic compounds and coarse particulate matter (PM<sub>10</sub>) emissions and would expose sensitive receptors to substantial pollutant concentrations. When PM<sub>10</sub> is inhaled, these tiny particles can penetrate the human respiratory system's natural defenses and damage the respiratory tract. PM<sub>10</sub> can increase the number and severity of asthma attacks, cause or aggravate bronchitis and other lung diseases, and reduce the body's ability to fight infections. Based on the preceding considerations, operational and health impacts associated with criteria air pollutants would be potentially significant. MM-AQ-1, Prescribed Burning, limits burn pile size to 5 feet by 5 feet and number to 22 in any one day, which will reduce emissions of reactive organic compounds and PM<sub>10</sub> generated during prescribed burn events. MM-AQ-2, Air Curtain Burner, requires coordination with Santa Barbara County Air Pollution Control District during the planning process to address health risk concerns and ensure the project is properly mitigated and has obtained the required permits in order to reduce short-term non-cancer impacts to sensitive receptors. MM-AQ-3, Covers, requires trucks transporting cut vegetation material to be covered from point of origin to reduce mobilization of pollutants. MM-AQ-4, Haul Route Approval by the transportation engineer, and MM-AQ-5, Disturbed Soil, require treatment using various approved methods to prevent wind pickup in order to reduce emissions of reactive organic compounds and PM<sub>10</sub> and exposure of sensitive receptors. With the above mitigation measures, the project impacts would be less than significant.

### Biological Resources

Potentially significant impacts on Biological Resources include impacts to special-status species, either directly or through impacts to their habitat; impacts to riparian habitat or other sensitive habitat communities; impacts to migratory fish and wildlife, including impacts to migratory corridors; and conflicts with policies and ordinances protecting Biological Resources. The CWPP MMRP identifies a number of biological mitigation measures to reduce these impacts such as:

- Surveys and monitoring by qualified biologists and relocation of activities to avoid special-status species and their habitats, including focused surveys and species-specific measures if suitable habitat for special status species is identified.
- Preparation of site-specific work plans and measures to avoid impacts to riparian resources.
- Preparation of property-owner educational material in consultation with a City qualified biologist that advises property owners about regulatory obligations with defensible space and specifying measures that owners can take when performing vegetation management.
- Biological resource evaluations associated with CWPP activities will be made available, whether performed for private or public projects, on the Sbfd website.
- Implementation of best management practices to avoid impacts to sensitive wildlife known to occur in the project area.
- Protections for nesting birds, including timing of activities to avoid nesting season.
- Avoidance of all wetland areas with compensatory mitigation if impacts do occur.
- Update of Project Design Features, Best Management Practices and Mitigation Measures in the CWPP prior to consideration by City, County, and CalFire.

With the above mitigation measures, the project impacts would be less than significant.

### Cultural and Tribal Cultural Resources

Vegetation management activities could impact historical or archaeological resources, including potential disturbance of human remains or tribal cultural resources. The City will implement mitigation measures to ensure impacts are less than significant. These measures include development of protocols for practical adherence of mitigation measures by workers, archaeological monitoring during construction, and pre-work surveys to avoid cultural resources to the extent possible. If cultural resources cannot be avoided, the City will conduct Native American consultation, when applicable to the resource, and data recovery to document the resource prior to impact. If human remains are found, the City will halt work in the vicinity and consult with the County Coroner, and the Native American Heritage Commission, if remains are determined to be Native American. The City will also conduct post-fire management assessments in the event a fire occurs within public space within certain Cultural Resource Sensitivity Zones.

### Geology and Soils

Removal of vegetation on steep slopes could lead reduced soil stability resulting in increased erosion and potentially landslides, subsidence and other hazardous soil conditions. To mitigate these impacts, the City will minimize subsurface soil disturbance by ensuring field crews avoid creating footpaths that can remove leaf litter exposing mineral soils to future erosion; restoring rehabilitating disturbed areas; and implementing standard erosion control and slope stability BMPs. With these measures the potential impacts to geology and soils will be less than significant.

### Hazards, Hazardous Materials, and Wildland Fire

Work performed in areas with known hazardous materials has the potential to mobilize those materials or expose workers to them. To avoid this, the City has mapped the areas with known hazardous materials and will avoid CWPP activities occurring in those areas. Vegetation management activities at Elings Park will be coordinated so that they do not interfere with enforced monitoring and reporting activities on the former Las Positas Landfill. To mitigate the risk associated with post-fire flooding landslide or erosion hazards, the City will implement erosion control measures in defensible space areas on slopes exceeding a 10% gradient and incorporate best management practices. The City will also ensure that post-fire field assessments are conducted by an engineering geologist to identify areas that may be subject to increased risk of post-fire flooding, landslide or erosion. With these measures, the potential impacts associated with hazards, hazardous materials, and wildland fire will be less than significant.

### Hydrology and Water Quality

Potential impacts to hydrology and water quality stem from the potential destabilization of soils by vegetation management treatments. Potential impacts of vegetation management activities that occur on slopes greater than 10%, within 25 feet of the top of a creek, or within a creek will be mitigated by preparation of an erosion control plan that evaluates erosion potential and identifies BMPs to avoid impacts. BMPs will also be employed to reduce erosion and sedimentation and associated increased runoff to prevent migration of hazardous substances spills and grazing animal pathogens to waterways, to the greatest extent feasible.

### Noise

Vehicles and equipment used to undertake the vegetation management work could increase noise levels above levels allowed by local ordinances. Mitigation measures carried over from the 2004 EIR include keeping all equipment professionally maintained and fitted with standard manufacturers' muffler and silencing devices and requiring workers to utilize noise protection and other legal workplace requirements. With these measures, impacts from noise will be less than significant.

### Recreation

Potentially significant impacts to recreation could occur if City parks and open space users are disturbed by vegetation management activities. These impacts will be temporary. The Fire Department will consult with the Parks and Recreation Department in order to limit

simultaneous vegetation management in nearby parks and trails to ensure that at least some recreation opportunities would remain available throughout management activities. This combined with implementation of mitigation measures related to safety of recreational users will mitigate this potential Recreation impact to less than significant.

**Findings for Potentially Significant and Unavoidable Effects**

The CWPP PEIR identifies potentially significant and unavoidable Cumulative effects from implementation of the project to Aesthetics/Visual Resources, Air Quality, and Biological Resources. Proposed project activities include recurring alteration of vegetation that could significantly and adversely affect scenic resources and the visual character of the public and private open space lands.

**Aesthetics/Visual Resources (Cumulative)**

The CWPP's vegetation management could contribute to a past and ongoing cumulatively significant impact due to land development in the City and outside the City limits that removes vegetation and establishes landscaping elements that are out of character with the native landforms and vegetation. Mitigation measure MM-AES-1 would help to maintain the natural appearance of the landscape. Nonetheless, cumulative impacts related to visual resources and aesthetics impacts would be significant and unavoidable.

**Air Quality (Cumulative)**

The Air Quality impacts of the CWPP can be mitigated to a less than significant level when considering only the CWPP activities. However, if a project does not exceed thresholds and is determined to have less than significant project-specific impacts, it may still contribute to a significant cumulative impact on air quality. The basis for analyzing the project's cumulatively considerable contribution is if the project's contribution accounts for a significant proportion of the cumulative total emissions (i.e., it represents a "cumulatively considerable contribution" to the cumulative air quality impact) and consistency with SBCAPCD's 2019 Ozone Plan, which addresses cumulative emissions in the South Central Coastal Air Basin (SCCAB). The SCCAB, which includes San Luis Obispo, Santa Barbara, and Ventura Counties, has been designated as a state attainment area for O3. The CWPP will generate both ROC and NOx emissions (which are precursors to O3). As a result, the project may result in a cumulatively considerable increase in emissions of nonattainment pollutants, and cumulative impacts would be potentially significant.

**Biological Resources (Cumulative)**

The proposed CWPP would affect vegetation communities and biological habitats (special-status species habitats, wetlands) by thinning native vegetation, pruning oak and other trees, and removing understory plants. While these impacts can be mitigated to a less than significant level within the context of the CWPP activities, these impacts would, over time, contribute to a cumulative impact from past, present, and future projects and actions by public and private parties that result in habitat removal and/or degradation. Most of the City has been developed, and native habitat occurs in fragments on steep slopes, in canyons, in several blocks of habitat in the northern part of the City, and along creek corridors. Any future action that continues to reduce or otherwise degrade native habitat would contribute to a past and ongoing significant impact to the biological resources of the City. Therefore, the proposed CWPP would contribute

to a past and ongoing cumulative impact to biological resources that would be significant and unavoidable.

**Statement of Overriding Considerations**

In the event a project has unavoidable significant potential effects, the CEQA Guidelines require the decision-making agency to balance, as applicable, the economic, legal, social, technological, or other benefits of a proposed project against its unavoidable environmental risks when determining whether to approve the project (Title 14 California Code of Regulations Section 15093). If the specific project benefits outweigh the unavoidable adverse environmental effects of the project, a Statement of Overriding Considerations may be adopted and the project approved, despite its adverse environmental effects. The overall environmental benefits of the proposed project, as detailed in the CWPP PEIR, warrant the Conservancy's decision to approve the project even though some of the cumulative environmental effects of the Community Wildfire Protection Plan cannot be mitigated and will result in significant and unavoidable effects.

The project will provide the following public benefits. Strategically placed fuel treatments have been shown to substantially reduce wildland fire risk thereby increasing public safety, increasing fire resiliency of the forest, and providing benefits for long-term carbon management. The project reduces the risk of wildland fires and thus helps avoid the high economic cost associated with wildland fires. These benefits justify proceeding with the project despite the environmental cost of the unavoidable significant effects.

For these reasons, staff recommends that the Conservancy find that the project, as mitigated, avoids or reduces to less than significant all potentially significant environmental effects, except for the cumulative unavoidable significant impacts to Aesthetic/Visual Resources, Air Quality, and Biological Resources. With respect to these potential unavoidable effects, Conservancy staff recommends that the Conservancy find that the environmental, economic, and social (public safety) benefits of the project outweigh the unavoidable environmental effects, thereby warranting its approval.

Upon Conservancy approval of the proposed project, Conservancy staff will prepare and file a Notice of Determination.