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Project Specific Analysis/Addendum

# Santa Barbara South Coast Herbivory Project

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**BOARD OF FORESTRY PROJECT ID: 2023-21**

**SEPTEMBER 2023**

*Prepared for:*

**SANTA BARBARA COUNTY FIRE DEPARTMENT**

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- B Soils Report
- C Cultural Report
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- E Soils Report
- F Grazing Best Management Practices
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# Acronyms and Abbreviations

Acronym/Abbreviation	Definition
CAL FIRE	California Department of Forestry and Fire Protection
CaIVTP	California Vegetation Treatment Program
CDFW	California Department of Fish and Wildlife
CEQA	California Environmental Quality Act
CLUP	Coastal Land Use Plan
CNDDB	California Natural Diversity Database
CRHR	California Register of Historical Resources
DPM	diesel particulate matter
EGVCP	Eastern Goleta Valley Community Plan
EIR	Environmental Impact Report
ESH	environmentally sensitive habitat
ESHA	Environmentally Sensitive Habitat Area
GHG	greenhouse gas
MM	mitigation measure
NRHP	National Register of Historic Places
PEIR	Program Environmental Impact Report
PIZ	project influence zone
PRC	California Public Resources Code
PSA	Project-Specific Analysis
SPR	standard project requirement
VMT	vehicle miles traveled
WLPZ	Watercourse and Lake Protection Zone

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# 1 Introduction

## 1.1 Project Overview

The Santa Barbara Fire Safe Council and the Santa Barbara County Fire Department (SBCFD) propose to implement the Santa Barbara South Coast Herbivory Project (project), which is anticipated to occur over a 4-year timeframe. The project includes prescribed herbivory throughout the wildland urban interface and along critical transportation corridors (see Figure 1, Project Location). The project site includes approximately 1,639 acres of treatment locations throughout the southern coast of the County of Santa Barbara (County). The project influence zone (PIZ) spans 219,472 acres and aligns with the already established Regional Wildfire Mitigation Plan study area. Proposed treatment activities aim to reduce the number and severity of wildfires within the PIZ, improving firefighter safety; protect lives, property, and infrastructure; improve health and resilience of grassland and oak woodland; and reduce greenhouse gas (GHG) emissions from reduced wildfires. The impacted communities range from rural rangeland to populated, wildland urban interface and include Santa Barbara, Goleta, Montecito, Summerland, Painted Cave, San Marcos Pass, and the Gaviota Coast communities. Given the physical characteristics of this area, prescribed herbivory within grasslands and steeper terrain is anticipated to be the most economically and environmentally sound treatment prescription.

## 1.2 California Environmental Quality Act Compliance

Serving as the lead agency under the California Environmental Quality Act (CEQA) (California Public Resources Code [PRC] Section 21000 et seq.), SBCFD must comply with CEQA prior to implementing the proposed vegetation treatment activities. SBCFD has evaluated the proposed treatments for CEQA compliance as later activities covered by the California Department of Forestry and Fire Protection (CAL FIRE) California Vegetation Treatment Program (CalVTP) Program Environmental Impact Report (PEIR), using the Project-Specific Analysis (PSA) Checklist herein. Consistent with CEQA Guidelines Section 15168(c)(2), if the potential environmental impacts of a proposed vegetation treatment project are determined to be covered by the environmental impacts analyzed in the PEIR, the project may be approved using a finding that the project is within the scope of the PEIR. Such a finding would constitute CEQA compliance under the PEIR. The PEIR identified the range of environmental impacts associated with vegetation treatment projects and required implementation of standard project requirements (SPRs) and mitigation measures (MMs) to address and minimize these impacts. In accordance with the PEIR, all relevant SPRs and MMs would be incorporated into the project. No additional CEQA review is required for a project that is consistent with the PEIR. The PEIR is available for public review at <https://bof.fire.ca.gov/projects-and-programs/calvtp/>.

This document serves as a PSA to evaluate whether the proposed project is within the scope of the CalVTP PEIR. Proposed treatment projects qualifying as within the scope of the PEIR must be consistent with the treatment types and treatment activities covered in the CalVTP and the geographic extent of the CalVTP treatable landscape. As further discussed in Chapter 2, Project Description, the proposed project has aspects that represent a change to the PEIR; as such, an Addendum to the PEIR has been prepared. Consistent with CEQA Section 21166 and CEQA Guidelines Sections 15162, 15163, 15164, and 15168 an Addendum to an Environmental Impact Report (EIR) would be appropriate where a previously certified EIR has been prepared and some changes or revisions to the project are proposed or the circumstances surrounding the project have changed, but none of the changes or revisions would result in new or substantially more severe significant environmental impacts (PRC Section 21166; 14 CCR 15162–15164 and 15168).

The PSA Checklist (see Chapter 3, Project-Specific Analysis) includes the criteria to support an Addendum to the CalVTP PEIR for the use of prescribed herbivory on slopes greater than 50%, as well as inclusion of proposed treatment areas outside the CalVTP treatable landscape. The PSA Checklist evaluates each environmental resource area in terms of whether the proposed project, including the “changed condition,” would result in significant impacts that would be substantially more severe than those covered in the PEIR and/or would result in any new impacts that were not covered in the PEIR. This document serves as a combined PSA and Addendum to the CalVTP PEIR for analysis under CEQA.

SPRs and MMs from the CalVTP PEIR have been included in the project design to avoid or reduce potential impacts. The project-specific Mitigation Monitoring and Reporting Program, which identifies the standard project requirements and mitigation measures applicable to the proposed project, is included as Attachment A. The SPRs identified in Attachment A have been incorporated into the proposed vegetation treatments as a standard part of treatment design and implementation. Attachment B contains the project-specific CEQA findings and Statement of Overriding Considerations.

Fieldwork was conducted and technical reports were prepared for the project to fulfill the need for cultural and biological resources surveys. Attachment C includes the Cultural Resources Report and Attachment D contains the Biological Resources Memo. Additionally, geological resources field surveys were conducted to assess the potential impacts related to erosion; Attachment E includes the results of the soil survey and soils maps. Lastly, Attachment F includes best management practices for grazing that have been included as part of project design.

## Description of Changed Condition

The inclusion of areas outside the CalVTP treatable landscape and the inability to implement SPR GEO-7 represent a change to the CalVTP. The proposed treatment type (Wildland-Urban Interface Fuel Reduction) and treatment activity (prescribed herbivory) are consistent with the CalVTP PEIR. The PSA Checklist evaluates each environmental resource area in terms of whether the proposed project, including the changed condition, would result in significant impacts that would be substantially more severe than those covered in the PEIR and/or would result in any new impacts that were not covered in the PEIR. This document serves as both a PSA and an Addendum to the CalVTP PEIR for analysis under CEQA.

Figure 2, Project Site, presents the location and extent of proposed treatment activities. Approximately 1,083 acres of land proposed for treatment are located within the CalVTP treatable landscape, while approximately 556 acres of the proposed treatment acres are outside the CalVTP treatable landscape (see Figure 3, CalVTP Treatable Landscape). The method by which the CalVTP treatable landscape was digitally modeled and the degree of mapping resolution resulted in some disjointed and scattered treatable landscape areas. Therefore, areas where proposed treatment activities extend outside the treatable landscape are largely due to these modeling results. If the areas of the proposed project outside the CalVTP treatable landscape have essentially the same, or substantially similar, landscape conditions and vegetation cover as the adjacent areas within the treatable landscape, the environmental analysis in the PEIR would be applicable.

The inability to implement SPR GEO-7 due to the proposed use of prescribed herbivory treatments on slopes greater than 50% represents a change to the PEIR. Due to steep terrain that limits accessibility for manual or mechanical treatments, as well as the large areas proposed for treatments, prescribed herbivory is the most efficient and feasible treatment activity in the proposed treatment areas. The areas identified for treatments are dominated by annual grassland and non-native species, both of which present flammable fuels that would be reduced through



implementation of the project. Proposed prescribed herbivory treatments would not denude the landscape of all vegetation, as grazing best practices would be employed (see Attachment F) and mature shrubs and trees would be retained. Section 3.6, Geology, Soils, Paleontology, and Mineral Resources, includes a review and analysis of the potential impacts related to geologic resources, fully analyzes the use of prescribed herbivory on the project site on slopes greater than 50%, and prescribes measures to avoid potential impacts, which have been adopted as grazing best management practices by the project (see Attachment F).

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## 2 Project Description

### 2.1 Project Location

The project site spans along the south coast of the County of Santa Barbara from Gaviota to Santa Barbara. The County is located on the central coast of California. The project site generally lies between the Pacific Ocean to the south, the foothills of the Santa Ynez Mountains to the north, the City of Santa Barbara to the west, and Point Conception to the east. Prescribed herbivory treatment activities are proposed throughout the project site adjacent to critical roadways and communities adjacent to wildland vegetation (see Figure 2).

### 2.2 Project Characteristics

The proposed treatment activities aim to reduce fuel loads to create buffers between the wildland vegetation in wildland urban interface areas and to reduce fuel loads adjacent to critical transportation corridors. These strategic treatments would help to mitigate the potential for high intensity wildfire and reduce the potential for wildfire ignitions.

The proposed prescribed herbivory treatments would occur within 27 treatment areas comprising approximately 1,639 acres (see Table 1) and is intended to be implemented over a 4-year period. The project will aim for a minimum target of 1,000 acres treated per year and would include maintenance treatments where feasible. The project site is characterized by gentle to steep slopes with multiple aspects covered in vegetation typical of Southern California; foothills covered in grass and oak woodland with mixed chaparral on the upper slopes and ridgetops. These areas include large areas of grasslands and also contain steep slopes, which provide for limited access by hand crews or mechanical equipment, making prescribed herbivory the most realistic vegetation management treatment activity in the proposed treatment areas. The prescribed herbivory treatment activities would involve the use of temporary electric fences to contain the animals. The fences would be constructed along existing road and trail systems. During project implementation, narrow (approximately 3-foot-wide) saw lines would need to be constructed to facilitate fence construction. Limited ground disturbance is expected to occur in any of the treatment areas.

Prescribed herbivory treatments would follow best practices to reduce the potential for overgrazing or the spread of invasive species. Attachment F includes a description of best management practices that would be followed for all grazing treatments implemented under the project. Animals would be confined within small (1–10 acre) paddocks using portable electric fencing until the agreed upon level of grazing in the paddock is completed. Prior to being brought to the site, the herd would be sequestered for at least 3 days where feed utilized does not contain unwanted seed/plant material. Grazing activities would be conducted in a manner that keeps all animals under the shepherd's/shepherdess' control and appropriately confined. Measures would be taken to ensure no grazing animals or herd control animals (e.g., dogs) cause noise that disturbs adjoining neighbors and any animals that cause a noise nuisance be removed. Within each paddock, the goal would be an 80% reduction of herbaceous fuels (grasses), whether trampled or consumed. Roots would be left in place and mature shrubs and trees would be retained. The animals would be moved to the next paddock once desired results are achieved.

## Project Goals

The goals of the project are as follows:

- Enhance fire safety along main transportation corridors by reducing flammable vegetation
- Protect community areas by creating and/or increasing defensible space beyond PRC Section 4291 requirements
- Reduce the size and intensity of wildland fires common to this area
- Reduce the frequency of wildfire ignitions
- Improve forest health and biodiversity while enhancing forested communities' safety
- Reduce the impacts of climate change

## Project Objectives

The objectives of the project are as follows:

- Complete environmental review of project treatments
- Complete 27 fuel reduction treatments through the use of prescribed herbivory

## Project Outcomes

The project would result in the following outcomes:

- A reduction in the number and severity of roadside fires in the project area
- A decrease in number of large-scale wildfires as a result of reduced fuel loads within the project area
- An increase in firefighter safety while responding to and engaging in fire suppression actions
- Enhancement of the protection of lives, property, critical infrastructure, and natural resources from wildland fire
- Enhancement of health and resilience of local grasslands and oak woodlands
- Reduction of GHG emissions as a result of smaller and less severe wildland fires

## Schedule

The project is anticipated to occur over a 4-year period, with grazing treatments beginning as early as summer 2023. The first 1,000 acres are anticipated to be completed by fall 2023, with an additional 1,000 acres treated by fall 2024, and an additional 1,000 acres treated by fall 2025. Treatment maintenance activities would be conducted in high priority treatment areas throughout the 4-year grant period and all initial treatment and treatment maintenance activities conducted under the grant funding would be implemented by winter or spring 2026. Grazing in the treatment areas may continue beyond the 4-year grant period as additional funds become available.

## Access and Transportation

The project parcels are located on public and private property and accessible from existing roads. Herbivores would be transported to the project site by trucks, left on site until desired grazing level is achieved, and removed from

the project site by trucks. It is anticipated that two trucks per project site would be needed to transport animals, with a total of four truck trips per site. Where feasible, animals would be moved between adjacent treatment areas by herding across property boundaries, reducing the need for truck transportation. Additional vehicles arriving on site when transporting animals would include passenger vehicles for project management staff (approximately two to three vehicles arriving on site at once are anticipated).

## Biomass Disposal

The use of prescribed herbivory eliminates the possibility of leftover biomass. A shepherd would remain on site with the animals during treatment activities. Any trash or refuse produced by the shepherd would be nominal and would be properly disposed of.

## Proposed Treatments

Details of the proposed treatment sites are shown in Table 1, and the map ID shown in the first column corresponds to Figure 2.

**Table 1. Proposed Treatment Sites**

Map ID	Treatment Area	Ownership	Jurisdiction	Acres	Timeframe (weeks)	Personnel Required	Treatment Maintenance
1	Arroyo Hondo West	SB Land Trust	SRA	88.3	11	2-3	Yes- annually
2	Arroyo Hondo East	SB Land Trust	SRA	53.5	7	2-3	Yes- annually
3	Baron Ranch West	SB County	SRA	160.7	18	2-3	Yes- annually
4	Baron Ranch East	SB County	SRA	220.5	28	2-3	Yes- annually
5	Las Flores	Exxon Corp	SRA	241.8	30	2-3	Yes- annually
6	Coral Canyon	Exxon Corp	SRA	218.3	28	2-3	Yes- annually
7	Ellwood Mesa	City of Goleta	LRA	204.0	20	2-3	Yes- annually
8	Northgate	City of Goleta	LRA	10.2	1	2-3	Yes- annually
9	Evergreen Park	City of Goleta	LRA	28.8	4	2-3	Yes- annually
10	Lake Los Carneros	City of Goleta	LRA	104.4	14	2-3	Yes- annually
11	La Goleta North	City of Goleta	LRA	1.8	.5	2-3	Yes- annually
12	La Goleta South	City of Goleta	LRA	3.0	1	2-3	Yes- annually
13	Via Salerno South	City of Goleta	LRA	2.6	1	2-3	Yes- annually
14	Via Salerno North	City of Goleta	LRA	2.2	.5	2-3	Yes- annually
15	Trout Club	Private HOA	SRA	12.4	1.5	2-3	Yes- annually
16	Painted Cave South FB	Private	SRA	7.7	1	2-3	Yes- annually
17	Oak Grove	Private HOA	LRA	8.3	1	2-3	Yes- annually
18	County Range	SB County	LRA	21.9	3	2-3	Yes- annually

**Table 1. Proposed Treatment Sites**

Map ID	Treatment Area	Ownership	Jurisdiction	Acres	Timeframe (weeks)	Personnel Required	Treatment Maintenance
19	West Mesa	Private Preserve	SRA	93.6	13	2-3	Yes- annually
20	SM Foothills	SB County	SRA	37.1	5	2-3	Yes- annually
21	Preserve SM Private	Private	SRA	20.7	3	2-3	Yes- annually
22	Preserve SM HOA	Private HOA	SRA	13.8	2	2-3	Yes- annually
23	SM Foothills East	SB County	SRA	23.4	3	2-3	Yes- annually
24	San Roque West	Private	SRA	15.9	2	2-3	Yes- annually
25	San Roque East	Private	SRA	24.8	3	2-3	Yes- annually
26	San Roque South	Private	SRA	9.4	1	2-3	Yes- annually
27	Tunnel Rd FB	City of Santa Barbara	SRA	10.5	2	2-3	Yes- annually

**Note:** SRA = State Responsibility Area; LRA = Local Responsibility Area.

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# 3 Project-Specific Analysis

## California Vegetation Treatment Program Environmental Checklist

### Project Information

1. **Project Title:** Santa Barbara South Coast Herbivory Board of Forestry Project ID - 2023-21
2. **Project Proponent Name and Address:** Santa Barbara County Fire Safe Council  
4410 Cathedral Oaks  
Santa Barbara, California 93110
3. **Contact Person Information and Phone Number:** Rob Hazard, 805.681.5554
4. **Project Location:** County of Santa Barbara
5. **Total Area to be Treated (acres)** 1,639
6. **Description of Project:** See Chapter 2, Project Description.
7. **Treatment Types** [see description in CalVTP PEIR Section 2.5.1, check every applicable category; provide detail in Description of Project]
  - Wildland-Urban Interface Fuel Reduction
  - Fuel Break
  - Ecological Restoration
8. **Treatment Activities** [see description in CalVTP PEIR Section 2.5.2, check every applicable category; include number of acres subject to each treatment activity, provide detail in Description of Project]
  - Prescribed (Broadcast) Burning
  - Prescribed (Pile) Burning
  - Mechanical Treatment
  - Manual Treatment
  - Prescribed Herbivory, 1,639 acres
  - Herbicide Application
9. **Fuel Type** [see description in CalVTP PEIR Section 2.4.1, check every applicable category; provide detail in Description of Project]
  - Grass Fuel Type
  - Shrub Fuel Type
  - Tree Fuel Type
10. **Geographic Scope**
  - The treatment site is entirely within the CalVTP treatable landscape
  - The treatment site is NOT entirely within the CalVTP treatable landscape
11. **Surrounding Land Uses and Setting:** (Briefly describe the project's surroundings)

The project site is located within the Regional Wildfire Mitigation Plan study area on the southern coast of the County of Santa Barbara. The PIZ is generally surrounded by the Santa Ynez Mountains within Los Padres National Forest to the north and east, the Pacific Ocean and minimal development to the south, and undeveloped land to the west. The PIZ consists of developed

communities and undeveloped lands. Treatment areas are generally located next to critical transportation corridors and communities located within wildland urban interface areas. Land uses surrounding the treatment areas include residential uses, open space uses, recreational uses, and agricultural uses. Primary regional access to the treatment areas is available from U.S. 101/State Route (SR) 1, SR-154, and SR-192.

12. **Other public agencies whose approval is required:** (e.g., permits)

Portions of the project site are located within the coastal zone and require a Coastal Development Permit from the California Coastal Commission (see below). The project is being implemented in close coordination with the City of Goleta, the City of Santa Barbara, and the County of Santa Barbara. The California Department of Fish and Wildlife and California Department of Conservation were consulted for input on the proposed project. All recommendations provided during agency coordination were agreed upon and will be implemented with the project as described in Section 3.5, Biological Resources.

**Coastal Act Compliance**

The proposed project is NOT within the coastal zone

The proposed project is within the coastal zone (*check one of the following boxes*)

A Coastal Development Permit been applied for or obtained from the local Coastal Commission district office or local government with a certified Local Coastal Plan, as applicable

The local Coastal Commission district office or local government with a certified Local Coastal Plan (in consultation with the local Coastal Commission district office) has determined that a coastal development permit is not required

13. **Native American Consultation.** Pursuant to PRC Sections 21080.3.1, 21080.3.2, and 21082.3, lead agencies undertaking CEQA review must, upon written request of a California Native American tribe, begin consultation before the release of an environmental impact report, negative declaration, or mitigated negative declaration. For treatment projects that require additional CEQA review and documentation, have California Native American tribes traditionally and culturally affiliated with the project area requested consultation pursuant to Public Resources Code section 21080.3.1? If so, is there a plan for consultation that includes, for example, the determination of significance of impacts to tribal cultural resources, procedures regarding confidentiality, etc.?

*Note: For treatment projects that are within the scope of this PEIR, AB 52 consultation has been completed. The Board of Forestry and Fire Protection and CAL FIRE completed consultation pursuant to Public Resources Code section 21080.3.1 in preparation of the PEIR.*

Pursuant to SPR CUL-2, SBCFD contacted culturally affiliated tribes via email and certified mail on July 14, 2023. Two responses with request for consultation were received. Formal consultation was conducted between the SBCFD and the tribes, agreement was made, and consultation was closed. The project is within the scope of the PEIR and does not require additional CEQA review and documentation.



**14. Use of PSA for Treatment Maintenance:**

*[Prior to implementing a maintenance treatment, the project proponent would verify that the expected site conditions as described in the PSA are present in the treatment area. As time passes, the continued relevance of the PSA would be considered by the project proponent in light of potentially changed conditions or circumstances. Where the project proponent determines that the PSA is no longer sufficiently relevant, the project proponent would determine whether a new PSA or other environmental analysis is warranted. In addition to verifying that the PSA continues to provide relevant CEQA coverage for treatment maintenance, the project proponent would update the PSA at the time a maintenance treatment is needed when more than 10 years have passed since the approval of the PSA or the latest PSA update. For example, the project proponent may conduct a reconnaissance survey to verify that conditions are substantially similar to those anticipated in the PSA. Updated information should be documented.]*

Prior to re-treating any area within the project boundary, SBCFD will verify that site conditions described in the PSA are still relevant. The project is proposed to occur over a 4-year grant period, beginning in 2023. However, should funds become available, additional treatments may be conducted after the 4-year grant period. After 10 years, SBCFD may update the treatment prescription, treatment areas, and this PSA to continue treatment activities in the project area.

**15. Standard Project Requirements and Mitigation Measures.** *[Refer to Attachment A to identify which SPRs and MMs apply to the project. Complete Attachment A to document the responsible party for each applicable SPR and MM. Check one box below.]*

- All applicable SPRs and MMs are feasible and will be implemented.
- There is NO new information which would render mitigation measures previously considered infeasible or not considered in the CalVTP PEIR now feasible OR such mitigation measures have been adopted. [Guidelines Sec.15162(a)(3); PRC Sec. 21166(c)].
- All applicable SPRs and Mitigation Measures are NOT feasible or will NOT be implemented *(provide explanation)*.
- SPR GEO-7 requires that prescribed herbivory be limited to areas with a less than 50% slope. However, the project proposes to implement grazing treatments within steep slope areas, due to the accessibility challenges of steep slopes, which limit the feasibility of manual or mechanical treatments. Additionally, targeted grazing would occur in grass fuel beds, which are efficiently treated using prescribed herbivory.

**Explanation:** To address this aspect of the project, which represents a change to the CalVTP PEIR, an Addendum to the PEIR has been prepared and is wholly contained within this Addendum/PSA document.

**DETERMINATION (To be completed by the project proponent)**

On the basis of this initial evaluation:

- I find that all of the effects of the proposed project (a) have been analyzed adequately in the CalVTP PEIR, (b) have been avoided or mitigated pursuant to the CalVTP PEIR, and (c) all applicable mitigation measures and Standard Project Requirements identified in the CalVTP PEIR will be implemented. The proposed project is therefore **WITHIN THE SCOPE** of the CalVTP PEIR. NO ADDITIONAL CEQA DOCUMENTATION is required.
- I find that the proposed project will have effects that were not examined in the CalVTP PEIR. These effects are less than significant without any mitigation beyond what is already required pursuant to the CalVTP PEIR. A NEGATIVE DECLARATION will be prepared.
- I find that the proposed project will have effects that were not examined in the CalVTP PEIR. Although these effects might be significant in the absence of additional mitigation beyond what is already required pursuant to the CalVTP PEIR, revisions to the proposed project or additional mitigation measures have been agreed to by the project proponent that would avoid or reduce the effects so that clearly no significant effects would occur. A MITIGATED NEGATIVE DECLARATION will be prepared.
- I find that the proposed project will have environmental effects that were not examined in the CalVTP PEIR. Because these effects are or may be significant and cannot be clearly mitigated, an ENVIRONMENTAL IMPACT REPORT will be prepared.

Signature:  Date 9-12-2023

Printed Name: Mark Hartwig Title: Fire Chief

Santa Barbara County Fire Department  
Agency

## EVALUATION OF ENVIRONMENTAL IMPACTS

1. A brief explanation is required for each Impact, Standard Project Requirement (SPR) and Mitigation Measure (MM) identified in the Project-Specific Analysis Checklist (PSA Checklist). The information provides clarity for review and/or provides direction to the field staff that will implement the project utilizing the checklist (persons familiar with the project and preparation of the document may be different through the life span of the document). Answers should consider whether the proposed project would result in new or more substantial environmental effects than described in the CalVTP PEIR, after incorporation of applicable SPRs and MM required by the CalVTP PEIR
2. All answers must take account of the whole action involved, including off-site as well as on-site, cumulative as well as project-level, indirect as well as direct, and short-term as well as long-term impacts. Refer to the applicable resource analysis section in the CalVTP PEIR for each environmental topic.
3. Once the project proponent has evaluated the environmental effect that may occur, then the checklist answers must indicate whether the impact is:
  - **Less Than Significant (LTS)** - An impact either on its own or with incorporation of SPRs, does not exceed the defined thresholds of significance (no mitigation required), or that is potentially significant and can be reduced to less than significant through implementation of feasible mitigation measures.
  - **Less Than Significant with Mitigation (LTSM)** - An impact was identified within the PEIR which was viewed in totality as potentially significant and/or significantly unavoidable and the mitigation measures and SPRs and MMs provided in the PEIR will be implemented mitigating to a point of less than significance.
  - **Potentially Significant (PS)** - An impact treated as if it were a significant impact. “Potentially” is used to convey that not every qualifying treatment will result in impacts to the reasonably maximum degree that they are disclosed in this PEIR.
  - **Potentially Significant and unavoidable (PSU)** - An impact is considered significant and unavoidable if it would result in a substantial adverse change in the environment that cannot be feasibly avoided or mitigated to a less-than-significant level. “Potentially” is used to convey that not every qualifying treatment will result in impacts to the reasonably maximum degree that they are disclosed in this PEIR
  - **Significantly Unavoidable (SU)** - An impact is considered significant and unavoidable if it would result in a substantial adverse change in the environment that cannot be feasibly avoided or mitigated to a less-than-significant level.
  - **Not applicable (N/A)** - If the impact is evaluated to be the same or equal to the impact in the PEIR, the PEIR can be utilized without a Negative Declaration, Mitigated Negative Declaration or EIR. If there are one or more entries where the impact is evaluated to be greater than the impact in the PEIR, additional documentation is required.
4. Where a Negative Declaration, Mitigated Negative Declaration is required, the environmental review would be guided by the directions for use of the PEIR with later activities in Section 15168. Where an EIR is required, the environmental review would be guided by Sections 15162 and 15163. When preparing any environmental document, the environmental analysis may incorporate by reference the analysis from the CalVTP PEIR and focus the environmental analysis solely on issues that were not addressed in the CalVTP PEIR.

5. Project proponents should incorporate into the PSA checklist references to information sources for potential impacts. Include a list of references cited in the PSA and make copies of such references available to the public upon request.
6. Standard Project Requirements (SPR) and Mitigations Measures (MM).
  - **Applicable (Yes/No).** Document whether the SPR or mitigation measure is applicable to the project (Yes or No). The applicability should be substantiated in the Environmental Checklist Discussion.
  - **Implementing Entity.** Most cases this will be CAL FIRE. The implementing entity is the individual or organization responsible for carrying out the requirement. This could include the project proponent's project manager, a technical specialist (e.g., archaeologist or biologist), a vegetation management contractor, a partner agency or organization, or other entities that are primarily responsible for carrying out each project requirement.
  - **Verifying/Monitoring Entity.** Most cases this will be CAL FIRE. The verifying/monitoring entity is the individual or organization responsible for ensuring that the requirement is implemented. The verifying/monitoring entity may be different from the implementing entity.
  - **NOTE:** the cited SPRs and MMs are summarized to manage the template size. Refer to Attachment A for the approved CalVTP requirements.

### 3.1 Aesthetics and Visual Resources

Impacts and Discussions	PEIR-Specific			Project-Specific			
	Identify Location of Impact Analysis in the PEIR	SPRs & MMs Applicable to the Impact Analysis in PEIR	Identify Impact Significance in the PEIR	Does the Impact Apply to the Project Treatments Proposed	SPRs & MMs Applicable to the Project Impact Analysis	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact AES-1:</b> Result in short-term, substantial degradation of a scenic vista or visual character or quality of public views, or damage to scenic resources in a state scenic highway from treatment activities	Impact AES-1, pp. 3.2-16–3.2-19	SPR AES-2 SPR AES-3 SPR AQ-2 SPR AQ-3	LTS	Yes	SPR AES-2 SPR AES-3	LTS	<input checked="" type="checkbox"/>

**Impact Discussion:**

Vegetation treatment activities and maintenance activities would include prescribed herbivory. The potential for the treatment activities to result in short-term degradation of visual character was examined in the CalVTP PEIR. Equipment and vehicles associated with prescribed herbivory treatments could be visible to public viewers at scenic vistas, along a state scenic highway, or at other public viewing locations.

Project activities span the south coast of the County of Santa Barbara. There are several official designated and eligible scenic highways that traverse the project study area (as defined in Figure 2). Officially designated state scenic highways within the project study area include SR-154 and U.S. Route 101 from west of Vereda Leyenda to the intersection of Highway 1 and U.S. Route 101 west of the project study area boundary (Caltrans 2018).

**County of Santa Barbara**

The Environmental Resources Management Element and Open Space Element of the County’s Comprehensive Plan (County of Santa Barbara 2009a, 2009b) identify several scenic corridors, including SR-154, U.S. Route 101, and Highway 1, that are located within the project study area; there are also certain landscapes and vegetation communities that are identified as valued scenic resources. Treatment areas of the proposed project are located in areas that have been identified in the Open Space Element as having high scenic value, as many of them consist of open space areas with sloping terrain. The Tecolote West treatment area is located within the Environmental Resources Management Element Scenic Corridor for Highway 1, U.S. Route 101, and Jalama Road; the West Mesa, Vista Del Mundo, Maria Ygnacio, and Trout Club treatment areas are located within the Environmental Resources Management Element Scenic Corridor for SR-154. The St. Vincents West, St. Vincents East, and Shadow Hills treatment areas are located within the Scenic Highway 2,000-foot buffer for SR-154 (County of Santa Barbara 2023).

**City of Goleta**

The Visual and Historic Resources Element of the City of Goleta General Plan/Coastal Land Use Plan identifies several scenic views within the City of Goleta (City of Goleta 2006). Several treatment areas including Ellwood Mesa, Northgate, Lake Los Carneros, Via Solerno South, and Via Solerno North are identified in the Scenic and Visual Resources Map (Figure 6-1 of the General Plan/Coastal Land Use Plan [City of Goleta 2006]) as areas that contain scenic views that shall be protected.

**City of Santa Barbara**

The Environmental Resources Element of the City of Santa Barbara General Plan describes the scenic resources within the city, which include creeks, hillsides, shorelines, trees, and open space. San Roque South treatment area has been identified as a hillside scenic resource within the city (City of Santa Barbara 2011a, 2023a). Additionally, the Circulation Element discusses scenic highways within the city; however, SR-154 is the only officially designated state scenic highway within the City of Santa Barbara (City of Santa Barbara 2011b, 2023b).

Proposed project activities would occur on both public and private property. Proposed project activities would be visible from scenic highways and scenic views identified by the City of Goleta, City of Santa Barbara, and County. However, due to intervening terrain, development, and vegetation, public views of the treatment site would be limited and brief. Additionally, livestock are part of the existing landscape in many parts of the County and would not disrupt the character of the treatment areas during treatment activities. Further, prescribed herbivory treatments would target removal of invasive species and flashy fuels, while larger shrubs and trees would be retained and views would not be significantly altered. The proposed treatment activities would not block views, dominate a viewshed, degrade the visual character or quality of public views, or significantly disrupt views from a scenic vista or state scenic highway. Although equipment, vehicles, and livestock may be visible from limited off-site areas, prescribed herbivory treatment activities would be temporary. With the implementation of SPR AES-2 and SPR AES-3, SBCFD would avoid staging equipment within viewsheds and retain sufficient vegetative screening. Therefore, with the implementation of SPRs, the project would result in a less-than-significant impact related to short-term impacts to visual resources, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<p><b>Impact AES-2:</b> Result in long-term, substantial degradation of a scenic vista or visual character or quality of public views, or damage to scenic resources in a state scenic highway from WUI fuel reduction, ecological restoration, or shaded fuel break treatment types</p>	<p>Impact AES-2, pp. 3.2-20-3.2-25</p>	<p>SPR AES-1                  SPR AES-3                  SPR AD-4                  SPR REC-1</p>	<p>LTS</p>	<p>Yes</p>	<p>SPR AES-2                  SPR AES-3</p>	<p>LTS</p>	<p>☒</p>
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**Impact Discussion:**

Proposed vegetation treatment activities consist of prescribed herbivory. The potential for prescribed herbivory treatment activities to result in long-term visual impacts was examined in the CalVTP PEIR. As discussed above, there are treatment areas that are located in proximity to state designated scenic highways and are located within areas designated by the City of Goleta and the County as scenic resources. However, vegetation treatment activities would be limited to prescribed herbivory treatments, which would be implemented such that mature shrubs and trees would be retained. Treatment activities would aim to achieve 80% reduction of herbaceous fuels (grasses) and would be monitored at all times to ensure the desired reduction in

vegetation is achieved. Upon achieving 80% reduction in herbaceous fuels, animals would be herded to a new area to avoid overgrazing. Treatment areas would not be denuded of vegetation or reduced to visible soil. As such, the appearance of treatment areas would not be significantly altered. Fuel reduction activities would reduce vegetation along roadsides and near development, reducing wildfire risks. Although there are available views of the treatment areas, due to distance, intervening terrain, and the amount of vegetation that would be retained within and surrounding the project study area, the project would not result in significant long-term degradation of scenic vistas, visual character, public views, or any scenic resources visible from a state scenic highway. Additionally, SPR AES-2, and SPR AES-3 would be incorporated into vegetation treatments, which would avoid staging withing viewsheds and screen views from public viewpoints as feasible.

The retention of mature shrubs and trees would retain vividness, intactness, and unity of views. Project equipment would not be staged within viewsheds (SPR AES-2) and the project would retain vegetation at the edges of treatment areas to provide for vegetation screening (SPR AES-3). Therefore, the proposed treatment project would not result in a long-term or substantial degradation of a scenic vista, substantially damage resources in a state scenic highway, or degrade the existing visual character and quality of the project site. The project would result in a less-than-significant impact on visual resources, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<b>Impact AES-3:</b> Result in long-term substantial degradation of a scenic vista or visual character or quality of public views, or damage to scenic resources in a state scenic highway from the non-shaded fuel break treatment type	Impact AES-3, pp 3.2-25-3.2-27	MM AES-3	SU	No	N/A	N/A	☒
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**Impact Discussion:**

The project does not propose to implement the Non-Shaded Fuel Break treatment type; this impact does not apply.

<b>Other Impacts on Aesthetics:</b> Would the project result in other impacts on aesthetics that are not evaluated in the CalVTP PEIR?	N/A	N/A	N/A	No	N/A	No Impact	☒
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**Impact Discussion:**

The proposed project treatment areas are partially visible from public views within the area and surrounding public roadways. Site-specific characteristics of the proposed treatment project are consistent with the environmental and regulatory conditions outlined in the CalVTP PEIR, Section 3.2. While the inclusion of land outside the CalVTP treatable landscape is a change to the geographic extent in the PEIR and the use of prescribed herbivory on slopes greater than 50% represents a change to the PEIR, the existing conditions in the project study area relating to visual resources are essentially the same for treatment areas within the CalVTP treatable landscape and treatment areas outside the CalVTP treatable landscape, as well as in steep slope areas. The inclusion of areas outside the CalVTP treatable landscape and the use of prescribed herbivory on slopes greater than 50% would not result in new or more severe impacts than those covered by the PEIR. No new impact related to aesthetics and visual resources would occur.

SPRs and MMs	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
<b>SPR AES-1 Vegetation Thinning and Edge Feathering:</b> This SPR only applies to mechanical and manual treatment activities within all treatment types.	No	N/A	N/A
<b>SPR AES-2 Avoid Staging within Viewsheds:</b> This SPR applies to all treatment activities and all treatment types.	Yes	SBCFD During	SBCFD
<b>SPR AES-3 Provide Vegetation Screening:</b> This SPR applies to all treatment activities and all treatment types.	Yes	SBCFD During	SBCFD
<b>MM AES-3 Conduct Visual Reconnaissance for Non-Shaded Fuel Breaks and Relocate or Feather and Screen Publicly Visible Non-Shaded Fuel Breaks</b>	No	N/A	N/A

## 3.2 Agriculture and Forest Resources

Impacts and Discussions	PEIR-Specific			Project-Specific			
	Identify Location of Impact Analysis in the PEIR	SPRs & MMs Applicable to the Impact Analysis in PEIR	Identify Impact Significance in the PEIR	Does the Impact Apply to the Project Treatments Proposed	SPRs & MMs Applicable to the Impact Analysis in PEIR	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact AG-1:</b> Result directly in the loss of forest land or conversion of forest land to a non-forest use or involve other changes in the existing environment which, due to their location or nature, could result in conversion of forest land to non-forest use	Impact AG-1, pp 3.3-7-3.3-8	N/A	LTS	Yes	N/A	N/A	<input checked="" type="checkbox"/>



**Impact Discussion:**

The proposed project would include prescribed herbivory of herbaceous vegetation on private and public lands. Prescribed herbivory treatments would primarily result in removal of herbaceous vegetation, including invasive species and flashy fuels, while larger shrubs and trees would be retained. Treatment areas in the County, City of Santa Barbara, and City of Goleta have various land use designations, including agriculture, recreation/open space, and rural residential among others, but no treatment areas are zoned as forestland. Grassland, oak woodland, and coastal scrub are the dominant vegetation types in the project site. Prescribed herbivory would reduce finer fuels, such as grasses and herbaceous fuels. Trees and mature shrubs would be retained in areas treated by prescribed herbivory, with damage to oak trees avoided. Oak trees would be retained and protected in accordance with the County’s Oak Tree Protection Ordinance (County of Santa Barbara 2009a). Additionally, existing uses on the project site would remain the same after project implementation. Therefore, the project would not result in the direct loss of forest land or conversion of forest land to non-forest use. As a result, the project would have no impact on agriculture and forest resources, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR..

<b>Other Impacts to Agriculture and Forest Resources:</b> Would the project result in other impacts to agriculture and forest resources that are not evaluated in the CalVTP PEIR?	N/A	N/A	N/A	No	N/A	No Impact	☒
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**Impact Discussion:**

Site-specific characteristics of the proposed treatment activities are consistent with the environmental and regulatory conditions outlined in the CalVTP PEIR, Section 3.3. While the inclusion of land outside the CalVTP treatable landscape is a change to the geographic extent addressed in the PEIR, the existing conditions in the project site relating to agriculture and forest resources are essentially the same for treatment areas within the CalVTP treatable landscape and treatment areas outside the CalVTP treatable landscape. Additionally, the use of prescribed herbivory on slopes greater than 50% would not result in any new or more severe impacts related to agriculture and forestry. As a result, the impacts associated with the proposed project are consistent with the impacts covered in the PEIR and the inclusion of land outside the CalVTP treatable landscape and the use of prescribed herbivory on slopes greater than 50% would not result in new impacts not covered in the PEIR. No new impact related to agriculture and forest resources would occur.

### 3.3 Air Quality

Impacts and Discussions	PEIR-Specific			Project-Specific			
	Identify Location of Impact Analysis in the PEIR	SPRs & MMs Applicable to the Impact Analysis in PEIR	Identify Impact Significance in the PEIR	Does the Impact Apply to the Project Treatments Proposed	SPRs & MMs Applicable to the Project Impact Analysis	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact AQ-1:</b> Generate emissions of criteria air pollutants and precursors during treatment activities that would exceed CAAQS or NAAQS	Table 3.4-1; Impact AQ-1, pp. 3.4-26–3.4-32; Appendix AQ-1	SPR AQ-1 through SPR AQ-6 MM AQ-1	PSU	Yes	SPR AQ-1 SPR AQ-4 MM AQ-1	PSU	<input checked="" type="checkbox"/>

**Impact Discussion:**

The project would require the use of vehicles associated with transportation of animals and workers to the treatment areas. These actions would result in the emission of criteria pollutants that could exceed the California Ambient Air Quality Standards, the National Ambient Air Quality Standards, and/or the County air quality rules and regulations (SBCAPCD 2021). Vehicles and tools would be limited to vehicles hauling animals and materials to the treatment areas and a limited number of passenger vehicles. The potential for the emission of criteria pollutants from the described activities was examined in the PEIR. SPR AQ-1 and SPR AQ-4 would be implemented by the project proponent to reduce the level of criteria pollutants generated by treatment activities through compliance with air quality regulations (SPR AQ-1) and taking steps to minimize dust (SPR AQ-4). SPR AQ-2, SPR AQ-3, and SPR AQ-6 do not apply because the project does not include prescribed burning. SPR AQ-5 does not apply to the project because the project site does not contain any naturally occurring asbestos (Agency for Toxic Substances and Disease Registry 2007; USGS 2011). MM AQ-1 does not apply to the project because the project does not propose the use of off-road equipment. As noted in the PEIR, prescribed herbivory treatments are anticipated to produce emissions of criteria pollutants and precursors and the County is in nonattainment for ozone and particulate matter less than or equal to 10 microns in diameter (Board of Forestry 2019). Although implementation of the applicable SPRs would lower the level of impact on criteria air pollutants and precursors, as described in the PEIR the use of on-road vehicles to transport animals, equipment, and worker commutes would result in emissions of criteria air pollutants and precursors that could result in, or contribute to, localized exceedances of National Ambient Air Quality Standards and California Ambient Air Quality Standards for carbon monoxide, particulate matter less than or equal to 10 microns in diameter, and particulate matter less than or equal to 2.5 microns in diameter in areas where people reside and work. Therefore, this impact would remain significant and unavoidable, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<b>Impact AQ-2:</b> Expose people to diesel particulate matter emissions and related health risk	Impact AQ-2, 3.4	SPR HAZ-1 SPR NOI-4 SPR NOI-5	LTS	Yes	SPR HAZ-1 SPR NOI-4 SPR NOI-5	LTS	<input checked="" type="checkbox"/>
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**Impact Discussion:**

The project would include prescribed herbivory and the use of vehicles, as described above, which could expose people to diesel particulate matter (DPM) emissions. However, the treatments would take place over a short duration of time, limiting the level of exposure to DPM. Further, the treatment activities would progress across the treatment areas, meaning that DPM generated by treatment activities would not take place near any single sensitive receptor for an extended period. Additionally, the project would not include any mechanical treatments or prescribed burning, which would limit the DPM emissions that could result from implementation of the project. SPR HAZ-1 would be implemented, requiring that all diesel- and gasoline-powered equipment be properly maintained in compliance with federal and state requirements, to prevent excessive emissions of DPM. Further, SPR NOI-4 and SPR NOI-5 would be implemented by the project proponent, requiring staging areas to be as far as possible from human receptors and restricting the amount of time that equipment can idle. Therefore, the impact relating to DPM would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR..

<b>Impact AQ-3:</b> Expose people to fugitive dust emissions containing naturally occurring asbestos and related health risk	Impact AQ-3, 3.4	SPR AQ-4 SPR AQ-5	LTS	No	N/A	N/A	<input checked="" type="checkbox"/>
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**Impact Discussion:**

Ground-disturbance activities can expose receptors to fugitive dust emissions containing naturally occurring asbestos. However, the project does not include mechanical treatment or require the use of off-road vehicles and ground disturbance is expected to be minimal. Vehicles would be limited to staging areas on existing roads. Further, the treatment areas are not located on soil types that contain naturally occurring asbestos (Agency for Toxic Substances and Disease Registry 2007; USGS 2011). Therefore, the project would not expose people to fugitive dust emissions containing naturally occurring asbestos and there would be no impact related to this threshold, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR..

<b>Impact AQ-4:</b> Expose people to toxic air contaminants emitted by prescribed burns and related health risk	Impact AQ-4, 3.4	SPR AD-4 SPR AQ-2 SPR AQ-6	PSU	No	N/A	N/A	<input checked="" type="checkbox"/>
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**Impact Discussion:**

The project does not include activities related to prescribed burning. Therefore, the project would not expose people to toxic air contaminants through prescribed burns and related health risks and there would be no impact, and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<b>Impact AQ-5:</b> Expose people to objectionable odors from diesel exhaust	Impact AQ-5, 3.4	SPR HAZ-1 SPR NOI-4 SPR NOI-5	LTS	Yes	SPR HAZ-1 SPR NOI-4 SPR NOI-5	LTS	☒
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**Impact Discussion:**

The treatments would require the use of vehicles, as described above, which could expose people to objectionable odors from diesel exhaust. However, the levels of diesel exhaust would not be at excessive levels, nor they would they affect a substantial number of people, especially because the project would not include mechanical treatments. The exposure to objectionable odors would be short term and dispersed across the treatment areas. As described in Impact AQ-2, the emissions would be temporary and would not be generated in one location for an extended period; further, the emissions would dissipate rapidly as distance from the source increases. All diesel- and gasoline-powered equipment would be properly maintained in compliance with federal and state emission requirements, which would lower the level of emissions from diesel exhaust, per SPR HAZ-1. The project proponent would also implement SPR NOI-4 and SPR NOI-5. These SPRs would reduce the level of exposure to diesel exhaust by requiring staging areas to be as far from receptors as possible and restricting idling time. Therefore, this impact would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR..

<b>Impact AQ-6:</b> Expose people to objectionable odors from smoke during prescribed burning	Impact AQ-6, 3.4	SPR AD-4 SPR AQ-2 SPR AQ-3 SPR AQ-6	PSU	No	N/A	N/A	☒
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**Impact Discussion:**

The project does not include the prescribed burning of vegetation. Therefore, the project would not expose people to objectionable odors from the smoke and no impact would occur and this impact does not apply to the project.

<b>Other Impacts to Air Quality:</b> Would the project result in other impacts to air quality that are not evaluated in the CalVTP PEIR?	N/A	N/A	N/A	No	N/A	N/A	<input checked="" type="checkbox"/>
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**Impact Discussion:**

Site-specific characteristics of the proposed treatment plan are consistent with the environmental and regulatory conditions outlined in the CalVTP PEIR, Section 3.4. While the inclusion of land outside the CalVTP treatable landscape is a change to the geographic extent in the PEIR and the use of prescribed herbivory on slopes greater than 50% represents a change to the PEIR, the existing conditions in the project study area relating to air quality are essentially the same for treatment areas within the CalVTP treatable landscape and treatment areas outside the CalVTP treatable landscape and in steep slope areas. As a result, the impacts associated with the proposed project are consistent with the impacts covered in the PEIR and the project would not result in new or more severe impacts than those covered in the PEIR. No new impact related to air quality would occur.

SPRs and MMs	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/ Monitoring Entity
<b>SPR AQ-1 Comply with Air Quality Regulations:</b> This SPR applies to all treatment activities and all treatment types.	Yes	<u>SBCFD</u> Prior-During	<u>SBCFD</u>
<b>SPR AQ-2 Submit Smoke Management Plan:</b> This SPR applies only to prescribed burning treatment activities and all treatment types.	No	<u>N/A</u>	<u>N/A</u>
<b>SPR AQ-3 Create Burn Plan:</b> The project proponent will create a burn plan using the CAL FIRE burn plan template for all prescribed burns. This SPR applies only to prescribed burning treatment activities and all treatment types.	No	<u>N/A</u>	<u>N/A</u>
<b>SPR AQ-4 Minimize Dust:</b> This SPR applies to all treatment activities and treatment types.	Yes	<u>SBCFD</u> During	<u>SBCFD</u>
<b>SPR AQ-5 Avoid Naturally Occurring Asbestos:</b> This SPR applies to all treatment activities and treatment types, including treatment maintenance.	No	<u>N/A</u>	<u>N/A</u>
<b>SPR AQ-6 Prescribed Burn Safety Procedures:</b> Prescribed burns will follow all safety procedures required of CAL FIRE crews, including the implementation of an approved Incident Action Plan (IAP).	No	<u>N/A</u>	<u>N/A</u>
<b>MM AQ-1: Implement On-Road Vehicle and Off-Road Equipment Exhaust Emission Reduction Techniques:</b> Where feasible, project proponents will implement emission reduction techniques to reduce exhaust emissions from off-road equipment.	No	<u>N/A</u>	<u>N/A</u>

### 3.4 Archaeological, Historical, and Tribal Cultural Resources

Impacts and Discussions	PEIR specific			Project specific			
	Identify location of impact Analysis in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Identify impact Significance in the PEIR	Does the Impact Apply to the project Treatments proposed	SPRs & MMs applicable to the Project Impact Analysis	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact CUL-1:</b> Cause a substantial adverse change in the significance of built historical resources	Impact CUL-1, pp. 3.5-14-3.5-15	SPR CUL-1 SPR CUL-7 SPR CUL-8	LTS	Yes	SPR CUL-1	LTS	<input checked="" type="checkbox"/>

**Impact Discussion:**

No built historical resources were identified within the treatment areas, where ground-disturbing activities are proposed to occur, as a result of a records search of the California Historical Resources Information System database, National Register of Historic Places (NRHP), California Register of Historical Resources (CRHR), California Historic Property Data File, and the lists of California State Historical Landmarks and California Points of Historical Interest (SPR CUL-1). Additionally, no built historical resources were identified within the treatment areas, where ground-disturbing activities are proposed to occur, as a result of the intensive pedestrian survey conducted for this investigation (SPR CUL-4), nor as a result of background research conducted, including a relevant literature review and thorough review of historic maps and aerial images (SPR CUL-3).

As such, impacts to built historical resources would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR..

<b>Impact CUL-2:</b> Cause a substantial adverse change in the significance of unique archaeological resources or subsurface historical resources	Impact CUL-2, pp. 3.5-15-3.15-16	SPR CUL-1 through SPR CUL-5 SPR CUL-8 MM CUL-2	SU	Yes	SPR CUL-1 through SPR CUL-5 SPR CUL 8 MM CUL-2	LTSM	<input checked="" type="checkbox"/>
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**Impact Discussion:**

A record search was conducted of the California Historical Resources Information System database, NRHP, CRHR, California Historic Property Data File, and the lists of California State Historical Landmarks, California Points of Historical Interest, and Archaeological Determinations of Eligibility (SPR CUL-1). Within the project site, 28 cultural resources have been previously recorded, including 23 prehistoric archaeological sites, 1 historic archaeological site, and 4 multicomponent (prehistoric and historic) sites. Of these resources, five are considered potentially eligible for listing on the NRHP or CRHR. However, none of the potentially eligible cultural resources are located within areas where ground-disturbing activities are proposed to

occur. A pedestrian-level survey was conducted for the proposed project (SPR CUL-4) and is summarized in the Archaeological Survey Report included as Attachment C). All areas proposed to include treatment activities with the potential for ground disturbance of any type and degree were surveyed by a qualified archaeologist (under the direction of an archaeologist meeting the U.S. Secretary of Interior’s qualifications for Principal Investigator) provided the terrain was safe and accessible. No unique archaeological resources or subsurface historical resources were identified within the treatment areas where ground-disturbing activities are proposed to occur during the intensive pedestrian survey conducted for this investigation (SPR CUL-4). No unique archaeological resources or subsurface historical resources were identified either, in addition to those mentioned previously, as a result of background research conducted, including a relevant literature review and thorough review of historic maps and aerial images (SPR CUL-3).

The proposed treatment primarily involves treatment activities that either require no soil disturbance or very shallow soil disturbance with very limited extent. Despite the negative findings of the records searches and intensive pedestrian survey within the treatment areas where ground-disturbing activities are proposed to occur, there is always a potential for unknown unique archaeological resources or subsurface historical resources to be inadvertently damaged during treatment activities. This would be a potentially significant impact if unknown cultural resources are inadvertently encountered during ground-disturbing activities. SPR CUL-5, SPR CUL-6, and MM CUL-2 would be implemented to protect any inadvertent discovery of archaeological or historical resources. As a result, the impact would be less than significant with mitigation, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<b>Impact CUL-3:</b> Cause a substantial adverse change in the significance of a tribal cultural resource	Impact CUL-3, p. 3.5-17	SPR CUL-1 through SPR CUL-6 SPR CUL-8	LTS	Yes	SPR CUL-1 through SPR CUL-6 SPR CUL-8	LTSM	<input checked="" type="checkbox"/>
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**Impact Discussion:**

As mentioned previously, as the result of various records searches (SPR CUL-1), it was found that 28 cultural resources have been previously recorded within the proposed project site, 5 of which are considered potentially eligible for listing on the NRHP or CRHR. However, none of the potentially eligible cultural resources are located within areas where ground-disturbing activities are proposed to occur. No unique archaeological resources or subsurface historical resources were identified within the treatment areas where ground-disturbing activities are proposed to occur during the intensive pedestrian survey (SPR CUL-4) or as a result of background research (SPR CUL-3).

All areas proposed to include treatment activities with the potential for ground disturbance of any type and degree were surveyed by a qualified archaeologist provided the terrain was safe and accessible. The proposed project primarily involves treatment activities that either require no soil disturbance or very shallow soil disturbance with very limited extent.

Additionally, in accordance with SPR CUL-2, Native American tribes culturally and geographically affiliated with the region were contacted via email and certified mail. As a result of the notification, the SBCFD received two requests for consultation with the Barbareño Band of Chumash Indians and the Coastal Band of the Chumash Nation. Formal consultation was conducted between the SBCFD and the tribes, agreement was made, and consultation was closed. As a result of tribal consultation in accordance with SPR CUL-6, Treatment of Tribal Cultural Resources, the SBCFD has developed protection measures for important cultural resources located within treatment areas. These measures and specific implementation methods have been included in the description of SPRs and MMs in Attachment A. As a result, the impact to tribal cultural resources would be less than significant with mitigation, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<b>Impact CUL-4: Disturb human remains</b>	Impact CUL-4, pp. 3.5-18	N/A	LTS	Yes	N/A	LTS	<input checked="" type="checkbox"/>
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**Impact Discussion:**

As mentioned previously, as the result of various records searches (SPR CUL-1), it was found that 28 cultural resources have been previously recorded within the proposed project site, 3 of which are recorded to include human remains. However, none of the cultural resources recorded as containing human remains are located within areas where ground-disturbing activities are proposed to occur. No unique archaeological resources or subsurface historical resources were identified within the treatment areas where ground-disturbing activities are proposed to occur during the intensive pedestrian survey (SPR CUL-4) or as a result of background research (SPR CUL-3). No human remains were identified within the treatment areas where ground-disturbing activities are proposed to occur during the intensive pedestrian survey (SPR CUL-4) or as a result of background research (SPR CUL-3).

The proposed treatment primarily involves treatment activities that either require no soil disturbance or very shallow soil disturbance with very limited extent and would occur where human remains are not traditionally or historically known to be buried. Compliance with California Health and Safety Code Sections 7050.5 and 7052 and PRC Section 5097 would avoid disturbance, and impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR..

<b>Other Impacts to Archeological, Historical, and Tribal Cultural Resources:</b> Would the project result in other impacts on archeological, historical, or tribal cultural resources that are not evaluated in the CalVTP PEIR?	N/A	N/A	N/A	No	N/A	N/A	<input checked="" type="checkbox"/>
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**Impact Discussion:**

Site-specific characteristics of the treatment areas are consistent with the environmental and regulatory conditions outlined in Section 3.5.1 and Section 3.5.2 of the CalVTP PEIR. As a result, the impacts associated with the proposed project are consistent with the impacts covered in the PEIR. While the inclusion of land outside the CalVTP treatable landscape is a change to the geographic extent in the PEIR and the use of prescribed herbivory on slopes greater than 50% represents a change to the PEIR, the existing conditions in the project study area relating to unique archaeological, historical, built environment, human remains, and tribal cultural resources are essentially the same for treatment areas within the CalVTP treatable landscape and treatment areas outside the CalVTP treatable landscape and in steep slope areas. A records search of the California Historical Resources Information System database and Native American Heritage Commission Sacred Land Files, pre-field research, and a cultural resource reconnaissance level survey were conducted for the entirety of the project sites, including lands both inside and outside the treatable landscape and areas with greater than 50% slope. As a result, the impacts associated with the proposed project are consistent with the impacts covered in the PEIR and the project would not result in new or more severe impacts than those covered in the PEIR.

SPRs and MMs	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
<b>SPR CUL-1 Conduct Record Search:</b> For treatments led by CAL FIRE, an archaeological and historical resource record search will be conducted per the "Archaeological Review	Yes	SBCFD	SBCFD



SPRs and MMs	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/ Monitoring Entity
Procedures for CAL FIRE Projects” (current edition dated 2010). This SPR applies to all treatment activities and treatment types.		Prior	
<b>SPR CUL-2 Contact Geographically Affiliated Native American Tribes:</b> The project proponent will obtain the latest Native American Heritage Commission (NAHC) provided Native Americans Contact List, which may be obtained from the CAL FIRE website, as appropriate. This SPR applies to all treatment activities and treatment types.	Yes	SBCFD Prior	SBCFD
<b>SPR-CUL-3 Pre-field Research:</b> The project proponent will conduct research prior to implementing treatments as part of the cultural resource investigation. This SPR applies to all treatment activities and treatment types	Yes	SBCFD Prior	SBCFD
<b>SPR CUL-4 Archaeological Surveys:</b> The project proponent will coordinate with an archaeologically trained resource professional or qualified archaeologist to conduct a site-specific survey of the treatment area. This SPR applies to all treatment activities and treatment types.	Yes	SBCFD Prior	SBCFD
<b>SPR CUL-5 Treatment of Archaeological Resources:</b> If cultural resources are identified within a treatment area, and cannot be avoided, a qualified archaeologist will notify the culturally affiliated tribe(s) based on information provided by NAHC and assess, whether an archaeological find qualifies as a unique archaeological resource, an historical resource, or in coordination with said tribe(s), as a tribal cultural resource. This SPR applies to all treatment activities and treatment types.	Yes	SBCFD During	SBCFD
<b>SPR CUL-6 Treatment of Tribal Cultural Resources:</b> If a tribal cultural resource is identified within a treatment area, and cannot be avoided, the project proponent in consultation the culturally affiliated tribe(s), will develop effective protection measures for important tribal cultural resources located within treatment areas. This SPR applies to all treatment activities and treatment types.	Yes	SBCFD During	SBCFD
<b>SPR CUL-8 Cultural Resource Training:</b> The project proponent will train all crew members and contractors implementing treatment activities on the protection of sensitive archaeological, historical, or tribal cultural resources. This SPR applies to all treatment activities and treatment types.	Yes	SBCFD Prior-During	SBCFD

SPRs and MMs	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
<b>MM CUL-2: Protect Inadvertent Discoveries of Unique Archaeological Resources or Subsurface Historical Resources</b> If any prehistoric or historic-era subsurface archaeological features or deposits, including locally darkened soil (“midden”), that could conceal cultural deposits, are discovered during ground-disturbing activities, all ground-disturbing activity within 100 feet of the resources will be halted and a qualified professional archaeologist or CAL FIRE archeological trained Registered Professional Forester will assess the significance of the find.	Yes	SBCFD During	SBCFD

### 3.5 Biological Resources

Impacts and Discussions	PEIR specific			Project specific			
	Identify location of impact Analysis in the PEIR	SPRs & MMs applicable to the impact analysis in PEIR	Identify impact Significance in the PEIR	Does the Impact Apply to the project Treatments proposed	SPRs & MMs applicable to the Project Impact Analysis	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact BIO-1:</b> Substantially affect special-status plant species either directly or through habitat modifications	Impact BIO-1, pp. 3.6-132–3.6-139	SPR BIO-1 SPR BIO-2 SPR BIO-7 SPR BIO-9 SPR AQ-3 SPR AQ-4 SPR GEO-1 SPR GEO-3 SPR GEO-4 SPR GEO-5 SPR GEO-7 SPR HYD-5	LTSM	Yes	SPR BIO-1 SPR BIO-2 SPR BIO-6 SPR BIO-7 SPR BIO-9 SPR AQ-4 SPR GEO-1 SPR GEO-3 SPR GEO-4 SPR GEO-7 MM BIO-1a MM BIO-1b	LTSM	<input checked="" type="checkbox"/>

	MM BIO-1 <sup>a</sup> , MM BIO-1b MM BIO-1c					
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**Impact Discussion:**

Treatment activities could result in direct or indirect impacts to 2 potentially occurring plant species listed under the federal Endangered Species Act or the California Endangered Species Act and to 10 additional, non-listed special-status plants with potential to occur within the project site (Table 2). Data review and reconnaissance surveys were conducted for all areas, in accordance with SPR BIO-1 (see Attachment D, Biological Technical Memorandum for the South Coast Herbivory Cal-VTP Project). A variety of soils and natural communities occur throughout the project site that may support special-status plants. Grassland and coastal scrub are the dominant vegetation types and each occurs throughout the project site. Chaparral, oak woodland, and riparian are also widespread, although the project most avoids oak woodlands and riparian habitat. The variety of special-status plant species occurring in any one area depends mostly on which of these general vegetation types is supported. Grassland and other herbaceous habitats are the most abundant vegetation types, however, and the potentially occurring species in these areas are limited. One of the two potentially occurring listed species, seaside bird's beak (*Cordylanthus rigidus* ssp. *Littoralis*), has only a low potential to occur. Another listed species, Gaviota tarplant (*Deinandra increscens* ssp. *Villosa*) potentially occurs only in the Arroyo Hondo East and West and the Baron Ranch East and West treatment areas, although the likelihood of occurrence in these areas is also relatively low. If either of these species does occur, it could be subject to take from treatment activities. In the treatment areas, the potential for seaside bird's beak to occur is limited to coastal scrub, chaparral, and woodland habitats. The potential for Gaviota tarplant to occur is limited to coastal scrub and herbaceous habitats, although the latter predominate in the areas where the species potentially occurs.

Non-listed species potentially occurring in the treatment areas are Davidson's saltscale (*Atriplex serenana* var.  *davidsonii*), late-flowered mariposa lily (*Calochortus fimbriatus*), Palmer's mariposa lily (*Calochortus palmeri* var. *palmeri*), southern tarplant (*Centromadia parryi* ssp. *Australis*), umbrella larkspur (*Delphinium umbracolorum*), mesa horkelia (*Horkelia cuneata* var. *puberula*), Santa Barbara honeysuckle (*Lonicera subspicata* var. *subspicata*), white-veined monardella (*Monardella hypoleuca* ssp. *Hypoleuca*), Nuttall's scrub oak (*Quercus 29umosa*), and black-flowered figwort (*Scrophularia atrata*). None of these were observed during reconnaissance surveys, but the California Natural Diversity Database (CNDDDB) includes records for several within the treatment areas. Umbrella larkspur has occurred within or near San Roque East and San Roque West. Santa Barbara honeysuckle has occurred within or near Las Flores, Evergreen Park, Trout Club, Painted Cave South FB, Preserve SM Private, and Preserve SM HOA. White-veined monardella has occurred within or near Las Flores, Coral Canyon, and San Roque South. Nuttall's scrub oak is known to occur within or near San Roque South, San Roque East, and San Roque West. Black-flowered figwort has occurred within or near Ellwood Mesa. Attachment D (specifically, Attachments B and C of Attachment D) includes all potentially occurring special-status plants by treatment area and an assessment of potential to occur for all special-status species identified in the literature review.

Potential direct impacts to special-status plant species include direct removal or destruction from being consumed or trampled by grazing livestock, resulting in death of plants or reduction of reproduction and growth, and inadvertent crushing, trampling, or damage during fence installation or removal. Indirect impacts could include long-terms of results of habitat alterations or soil erosion, in which the treatment areas become unsuitable to support special-status plants. However, prescribed herbivory could result in the reduction of target populations, such as invasive plants, which would reduce fire fuels and competition with other plants, thus benefiting special-status plants.

SPR BIO-7, including the project-specific requirements listed below, requires surveys for special-status plants. Table 3 of Attachment D includes the schedule for special-status plant surveys by treatment area, which is based on the life cycle and blooming season of potentially occurring special-status plants in each area. This schedule may vary depending on which vegetation types are targeted by prescribed herbivory in each treatment area. Also,

protocol-level surveys for special-status plants will not be required if the target special-status plant species in an area are herbaceous annuals, stump-sprouting species, or geophyte species and if the treatment may be carried out during the dormant season for those species or when the species have completed their annual life cycle, provided the treatment will not alter habitat in a way that would make it unsuitable for the special-status plants to reestablish following treatment or destroy seeds, stumps, or roots, rhizomes, bulbs, and other underground parts of special-status plants.

Surveys during the blooming season (SPR BIO-7) will be conducted for seaside bird's beak and Gaviota tarplant, the only potentially occurring listed plant species, so that avoidance measures in SPR BIO-7 and MM BIO-1a could be implemented. Surveys conducted under SPR BIO-7 will also identify any non-listed special-status plant species occurring within the project site; avoidance measures in MM BIO-1b will ensure avoidance of areas occupied by these plants. Treatment may occur if potentially occurring non-listed plants are geophytic, stump-sprouting, or annual species and the treatment is conducted outside of the growing season or during the dormant season. However, only Davidson's saltscale, late-flowered mariposa lily, southern tarplant, mesa horkelia, and black-flowered figwort can be avoided in this manner. SPR BIO-2, which requires worker training in sensitive biological resources, will further reduce the potential for impacts to special-status plants.

Identification of the location of rare plants in accordance with SPR BIO-1 and avoidance under MM BIO-1a and MM BIO-1b will also reduce or eliminate potential impacts to rare plants from habitat alteration. Several measures will reduce the potential for erosion to result in impacts to rare plants: SPR GEO-1, which will suspend treatment during heavy precipitation; SPR GEO-3, which will require stabilization of soil disturbed during treatment; SPR GEO-4, which will require monitoring for erosion; and SPR GEO-7, which prescribes measures to minimize erosion on steep slopes.

Several additional project requirements will reduce potential indirect impacts to special-status plants. SPR BIO-6 will prevent the spread of plant pathogens in areas with sensitive biological resources, while SPR BIO-9 will prescribe measures to prevent the spread of invasive plants. SPR AQ-4 includes dust control measures such as speed limits and use of water trucks if road use creates excessive dust. With implementation of the SPRs and MM described above, impacts to special-status plants from the treatment project would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<b>Impact BIO-2: Substantially Affect Special-Status Wildlife Species Either Directly or Through Habitat Modifications</b>	Impact BIO-2, pp. 3.6-139-3.6-187	SPR BIO-1 through SPR BIO-5 SPR BIO-8 SPR BIO-10 SPR BIO-11 SPR HYD-1 SPR HYD-3 through SPR HYD-5 SPR HAZ-5 SPR HAZ-6 SPR HYD-5 MM BIO-2a through MM BIO-2h	PS/SU	Yes	SPR BIO-1 through SPR BIO-5 SPR BIO-8 SPR BIO-10 SPR BIO-11 SPR HYD-1 SPR HYD-3 through SPR HYD-5 MM BIO-2a MM BIO-2b MM BIO-2f MM BIO-3a MM BIO-4	LTSM	☒
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		MM BIO-3a through MM BIO-3c MM BIO-4					
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**Impact Discussion:**

Treatment activities could result in direct and indirect impacts to special-status wildlife (Table 3). Data review and reconnaissance surveys were conducted in accordance with SPR BIO-1 (see Attachment D). The project proponent has consulted with regulatory agencies (the California Department of Fish and Wildlife [CDFW] and the U.S. Fish and Wildlife Service) and will implement all agency recommendations into project design. Applicable SPRs and MMs, listed at the end of this section, include project-specific measures to ensure avoidance or minimization of impacts.

**Special-Status Invertebrate Species:** Two special-status invertebrate species were identified as having potential to occur in the treatment areas: Crotch bumble bee (*Bombus crotchii*), a state candidate for listing, and monarch butterfly (*Danaus plexippus*), proposed for federal listing and protected at its winter roost sites under the Gaviota Coast Plan, the Goleta General Plan/Coastal Land Use Plan (CLUP), and the Eastern Goleta Valley Community Plan (EGVCP). Crotch bumble bee is known from CNDDDB occurrences in the vicinity of the project site, including one in Gaviota, several in the Goleta area, one from the Ellwood Mesa treatment area (CDFW 2023a). This species potentially occurs at nearly every treatment area. Monarch butterfly is known to roost in eucalyptus in several locations at the Ellwood Mesa treatment area, at Lake Los Carneros, and at Evergreen Park. Additional locations are in eucalyptus woodland adjacent to Las Flores and Coral Canyon and the species potentially roosts at La Goleta North.

If nesting bumble bees occur within any of the treatment areas, such as in small mammal burrows, in debris piles, or duff layers, nests and larvae could be crushed underfoot by grazing animals or during temporary fence installation. Prescribed herbivory could also result in complete removal of important floral resources for nesting bumble bees. The PEIR does not specifically address impacts to monarch butterflies as special-status wildlife, although it addresses impacts to roosting monarch butterflies as an impact to a wildlife nursery. Grazing activities and fence installation could result in disturbance to butterflies at roost sites. Prescribed herbivory would not result in impacts to winter roosting habitat for monarch butterflies. SPR BIO-10 will require implementation of focused surveys for Crotch bumble bee and roosting monarch butterfly in the appropriate season. SPR BIO-2 will require worker training from a qualified biologist familiar with both species. SPR BIO-3 will result in identification and protection of sensitive vegetation communities and SPR BIO-5 will result in avoidance of type conversion of coastal scrub and chaparral, reducing the potential for impacts. The limitation of treatment within coastal zone Environmentally Sensitive Habitat Areas (ESHAs) in accordance with SPR BIO-8 will result in similar benefits. In addition, MM BIO-2a would require avoidance of injury, mortality, or loss of habitat function for a listed species, which includes state candidate species such as Crotch bumble bee. Implementation of MM BIO-2b would result in avoidance of monarch butterflies if they are detected at winter roosts (October to March) as a result of surveys conducted under SPR BIO-10. MM BIO-2g will require additional measures in areas where bumble bees are confirmed or suitable habitat occurs, further ensuring avoidance of impacts to Crotch bumble bee. This measure will require that a treatment be conducted in a sufficient number of treatment areas such that not all habitat will be treated in the same year, thus providing refuge to bumble bees within the treatment area. Treatment will also be conducted in a “patchy pattern” under this measure, to ensure that suitable habitat remains at all times. In addition, treatment will only occur if a qualified biologist, based on results of surveys and presence of suitable habitat, determines that the treatment will not result in injury or mortality of Crotch bumble bee. If this species remains a candidate at the time of treatment, or is listed under the California Endangered Species Act prior to treatment, the qualified biologist must consult with CDFW to confirm the biologists’ determination of whether injury, mortality, or degradation of occupied habitat will occur.

**Special-Status Fish:** Two special-status fish species potentially occur in the vicinity of the project site: the federally listed endangered steelhead, southern California Distinct Population Segment (DPS), or southern steelhead (*Oncorhynchus mykiss irideus* pop. 10), which is also a state candidate for listing, and the federally listed endangered tidewater goby (*Eucyclogobius newberryi*). No non-listed fish species have potential to occur. Although southern steelhead and tidewater goby are known to occur near some of the treatment areas, their potential occurrence is limited to aquatic habitats within creeks, which are entirely outside the treatment areas. The potential occurrence of steelhead is well known and it is restricted to the following watersheds supporting federal critical habitat adjacent to the treatment areas: Arroyo Hondo Creek (near Arroyo Hondo West and Arroyo Hondo East), San Jose Creek (near the Trout Club), and Cieneguitas Creek (San Marcos Foothills East and adjacent to San Marcos Foothills and San Marcos Preserve HOA). Occurrence of tidewater goby adjacent to the treatment areas is limited to the lower reaches of Arroyo Hondo Creek, which supports critical habitat. Southern steelhead critical habitat and habitat potentially supporting southern steelhead overlap only one of these treatment areas, San Marcos Foothills East, where Cieneguitas Creek skirts the edge of the treatment area; however, impacts to steelhead may occur due to activities well outside of occupied habitat (upstream or in adjacent uplands). Impacts due to activities in adjacent uplands could occur to tidewater goby only in Arroyo Hondo West and Arroyo Hondo East.

Prescribed herbivory within or near habitats supporting these species could result in inadvertent trampling of aquatic species or inadvertent fill of aquatic or brackish water habitats through erosion and sedimentation, which could result in adverse effects on southern steelhead or tidewater goby.

SPR BIO-3 will result in identification of sensitive communities, including riparian habitat along streams supporting critical habitat. Furthermore, implementation of SPR HYD-4 will require identification of Watercourse and Lake Protection Zones (WLPZs), further ensuring that sensitive areas potentially supporting southern steelhead will be identified prior to implementation of treatments. SPR HYD-3 will prohibit prescribed herbivory within sensitive waterbodies, wetlands, or riparian areas. Implementation of MM BIO-2a will also result in avoidance of take of southern steelhead. In accordance with coordination with CDFW, no treatment will occur within streams or riparian habitat, unless the project files a Notification of Streambed Alteration with CDFW under Section 1602 of the California Fish and Game Code. Implementation of SPR BIO-4 will provide additional protection for steelhead and tidewater goby by requiring that treatment be designed to avoid loss or degradation of riparian habitat function. Additional measures related to erosion control and water quality will also help ensure no impacts occur to southern steelhead or tidewater goby. MM BIO-4 (Avoid State and Federally Protected Wetlands) will further ensure avoidance of habitat that may support these species. Several other measures will limit erosion and sedimentation impacts and result in avoidance of water quality impacts. SPR GEO-1 will result in suspension of disturbance during and after heavy precipitation. SPR-GEO-4 will require erosion monitoring during prescribed herbivory and manual treatment. SPR HYD-1 will require that treatments comply with State Water Resources Control Board Waste Discharge Requirements. SPR HYD-3 will ensure additional water quality protections during prescribed herbivory, including identification of the sensitive areas (streams, riparian habitats) and a 50-foot buffer from which the treatment will be excluded, providing water for livestock from outside sources, and designing treatment to protect soil stability.

**Special-Status Amphibians:** Two special-status amphibian species, including the federally listed threatened California red-legged frog (*Rana draytonii*) and California newt (*Taricha torosa*), a California Species of Special Concern, occur in the vicinity of the project site. California red-legged frog is known from occurrences near all of the Gaviota Coast sites (Arroyo Hondo West, Arroyo Hondo East, Baron Ranch West, Baron Ranch East, Las Flores Canyon, and Coral Canyon). Critical habitat occurs over about half of Baron Ranch West and over all of Baron Ranch East. CNDDDB also includes an occurrence near the Trout Club and the species has been known to occur just west of Ellwood Mesa. Suitable habitats in the Goleta area and in the San Marcos Foothills area have been well studied and this species is unlikely to occur elsewhere. California newt is known from CNDDDB occurrences near Arroyo Hondo West, Arroyo Hondo East, and the Trout Club. It may occur near other treatment areas and may occur in upland habitats away from suitable

breeding habitats, especially near creeks in or near the Santa Ynez Mountain foothills. The species may occur at Baron Ranch West, Baron Ranch East, Las Flores, Coral Canyon, La Goleta North, and La Goleta South.

Because the CalVTP does not propose treatment of any kind in wetlands or aquatic habitat, direct impacts to breeding locations for both species are not expected. Most frogs and newts are likely to occupy upland habitats near aquatic habitats, such as in riparian vegetation. Prescribed herbivory could result in direct effects to California red-legged frog or California newt through crushing them in burrows or other refugia. However, because agency comments requested no prescribed herbivory occur in riparian habitats unless the applicant seeks permitting under Section 1602 of the California Fish and Game Code, the potential for this to happen is relatively low. Installation of temporary fencing could also result in crushing of frogs or newts, if present. Also, effects from erosion could result in water quality impacts to aquatic breeding habitat and inadvertent fill from sedimentation. Finally, although effects to California red-legged frogs or California newt within their upland refugia are unlikely in most circumstances, the potential for direct harm increases during periods when these species are moving through upland habitats between breeding habitats, such as during rain events or during the rainy season.

SPR BIO-3 will result in identification of sensitive communities, including riparian habitat along streams, wetlands, and aquatic habitats. SPR BIO-4 will ensure that loss of riparian function is avoided. Furthermore, implementation of SPR HYD-4 will require identification of WLPZs, further ensuring that sensitive areas potentially supporting wetlands and aquatic habitat will be identified prior to implementation of treatments. SPR HYD-3 will prohibit prescribed herbivory altogether within sensitive waterbodies, wetlands, or riparian areas. Implementation of SPR BIO-10, which requires surveys for special-status wildlife species, and MM BIO-2a, which requires avoidance of take of listed species, will also result in avoidance of take of California red-legged frogs and California newt. Project-specific requirements for MM BIO-2a, requested by USFWS (2023c) to ensure avoidance of take of California red-legged frogs, will help ensure avoidance of impacts to both species by requiring that treatment activities do not occur during rain events and that during winter they avoid all aquatic habitats plus a buffer of 330 feet around such habitats. Implementation of these measures will also include surveys, conducted by a qualified biologist, for suitable aquatic habitat within 330 feet of proposed treatment, to the extent access permits. Pre-activity surveys will also include searches of upland habitats where prescribed herbivory and associated fence installation will take place. If any California red-legged frogs are observed, the Santa Barbara Fire Safe Council will contact U.S. Fish and Wildlife Service to determine a course of action. MM BIO-4 (Avoid State and Federally Protected Wetlands) will further ensure avoidance of habitat that may support California red-legged frogs and California newts. SPR GEO-2, by suspending treatment activities when rain is predicted, will further reduce the unlikely possibility that California red-legged frogs or California newts will be harmed within upland habitats at times when they are most likely to be moving through these habitats. This and several other requirements will ensure that no adverse effects from erosion and sedimentation will occur in California aquatic breeding habitats downstream of treatment areas. SPR GEO-4 will require erosion monitoring during prescribed herbivory and manual treatment. SPR HYD-1 will require that treatments comply with State Water Resources Control Board Waste Discharge Requirements. SPR HYD-3 will ensure additional water quality protections during prescribed herbivory, including identification of the sensitive areas (streams, riparian habitats) and a 50-foot buffer from which the treatment will be excluded, providing water for livestock from outside sources, and designing treatment to protect soil stability.

**Special-Status Semi-Aquatic Reptiles:** Two non-listed special-status semi-aquatic reptile species have the potential to occur within the treatment areas: two-striped gartersnake (*Thamnophis hammondi*) and western pond turtle (*Emys marmorata*). The occurrence of two-striped gartersnake is limited to streams and adjacent riparian habitats and therefore the species is unlikely to occur within the treatment areas. CNDDDB includes occurrences of western pond turtle near Arroyo Hondo West, Arroyo Hondo East, Baron Ranch West, Baron Ranch East, Las Flores, Coral Canyon, Ellwood Mesa, and Lake Los Carneros. The species also potentially occurs at La Goleta North, La Goleta South, the Trout Club, San Roque West, and San Roque East.

Western pond turtles typically stay close to aquatic habitat but occasionally wander far away from these habitats during winter or to establish nests. Because project activities will not occur in aquatic habitats, no impacts will occur to western pond turtle in those habitats. However, impacts from

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erosion and sedimentation during prescribed herbivory may have the potential to result in inadvertent fill of aquatic features. Also, any nests of western pond turtle could be subject to exposure during treatment and therefore subject to predation. Or they could be trampled by livestock or destroyed during fence installation.

SPR BIO-3 will result in identification of sensitive communities, including riparian habitat along streams potentially supporting these species. Implementation of SPR HYD-4 will require identification of WLPZs, further ensuring that sensitive areas potentially supporting western pond turtle and two-striped gartersnake will be identified prior to implementation of treatments. SPR HYD-3 will prohibit prescribed herbivory within in sensitive waterbodies, wetlands, or riparian areas. These measures together will result in a substantial reduction in any potential for direct impacts to these species. SPR BIO-10, by requiring pre-activity wildlife surveys and avoidance of special-status wildlife identified, will further ensure avoidance of direct harm to these species. SPR GEO-2, by suspending treatment activities when rain is predicted, will reduce the potential for erosion. SPR-GEO-4 will require erosion monitoring during prescribed herbivory and manual treatment. SPR HYD-1 will require that treatments comply with State Water Resources Control Board Waste Discharge Requirements. SPR HYD-3 will ensure additional water quality protections during prescribed herbivory.

**Special-Status Upland Reptiles:** Three non-listed special-status upland reptile species have the potential to occur within the treatment areas: northern California legless lizard (*Anniella pulchra*), Blainville's horned lizard (*Phrynosoma blainvillii*), and coast patch-nosed snake (*Salvadora hexalepis virgultea*). Northern California legless lizards rarely come to the surface, so they are unlikely to be affected by prescribed herbivory. Blainville's horned lizards and coast patch-nosed snake are both generally known in the area from occurrences away from the coast and are mostly likely to occur at locations such as the Trout Club, Painted Cave South FB, and Tunnel Road FB. Both Blainville's horned lizard and coast patch-nosed snake spend much of their lives underground. Prescribed herbivory could result in injury or mortality to these species due to being crushed in their burrows, but this is relatively unlikely to occur. Injury or mortality is more likely to occur animals in their burrows from fence installation. Although neither species is highly mobile, both are likely to be able to avoid trampling by grazing animals.

Implementation of SPR BIO-10, which will involve conducting a focused survey for special-status wildlife, may result in identification of these species. Implementation of MM BIO-2b will ensure establishment of buffers around the locations of any occupied sites. Due to implementation of these and additional SPRs meant to protect sensitive natural communities (SPR BIO-3), avoid effects of type conversion in coastal scrub and chaparral (SPR BIO-5), prevent the spread of plant pathogens (SPR BIO-6), and prevent the spread of invasive plants (SPR BIO-8), the project will not substantially affect the function of habitat for these species. Furthermore, implementation of MM BIO-3a will ensure treatment is designed to avoid loss of sensitive communities.

**Special-Status Bird Species:** The literature reviewed and surveys conducted during implementation of SPR BIO-1 identified three special-status bird species that may be affected by prescribed herbivory within the treatment areas. One of these, white-tailed kite (*Elanus leucurus*), is a state fully protected species. The others, grasshopper sparrow (*Ammodramus savannarum*) and burrowing owl (*Athene cunicularia*), are California Species of Special Concern. White-tailed kite is known to nest and forage at Ellwood Mesa and Lake Los Carneros and to forage at West Mesa, SM Foothills, Preserve SM Private, Preserve SM HOA, and SM Foothills East and nest in the vicinity of these sites. It also has potential to forage or nest at Arroyo Hondo West, Arroyo Hondo East, Baron Ranch West, Baron Ranch East, Las Flores, and Coral Canyon. Grasshopper sparrow has been recorded at Ellwood Mesa and West Mesa (CDFW 2023a) and it also potentially occurs at Arroyo Hondo West, Arroyo Hondo East, Baron Ranch West, Baron Ranch East, Las Flores, Coral Canyon, SM Foothills, Preserve SM HOA, and SM Foothills East. Burrowing owl has been recorded at West Mesa and Ellwood Mesa in winter and may also occur as a wintering species at Arroyo Hondo West, Arroyo Hondo East, SM Foothills, and SM Foothills East. The project is not expected to result in long-term impacts to any of the above species. However, treatment activities could result in disruption of nesting activities of white-tailed kite and grasshopper sparrow due to noise and human presence. It could also potentially result in disturbance to burrowing owls occupying habitat where grazing occurs in winter. In grasslands, grazing animals could trample or otherwise disturb nests of grasshopper sparrows; fence



installation could also result in destruction of nests. SPR BIO-12, through its protections for common nesting birds, will result in avoidance of impacts to nesting white-tailed kites and grasshopper sparrows due to its requirement to avoid the nesting season or conduct nesting bird surveys and implement avoidance of nests found. SPR BIO-10, including the project-specific requirements listed below, would result in identification of any wintering burrowing owl and avoidance if any are found.

**Special-Status Bats:** The literature review identified two special-status bat species that have potential to roost within or adjacent to the treatment areas: western red bat (*Lasiurus blossevillii*) and pallid bat (*Antrozous pallidus*) (CDFW 2023a). No bat roosts have been identified within the project site and habitat for bats, such as pallid bat, which roosts in rock outcrops and crevices, is absent within the treatment areas and would not be directly affected by the project. Western red bat, which is a California Species of Special Concern, is generally associated with mature riparian habitat and the records in the vicinity are in areas where such habitats occur and are from coastal lowlands. Such habitats along Arroyo Hondo between the Arroyo Hondo West and East treatment areas or within Arroyo Quemada between the Baron Ranch West and East treatment areas may have potential to support this species. Grazing treatments will include avoidance of riparian habitat and all areas within 50 feet. Therefore, while the Project has some potential to result in impacts to roosting western red bats, the likelihood of disturbing a maternity roost is very low.

**Special-Status Mammals:** Two additional special-status mammal species, American badger (*Taxidea taxus*) and San Diego desert woodrat (*Neotoma lepida intermedia*), which are both California Species of Special Concern, have the potential to occur within the treatment areas. The project could result in impacts to these species by causing injury or harm to individuals or altering their habitats substantially. American badger occurs mostly in open habitats, such as grassland or open scrub, where it establishes underground dens. San Diego desert woodrats live in nests (middens) that are piles of stick and other material, constructed in coastal scrub and chaparral. Prescribed herbivory could result in disturbance to American badgers, including those occupying natal dens. Grazing activities could result in abandonment of a den or even injury or mortality if badgers come in conflict with dogs or other herd-control animals involved in grazing. In addition, grazing treatments could result in damage or destruction of woodrat nests and potentially injury or mortality to woodrats. Because the Project as proposed is not likely to result in any type conversion of scrub or grassland communities, it is not expected to result in loss of habitat for these species. Implementation of SPR BIO-10, which would require a focused survey for special-status wildlife, will result in identification of locations where these species occur, or potentially occur. Implementation of MM BIO-2a will result in avoidance of badger dens and any woodrat nest and areas immediately surrounding them. In accordance with MM BIO-2b, the location of any woodrat nest that may be occupied by San Diego desert woodrat, as well as a sufficient buffer around the nest, will be marked in the field and treatment will avoid the nest.

With implementation of the above SPRs and MMs to address potential impacts to the species discussed above, including the project-specific requirements listed below, impacts to special-status wildlife occurring within the project site would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<b>Impact BIO-3:</b> Substantially affect riparian habitat or other sensitive natural community through direct loss or degradation that leads to loss of habitat function	Impact BIO-3, pp. 3.6-187-3.6-192	SPR BIO-1 through SPR BIO-6 SPR BIO-8 SPR BIO-9 SPR HYD-4 SPR HYD-5	PS	Yes	SPR BIO-1 through SPR BIO-6 SPR BIO-9 SPR HYD-3 SPR HYD-4 MM BIO-3a	LTSM	<input checked="" type="checkbox"/>
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		MM BIO-3a through MM BIO-3c					
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**Impact Discussion:**

Treatment conducted within the project site has the potential to result in impacts to sensitive natural communities. This could include loss of sensitive communities or oak woodlands, degradation through removal of dominant and characteristic vegetation, and conversion of sensitive communities to common vegetation types. Sensitive communities are defined in the Manual of California Vegetation Online (CNPS 2023) and the California Natural Community List (CDFW 2023b). Communities with a global ranking of G1 to G3 or a state ranking of S1 to S3 are considered sensitive. Oak woodlands are considered sensitive under the City of Goleta General Plan/CLUP and EGVCP. However, the City of Goleta considers grazing within oak woodlands as potentially beneficial. Coastal scrub habitats are also considered sensitive under the City of Goleta General Plan/CLUP, regardless of state and global rarity ranks. Data review for all areas and reconnaissance surveys were conducted in accordance with SPR BIO-1 (Attachment D). Vegetation communities considered sensitive based on their global ranks and mapped or otherwise noted included California brittle bush scrub (G3/S3 ranking; Oak Grove, County Range), giant wildrye grassland (G3/S3; Arroyo Hondo West Arroyo Hondo East, Baron Ranch West, Baron Ranch East, Las Flores, Coral Canyon), and needle grass grassland (G3/S3 ranking; Ellwood Mesa, West Mesa). Smaller areas of sensitive vegetation per the California Native Plant Society (CNPS 2023) and CDFW (2023b) may occur elsewhere in the treatment areas. In addition to these communities, riparian vegetation, also regarded as sensitive under the City of Goleta General Plan/CLUP and the EGVCP and typically considered under the jurisdiction of CDFW under Section 1602 of the California Fish Game Code, occurs along the streams adjacent to several of the treatment areas, although the project site was largely designed to avoid riparian vegetation and streams. Coast live oak woodland, which is also protected under the City of Goleta General Plan/LCUP and the EGVCP, occurs within several treatment areas (Attachment D). Coastal scrub communities were noted within several treatment areas in the City of Goleta, where they are considered environmentally sensitive and the City of Goleta has designated several specific examples as ESHAs. California brittle bush scrub and other scrub communities are designated as sensitive by the California Native Plant Society (CNPS 2023) and CDFW (2023b). Sensitive grassland communities could be severely impacted by prescribed herbivory, which could result in the loss of enough native grassland cover to result in type conversion. Removal of live riparian vegetation could impact the quality of such habitats. In oak woodlands, no live trees will be removed and prescribed herbivory would not result in type conversion.

SPR BIO-3 requires a survey for sensitive vegetation communities prior to treatment, to ensure these are identified and treatment avoids these communities, where necessary. SPR BIO-4 will ensure that treatment is designed to maintain riparian function. Furthermore, implementation of SPR HYD-4 will require identification of WLPZs, further ensuring that sensitive areas potentially supporting wetlands and aquatic habitat will be identified prior to implementation of treatments. More importantly, based on consultation with CDFW, impacts to live vegetation (as opposed to removal of dead material) will be avoided in riparian areas or a Notification of Lake and Streambed Alteration will be filed, in accordance with California Fish and Game Code Section 1602. SPR HYD-3 will prohibit prescribed herbivory altogether within in sensitive waterbodies, wetlands, or riparian areas. SPR BIO-5 will ensure that treatment is designed to maintain or enhance habitat function of chaparral and coastal sage scrub communities. And SPR BIO-6 requires that best management practices be employed to avoid spread of plant pathogens, while SPR BIO-9 prescribes actions to prevent the spread of invasive plants.

In addition to these requirements, MM BIO-3a will ensure that treatment is designed to avoid loss of sensitive natural communities and oak woodlands, including enhancement of communities to restore the natural fire regime and vegetation composition and structure. Consistency with policies in the several area plans providing protections for oak woodlands and setbacks from oak woodland communities will also ensure treatment does not result in degradation of oak woodland. In the City of Goleta, coordination with City Parks may be necessary to determine whether grazing is compatible with

management of oak woodland at Lake Los Carneros, La Goleta South, and Via Salerno South. MM BIO-3b and MM BIO-3c, which relate to compensation for loss of sensitive natural communities and oak woodlands and of riparian habitat, respectively, are not anticipated to be necessary for impacts to sensitive communities. With implementation of the above SPRs and MMs, impacts to sensitive natural communities occurring within the project site would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<b>Impact BIO-4:</b> Substantially affect state or federally protected wetlands	Impact BIO-4, pp. 3.6-192-3.6-193	SPR BIO-1 SPR HYD-1 SPR HYD-3 SPR HYD-4 MM BIO-4	PS	Yes	SPR BIO-1 SPR HYD-1 SPR HYD-3 SPR HYD-4 MM BIO-4	LTSM	☒
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**Impact Discussion:**

Reconnaissance surveys conducted in accordance with SPR BIO-1 did not include delineation of state or federally protected wetlands. However, several such resources were identified, including at Arroyo Hondo West and Lake Los Carneros (Attachment D). Additional wetlands potentially occur on a small scale in additional treatment areas throughout the project site (Table 3 in Attachment D). The CalVTP does not propose treatment within wetlands, but where unmapped wetlands occur they could be subject to impacts, such as unpermitted removal of wetland vegetation and alteration of wetland hydrology or loss or degradation of wetland function. Some of these effects could occur due to vegetation removal in upland areas adjacent to wetlands.

SPR HYD-1 and SPR HYD-3 require water quality protections and SPR HYD-4 requires identification and protection of WLPZs. Some potential for impacts to wetlands would still exist with implementation of these SPRs. Implementation of MM BIO-4, however, would require that treatment be designed to avoid loss or degradation of wetland habitat function. This would include delineation of the boundaries of wetlands, establishment of buffers a minimum of 25 feet wide, monitoring of wetland buffers to confirm that boundaries remain intact, prohibition of herbicides within the buffer, and prohibition of manual, mechanical, and prescribed herbivory treatments within the buffer. In addition, SPR BIO-8 will ensure that coastal zone ESHAs, including any wetlands within the coastal zone and buffers as prescribed in the appropriate CLUP, will be avoided. With implementation of the SPRs and MM described above, impacts to state and federally protected wetlands from the treatment project would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<b>Impact BIO-5:</b> Interfere substantially with wildlife movement corridors or impede use of nurseries	Impact BIO-5, pp. 3.6-193-3.6-197	SPR BIO-1 SPR BIO-4 SPR BIO-5 SPR BIO-10 SPR BIO-11 SPR HYD-1 SPR HYD-4 MM BIO-5	PS	Yes	SPR BIO-1 SPR BIO-4 SPR BIO-5 SPR BIO-10 SPR BIO-11 SPR HYD-1 SPR HYD-4 MM BIO-5	LTSM	☒
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**Impact Discussion:**

A large portion of the treatment areas, particularly areas along the Gaviota Coast and in the Santa Ynez Mountains, is located at the edge of a vast area of undeveloped habitats supporting a wide variety of wildlife and because many other areas, such as in the San Marcos Foothills or along San Roque Creek, are in sparsely developed areas, larger wildlife species such as mule deer (*Odocoileus hemionus*) likely move through regularly. Some of these species likely use creeks and other narrower areas of habitat extending southward to the coastal plain; these species may also access more developed portions of the project study area in the vicinities of Goleta and Santa Barbara.

Movement of fish is tied to creeks within the project vicinity. Smaller animals occupying coastal scrub, chaparral, oak woodland, and streamside habitats outside the treatment areas occur along undeveloped corridors extending into more developed areas, which provide avenues of gene flow for populations of these less-mobile species, connecting populations in the Los Padres National Forest with those within the treatment areas. Therefore, nearly all of the treatment areas likely support some level of wildlife connectivity in the vicinity.

Short-term effects of treatment, including increase presence of human and dogs and the presence of livestock, could cause wildlife to avoid the project site temporarily and disrupt wildlife movement. However, wildlife using the area for movement would have access to the extensive undeveloped surrounding lands during treatment. In addition, SPR BIO-11, which calls for wildlife friendly fencing during prescribed herbivory, would ensure that smaller and some medium-sized wildlife are safely able to move through the areas. Project treatment would not create long-term barriers to wildlife movement and would not result in habitat changes that would limit movement. Since wildlife nursery sites are limited to streams and riparian areas, protection for these areas during treatment would reduce any potential impacts to nursery sites. SPR BIO-10 requires surveys for special-status wildlife and nursery sites and would further ensure that sensitive areas such as those subject to surveys in accordance with SPR BIO-3 would be identified prior to treatment. SPR BIO-10 also requires that nursery sites be avoided during treatment. SPR HYD-3 would require that livestock used in these treatments be excluded from these areas. Any potential long-term impacts to nursery sites would be limited by SPR BIO-4, which ensures that treatment will not result in loss or degradation or riparian function; SPR BIO-5, which requires that treatment avoid the effects of type conversion within scrub habitats; and SPR HYD-4, which would establish WLPZs. Any residual impacts to nursery sites would be further reduced by implementation of MM BIO-5, under which a biologist, prior to treatment, will identify important habitat features that provide nursery sites and mark the sites and a suitable buffer for avoidance. Implementation of MM BIO-5 would ensure avoidance of nursery sites and establishment of buffers. Implementation of these SPRs and MMs would reduce any potential impacts to less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<b>Impact BIO-6:</b> Substantially reduce habitat or abundance of common wildlife	Impact BIO-6, pp. 3.6-197 – 3.6-199	SPR BIO-1 through SPR BIO-5 SPR BIO-12	LTS	Yes	SPR BIO-1 through SPR BIO-5 SPR BIO-12	LTS	☒
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**Impact Discussion:**

The project could result in direct and indirect impacts to common wildlife, including nesting birds. The various habitats that occur within the project site, consisting mostly of grassland and other herbaceous communities, coastal scrub, oak woodland, chaparral, and riparian woodland, support a variety of common wildlife, including nesting birds. Treatment could result in substantial reduction of habitat for common species. All treatment activities, including manual treatment and prescribed herbivory, if conducted during the nesting bird season (approximately January 15 to August 31 in the

region), could result in direct loss of active bird nests or in disturbance of nesting birds from noise and presence of personnel and livestock, which could disrupt nesting activities and cause nest abandonment and failure.

Extensive areas of similar habitats occur adjacent to the treatment areas, such that substantial similar habitats will remain in surrounding areas that are available to common wildlife species during and after treatment. In addition, implementation of SPR BIO-1, SPR BIO-2, SPR BIO-3, SPR BIO-4, and SPR BIO-5 would limit the loss and degradation of high-quality habitat for common species within the project site. SPR BIO-2 would require worker training in sensitive biological resources. SPR BIO-3 would ensure mapping of sensitive habitats. SPR BIO-4 would require treatment be designed to avoid loss or degradation of riparian habitat. And SPR BIO-5 would result in avoidance of type conversion in scrub habitats. Therefore, project treatment would remove vegetation and alter habitat structure locally but would not result in permanent habitat degradation or conversion. Overall diversity and abundance of common birds and other wildlife would not substantially change in the long term.

For nesting birds, implementation of SPR BIO-12 would require a survey for common nesting birds prior to treatment, if avoiding the nesting season is not possible. A qualified biologist will review a list of the common nesting birds, including raptors, in the vicinity, using available data sources. For any nests found, SPR BIO-12 requires establishment of buffers and modification and deferral of treatment in the vicinity of the nests.

No mitigation measures are required to address this impact; with implementation of the SPRs noted above, this impact would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<b>Impact BIO-7:</b> Conflict with local policies or ordinances protecting biological resources	Impact BIO-7, pp. 3.6-199	SPR AD-3	No Impact	Yes	SPR AD-3	N/A	<input checked="" type="checkbox"/>
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**Impact Discussion:**

The treatment areas occur in several plan areas, each of which includes a different set of policies addressing biological resources. Sites along the Gaviota Coast occur in the Gaviota Coast Plan (County of Santa Barbara 2016a) area; sites in the City of Goleta are in the City of Goleta General Plan/CLUP area; and most of the remaining sites are within the EGVCP (County of Santa Barbara 2015a) area. Policies included in these plans provide specific requirements and guidelines with relation to Environmentally Sensitive Habitats (ESH) or ESHAs, setbacks from these habitats, and other biological resources. Issues addressed within these policies are incorporated in the discussion of the different impacts identified in the PEIR, including impacts to special-status plants, special-status wildlife, riparian habitat and sensitive communities, wetlands, and wildlife movement. In addition, implementation of SPR AD-3 will ensure that the project remains consistent with all the plans that apply to the project. Some specifics of the individual plans and the treatment areas to which they apply are below. In addition to the treatment areas and plans discussed below, San Roque South is within the City of Santa Barbara and subject to requirements of the Environmental Resources Element of the City of Santa Barbara General Plan (City of Santa Barbara 2011a) and the Tunnel Rd FB site is within the County of Santa Barbara and subject to requirements of the Conservation Element of the County's Comprehensive Plan (County of Santa Barbara 2010a).

**Gaviota Coast Plan**

The Gaviota Coast Plan is an area plan within Santa Barbara County that includes coastal zone and inland natural resources policies and development standards. The Arroyo Hondo West, Arroyo Hondo East, Baron Ranch West, Baron Ranch East, Las Flores, and Coral Canyon treatment areas are within the Gaviota Coast Plan area. The Arroyo Hondo West treatment area occurs entirely within the coastal zone, while the Arroyo Hondo East treatment area is almost entirely within the coastal zone. The remainder of the sites are more evenly split between coastal and inland zones. The policies and development standards include a 100-foot wetland setback for wetlands and riparian ESH (Dev Std NS-2, Policy NS-7), general prohibition of fuel modification within designated setbacks in the coastal zone (Policy NS-2, Policy NS-7), application of the one-parameter wetland standard in the coastal

zone (Dev Std NS-5), consideration of all native grassland as ESH (Policy NS-4), and consideration of oak woodland and all native woodland as ESH (Policy NS-4). Implementation of SPR AD-3 will ensure that all of these policies, as well as any other relevant natural resources policies or development standards, are applied appropriately during treatment.

**City of Goleta General Plan/CLUP**

The City of Goleta General Plan/CLUP includes policies within its Conservation Element providing protections for biological resources. Ellwood Mesa is within the coastal portion of the plan area. Northgate, Evergreen Park, Lake Los Carneros, La Goleta North, La Goleta South, Via Salerno North, and Via Salerno South are all within the inland portion of the plan area. Specific policies include consideration of scrub, chaparral, native grassland, oak woodland, and monarch butterfly sites as ESHAs (Policy CE 1.1); designation of setbacks/buffers to ESHA that prevent degradation of the habitat (Policy CE 1.6, Policy CE 1.8; this may not necessarily preclude fuel modification from setbacks, or even ESHA itself, although it is not specified in the plan as an allowable use); management of ESHA that includes low-impact weed abatement and brush clearing (Policy CE 1.10); maximum and minimum buffers of 100 feet and 25, respectively, for creeks and riparian areas (Policy CE 2.2); setbacks of between 50 and 100 feet for wetlands (Policy CE 3.4); restricting activities within monarch butterfly roosts and buffers to this ESHA type (Policies CE 4.4 and 4.5, but consult with the City on potential for prescribed herbivory); and protection of native grasslands of at least 0.25 acres and a 10-foot buffer (Policy CD 5.2). Implementation of SPR AD-3 will ensure that all of these policies, as well as any other relevant Conservation Element policies, are applied appropriately during treatment.

**Eastern Goleta Valley Community Plan**

The EGVCP is an area plan within Santa Barbara County. All treatment areas that occur in this plan area are outside the coastal zone; they include the Trout Club, Painted Cave FB, Oak Grove, County Range, West Mesa, SM Foothills, Preserve SM Private, Preserve SM HOA, SM Foothills East, San Roque West, and San Roque East. Specific policies and development standards include a designation of a nesting bird survey window of January 15 to September 15 (DevStd ECO-EGV-2C); protection of ESH (including the existing ESH overlay; Policy ECO-EGV-5.1); designation of monarch butterfly roosts, coastal sage scrub, some chaparral, oak woodland, and native grasslands as ESH (Policy ECO-EGV-5.4); designation of minimum setbacks to ESH (Policy ECO-EGV-5.5, Policy ECO-EGV-5.6); and several specific protection policies for different habitat types (policies and development standards associated with OBJECTIVE ECO-EGV-6). While fuel modification is restricted in some cases in ESH and ESH buffers, under Policy ECO-EGV-1.2, it may be permitted as a method of protecting ecological and biological processes. Implementation of SPR AD-3 will ensure that all of these policies, as well as any other relevant policies and standards, are applied appropriately during treatment.

With implementation of SPR AD-3 and the additional SPRs and MMs as described in relation to other impacts, the project would result in no impact, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<p><b>Impact BIO-8:</b> Conflict with the provisions of an adopted natural community conservation plan, habitat conservation plan, or other approved habitat plan</p>	<p>Impact BIO-8, pp. 3.6-199 – 3.6-200</p>	<p>N/A</p>	<p>No Impact</p>	<p>No</p>	<p>N/A</p>	<p>N/A</p>	<p><input checked="" type="checkbox"/></p>
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**Impact Discussion:**

No natural community conservation plans, habitat conservation plans, or other approved habitat plans occur within the project site; this impact does not apply.

<b>Other Impacts to Biological Resources:</b> Would the project result in other impacts to biological resources that are not evaluated in the CalVTP PEIR?	—	—	—	No	N/A	N/A	<input checked="" type="checkbox"/>
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**Impact Discussion:**

Site-specific characteristics of the proposed treatment plan are consistent with the environmental and regulatory conditions outlined in the CalVTP PEIR Section 3.6. While the inclusion of land outside the CalVTP treatable landscape is a change to the geographic extent in the PEIR and the use of prescribed herbivory on slopes greater than 50% represents a change to the PEIR, the existing conditions in the project study area relating to biological resources are essentially the same for treatment areas within the CalVTP treatable landscape and treatment areas outside the CalVTP treatable landscape and in steep slope areas. As a result, the impacts associated with the proposed project are consistent with the impacts covered in the PEIR and the project would not result in new or more severe impacts than those covered in the PEIR. No new impact related to air quality would occur.. Any impacts associated with the proposed project are consistent with the impacts covered in the PEIR. No new impact related to biological resources would occur.

SPRs and MMs	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/ Monitoring Entity
<b>SPR BIO-1: Review and Survey Project-Specific Biological Resources.</b> 1. <b>Suitable Habitat Is Present but Adverse Effects Can Be Clearly Avoided.</b> 2. <b>Suitable Habitat is Present and Adverse Effects Cannot Be Clearly Avoided.</b>  This SPR applies to all treatment activities and treatment types.	Yes Yes No	SBCFD Prior	SBCFD
<b>SPR BIO-2: Require Biological Resource Training for Workers.</b> The project proponent will require crew members and contractors to receive training from a qualified registered professional forester (RPF) or biologist prior to beginning a treatment project. This SPR applies to all treatment activities and treatment types.  <u>Project-Specific Requirements: Resources to be addressed are those described in the Biological Technical Memorandum for the South Coast Herbivory Cal-VTP Project, Attachment B, Potentially Occurring Special-Status Plant and Wildlife Species by Project Site. Listed species to be addressed by the training shall be:</u> <ul style="list-style-type: none"> <li>• <u>Seaside bird’s beak</u></li> <li>• <u>Gaviota tarplant</u></li> <li>• <u>California red-legged frog</u></li> <li>• <u>Crotch bumble bee</u></li> </ul>	Yes	SBCFD Prior	SBCFD

<p><u>Non-listed plant and wildlife species shall include those listed in Attachment C, Potentially Occurring Special-Status Plant and Wildlife Species by Project Site, of the Biological Technical Memorandum for the South Coast Herbivory Cal-VTP Project.</u></p>			
<p><b>SPR BIO-3: Survey Sensitive Natural Communities and Other Sensitive Habitats.</b> If SPR BIO-1 determines that sensitive natural communities or sensitive habitats may be present and adverse effects cannot be avoided. This SPR applies to all treatment activities and treatment types.</p> <p><u>Project-Specific Requirements: All sensitive communities identified during implementation of SPR BIO-1, and listed by project site in Table 3, Biological Resources by Treatment Area and California Vegetation Treatment Program PEIR Bio Impact, in the Biological Technical Memorandum for the South Coast Herbivory Cal-VTP Project, shall be protected in accordance with this measure. Buffers shall adhere to recommendations provided in Table 4, Recommendations by Project Site, of the Biological Technical Memorandum for the South Coast Herbivory Cal-VTP Project, and shall be consistent with the applicable area plan, including the Gaviota Coast Plan, the City of Goleta General Plan/Local Coastal Program, and the Eastern Goleta Valley Community Plan. In addition to communities protected under the Cal-VTP PEIR, coastal scrub communities within the city of Goleta General Plan/Local Coastal Program area and the Eastern Goleta Valley Community Plan area shall receive protections in accordance with those plans. Oak woodlands shall be delineated and protected wherever they occur.</u></p>	<p>Yes</p>	<p>SBCFD Prior</p>	<p>SBCFD</p>
<p><b>SPR BIO-4: Design Treatment to Avoid Loss or Degradation of Riparian Habitat Function.</b> Project proponents, in consultation with a qualified RPF or qualified biologist, will design treatments in riparian habitats to retain or improve habitat functions. This SPR applies to all treatment activities and treatment types.</p> <p><u>Project-Specific Requirements: In accordance with SPR HYD-3, no grazing shall occur within 50 feet of any riparian habitat. In addition, all no-disturbance buffers for riparian habitats shall conform with provisions of the Gaviota Coast Plan, the Goleta General Plan/Local Coastal Program, and the Eastern Goleta Valley Community Plan, whichever is applicable. Any disturbance occurring within riparian habitat subject to the jurisdiction of the California Department of Fish and Wildlife (CDFW) would require that the applicant seek a Lake and Streambed Alteration Agreement from CDFW.</u></p>	<p>Yes</p>	<p>SBCFD Prior</p>	<p>SBCFD</p>
<p><b>SPR BIO-5: Avoid Environmental Effects of Type Conversion and Maintain Habitat Function in Chaparral and Coastal Sage Scrub.</b> The project proponent will design treatment</p>	<p>Yes</p>	<p>SBCFD Prior-During</p>	<p>SBCFD</p>



<p>activities to avoid type conversion where native coastal sage scrub and chaparral are present. These SPR requirements apply to all treatment activities and all treatment types.</p> <p>Additional measures will be applied to ecological restoration treatment types</p>			
<p><b>SPR BIO-6: Prevent Spread of Plant Pathogens.</b> When working in sensitive natural communities, riparian habitats, or oak woodlands that are at risk from plant pathogens (e.g., lone chaparral, blue oak woodland), the project proponent will implement best management practices to prevent the spread of <i>Phytophthora</i> and other plant pathogens (e.g., pitch canker (<i>Fusarium</i>), goldspotted oak borer, shot hole borer, bark beetle). This SPR applies to all treatment activities and treatment types.</p>	Yes	SBCFD During	SBCFD
<p><b>SPR BIO-7: Survey for Special-Status Plants.</b> If SPR BIO-1 determines that suitable habitat for special-status plant species is present and cannot be avoided, the project proponent will require a qualified RPF or botanist to conduct protocol-level surveys for special-status plant species with the potential to be affected by a treatment prior to initiation of the treatment. The survey will follow the methods in the current version of CDFW’s “Protocols for Surveying and Evaluating Impacts to Special Status Native Plant Populations and Sensitive Natural Communities.” This SPR applies to all treatment activities and treatment types.</p> <p><u>Project-Specific Requirements: Species that shall be the focus of special-status plant surveys are:</u></p> <ul style="list-style-type: none"> <li>• <u>seaside bird’s beak</u></li> <li>• <u>Gaviota tarplant</u></li> <li>• <u>black-flowered figwort</u></li> <li>• <u>Davidson’s saltscare</u></li> <li>• <u>late-flowered mariposa-lily</u></li> <li>• <u>mesa horkelia</u></li> <li>• <u>Nuttall’s scrub oak</u></li> <li>• <u>Santa Barbara honeysuckle</u></li> <li>• <u>southern tarplant</u></li> <li>• <u>umbrella larkspur</u></li> <li>• <u>white-veined monardella</u></li> </ul> <p><u>The required timing of surveys may vary depending on vegetation communities targeted by project activities. Attachment B, Special-Status Plant and Wildlife Species with Potential to Occur in the Project Site, in the Biological Technical Memorandum for the South Coast Herbivory Cal-VTP Project, supplies the blooming period for each potentially occurring plant species, as well as vegetation communities in which the species occur. As well as being</u></p>	Yes	SBCFD Prior	SBCFD

<p><u>limited by vegetation type, the potential of several species to occur in the project sites may be limited geographically. For example, Gaviota tarplant potentially occurs only in Arroyo Hondo East and West and Baron Ranch East and West, on the Gaviota Coast. See Attachment C, Potentially Occurring Special-Status Species by Project Site, in the Biological Technical Memorandum, with regard to which species potentially occur in each project site. Table 3, Biological Resources by Treatment Area and California Vegetation Treatment Program PEIR Bio Impact, of the Biological Technical Memorandum, provides the recommended timing for surveys by project site. Buffers and avoidance for special-status plants shall comply with MM BIO-1a, Avoid Loss of Special-Status Plants Listed under ESA or CESA, and MM BIO-1b, Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA, but shall also comply with requirements of the applicable local area plan, including the Gaviota Coast Plan, the City of Goleta General Plan/LCP, and the Eastern Goleta Valley Community Plan, depending on location.</u></p> <p><u>Field data forms for the CNDDDB shall be submitted for any observations of special-status plant species observed during pre-activity surveys or during treatment activities.</u></p>			
<p><b>SPR BIO-8: Identify and Avoid or Minimize Impacts in Coastal Zone ESHAs.</b> This SPR applies to all treatment activities and treatment types.</p>	Yes	SBCFD Prior-During	SBCFD
<p><b>SPR BIO-9: Prevent Spread of Invasive Plants, Noxious Weeds, and Invasive Wildlife.</b> This SPR applies to all treatment activities and treatment types.</p>	Yes	SBCFD During	SBCFD
<p><b>SPR BIO-10: Survey for Special-Status Wildlife and Nursery Sites.</b> If SPR BIO-1 determines that suitable habitat for special-status wildlife species or nurseries of any wildlife species is present and cannot be avoided, the project proponent will require a qualified RPF or biologist to conduct focused or protocol-level surveys for special-status wildlife species or nursery sites (e.g., bat maternity roosts, deer fawning areas, heron or egret rookeries) with potential to be directly or indirectly affected by a treatment activity. The survey area will be determined by a qualified RPF or biologist based on the species and habitats and any recommended buffer distances in agency protocols. This SPR applies to all treatment activities and treatment types.</p> <p><u>Project-Specific Requirements: Surveys shall be conducted for the following wildlife species in areas where they have the potential to occur:</u></p> <ul style="list-style-type: none"> <li>• <u>California red-legged frog</u></li> <li>• <u>California newt</u></li> <li>• <u>burrowing owl</u></li> <li>• <u>white-tailed kite</u></li> <li>• <u>San Diego desert woodrat</u></li> </ul>	Yes	SBCFD Prior	SBCFD

<ul style="list-style-type: none"> <li>• <u>American badger</u></li> <li>• <u>Blainville’s [coast] horned lizard</u></li> <li>• <u>Western pond turtle</u></li> </ul> <p><u>Surveys for California red-legged frog, California newt, and western pond turtle will focus on upland (i.e., non-aquatic) habitats in areas where these species may occur. However, for work in areas where California red-legged frog potentially occurs, a survey should be conducted that would include a search for suitable aquatic habitat in all areas within 100 meters (approximately 330 feet) of the Project site, to the extent accessible. “Aquatic habitat” shall include all areas potentially providing any habitat value for these species, including temporary refuge. The California red-legged frog survey shall be conducted by a biologist qualified to survey for that species.</u></p> <p><u>Burrowing owl is expected only from fall until early spring in the project area. Therefore, surveys for this species shall be conducted from September 15 through April 15. Surveys for all other species listed above shall be conducted regardless of season. As no project activities would occur in aquatic habitats, protocol surveys for California red-legged frog are not required. But pedestrian surveys in upland areas should focus on the potential presence of this species, as well as nesting western pond turtles and California newts inhabiting upland areas.</u></p> <p><u>Field data forms for the CNDDDB shall be submitted for any observations of special-status wildlife species observed during pre-activity surveys or during treatment activities.</u></p>			
<p><b>SPR BIO-11: Install Wildlife-Friendly Fencing.</b> The fencing design will meet the following standards: minimize the chance of wildlife entanglement by avoiding barbed wire, loose or broken wires, or any material that could impale or snag a leaping animal; if feasible, keeping electric netting-type fencing electrified at all times or laid down while not in use; charge temporary electric fencing with intermittent pulse energizers; Allow wildlife to jump over easily without injury by installing fencing that can flex as animals pass over it and installing the top wire low enough (no more than approximately 40 inches high on flat ground) to allow adult ungulates to jump over it; and be highly visible to birds and mammals by using high-visibility tape or wire, flagging, or other markers</p>	Yes	SBCFD Prior-During	SBCFD
<p><b>SPR BIO-12. Protect Common Nesting Birds, Including Raptors.</b> The project proponent will schedule treatment activities to avoid the active nesting season of common native bird species, including raptors, that could be present within or adjacent to the treatment site, if feasible. Common native birds are species not otherwise treated as special status in the CalVTP PEIR. The active nesting season or peak nesting season</p>	Yes	SBCFD Prior-During	SBCFD

<p>will be defined by the qualified RPF or biologist. This SPR applies to all treatment activities and treatment types.</p> <p><u>Project-Specific Requirements: If treatment is initiated in any new areas between January 15 and August 31, conduct a pre-activity nesting bird survey in accordance with this requirement.</u></p>			
<p><b>MM BIO-1a: Avoid Loss of Special-Status Plants Listed under ESA or CESA</b>                  If listed plants are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will avoid and protect these species by establishing a no-disturbance buffer around the area occupied by listed plants and marking the buffer boundary with high-visibility flagging, fencing, stakes, or clear, existing landscape demarcations (e.g., edge of a roadway).</p>	Yes	SBCFD Prior-During	SBCFD
<p><b>MM BIO-1b: Avoid Loss of Special-Status Plants Not Listed Under ESA or CESA</b>                  If non-listed special-status plant species (i.e., species not listed under ESA or CESA, but meeting the definition of special-status as stated in Section 3.6.1 of the Program EIR) are determined to be present through application of SPR BIO-1 and SPR BIO-7, the project proponent will implement measures to avoid loss of individuals and maintain habitat function of occupied habitat.</p>	Yes	SBCFD Prior-During	SBCFD
<p><b>MM BIO-2a: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Listed Wildlife Species and California Fully Protected Species (All Treatment Activities)</b></p> <p><u>Project-Specific Requirements: To avoid take of California red-legged frog in accordance with Mitigation Measure BIO-2a, implement the following special measures:</u></p> <ul style="list-style-type: none"> <li>Avoid treatment activities during the rainy season (October 1 to April 30), in any area where California red-legged frog potentially occurs (see Table 3 in Biological Technical Memorandum for the Santa Barbara South Coast Herbivory Project) that is within 330 feet of aquatic habitat. Adjacent (offsite) areas where the absence of aquatic habitat cannot be verified should be considered as having aquatic habitats, and the buffer distance of 330 feet shall apply. For purposes of this measure, “aquatic habitat” refers to any habitat where the California red-legged frogs may potentially take refuge, including seeps and shallow pools, and not only aquatic breeding habitat.</li> <li>Project activities may take place within the 330-foot buffer during winter, only if a burrow survey is conducted prior to conducting project activities and avoidance of all burrows is implemented.</li> </ul>	Yes	SBCFD Prior-During	SBCFD

<ul style="list-style-type: none"> <li>• <u>Fence installation work shall not be scheduled or implemented when 0.5 inches or greater of rain is forecast or within 24 hours after a rain event, in any area where California red-legged frog potentially occurs.</u></li> <li>• <u>If any California red-legged frogs are observed during pre-activity surveys (see SPR BIO-10, Project-Specific Requirements), consult with USFWS to determine appropriate avoidance measures in accordance with MM BIO-2a. If any California red-legged frogs are encountered during treatment, stop work in the vicinity of the observation and immediately notify USFWS of the occurrence. Consult with USFWS on the appropriate course of action.</u></li> </ul>			
<p><b>MM BIO-2b: Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Other Special-Status Wildlife Species (All Treatment Activities)</b> If other special-status wildlife species (i.e., species not listed under CESA or ESA or California Fully Protected, but meeting the definition of special status as stated in Section 3.6.1 of the Program EIR) are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid or minimize adverse effects to the species.</p> <p>The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or biologist that the special-status wildlife would benefit from treatment in the occupied habitat area even though some of the non-listed special-status wildlife may be killed, injured, or disturbed during treatment activities. If it is determined that treatment activities would be beneficial to special-status wildlife, no compensatory mitigation will be required.</p> <p><u>Project-Specific Requirements: Avoidance measures for non-listed special-status wildlife species shall include:</u></p> <ul style="list-style-type: none"> <li>• <u>California newt: In any area where California newt is detected during surveys, fence installation work shall not be scheduled or implemented when rain is forecast or within 48 hours after a rain event. A buffer of 100 feet around any observation shall be established, as long as the species is present there. This buffer may be reduced, as determined by Registered Professional Forester or biologist.</u></li> <li>• <u>Western pond turtle: If pre-activity surveys identify the presence of western pond turtles or their nests in upland habitats subject to project activities, establish a buffer of 100 feet around the nest location or where the turtle was observed, within which no project activities, including grazing, may take place, as long as turtles or active nests are present. Install fencing to exclude grazing</u></li> </ul>	<p>Yes</p>	<p>SBCFD Prior-During</p>	<p>SBCFD</p>

<p><u>activities from the buffer area, in accordance with other Cal-VTP standard project requirements and mitigation measures.</u></p> <ul style="list-style-type: none"> <li>• <u>Blainville’s horned lizard/coast patch-nosed snake: If Blainville’s horned lizards or coast patch-nosed snakes are observed during pre-activity surveys, establish a buffer of 100 feet around the location of the observation, within which no project activities, including grazing, may take place. This buffer may be reduced, as determined by a Registered Professional Forester or biologist. Install fencing to exclude grazing activities from the buffer area, in accordance with other Cal-VTP standard project requirements and mitigation measures.</u></li> <li>• <u>San Diego desert woodrat: If San Diego desert woodrats or their nests are observed during pre-activity surveys, establish a buffer of 100 feet around the location of the observation, within which no project activities, including grazing, may take place. This buffer may be reduced, as determined by a Registered Professional Forester or biologist. Install fencing to exclude grazing activities from the buffer area, in accordance with other Cal-VTP standard project requirements and mitigation measures. This measure applies to any woodrat nests located for which the occupant species cannot be established.</u></li> <li>• <u>If burrowing owl or American badger is detected during surveys, establish a minimum buffer of 50 meters (164 feet) around any occupied burrow, within which no project activities may take place, as long as these species are present.</u></li> <li>• <u>If any special-status wildlife species not addressed in this measure are encountered, implement avoidance measures consistent with the above measures and the life history of the species involved, in accordance with MM BIO-2b.</u></li> </ul> <p><u>Field data forms for the CNDDDB shall be submitted for any observations of special-status wildlife species observed during pre-activity surveys or during treatment activities.</u></p>			
<p><b>MM BIO-2g: Design Treatment to Avoid Mortality, Injury, or Disturbance and Maintain Habitat Function for Special-Status Bumble Bees (All Treatment Activities)</b> If special-status bumble bees are observed, or suitable habitat for special-status bumble bees occurs are observed during reconnaissance surveys (conducted pursuant to SPR BIO-1) or focused or protocol-level surveys (conducted pursuant to SPR BIO-10), the project proponent will avoid or minimize adverse effects to the species. For CESA-listed species, or species that are candidates for listing under CESA, habitat function will remain and occupied habitat will be avoided. CDFW will be consulted for concurrence on whether treatment will maintain habitat function and avoid listed bumble bees.</p>	<p>Yes</p>	<p>SBCFD Prior-During</p>	<p>SBCFD</p>

<p><u>Project-Specific Measures:</u> to address the requirements of MM BIO-2g, implement the following measures:</p> <ul style="list-style-type: none"><li>▪ In addition to wet meadow, forest meadow, riparian, grassland, or coastal scrub habitats, also consider oak woodland and chaparral as suitable habitat for Crotch bumble bee, where these communities contain suitable floral resources.</li><li>▪ When considering whether suitable floral resources may remain after treatment, consider (1) potential presence of floral resources within habitats included in the project site but not subject to grazing (e.g., if implementation includes avoidance of coastal scrub or chaparral habitats or avoidance of sensitive natural communities [native grasslands, California brittle bush scrub]), (2) exclusion of any areas due to steepness of slopes, and (3) the quality of habitat being treated and whether treatment may improve habitat by permitting suitable floral resources to grow. Avoidance of these areas may address the requirement to conduct treatment in a “patchy” pattern.</li><li>▪ During the season when workers are most likely to be present (typically, April to September), conduct a survey to search for presence of bumble bees to identify activity potentially signaling the presence of a nest. The actual survey period should be determined by the qualified biologist, based on site specific environmental factors, such as the location, local observation records, elevation, seasonal rainfall, average ambient air temperatures, and/or local seasonal weather conditions. Searching for a nest may include watching an area of high bee activity or following bees observed foraging. Suitable nesting and wintering habitats may include animal burrows of any size, debris piles, rock walls, or a duff layer.</li><li>▪ Follow any additional guidance provided by the California Department of Fish and Wildlife subsequent to completion of the project-specific analysis.</li></ul>			
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<p><b>MM BIO-3a: Design Treatments to Avoid Loss of Sensitive Natural Communities and Oak Woodlands</b> The project proponent will implement the following measures when working in treatment areas that contain sensitive natural communities identified during surveys conducted pursuant to</p> <p><b>SPR BIO-3:</b></p> <p>The only exception to this mitigation approach is in cases where it is determined by a qualified RPF or botanist that the sensitive natural community or oak woodland would benefit from treatment in the occupied habitat area even though some loss may occur during treatment activities. If it is determined that treatment activities would be beneficial to sensitive natural communities or oak woodlands, no compensatory mitigation will be required.</p> <p><u>Project-Specific Requirements: Avoidance buffers for sensitive natural communities shall be in accordance with policies of the appropriate local area plan, including the Gaviota Coast Plan, the City of Goleta General Plan/Local Coastal Program, and the Eastern Goleta Valley Community Plan. Guidance from County of Santa Barbara or City of Goleta staff, as appropriate, including permitting grazing within buffers or with oak woodland or other sensitive habitats, may supersede buffer distance requirements and other prohibitions in policies.</u></p>	<p>Yes</p>	<p>SBCFD Prior-During</p>	<p>SBCFD</p>
<p><b>MM BIO-4: Avoid State and Federally Protected Wetlands</b></p> <p><u>Project-Specific Requirements: All buffers established around delineated wetlands or potential wetlands shall conform with policies included in the appropriate local area plan, including the Gaviota Coast Plan, the City of Goleta General Plan/LCP, and the Eastern Goleta Vally Community Plan, as well as any standards for avoidance included in Mitigation Measure BIO-4.</u></p>	<p>Yes</p>	<p>SBCFD Prior-During</p>	<p>SBCFD</p>
<p><b>MM BIO-5: Retain Nursery Habitat and Implement Buffers to Avoid Nursery Sites</b></p>	<p>Yes</p>	<p>SBCFD Prior-During</p>	<p>SBCFD</p>



**Table 2. Special-Status Plant Species with Potential to Occur in the Treatment Area**

Scientific Name	Common Name	Status (Federal/State/CRPR)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
<i>Atriplex serenana</i> var. <i>davidsonii</i>	Davidson's saltscale	None/None/1B.2	Coastal bluff scrub, coastal scrub; alkaline/ annual herb/Apr-Oct/ 35-655	Potentially occurs. The one recent occurrence is from the Gaviota area and this species may have potential to occur at the Arroyo Hondo and Baron Ranch treatment areas.
<i>Calochortus fimbriatus</i>	late-flowered mariposa-lily	None/None/1B.3	Chaparral, cismontane woodland, riparian woodland; serpentinite (sometimes)/perennial bulbiferous herb/June-Aug/900-6,250	Potentially occurs. May occur in suitable habitat above 900 feet in elevation.
<i>Calochortus palmeri</i> var. <i>palmeri</i>	Palmer's mariposa-lily	None/None/1B.2	Chaparral, lower montane coniferous forest, meadows and seeps; mesic/perennial bulbiferous herb/Apr-July/2,325-7,840	Low potential to occur. The only location within the elevation range of this species is Painted Cave South FB.
<i>Centromadia parryi</i> ssp. <i>australis</i>	southern tarplant	None/None/1B.1	Marshes and swamps (margins), valley and foothill grassland (vernally mesic), vernal pools/ annual herb/May-Nov/ 0-1,570	Potentially occurs. Occurrences are limited to the Santa Barbara and Goleta areas and this species is not expected at the Gaviota coast treatment areas.

**Table 2. Special-Status Plant Species with Potential to Occur in the Treatment Area**

Scientific Name	Common Name	Status (Federal/State/CRPR)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
<i>Cordylanthus rigidus</i> ssp. <i>littoralis</i>	seaside bird's-beak	None/SE/1B.1	Chaparral (maritime), cismontane woodland, closed-cone coniferous forest, coastal dunes, coastal scrub; disturbed areas (often), sandy/ annual herb (hemiparasitic)/ Apr–Oct/0–1,685	Low potential to occur. One occurrence in the Santa Ynez Mountains and within 3 miles of the Gaviota coast treatment areas was from the 1960s. CDFW considers this species as potentially occurring throughout the project site in suitable habitats, which include chaparral and oak woodland in the treatment areas.
<i>Deinandra increscens</i> ssp. <i>villosa</i>	Gaviota tarplant	FE/SE/1B.1	Coastal bluff scrub, coastal scrub, valley and foothill grassland/annual herb/May–Oct/65–1,410	Potentially occurs. Known occurrences are approximately 1.5 miles and greater west of Arroyo Hondo West; this species only potentially occurs in Arroyo Hondo and Baron Ranch treatment areas.
<i>Delphinium umbracolorum</i>	umbrella larkspur	None/None/1B.3	Chaparral, cismontane woodland/perennial herb/Apr–June/ 1,310–5,245	Potentially occurs. CNDDDB includes one occurrence within the San Roque East and West treatment areas but the species has a low likelihood of occurring elsewhere.
<i>Horkelia cuneata</i> var. <i>puberula</i>	mesa horkelia	None/None/1B.1	Chaparral (maritime), cismontane woodland, coastal scrub; gravelly (sometimes), sandy (sometimes)/perennial herb/Feb–July(Sep)/ 230–2,655	Potentially occurs. Suitable chaparral and cismontane woodland vegetation communities occur within the several treatment areas about 230 feet in elevation.
<i>Lonicera subspicata</i> var. <i>subspicata</i>	Santa Barbara honeysuckle	None/None/1B.2	Chaparral, cismontane woodland, coastal scrub/perennial	Potentially occurs in suitable communities anywhere in the treatment areas.

**Table 2. Special-Status Plant Species with Potential to Occur in the Treatment Area**

Scientific Name	Common Name	Status (Federal/State/CRPR)	Primary Habitat Associations/ Life Form/ Blooming Period/ Elevation Range (feet)	Potential to Occur
			evergreen shrub/ (Feb)May–Aug(Dec)/ 35–3,280	
<i>Monardella hypoleuca</i> ssp. <i>hypoleuca</i>	white-veined monardella	None/None/1B.3	Chaparral, cismontane woodland/perennial herb/(Apr)May–Aug(Sep– Dec)/165–5,000	Potentially occurs. Suitable chaparral and cismontane woodland vegetation communities occur within the treatment areas.
<i>Quercus dumosa</i>	Nuttall’s scrub oak	None/None/1B.1	Chaparral, closed-cone coniferous forest, coastal scrub/perennial evergreen shrub/ Feb–Apr (May–Aug)/ 50–1,310	Potentially occurs. Several CNDDB occurrences near sites in the Santa Ynez Mountain foothills and suitable habitat occurs in several locations.
<i>Scrophularia atrata</i>	black-flowered figwort	None/None/1B.2	Chaparral, closed-cone coniferous forest, coastal dunes, coastal scrub, riparian scrub/perennial herb/Mar–July/35–1,640	Potentially occurs. May occur in any treatment area supporting suitable habitat.

**Status Legend:**

FE: Federally listed as endangered

SE: State listed as endangered

ST: State listed as threatened

SR: State Rare

CRPR 1B: Plants rare, threatened, or endangered in California and elsewhere

CRPR 2B: Plants rare, threatened, or endangered in California but more common elsewhere

.1 Seriously threatened in California (over 80% of occurrences threatened / high degree and immediacy of threat)

.2 Moderately threatened in California (20-80% occurrences threatened / moderate degree and immediacy of threat)

.3 Not very threatened in California (<20% of occurrences threatened / low degree and immediacy of threat or no current threats known)

**Table 3. Special-Status Wildlife Species with Potential to Occur in the Treatment Area**

Row Labels	Common Name	Status (Federal/State)	Habitat	Potential to Occur
<b>Invertebrates</b>				
<i>Bombus crotchii</i>	Crotch bumble bee	None/SCE	Open grassland and scrub communities supporting suitable floral resources	Observed. CNDDDB (CDFW 2023a) includes an occurrence from within Ellwood Mesa.
<i>Danaus plexippus plexippus</i> pop. 1	monarch - California overwintering population	FC/None	Wind-protected tree groves with nectar sources and nearby water sources	Observed. Occurs widely in the region while migrating or flying between roosts and foraging sites. Several roosts occur within eucalyptus stands in the Ellwood Mesa treatment area. Additional known roosts are at Evergreen Open Space and Lake Los Carneros Park in the City of Goleta and at Arroyo Hondo (City of Goleta 2016; CDFW 2023a).
<b>Fish</b>				
<i>Eucyclogobius newberryi</i>	tidewater goby	FE/None	Brackish water habitats along the California coast from Agua Hedionda Lagoon, San Diego County, to the mouth of the Smith River	Not expected to occur. However, critical habitat is designated along streams adjacent to treatment areas at Arroyo Hondo, Baron Ranch, and Coral Canyon/Las Flores Canyon.
<i>Oncorhynchus mykiss irideus</i> pop. 10	southern steelhead - southern California DPS	FE/SCE	Clean, clear, cool, well-oxygenated streams; needs relatively deep pools in migration and gravelly substrate to spawn	Not expected to occur. Critical habitat occurs within several creeks adjacent to treatment areas, including Arroyo Hondo and in Atascadero Creek adjacent to Preserve San Marcos HOA, San Marcos

**Table 3. Special-Status Wildlife Species with Potential to Occur in the Treatment Area**

Row Labels	Common Name	Status (Federal/State)	Habitat	Potential to Occur
				Foothills East, and San Marco Foothills. However, these streams do not occur within the treatment areas.
<b>Amphibians</b>				
<i>Rana draytonii</i>	California red-legged frog	FT/SSC	Lowland streams, wetlands, riparian woodlands, livestock ponds; dense, shrubby or emergent vegetation associated with deep, still or slow-moving water; uses adjacent uplands	Observed. Known to occur along streams adjacent to several treatment areas, including Arroyo Hondo, Baron Ranch, Las Flores Canyon, and Coral Canyon.
<i>Taricha torosa</i> (Monterey Co. south only)	California newt	None/SSC	Wet forests, oak forests, chaparral, and rolling grassland	High potential to occur. Known to occur adjacent to the Trout Club and in Arroyo Hondo and likely occurs in the vicinity of the Painted Cave South FB and Tunnel Road. There are several reports at lower elevations along the Gaviota coast.
<b>Reptiles</b>				
<i>Anniella pulchra</i>	northern California legless lizard	None/SSC	Coastal dunes, stabilized dunes, beaches, dry washes, valley-foothill, chaparral, and scrubs; pine, oak, and riparian woodlands; associated with sparse vegetation and sandy or loose, loamy soils	High potential to occur. Although CNDDDB includes no occurrences within 1 mile of any treatment areas, this species is known to occur in suitable microhabitats in the vicinity and likely occurs within or adjacent to one or more treatment areas.
<i>Emys marmorata</i>	western pond turtle	None/SSC	Slow-moving permanent or intermittent streams, ponds, small lakes, and	High potential to occur. Known to occur along several

**Table 3. Special-Status Wildlife Species with Potential to Occur in the Treatment Area**

Row Labels	Common Name	Status (Federal/State)	Habitat	Potential to Occur
			reservoirs with emergent basking sites; adjacent uplands used for nesting and during winter	creeks adjacent to or within several treatment areas, including San Roque East, Lake Los Carneros Park, Baron Ranch West, and Arroyo Hondo.
<i>Phrynosoma blainvillii</i>	Blainville's horned lizard	None/SSC	Open areas of sandy soil in valleys, foothills, and semi-arid mountains including coastal scrub, chaparral, valley-foothill hardwood, conifer, riparian, pine-cypress, juniper, and annual grassland habitats	Moderate potential to occur. The only CNDDB occurrences near any of the treatment sites are north of Painted Cave South FB. The species is most likely to occur in scrub habitats in the Santa Ynez Mountain foothills.
<i>Salvadora hexalepis virgultea</i>	coast patch-nosed snake	None/SSC	Brushy or shrubby vegetation; requires small mammal burrows for refuge and overwintering sites	Moderate potential to occur. Most likely to occur in the vicinity of Painted Cave South FB and the Trout Club.
<i>Thamnophis hammondi</i>	two-striped gartersnake	None/SSC	Streams, creeks, pools, streams with rocky beds, ponds, lakes, vernal pools	Moderate potential to occur. CNDDB includes occurrences adjacent to Arroyo Hondo and Tunnel Road.
<b>Birds</b>				
<i>Ammodramus savannarum</i> (nesting)	grasshopper sparrow	None/SSC	Nests and forages in moderately open grassland with tall forbs or scattered shrubs used for perches	Observed. Known to occur at West Mesa and Ellwood Mesa and likely occurs in other areas with suitable grassland habitats.
<i>Athene cunicularia</i> (burrow sites and some wintering sites)	burrowing owl	BCC/SSC	Nests and forages in grassland, open scrub, and agriculture, particularly with ground squirrel burrows	Observed at West Mesa. Also potentially winters on occasion in other areas supporting

**Table 3. Special-Status Wildlife Species with Potential to Occur in the Treatment Area**

Row Labels	Common Name	Status (Federal/State)	Habitat	Potential to Occur
				short-grass and open scrub habitats.
<i>Elanus leucurus</i> (nesting)	white-tailed kite	None/FP	Nests in woodland, riparian, and individual trees near open lands; forages opportunistically in grassland, meadows, scrubs, agriculture, emergent wetland, savanna, and disturbed lands	Observed at several sites in the San Marcos Foothills area, Ellwood Mesa, and Lake Los Carneros and has nested within or adjacent to these sites (CDFW 2023a; Lehman 2022). The species likely occurs elsewhere on occasion.
<b>Mammals</b>				
<i>Antrozous pallidus</i>	pallid bat	None/SSC	Grasslands, shrublands, woodlands, forests; most common in open, dry habitats with rocky outcrops for roosting, but also roosts in man-made structures and trees	Moderate potential to occur. Likely forages on occasion over some of the treatment areas but suitable roosting habitat is absent from the sites.
<i>Neotoma lepida intermedia</i>	San Diego desert woodrat	None/SSC	Coastal scrub, desert scrub, chaparral, cacti, rocky areas	Moderate potential to occur. May occur in some scrub habitats within the treatment areas. Known to occur near Baron Ranch and Arroyo Hondo (CDFW 2023a).
<i>Taxidea taxus</i>	American badger	None/SSC	Dry, open, treeless areas; grasslands, coastal scrub, agriculture, and pastures, especially with friable soils	Moderate potential to occur. May occur on occasion, especially within treatment areas west of Goleta.
<i>Lasiurus frantzii</i>	western red bat	None/SSC	Forest, woodland, riparian, mesquite bosque, and orchards, including fig, apricot, peach, pear, almond, walnut, and orange; roosts in tree canopy	Moderate potential to occur. Potentially forages anywhere in the project site and may roost in areas with suitable woodland habitat.

**Status Legend:**

FE: Federally Endangered  
 FT: Federally Threatened  
 FC: Federal Candidate Species  
 SCE: State Candidate Endangered  
 FP: California Fully Protected Species  
 SSC: California Species of Special Concern

### 3.6 Geology, Soils, Paleontology, and Mineral Resources

Impacts and Discussions	PEIR-Specific			Project-Specific			
	Identify Location of Impact Analysis in the PEIR	SPRs & MMs Applicable to the Impact Analysis in PEIR	Identify Impact Significance in the PEIR	Does the Impact Apply to the Project Treatments Proposed	SPRs & MMs Applicable to the Project Impact Analysis	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact GEO-1:</b> Result in substantial erosion or loss of topsoil	Impact GEO-1, pp. 3.7-27-3.7-30, Table 3.7-3, Table 3.7-4	SPR GEO-1 through SPR GEO-8 SPR AQ-3 SPR AQ-4 SPR HYD-3 SPR HYD-4	LTS	Yes	SPR GEO-1 SPR GEO-2 SPR GEO-4 SPR HYD-3 SPR HYD-4	LTS	<input checked="" type="checkbox"/>

**Impact Discussion:**

Treatment activities implemented under the proposed CalVTP may involve the disturbance of soils and a reduction in vegetative cover, which has the potential to substantially increase rates of erosion and loss of topsoil. The project would be limited to prescribed herbivory treatment activities and would not include mechanical, manual, prescribed fire, or herbicide treatment activities. The project would reduce the amount of vegetation in all treated areas, which has the potential to expose soil to wind and water erosion. However, SPRs would be implemented to ensure soil stability. Implementation of SPR GEO-1, SPR GEO-2, and SPR GEO-4 would avoid and minimize the risk of substantial erosion and loss of topsoil. SPR GEO-3 would not apply to the project because the project would not result in exposure of bare soil over 50% or more of the treatment area and mulch would not be applied in treatment areas. Project treatments would be designed to reduce herbaceous fuels by 80%, either through consumption or trampling of vegetation, and grazing activities would be monitored so as not to result in removal of roots or result in bare soil. SPR GEO-5 would not apply because the project would not involve compacted and/or bare linear treatment areas. SPR GEO-6 would not apply because burn piles would not be utilized at



treatment areas. In addition, SPR HYD-3 and SPR HYD-4 require that treatment prescriptions be designed to protect soil stability in order to reduce siltation of creeks.

As previously discussed in Section 1.2, California Environmental Quality Act Compliance, for the proposed project, the inclusion of areas outside of the CalVTP treatable landscape and the inability to implement SPR GEO-7 represent a revision or change to the CalVTP PEIR. SPR GEO-7 is not able to be implemented as written because prescribed herbivory is proposed on slopes in excess of 50%. SPR GEO-8 would not apply because this SPR does not apply to prescribed herbivory. Nonetheless, it has been similarly implemented to evaluate the use of prescribed herbivory on slopes greater than 50%. The inability to implement SPR GEO-7 represents a change to the PEIR and this addendum to the PEIR has been prepared to evaluate this issue. A Dudek Certified Engineering Geologist completed a site reconnaissance of the proposed grazing treatment areas, focusing on areas with slopes greater than 50%, as further discussed below.

Due to steep terrain that precludes access for manual or mechanical treatments and the large size of the treatment areas, prescribed herbivory is the most feasible treatment activity in the proposed treatment areas. These areas are subject to invasive species growth and annual grasses, which present flammable fuels that would be reduced by implementation of the project. Prescribed herbivory treatments would result in removal of invasive species and flashy fuels (grasses), while larger shrubs would be retained, resulting in a mosaic plant pattern where generally up to 80% of flashy fuels would be reduced (either through consumption or trampling) and existing shrubs and mature trees would be retained. This vegetation pattern would reduce the vegetation connectivity, thus reducing the speed and intensity of wildland fires.

## **County of Santa Barbara**

### ***Shale Areas***

With the exception of prescribed herbivory on slopes in excess of 50%, the proposed treatment types and treatment activities are consistent with the CalVTP PEIR with respect to soil erosion and loss of topsoil. A Dudek Certified Engineering Geologist completed a site reconnaissance of the proposed grazing treatment areas in April and May 2023, including conducting field observations in an area of active prescribed herbivory on slopes in excess of 50% at Elings Park in the City of Santa Barbara. In addition to the steep slopes, this site in Elings Park is representative of the geologic/soil and vegetation conditions on the majority of the potential grazing treatment areas in County areas. The active prescribed herbivory site at Elings Park is underlain by Monterey shale deposits (Dibblee 2023), which are overlain by Diablo clay (DaF2) surficial soils. Diablo clay typically occurs on 30% to 50% slopes and consist of 40 inches of clay and clay loam overlying bedrock. These soils are highly expansive, causing swelling when wet and contraction cracking when dry, and have slow permeability and medium to rapid runoff when wet (USDA NRCS 2023). A shallow soil failure, or slump, reportedly occurred within this prescribed herbivory area within Elings Park during the heavy rains of January 2023, prior to herbivory activities in May 2023. Vegetation in this area within Elings Park consists of a mixture of grasses, mustard, and shrubs, which is similar to the proposed treatment areas. Based on field observations, prescribed herbivory on steep slopes, up to 100% (or 45 degrees), within Elings Park resulted in minimal soil exposure. Rather, the residual grasses were trampled and flattened, the mustard plants were stripped of their leaves and flowers, and some shrubs were stripped of their leaves. The roots of the plants were not removed during grazing. The vegetation cover prior to grazing was unusually dense following excessive rainfall in early 2023. Soil exposure following grazing would likely be greater during drier years with less vegetation growth. Based on these observations and conservatively assuming future treatments would be completed during drier years with potentially more exposed soil, prescribed herbivory on slopes up to 75% (or 37 degrees) is appropriate in areas underlain by the Rincon and Monterey shale. However, grazing on slopes in excess of 75% could exacerbate the potential for soil erosion.

The geology (including slope failures), soil type, steepness of slope, and vegetation types at Elings Park are representative of much of the proposed grazing sites throughout the County treatment areas, which are predominantly underlain by Monterey and Rincon shale deposits (i.e., Arroyo Hondo West and East, Baron Ranch West and East, Las Flores and Coral Canyon, San Marcos Foothills, San Marcos Foothills East, Preserve San Marcos HOA, Preserve San Marcos Private, and County Range) (Dibblee 2023). The steeper hillsides (i.e., 50% to 250% slopes [27 to 68 degrees]) underlain by these shale deposits in the County treatment areas are similarly overlain by clay soils, primarily Ayar clay (AhF2, AhG), which typically consist of eroded clay to a depth of 40 inches and overlying bedrock; these soils are expansive and have slow permeability and high runoff. Landslide soils (AE-Argixerolls and Xererts) are also prevalent overlying these shale deposits (USDA NRCS 2023) (see Attachment E). However, in general, the treatment areas underlain by Rincon shale typically consist only of grasses, weeds, and mustard, in comparison to areas underlain by Monterey shale, which include more shrubs. As a result, the Rincon shale soils would generally be more susceptible to erosion than the areas of Monterey shale, due to the lack of mosaic of shrubs that lessen the amount of potential soil exposure and increase slope stability.

Considering the site reconnaissance completed by Dudek in April and May 2023 was completed following a winter of extremely high rainfall and abundant vegetation cover, very limited soil erosion was noted in the County treatment areas underlain by Monterey and Rincon shale deposits, as discussed above. However, based on professional experience, exposed Rincon shale bedrock and overlying soils are generally loose, unconsolidated, easily disturbed, and erodible. A reduction in vegetation cover following prescribed herbivory, especially following a winter of limited precipitation and vegetation growth, could result in exposure of soils and potentially significant erosion impacts on slopes in excess of 75% (i.e., 37 degrees). Grazing best practices (Attachment F) to reduce the potential for soil erosion have been identified, in accordance with SPR GEO-8, and have been included as part of the project design. In combination with implementation of SPR GEO-1, SPR GEO-2, and SPR GEO-4, impacts would be less than significant. Best practices outlined in Attachment F require avoidance of slopes over 75% (i.e., 37 degrees) (see Attachment E), which would minimize the potential for erosion of exposed soil on steep slopes following grazing. Additionally, the best practices call for avoidance of established trails on slopes over 50% (i.e., 27 degrees). Sheep trampling of existing trails on steep slopes could damage the trails and as a result exacerbate the potential for downslope soil erosion. Installation of temporary fences upslope and downslope of these trails would prevent disturbance and associated erosion of these exposed soils, resulting in less-than-significant impacts. With implementation of best practices as described in Attachment F, in combination with implementation of SPR GEO-1, SPR GEO-2, and SPR GEO-4, no new erosion-related impacts beyond those evaluated in the PEIR would occur at County treatment areas Arroyo Hondo West and East, Baron Ranch West and East, Las Flores and Coral Canyon, San Marcos Foothills, San Marcos Foothills East, Preserve San Marcos HOA, Preserve San Marcos Private, and County Range. Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

### ***Sandstone Areas***

Another active prescribed herbivory site was inspected as representative of County treatment areas underlain by sandstone bedrock. A Dudek Certified Engineering Geologist completed a site reconnaissance of a grazing pilot project at the Tea Gardens in Montecito, to gain an understanding of potential impacts to sandstone areas from grazing activities. This site was representative of vegetation conditions following two rainy seasons. This site included slopes underlain by Coldwater sandstone bedrock and overlying Maymen-rock outcrop complex (MbH) and Maymen stony fine sandy loam (MaG) on 30% to 75% slopes (Dibblee 2023; USDA NRCS 2023). These soils generally consist of stony fine sandy loam, loam, and unweathered bedrock, which are well drained and have high runoff. The U.S. Department of Agriculture soil descriptions do not provide characterizations pertaining to erodibility; however, no soil erosion or rilling was noted in the prescribed herbivory treatment area. The abundance of broken bedrock pieces within the soil, as well as the presence of abundant chaparral, contributes to the soil stability on slopes in excess of 50%.

In addition to the steep slopes, the Tea Gardens site is representative of the soil conditions on the proposed County treatment areas underlain by sandstone bedrock and associated overlying soils, including Painted Cave South, Trout Club, San Roque South, San Roque East, San Roque West, Oak Grove, and County Range. These County treatment areas are underlain by Coldwater, Vaqueros, and Santa Barbara sandstone formations, as well as Sespe sandstone/claystone, which are mantled by soils similar to the Tea Gardens site, including Rock Outcrop-Maymen Complex, 75% to 100% slopes (Rb); Maymen stony fine sandy loam, 30% to 75% slopes (MaG); Lodo-Sespe Complex soils, 50% to 75% slopes; Todos-Lodo Complex soils, 30% to 50% slopes; and Gaviota sandy loam, 30% to 75% slopes (see Attachment E). These soils generally consist of 4 to 55 inches of sandy clay loam overlying bedrock and are somewhat excessively drained, with medium to rapid runoff (Dibblee 2023; USDA NRCS 2023). Considering the site reconnaissance completed by Dudek in April and May 2023 was completed following a winter of extremely high rainfall and abundant vegetation cover, very limited soil erosion was noted in the County treatment areas underlain by sandstone deposits, as discussed above. However, similar to the areas of shale deposits, a reduction in vegetation cover following prescribed herbivory, especially following a winter of limited precipitation and vegetation growth, could result in exposure of soils and potentially significant erosion impacts on slopes in excess of 75% (i.e., 37 degrees). With implementation of best practices outlined in Attachment F, in combination with implementation of SPR GEO-1, SPR GEO-2, and SPR GEO-4, no new erosion-related impacts would occur at County treatment areas Painted Cave South, Trout Club, San Roque South, San Roque East, San Roque West, Oak Grove, and County Range. Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

#### ***Alluvium/Older Alluvium/Terrace Deposit Areas/Fanglomerate***

At Arroyo Hondo and Baron Ranch treatment areas, on both the east and west sides of the canyons, older alluvium/terrace deposits overlie the Monterey and Rincon shale deposits (see Attachment E). These deposits generally consist of moderately consolidated gravel, sand, and silt, with some cobbles and boulders. Similarly, the northwest portion of the Oak Grove site is underlain by fanglomerate deposits, which consist of cobble-boulder fan gravel and fanglomerate deposits, composed largely of sandstone detritus. In addition, the Arroyo Hondo East project site is underlain by alluvium, which consists of unconsolidated silt, sand, and gravel that occurs on relatively flat to gently sloping canyon bottoms (Dibblee 2023). The topography of these deposits is gentle to moderately sloping, with slopes mostly ranging from 0% to 30%, with localized areas of 30% to 50%. As a result, the potential for excessive erosion to occur as a result of prescribed herbivory is very low and no new erosion-related impacts would occur at Arroyo Hondo, Baron Ranch, and Oak Grove. Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

#### **City of Goleta**

##### ***Shale Areas***

Two City of Goleta treatment areas, Northgate and La Goleta North, are partially underlain by Rincon and Monterey shale deposits and overlying Ayar clay. A portion of these shale areas consist of slopes of 30% to 50%. The remainder of these treatment areas are underlain by alluvium and older alluvium on slopes less than 30% (Dibblee 2023; USDA NRCS 2023) (see Attachment E). As described above for the County treatment areas, erosion related impacts would be potentially significant in the event that prescribed herbivory occurred on slopes in excess of 75% (i.e., 37 degrees). Neither Northgate nor La Goleta North include slopes in excess of 75% (37 degrees). As a result, no new erosion-related impacts would occur at City of Goleta treatment areas Northgate and La Goleta North. Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

**Sandstone Areas**

No City of Goleta treatment areas are underlain by sandstone deposits. As a result, no new erosion-related impacts would occur at City of Goleta treatment areas. Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

**Alluvium/Older Alluvium Areas**

The remaining City of Goleta treatment areas, including La Goleta South, Lake Los Carneros, Evergreen Park, Ellwood Mesa, Via Salerno North, and Via Salerno South, are underlain by alluvium and older alluvium on slopes predominantly less than 30%, with localized areas of 30% to 50% slopes. One localized area of slope with a gradient of 50% to 75% is present at Via Salerno South (Dibblee 2023; USDA NRCS 2023) (see Attachment E). At Lake Los Carneros, the main reservoir dam and a smaller subsidiary dam include localized slopes with a gradient of 30% to 50%. Evergreen Park includes a small slope at the south end of the area that is similarly greater than 30% but less than 50%, as well as localized steep slopes along the north-south trending creek that traverses the site. However, the project would implement SPR HYD-3 and SPR HYD-4, which establish water quality protections, such as establishment of buffers and watercourse and lake protection zones, to ensure that prescribed herbivory treatments do not impact environmentally sensitive areas such as water bodies, wetlands, or riparian areas. Exclusionary fencing would be used and grazing animals would be provided water and would be herded out of an area if accelerated soil erosion is observed. Similarly, the slopes at Ellwood Mesa are predominantly less than 30%; however, slopes varying from 30% to 50% are present within Devereux Creek, which includes standing water and traverses the site. SPR HYD-3 and SPR HYD-4 would similarly be implemented along this drainage. Therefore, the soils at City of Goleta treatment areas La Goleta South, Lake Los Carneros, Evergreen Park, Ellwood Mesa, Via Salerno North, and Via Salerno South would not be subject to excessive erosion as a result of prescribed herbivory. With implementation of SPR GEO-1, SPR GEO-2, and SPRGEO-4, as well as SPR HYD-3 and SPR HYD-4, no new erosion-related impacts would occur at these treatment areas. Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

**City of Santa Barbara**

The only treatment area within the City of Santa Barbara is the northern portion of the San Roque South treatment area. As described above, the San Roque treatment area is underlain by sandstone bedrock and associated overlying soils. A small portion of the San Roque South treatment site contains slopes greater than 75% and contains Sespe sandstone/claystone, which is mantled by soils similar to the Tea Gardens site, including Rock Outcrop-Maymen Complex on 75% to 100% slopes (see Attachment E). Very limited soil erosion was noted during the field reconnaissance survey. However, similar to the areas of shale deposits, a reduction in vegetation cover following prescribed herbivory, especially following a winter of limited precipitation and vegetation growth, could result in exposure of soils and potentially significant erosion impacts on slopes in excess of 75% (i.e., 37 degrees). With implementation of best practices outlined in Attachment F and avoidance of areas with slopes greater than 75%, in combination with implementation of SPR GEO-1, SPR GEO-2, and SPR GEO-4, no new erosion-related impacts would occur at the San Roque South treatment area. Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<p><b>Impact GEO-2:</b> Increase risk of landslides</p>	<p>Impact GEO-2, pp. 3.7-30-3.7-31</p>	<p>SPR GEO-3 SPR GEO-4 SPR GEO-7 SPR GEO-8</p>	<p>LTS</p>	<p>Yes</p>	<p>SPR GEO-4 SPR HYD-3 SPR HYD-4</p>	<p>LTS</p>	<p>☒</p>
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## Impact Discussion:

### County of Santa Barbara

A review of geologic maps and landslide inventory mapping data revealed that landslides have occurred throughout the County foothill areas, including proposed treatment areas San Roque West, Trout Club, Las Flores/Coral Canyon, and Baron Ranch (USGS 2023; Dibblee 2023) (see Attachment E). As discussed above for Impact GEO-1, the majority of the County treatment areas are underlain at least in part by Monterey and Rincon shale deposits, including Arroyo Hondo West and East, Baron Ranch West and East, Las Flores and Coral Canyon, San Marcos Foothills, San Marcos Foothills East, Preserve San Marcos HOA, Preserve San Marcos Private, and County Range (Dibblee 2023). The steeper hillsides (i.e., 50% to 250% slopes [27 to 68 degrees]) underlain by these shale deposits in the County treatment areas are overlain by clay soils, primarily Ayar clay (AhF2, AhG), which typically consists of eroded clay, as well as landslide soils (AE-Argixerolls and Xererts) (USDA NRCS 2023) (see Attachment E). The Monterey and Rincon shale deposits are regionally known (within the County) as being prone to slope failure. The Santa Barbara County Comprehensive Plan, Seismic Safety and Safety Element (County of Santa Barbara 2015b), identifies these treatment areas as moderate slope stability/landslide areas with moderate geologic problems. Slope failures within these shale deposits typically occur as a result of excessive precipitation over short periods of time and/or undercutting/destabilizing slopes during grading activities. However, as described for Impact GEO-1, in general, the treatment areas underlain by Rincon shale typically consist only of grasses, weeds, and mustard and less shrubs in comparison to areas underlain by Monterey shale. As a result, the Rincon shale soils would generally be more susceptible to slope instability than the areas of Monterey shale, due to the lack of a mosaic of shrubs that lessens the amount of potential soil exposure and increases slope stability.

The PEIR indicated that removing vegetation during treatments implemented under the CalVTP could potentially increase the risk of landslide by removing root systems that stabilize slopes. This risk was addressed with SPR GEO-3, which requires stabilization of mechanically disturbed or prescribed-herbivory-disturbed soil; SPR GEO-4, which requires erosion inspections; SPR GEO-7, which minimizes erosion by prohibiting mechanical treatment on steep slopes; and SPR GEO-8, which requires that a registered professional forester or licensed geologist evaluate treatment areas with slopes greater than 50% for unstable areas. The PEIR also indicated that removing vegetation could potentially increase the risk of landslide by removing vegetation that normally removes soil moisture, thereby increasing the water content of the soil and making soils more prone to sliding. The PEIR indicated that removal of vegetative cover decreases interception and transpiration; in wetter areas, this generally increases annual water yields. A rising groundwater table (“bottom up” saturation) within the saturated zone leads to a gradual growth of porewater pressure in the soil, which leads to destabilization of slopes and can lead to slope failure.

As previously discussed in Section 1.2, the inclusion of areas outside the CalVTP treatable landscape and the inability to implement SPR GEO-7 represent a revision or change to the CalVTP. The inability to implement SPR GEO-7 relates to the use of prescribed herbivory treatments on slopes greater than 50%. Due to steep terrain that precludes access for manual or mechanical treatments, prescribed herbivory is the most feasible treatment activity in the proposed treatment areas. Grazing would result in very short, cropped grasses, interspersed between a mosaic of shrubs, but would not remove root systems that could result in higher soil water content.

A Dudek Certified Engineering Geologist completed a site reconnaissance of the proposed treatment areas in April and May 2023, following a rainy season of extremely high precipitation. Many older, deep-seated landslides were observed within the Monterey and Rincon shale deposits, especially at Arroyo Hondo, Baron Ranch, and Las Flores/Coral Canyon. In the northern portions of these canyons, landslides typically occur in Rincon shale deposits in broad canyon areas, resulting in very steep slopes (i.e., greater than 75%) at the upper headscarp portion of the slides and moderately steep slopes (less than 75%) in the lower portion of the slide deposits. The intervening ridges between the landslides are stable and generally have slopes of less than 75%. In

some areas, such as the northern portion of Baron Ranch East, terracing for agriculture has contributed to stabilizing the slopes within the Rincon shale. In the southern portion of Las Flores Canyon and Baron Ranch, abundant landslides occur on very steep (i.e., greater than 75%) slopes within the Monterey shale deposits. However, the upper part of these slopes are gently to moderately sloping (i.e., less than 75%).

In addition to the older landslides, many recent shallow soil slumps were observed within these shale deposits. These slumps typically occurred as a result of oversaturated soils on slopes in excess of 75% (37 degrees) and took place topographically above roadcuts and agricultural terraces, which result in locally oversteepened slopes. In addition, shallow landslides/soil slumps were observed on steep slopes at the Oak Grove site, within the Santa Barbara sandstone; at the Trout Club, within the Coldwater sandstone; and at San Roque East and West, within the Sespe sandstone/claystone. However, with the exception of the Sespe Formation at San Roque, which includes abundant claystone, shallow slope failures within the sandstone deposits are very limited as, in general, the areas of sandstone include sandy to rocky, more permeable topsoils and more chaparral, which contributes to stabilizing the slopes. As a result, slope failures within the sandstone areas are primarily limited to old, inactive large landslides, such as at the Trout Club. The majority of the Trout Club neighborhood overlies such an ancient landslide (Dibblee 2023; USGS 2023). No slope failures were observed in the alluvium, older alluvium, or terrace deposits, as the topography of these areas is generally gently sloping.

Although prescribed herbivory would not result in removal of vegetation root systems, substantially decreased vegetation cover on slopes in excess of 75%, especially following a winter of heavy precipitation, could potentially destabilize the shale deposits and overlying clay soils, resulting in shallow soil slumps and possibly deep-seated landslides. Although less likely, grazing on slopes in excess of 75% could similarly destabilize slopes underlain by sandstone and claystone. With avoidance of areas in excess of 75% slope, this potentially significant impact would be reduced to less than significant. The grazing best practices outlined in Attachment F and included as part of the project require avoidance of slopes over 75% (i.e., 37 degrees) (see Attachment E for mapped areas with slopes greater than 75%), which would minimize the potential for slope instability on steep slopes following grazing. In addition, as part of the project, potential slope instability would be minimized through implementation of SPR GEO-4, which requires erosion inspections.

In summary, with implementation of grazing best practices to reduce the likelihood of erosion that could lead to landslides, in combination with implementation of SPR GEO-3 and SPR GEO-4, no new slope stability-related impacts would occur at County treatment areas. Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

### **City of Goleta**

As discussed for Impact GEO-1, two City of Goleta treatment areas, Northgate and La Goleta North, are partially underlain by Rincon and Monterey shale deposits and overlying Ayar clay. The remainder of these treatment areas are underlain by alluvium and older alluvium on slopes less than 50% (Dibblee 2023; USDA NRCS 2023) (see Attachment E). As described above for the County treatment areas, slope stability related impacts would be potentially significant in the event that prescribed herbivory occurred on slopes in excess of 75% (i.e., 37 degrees) in areas underlain by shale deposits. Neither Northgate nor La Goleta North include slopes in excess of 75% (37 degrees). As a result, no new slope stability-related impacts with respect to the PEIR would occur at City of Goleta treatment areas Northgate and La Goleta North.

No City of Goleta treatment areas are underlain by sandstone deposits. As a result, no new slope stability-related impacts with respect to the PEIR would occur at City of Goleta treatment areas.

With the exception of one localized slope with a gradient of 50% to 75% at Via Salerno South, the remaining City of Goleta treatment areas, including La Goleta South, Lake Los Carneros, Evergreen Park, Ellwood Mesa, and Via Salerno North, are underlain by alluvium and older alluvium on slopes

predominantly less than 50% (Dibblee 2023) (see Attachment E). At Lake Los Carneros, the main reservoir dam and a smaller subsidiary dam include localized slopes with a gradient of 30% to 50%. Evergreen Park includes a small slope at the south end of the area with a gradient of 30% to 50%, as well as similarly steep slopes along the north-south trending creek that traverses the site. However, the project would implement SPR HYD-3 and SPR HYD-4, which establish water quality protections, such as establishment of buffers and watercourse and lake protection zones, to ensure that prescribed herbivory treatments do not impact environmentally sensitive areas such as water bodies, wetlands, or riparian areas. Exclusionary fencing would be used and grazing animals would be provided water and would be herded out of an area if accelerated soil erosion is observed. Similarly, the slopes at Ellwood Mesa are predominantly less than 30%; however, slopes of 30% to 50% are locally present within Devereux Creek, which includes standing water. SPR HYD-3 and SPR HYD-4 would similarly be implemented along this drainage. Therefore, the localized steep slopes at City of Goleta treatment areas La Goleta South, Lake Los Carneros, Evergreen Park, Ellwood Mesa, Via Salerno North, and Via Salerno South would not be subject to slope instability as a result of prescribed herbivory. With implementation of SPR HYD-3 and SPR HYD-4, no new slope stability-related impacts would occur at these treatment areas. Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

**City of Santa Barbara**

As discussed for Impact GEO-1, the only treatment area within the City of Santa Barbara is the northern portion of the San Roque South treatment area, which contains a small area with slopes greater than 75% underlain by Sespe formation sandstone/claystone. Grazing on slopes in excess of 75% could destabilize slopes underlain by sandstone and claystone. With avoidance of areas in excess of 75% slope, this potentially significant impact would be reduced to less than significant. The grazing best practices outlined in Attachment F and included as part of the project require avoidance of slopes over 75% (i.e., 37 degrees) (see Attachment E for mapped areas with slopes greater than 75%), which would minimize the potential for slope instability on steep slopes following grazing. With implementation of best practices outlined in Attachment F, in combination with implementation of SPR GEO-1, SPR GEO-2, and SPR GEO-4, no new erosion-related impacts would occur at the San Roque South treatment area. Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

SPRs and MMs	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
<p><b>SPR GEO-1 Suspend Disturbance During Heavy Precipitation:</b> The project proponent will suspend mechanical, prescribed herbivory, and herbicide treatments if the National Weather Service forecast is a “chance” (30% or more) of rain within the next 24 hours. Activities that cause mechanical soil disturbance may resume when precipitation stops and soils are no longer saturated (i.e., when soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur). Indicators of saturated soil conditions may include, but are not limited to: (1) areas of ponded water, (2) pumping of fines from the soil or road surfacing, (3) loss of bearing strength resulting in the deflection of soil or road surfaces under a load, such as the creation of wheel ruts, (4) spinning or churning of wheels or tracks that produces a wet slurry, or (5) inadequate traction without blading wet soil or surfacing materials. This SPR applies to all treatment activities and all treatment types.</p>	Yes	SBCFD During	SBCFD

<p><b>SPR GEO-2 Limit High Ground Pressure Vehicles:</b> The project proponent will limit heavy equipment that could cause soil disturbance or compaction to be driven through treatment areas when soils are wet and saturated to avoid compaction and/or damage to soil structure. Saturated soil means that soil and/or surface material pore spaces are filled with water to such an extent that runoff is likely to occur. If use of heavy equipment is required in saturated areas, other measures such as operating on organic debris, using low ground pressure vehicles, or operating on frozen soils/snow covered soils will be implemented to minimize soil compaction. Existing compacted road surfaces are exempted as they are already compacted from use. This SPR applies to all treatment activities and all treatment types.</p>	Yes	SBCFD During	SBCFD
<p><b>SPR GEO-3 Stabilize Disturbed Soil Areas:</b> The project proponent will stabilize soil disturbed during mechanical, and prescribed herbivory treatments, and prescribed burns that result in exposure of bare soil over 50% or more of the treatment area with mulch or equivalent immediately after treatment activities, to the maximum extent practicable, to minimize the potential for substantial sediment discharge. If mechanical, or prescribed herbivory, or prescribed burn treatment activities could result in substantial sediment discharge from soil disturbed by machinery, or animal hooves, or being bare, organic material from mastication or mulch will be incorporated onto at least 75% of the disturbed soil surface where the soil erosion hazard is moderate or high, and 50% of the disturbed soil surface where soil erosion hazard is low to help prevent erosion. Where slash mulch is used, it will be packed into the ground surface with heavy equipment so that it is sufficiently in contact with the soil surface. This SPR applies to all treatment activities and all treatment types.</p>	No	N/A	N/A
<p><b>SPR GEO-4 Erosion Monitoring:</b> The project proponent will inspect treatment areas for the proper implementation of erosion control SPRs and mitigations prior to the rainy season. If erosion control measures are not properly implemented, they will be remediated prior to the first rainfall event per SPR GEO-3 and GEO-8. Additionally, the project proponent will inspect for evidence of erosion after the first large storm or rainfall event (i.e., <math>\geq 1.5</math> inches in 24 hours) as soon as is feasible after the event. Any area of erosion that will result in substantial sediment discharge will be remediated within 48 hours per the methods stated in SPRs GEO-3 and GEO-8. This SPR applies to all treatment activities and all treatment types.</p>	Yes	SBCFD During	SBCFD
<p><b>SPR GEO-5 Drain Stormwater Via Water Breaks:</b> The project proponent will drain compacted and/or bare linear treatment areas capable of generating storm runoff via water breaks using the spacing and erosion control guidelines contained in Sections 914.6, 934.6, and 954.6(c) of the California Forest Practice Rules (February 2019 version). Where waterbreaks cannot effectively disperse surface runoff, including where waterbreaks cause surface run-off to be concentrated on downslopes, other erosion controls will be installed as needed to maintain site productivity by minimizing soil loss. This SPR applies to all treatment activities and all treatment types.</p>	No	N/A	N/A



<p><b>SPR GEO-6 Minimize Burn Pile Size:</b> The project proponent will not create burn piles that exceed 20 feet in length, width, or diameter, except when on landings, road surfaces, or on contour to minimize the spatial extent of soil damage. In addition, burn piles will not occupy more than 15% of the total treatment area. The project proponent will not locate burn piles in a Watercourse and Lake Protection Zone as defined in SPR HYD-4. This SPR applies to all treatment activities and all treatment types.</p>	No	N/A	N/A
<p><b>SPR GEO-7 Minimize Erosion:</b> To minimize erosion, the project proponent will: (1) Prohibit use of heavy equipment where any of the following conditions are present: (i) Slopes steeper than 65%. (ii) Slopes steeper than 50% where the erosion hazard rating is high or extreme. (iii) Slopes steeper than 50% that lead without flattening to sufficiently dissipate water flow and trap sediment before it reaches a watercourse or lake.</p> <p>(2) On slopes between 50% and 65% where the erosion hazard rating is moderate, and all slope percentages are for average slope steepness based on sample areas that are 20 acres, or less, heavy equipment will be limited to: (i) Existing tractor roads that do not require reconstruction, or (ii) New tractor roads flagged by the project proponent prior to the treatment activity. (3) Prescribed herbivory treatments will not be used in areas with over <del>50%</del><b>75%</b> slope. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.</p> <p><u>Project-Specific Requirements:</u>  <u>For prescribed herbivory projects, to minimize soil erosion and potential slope instability the project proponent will avoid grazing on slopes in excess of 75% (i.e., 37 degrees). Further, to avoid erosion-related impacts to existing trails on steep slopes, the project proponent will avoid grazing on established trails on slopes in excess of 50% (i.e., 27 degrees).</u></p>	Yes	SBCFD During	SBCFD
<p><b>SPR GEO-8 Steep Slopes:</b> The project proponent will require a Registered Professional Forester (RPF) or licensed geologist to evaluate treatment areas with slopes greater than 50% for unstable areas (areas with potential for landslide) and unstable soils (soil with moderate to high erosion hazard). If unstable areas or soils are identified within the treatment area, are unavoidable, and will be potentially directly or indirectly affected by the treatment, a licensed geologist (P.G. or C.E.G.) will determine the potential for landslide, erosion, of other issue related to unstable soils and identity measures (e.g., those in SPR GEO-7) that will be implemented by the project proponent such that substantial erosion or loss of topsoil would not occur. This SPR applies only to mechanical treatment activities and WUI fuel reduction, non-shaded fuel breaks, and ecological restoration treatment types, including treatment maintenance.</p> <p><u>Project Specific Requirements:</u>  <u>For prescribed herbivory treatments in areas with slopes greater than 50%, a Registered Professional Forester (RPF) or licensed geologist shall evaluate treatment areas with slopes greater than 50% for unstable areas (areas with potential for landslide) and unstable soils</u></p>	Yes	SBCFD During	SBCFD

<p><u>(soil with moderate to high erosion hazard). If unstable areas or soils are identified within the treatment area, are unavoidable, and will be potentially directly or indirectly affected by the treatment, a licensed geologist (P.G. or C.E.G.) will determine the potential for landslide, erosion, or other issue related to unstable soils and identify measures (e.g., those in SPR GEO-7) that will be implemented by the project proponent such that substantial erosion or loss of topsoil would not occur. This SPR applies prescribed herbivory treatments.</u></p>			
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### 3.7 Greenhouse Gas Emissions

Impacts and Discussions	PEIR-Specific			Project-Specific			
	Identify Location of Impact Analysis in the PEIR	SPRs & MMs Applicable to the Impact Analysis in PEIR	Identify Impact Significance in the PEIR	Does the Impact Apply to the Project Treatments Proposed	SPRs & MMs Applicable to the Project Impact Analysis	Identify Impact Significance for the Treatment Project	No New Impact
<p><b>Impact GHG-1:</b> Conflict with the applicable plan, policy, or regulation of an agency adopted for the purpose of reducing the emissions of GHGs</p>	Impact GHG-1, pp. 3.8-10-3.8-11	SPR GHG-1	LTS	Yes	N/A	LTS	☒

**Impact Discussion:**

The use of vehicles and equipment associated with herbivory treatments would result in GHG emissions. Consistency with plans, policies, and regulations governing GHG emissions was examined in the PEIR. The project would be consistent with the applicable policies, plans, and regulations to reduce GHG emissions as described in California’s 2017 Climate Change Scoping Plan (CARB 2017), the California Forest Carbon Plan (Forest Climate Action Team 2018), and the Draft California 2030 Natural and Working Lands Climate Change Implementation Plan (CARB 2019). It would also be consistent with local policies, plans, and regulations regarding GHG emission reduction in the County’s Energy and Climate Action Plan (County of Santa Barbara 2015c), Sustainability Action Plan (County of Santa Barbara 2010b), and Climate Action Study (County of Santa Barbara 2011); the Goleta Climate Action Plan (City of Goleta 2014); and the City of Santa Barbara Climate Action Plan (City of Santa Barbara 2012). The project would be implemented so as to not be in conflict with applicable plans, policies, and/or regulations; the impact would be less than significant.

SPR GHG-1 is not applicable to the proposed project; SBCFD is not subject to providing information to inform reporting under the Board of Forestry and Fire Protection’s Assembly Bill 1504 Carbon Inventory Process because this project is not a registered offset project. Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR

<b>Impact GHG-2:</b> Generate Greenhouse Gas Emissions through Treatment Activities	Impact GHG-2, p. 3.8-11–3.8-17	SPR AQ-3 MM GHG-2	PSU	Yes	N/A	PSU	<input checked="" type="checkbox"/>
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**Impact Discussion:**

The intent of vegetation treatments is to reduce wildfire risk, which would reduce GHG emissions related to wildfires. The project would result in the generation of GHG emissions from treatment activities through the use of vehicles and trucks to transport animals and equipment needed to perform prescribed herbivory treatments. Although mitigation actions would be implemented to reduce GHG emissions, the treatments would still contribute to the annual emissions generated by the CalVTP and would remain potentially significant and unavoidable. The project does not include the use of prescribed burning; therefore SPR AQ-3 and MM GHG-2 do not apply.

Impacts would be potentially significant and unavoidable. This determination is consistent with the PEIR and would not constitute a substantially more severe significant impact than what was covered in the PEIR.

<b>Other Impacts to related to Greenhouse Gases:</b> Would the project result in other impacts related to greenhouse gases that are not evaluated in the CalVTP PEIR?	N/A	N/A	N/A	No	N/A	N/A	<input checked="" type="checkbox"/>
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**Impact Discussion:**

The project is consistent with the CalVTP PEIR. Site-specific characteristics of the proposed treatment plan are consistent with the environmental and regulatory conditions outlined in the CalVTP PEIR, Section 3.8. While the inclusion of land outside the CalVTP treatable landscape is a change to the geographic extent in the PEIR and the use of prescribed herbivory on slopes over 50% represents a change to the PEIR, the existing conditions in the project study area relating to GHG emissions are essentially the same for treatment areas within the CalVTP treatable landscape and treatment areas outside the CalVTP treatable landscape, as well as on steep slopes. As a result, the impacts associated with the proposed project are consistent with the impacts covered in the PEIR and the project would not result in new impacts not covered in the PEIR. No new impact related to GHG emissions would occur.

SPRs and MMs	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/ Monitoring Entity
<b>SPR GHG-1 Contribute to the AB1504 Carbon Inventory Process:</b> Projects subject to the AB 1504 process will provide all necessary data about the treatment that is needed by the U.S. Forest Service and FRAP to fulfill requirements of the AB 1504 carbon inventory. This SPR applies to all treatment activities and all treatment types, including treatment maintenance.	No	N/A	N/A

<b>MM GHG-2 Implement GHG Emission Reduction Techniques during Prescribed Burns:</b> The project proponent will document in the Burn Plan required pursuant to SPR AQ-3 which methods for reducing GHG emissions can feasibly be integrated into the treatment design.	No	N/A	N/A
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### 3.8 Energy

Impacts and Discussions	PEIR-Specific			Project-Specific			
	Identify Location of Impact Analysis in the PEIR	SPRs & MMs Applicable to the Impact Analysis in PEIR	Identify Impact Significance in the PEIR	Does the Impact Apply to the Project Treatments Proposed	SPRs & MMs Applicable to the Project Impact Analysis	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact ENG-1:</b> Result in wasteful, inefficient, or unnecessary consumption of energy	Impact ENG-1, pp. 3.9-7-3.9-8	N/A	LTS	Yes	N/A	LTS	<input checked="" type="checkbox"/>

**Impact Discussion:**

The project would require the consumption of energy through the use of fossil fuels associated with the use of vehicles. Diesel- and petroleum-based fuels, such as gasoline, would be consumed due to the use of trucks during the transport of personnel, animals (goats and sheep), and equipment to and from and within the project site. The primary objective of the project is to reduce wildfire risk and decrease the intensity of fires. Wildfire response requires an immediate response from emergency personnel and mobilization of equipment from across the state and even across the nation, which often results in inefficient consumption of energy. Implementation of treatment activities would reduce wildfire risk and the intensity of fire responses. There are no SPRs applicable to this impact. Impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR

<b>Other Impacts to Energy Resources:</b> Would the project result in other impacts on energy resources that are not evaluated in the CalVTP PEIR?	N/A	N/A	N/A	No	N/A	N/A	<input checked="" type="checkbox"/>
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**Impact Discussion:**

The project is consistent with the CalVTP PEIR. Site-specific characteristics of the proposed treatment plan are consistent with the environmental and regulatory conditions outlined in the CalVTP PEIR, Section 3.9. While the inclusion of land outside the CalVTP treatable landscape is a change to the geographic extent in the PEIR and the use of prescribed herbivory on slopes over 50% represents a change to the PEIR, the existing conditions in the

project study area and required energy use are essentially the same for treatment areas within the CalVTP treatable landscape and treatment areas outside the CalVTP treatable landscape. As a result, the impacts associated with the proposed project are consistent with the impacts covered in the PEIR. The project would not result in new impacts not covered in the PEIR.

### 3.9 Hazardous Materials, Public Health, and Safety

Impacts and Discussions	PEIR-Specific			Project-Specific			
	Identify Location of Impact Analysis in the PEIR	SPRs & MMs Applicable to the Impact Analysis in PEIR	Identify Impact Significance in the PEIR	Does the Impact Apply to the Project Treatments Proposed	SPRs & MMs Applicable to the Project Impact Analysis	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact HAZ-1:</b> Create a significant health hazard from the use of hazardous materials	Impact HAZ-1, pp. 3.10-14-3.10-15	SPR HAZ-1 SPR HYD-4	LTS	Yes	SPR HAZ-1 SPR HYD-4	LTS	<input checked="" type="checkbox"/>

**Impact Discussion:**

The proposed project would include prescribed herbivory. Treatment activities and transportation of personnel, animals, and equipment would require the use of hazardous materials, including fuels, oils, and lubricants. Potential impacts related to use of such materials during treatment activities are within the scope of the activities and impacts addressed in the PEIR because the types of treatments, associated equipment, and types of hazardous materials that would be used are consistent with those analyzed in the PEIR. SPR HAZ-1 is applicable to the project and requires that all equipment be properly maintained and regularly inspected for leaks. Additionally, the project proponent would ensure that the transport and use of hazardous materials would be conducted in compliance with existing federal, state, and local regulations governing hazardous material use, storage, disposal, and transport to prevent project-related risks to public health and safety.

Additionally, project treatment activities would not be conducted within protection zones for watercourses (SPR HYD-4). Watercourses and potential drainages leading to watercourses have been identified during field surveys and protection zones have been implemented during project design (further discussed in Section 3.10, Hydrology and Water Quality). Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR

<b>Impact HAZ-2:</b> Create a significant health hazard from the use of herbicides	Impact HAZ-2, pp. 3.10-16-3.10-18	SPR HAZ-5 through SPR HAZ-9	LTS	No	N/A	N/A	<input checked="" type="checkbox"/>
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**Impact Discussion:**

The project does not propose the use of herbicides; this impact does not apply.

<b>Impact HAZ-3:</b> Expose the public or environment to significant hazards from disturbance to known hazardous material sites	Impact HAZ-3, pp. 3.10-18-3.10-19	MM HAZ-3	PS	Yes	MM HAZ-3	LTSM	<input checked="" type="checkbox"/>
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**Impact Discussion:**

The proposed project treatments would include prescribed herbivory, which would result in soil disturbance and could expose the public, workers, or the environment to hazards from a hazardous materials site, if present within the project site. The potential for the proposed treatment activities to encounter contamination that could expose workers or the environment to hazardous materials was examined in the PEIR. This impact was identified as potentially significant in the PEIR because hazardous materials sites could be present within treatment areas and soil disturbance or burning in those areas could expose people or the environment to hazards.

Due to the potential, albeit low, for soil disturbance, MM HAZ-3 is applicable to the project. With the implementation of MM HAZ-3, searches of the California Department of Toxic Substances Control’s EnviroStor were conducted (results are contained within Attachment G). These databases contain information regarding the location and status of hazardous materials sites included on the Cortese List (California Government Code Section 65962.5). A review of these regulatory databases showed that the project site does not contain any known hazardous materials sites and the nearest known hazardous materials site is approximately 0.45 miles from the Lake Los Carneros treatment area (DTSC 2022). The database indicated that there are leaking underground storage tank cleanup sites within the treatment areas. However, the project does not include ground disturbance and proposed treatment activities are not likely to pose a risk to workers, livestock, the public, or the environment. Therefore, project impacts would be less than significant with mitigation (MM HAZ-3), and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<b>Other Impacts to Hazardous Materials, Public Health and Safety:</b> Would the project result in other impacts to hazardous materials, public health and safety that are not evaluated in the CalVTP PEIR?	N/A	N/A	N/A	No	N/A	N/A	<input checked="" type="checkbox"/>
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**Impact Discussion:**

The project is consistent with the CalVTP PEIR and the site-specific characteristics are consistent with the regulatory and environmental setting examined in Section 3.10 of the PEIR. The inclusion of land outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR and the use of prescribed herbivory on slopes greater than 50% represents a change to the PEIR. However, the environmental

conditions with respect to hazards outside the treatable landscape and within the treatable landscape, as well as within steep slope areas, are essentially the same. Further, the use of hazardous materials and proximity to known hazardous material sites would be the same. Therefore, the project would not result in other impacts related to hazards and hazardous materials not addressed in the PEIR. The impacts associated with the proposed treatment activities were also determined to be consistent with the PEIR and would not result in a more significant impact.

SPRs and MMs	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/ Monitoring Entity
<b>SPR HAZ-1 Maintain All Equipment:</b> The project proponent will maintain all diesel- and gasoline-powered equipment per the manufacturer's specifications, and in compliance with all state and federal emissions requirements. Maintenance records will be available for verification. This SPR applies to all treatment activities and treatment types.	Yes	<u>SBCFD</u> Prior-During	<u>SBCFD</u>
<b>SPR HAZ-2 Require Spark Arrestors:</b> This SPR applies only to manual treatment activities and all treatment types	No	<u>N/A</u>	<u>N/A</u>
<b>SPR HAZ-3 Require Fire Extinguishers:</b> The project proponent will require tree cutting crews to carry one fire extinguisher per chainsaw. Each vehicle would be equipped with one long-handled shovel and one ax or Pulaski consistent with PRC Section 4428. This SPR applies only to manual treatment activities and all treatment types.	No	<u>N/A</u>	<u>N/A</u>
<b>SPR HAZ-4 Prohibit Smoking in Vegetated Areas:</b> This SPR applies to all treatment activities and treatment types.	Yes	<u>SBCFD</u> During	<u>SBCFD</u>
<b>SPR HAZ-5 Spill Prevention and Response Plan:</b> This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	No	<u>N/A</u>	<u>N/A</u>
<b>SPR HAZ-6 Comply with Herbicide Application Regulations:</b> This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	No	<u>N/A</u>	<u>N/A</u>
<b>SPR HAZ-7 Triple Rinse Herbicide Containers:</b> This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	No	<u>N/A</u>	<u>N/A</u>
<b>SPR HAZ-8 Minimize Herbicide Drift to Public Areas:</b> This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	No	<u>N/A</u>	<u>N/A</u>
<b>SPR HAZ-9 Notification of Herbicide Use in the Vicinity of Public Areas:</b> This SPR applies only to herbicide treatment activities and all treatment types, including treatment maintenance.	No	<u>N/A</u>	<u>N/A</u>
<b>MM HAZ-3: Identify and Avoid Known Hazardous Waste Sites:</b> Prior to the start of vegetation treatment activities requiring soil disturbance (i.e., mechanical treatments) or prescribed burning, CAL FIRE and other project proponents will make reasonable efforts to check with the landowner or other entity with jurisdiction (e.g., California Department of Parks and Recreation) to determine if there are any sites known to have previously used, stored, or disposed of hazardous materials.	Yes	<u>SBCFD</u> Prior	<u>SBCFD</u>

### 3.10 Hydrology and Water Quality

Impacts and Discussions	PEIR-Specific			Project-Specific			
	Identify Location of Impact Analysis in the PEIR	SPRs & MMs Applicable to the Impact Analysis in PEIR	Identify Impact Significance in the PEIR	Does the Impact Apply to the Project Treatments Proposed	SPRs & MMs Applicable to the Project Impact Analysis	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact HYD-1:</b> Violate water quality standards or waste discharge requirements, substantially degrade surface or ground water quality, or conflict with or obstruct the implementation of a water quality control plan through the implementation of prescribed burning	Impact HYD-1, pp. 3.11-25-3.11-27	SPR AQ-3 SPR HYD-4 SPR BIO-4 SPR BIO-5 SPR GEO-4 SPR GEO-6 MM BIO-3b	LTS	No	N/A	N/A	<input checked="" type="checkbox"/>

**Impact Discussion:**

The project does not include the use of prescribed burning; this impact does not apply. .

<b>Impact HYD-2:</b> Violate water quality standards or waste discharge requirements, substantially degrade surface or ground water quality, or conflict with or obstruct the implementation of a water quality control plan through the implementation of manual or mechanical treatment activities	Impact HYD-2, pp. 3.11-27-3.11-29	SPR HYD-1 SPR HYD-4 SPR HYD-5 SPR BIO-1 SPR GEO-1 through 4 SPR GEO-7 SPR GEO-8 SPR HAZ-1 SPR HAZ-5	LTS	No	N/A	N/A	<input checked="" type="checkbox"/>
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**Impact Discussion:**

The project does not include the use of mechanical or manual treatment activities; this impact does not apply.



<b>Impact HYD-3:</b> Violate water quality standards or waste discharge requirements, substantially degrade surface or ground water quality, or conflict with or obstruct the implementation of a water quality control plan through prescribed herbivory	Impact HYD-3, pp. 3.11-29	SPR HYD-3	LTS	Yes	SPR HYD-3	LTS	☒
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**Impact Discussion:**

The project includes vegetation treatment activities through the use of prescribed herbivory. As discussed in the PEIR, the use of prescribed herbivory has the potential to impact water quality. There are several creeks, including Las Vegas Creek, Atascadero Creek, Cieneguitas Creek, and Arroyo Burro, and small water bodies within the vicinity of treatment areas. Additionally, the project overlies the Goleta, Mission Canyon, and Santa Barbara groundwater basins. Further, through implementation of SPR BIO-1, data review and reconnaissance-level surveys identified the location of riparian habitat and identified the location of potential wetlands within the project sites. Streams that would likely be considered waters of the U.S. are relatively well known from data included in the NHD (USGS 2022) and the NWI (USFWS 2022) and have been included in project data. Project sites supporting riparian vegetation, and those potentially supporting wetlands, are identified in Table 3 of Attachment C (Biological Technical Memorandum). In general, few potentially jurisdictional waters or wetlands occur within the project sites, which were designed, in part, to avoid such areas. Further, the project would implement SPR HYD-3, which would reduce the potential for water quality impacts as determined in the PEIR. Prescribed herbivory treatments would be implemented with water quality protections (SPR HYD-3), including keeping animals out of water bodies, wetlands, or riparian areas; providing drinking water for animals; and avoiding soil erosion. Per SPR HYD-3 the project would prevent grazing animals from lingering in riparian areas by establishing buffers around the riparian zones, thereby preventing the denudation of vegetation, loss of soil structure, and accumulation of animal waste adjacent to water bodies. Water will be provided on site for the grazing animals to prevent them from seeking out existing water bodies. Grazing will also be monitored to prevent accelerated soil erosion and animals moved accordingly. Stream access points and crossings would be avoided to further prevent water quality impacts. Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<b>Impact HYD-4:</b> Violate water quality standards or waste discharge requirements, substantially degrade surface or ground water quality, or conflict with or obstruct the implementation of a water quality control plan through the ground application of herbicides	Impact HYD-4, pp. 3.11-30-3.11-31	SPR HYD-5 SPR BIO-4 SPR HAZ-5 SPR HAZ-7	LTS	No	N/A	N/A	☒
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**Impact Discussion:**

The project does not propose the use of herbicides; this impact does not apply. Further, SPR HYD-5, SPR BIO-4, SPR HAZ-5, and SPR HAZ-7 are not applicable to the project.

<b>Impact HYD-5:</b> Substantially alter the existing drainage pattern of a treatment site or area	Impact HYD-5, pp. 3.11-31	SPR HYD-4 SPR HYD-6 SPR GEO-5	LTS	Yes	SPR HYD-4 SPR HYD-6	LTS	☒
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**Impact Discussion:**

Based on the PEIR, the potential for alteration of drainage patterns would be greatest as a result of extensive ground disturbance required for creation of non-shaded fuel breaks. Proposed project treatments would be limited to prescribed herbivory; non-shaded fuel breaks would not be created. Additionally, SPR HYD-4 and SPR HYD-6 would be implemented, which would ensure that watercourses are protected. SPR GEO-5 would not apply because the project does not propose compacted and/or bare linear treatment areas. As a result, the project would not substantially alter the existing drainage pattern of a treatment site or area. Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR

<b>Other Impacts to Hydrology and Water Quality:</b> Would the project result in other impacts to hydrology and water quality that are not evaluated in the CalVTP PEIR?	N/A	N/A	N/A	No	N/A	N/A	<input checked="" type="checkbox"/>
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**Impact Discussion:**

The project is consistent with the CalVTP PEIR and the site-specific characteristics are consistent with the regulatory and environmental setting examined in Section 3.11 of the PEIR. The inclusion of land outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR and use of prescribed herbivory on slopes greater than 50% represents a change to the PEIR. However, the environmental conditions, including proximity to surface waters, groundwater, and existing drainage of the treatment areas outside the treatable landscape and within the treatable landscape, as well as within steep slope areas, are essentially the same. Therefore, the project would not result in other impacts related to hydrology and water quality not addressed in the PEIR. The impacts associated with the proposed treatment activities were also determined to be consistent with the PEIR and would not result in a more significant impact.

<b>SPRs and MMs</b>	<b>Applicable</b>	<b>Implementing Entity &amp; Timing Relative to Implementation</b>	<b>Verifying/Monitoring Entity</b>
<b>SPR HYD-1 Comply with Water Quality Regulations:</b> Project proponents must conduct proposed vegetation treatments in conformance with appropriate RWQCB timber-, vegetation-, and land disturbance-related WDRs and/or related Conditional Waivers of WDRs (Waivers), and appropriate Basin Plan Prohibitions. Where these regulatory requirements differ, the most restrictive will apply. This SPR applies to all treatment activities and treatment types.	Yes	<u>SBCFD</u> Prior-During	<u>SBCFD</u>
<b>SPR HYD-2 Avoid Construction of New Roads:</b> The project proponent will not construct or reconstruct (i.e., cutting or filling involving less than 50 cubic yards/0.25 linear road miles) any new roads (including temporary roads). This SPR applies to all treatment activities and treatment types.	Yes	<u>SBCFD</u> Prior-During	<u>SBCFD</u>
<b>SPR HYD-3 Water Quality Protections for Prescribed Herbivory:</b> The project proponent will implement water quality protections for all prescribed herbivory treatments. This SPR applies to prescribed herbivory treatment activities and all treatment types, including treatment maintenance.	Yes	<u>SBCFD</u> Prior-During	<u>SBCFD</u>

<b>SPR HYD-4 Identify and Protect Watercourse and Lake Protection Zones:</b> The project proponent will establish Watercourse and Lake Protection Zones (WLPZs) as defined in 14 CCR Section 916.5 of the California Forest Practice Rules on either side of watercourses. This SPR applies to all treatment activities and treatment types.	Yes	<u>SBCFD</u> Prior	<u>SBCFD</u>
<b>SPR HYD-5 Protect Non-Target Vegetation and Special-status Species from Herbicides:</b> This SPR applies to herbicide treatment activities and all treatment types, including treatment maintenance.	No	<u>N/A</u>	<u>N/A</u>
<b>SPR HYD-6 Protect Existing Drainage Systems:</b> This SPR applies to all treatment activities and treatment types.	Yes	<u>SBCFD</u> Prior-During	<u>SBCFD</u>

### 3.11 Land Use and Planning, Population, and Housing

Impacts and Discussions	PEIR-Specific			Project-Specific			
	Identify Location of Impact Analysis in the PEIR	SPRs & MMs Applicable to the Impact Analysis in PEIR	Identify Impact Significance in the PEIR	Does the Impact Apply to the Project Treatments Proposed	SPRs & MMs Applicable to the Project Impact Analysis	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact LU-1:</b> Cause a significant environmental impact due to a conflict with a land use plan, policy, or regulation	Impact LU-1, pp. 3.12-13-3.12-14	SPR AD-3 SPR AD-9	LTS	Yes	SPR AD-3 SPR-AD-9	LTS	<input checked="" type="checkbox"/>

**Impact Discussion:**

The treatments would occur on private property within State Responsibility Areas and Local Responsibility Areas within the City of Goleta and the County (CAL FIRE 2007). As a local agency, SBCFD is required to comply with local plans, policies, and regulations. SPR AD-3 would be implemented, which would ensure that the project does not conflict with land use plans, policies, and regulations. The project would be designed and implemented consistent with applicable local planning documents, policies, and ordinances. Treatments would be designed and take place in a manner that is consistent with applicable plans, policies, and regulations outlined in the County Comprehensive Plan Land Use Element (County of Santa Barbara 2016b), the County Land Use and Development Code (County of Santa Barbara 2021), the City of Goleta Land Use Element (City of Goleta 2006), the City of Santa Barbara Land Use Element (City of Santa Barbara 2011c), the County Unit Strategic Fire Plan (SBCFD 2021), the City of Goleta Community Wildfire Protection Plan (City of Goleta 2012), and the City of Santa Barbara Community Wildfire Protection Plan (City of Santa Barbara 2021). As discussed in Section 3.2, Agriculture and Forest Resources, and Section 3.5, Biological Resources, treatment activities would be implemented

consistent with the County Oak Tree Protection Ordinance and oak trees would not be impacted by proposed treatments. Additionally, as discussed in Section 3.12, Noise, treatment activities would take place during daytime hours, consistent with the County Noise Ordinance. Animals and a shepherd would be on site 24 hours a day while treatments are being implemented; however, grazing activities would be limited to daytime hours.

The potential for vegetation treatment to cause a significant impact on land use planning, policy, and regulation was examined in the PEIR. Portions of the project site are within the coastal zone; the project would implement SPR AD-9, which would require the project to acquire a Coastal Development Permit under the Coast Act (County of Santa Barbara 2019). A Coastal Development Permit has been applied for with the California Coastal Commission and any suggested coastal vegetation treatment standards would be implemented. Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR

Impact LU-2: Induce substantial unplanned population growth	Impact LU-2, pp. 3.12-14-3.12-15	N/A	LTS	Yes	N/A	LTS	☒
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**Impact Discussion:**

The potential for implementation of treatment projects to result in population growth was analyzed in the PEIR. The project would utilize existing SBCFD and Santa Barbara Fire Safe Council staff, as well as grazing contractors, to implement prescribed herbivory treatments. The project would require a short-term increase in demand for workers. However, it is anticipated that workers implementing the proposed treatment project would primarily consist of existing SBCFD, Santa Barbara Fire Safe Council, and contract staff and the project would not require the hiring of new permanent employees. Additionally, the number of workers required for the implementation of treatment activities would be minimal and consistent with the crew sizes analyzed in the PEIR. Therefore, the resulting impact on population and housing would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR

<b>Other Impacts related to Land Use and Planning, Population, and Housing:</b> Would the project result in other impacts related to land use and planning, and population and housing that are not evaluated in the CalVTP PEIR?	—	N/A	N/A	No	N/A	N/A	☒
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**Impact Discussion:**

Site-specific characteristics of the proposed treatment plan are consistent with the environmental and regulatory conditions outlined in CalVTP PEIR, Section 3.12. While the inclusion of land outside the CalVTP treatable landscape is a change to the geographic extent in the PEIR and the use of prescribe herbivory on slopes greater than 50% represents a change to the PEIR, the existing conditions in the project study area relating to land use and planning, population, and housing are essentially the same for treatment areas within the CalVTP treatable landscape and treatment areas outside the CalVTP treatable landscape and within steep slope areas. Further, the land outside the treatment landscape and within steep slope areas is subject

to the same land use plans, policies, and regulations as the land inside the treatable landscape and project implementation would not result in increased population growth.

Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR

### 3.12 Noise

Impacts and Discussions	PEIR-Specific			Project-Specific			
	Identify Location of Impact Analysis in the PEIR	SPRs & MMs Applicable to the Impact Analysis in PEIR	Identify Impact Significance in the PEIR	Does the Impact Apply to the Project Treatments Proposed	SPRs & MMs Applicable to the Project Impact Analysis	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact NOI-1:</b> Result in a substantial short-term increase in exterior ambient noise levels during treatment implementation	Impact NOI-1, pp. 3.13-9-3.13-12; Appendix NOI-1	SPR NOI-1 through SPR NOI-6 SPR AD-3	LTS	No	SPR NOI-1 SPR NOI-2 SPR NOI-4 SPR NOI-5 SPR AD-3	LTS	<input checked="" type="checkbox"/>

**Impact Discussion:**

The proposed treatments would not require the use of heavy noise-generating equipment. Noise generated by prescribed herbivory treatments is identified as negligible in the PEIR. SPRs to ensure noise impacts are further reduced would be implemented, including SPR NOI-1, which would limit equipment use and truck trips to daylight hours; SPR NOI-2, which requires equipment be properly maintained and equipped with noise mufflers; SPR NOI-4, which requires siting staging areas away from noise sensitive receptors; and SPR NOI-5, which restricts equipment and truck idling time to 5 minutes or less. Additionally, the project would comply with local noise ordinances and policies (SPR AD-3). Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<b>Impact NOI-2:</b> Result in a substantial short-term increase in truck-generated SENLs during treatment activities	Impact NOI-2, pp. 3.13-12	SPR NOI-1	LTS	Yes	SPR NOI-1	LTS	<input checked="" type="checkbox"/>
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**Impact Discussion:**

The project would require the use of trucks to haul personnel and animals to the project site. The project site would be accessed by the existing public road network and would use paved roads and unpaved roads going through the treatment areas. While trucks would pass residential sensitive receptors, it is not anticipated that project traffic would result in a substantial increase in truck-generated noise along these roads. The event of each truck passing could increase the single-event noise levels. Consistent with Goleta Municipal Code Section 17.39.070, City of Santa Barbara Municipal Code Chapter 9.16, and the County Noise Ordinance, SPR NOI-1 would be implemented and equipment hauling trips would be limited to daylight hours, limiting single-event noise level exposure during more noise-sensitive hours such as evening and nighttime.

Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<b>Other Impacts Related to Noise:</b> Would the project result in other impacts related to noise that are not evaluated in the CalVTP PEIR?	N/A	N/A	N/A	No	N/A	N/A	☒
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**Impact Discussion:**

The project site-specific characteristics are consistent with the regulatory and environmental setting in Section 3.13 of the PEIR. The inclusion of land outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR and the use of grazing on slopes greater than 50% represents a change to the PEIR. However, the environmental conditions of the treatment areas outside the treatable landscape and on steep slopes were determined to be essentially the same as the rest of the project site and those addressed in the PEIR. Noise sensitive receptors are located in similar proximity to treatment areas within and outside the treatable landscape and on steep slopes. The impacts associated with the proposed treatment activities were also determined to be consistent with the PEIR and would not result in a more significant impact. Therefore, the project would not result in other impacts to noise not addressed in the PEIR.

SPRs and MMs	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
<b>SPR NOI-1 Limit Heavy Equipment Use to Daytime Hours:</b> If the project proponent is not subject to local ordinances (e.g., CAL FIRE), it will adhere to the restrictions stated above or may elect to adhere to the restrictions identified by the local ordinance encompassing the treatment area. This SPR applies to all treatment activities and treatment types.	Yes	<u>SBCFD</u> <u>During</u>	<u>SBCFD</u>
<b>SPR NOI-2 Equipment Maintenance:</b> All diesel- and gasoline-powered treatment equipment will be properly maintained and equipped with noise-reduction intake and exhaust mufflers and engine shrouds, in accordance with manufacturers' recommendations. This SPR applies to all activities and all treatment types.	Yes	<u>SBCFD</u> <u>During</u>	<u>SBCFD</u>

SPRs and MMs	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
<b>SPR NOI-3 Engine Shroud Closure:</b> The project proponent will require that engine shrouds be closed during equipment operation. This SPR applies only to mechanical treatment activities and all treatment types.	No	N/A	N/A
<b>SPR NOI-4 Locate Staging Areas away from Noise-Sensitive Land Uses:</b> This SPR applies to all treatment activities and treatment types.	Yes	SBCFD During	SBCFD
<b>SPR NOI-5 Restrict Equipment Idle Time:</b> The project proponent will require that all motorized equipment be shut down when not in use. Idling of equipment and haul trucks will be limited to 5 minutes. This SPR applies to all treatment activities and all treatment types.	Yes	SBCFD During	SBCFD
<b>SPR NOI-6 Notify Nearby Off-Site Noise-Sensitive Receptors:</b> The project proponent will notify noise-sensitive receptors (e.g., residential land uses, schools, hospitals, places of worship) located within 1,500 feet of the treatment activity. Notification will include anticipated dates and hours during which treatment activities are anticipated to occur and contact information, including a daytime telephone number, of the project representative. Recommendations to assist noise-sensitive land uses in reducing interior noise levels (e.g., closing windows and doors) will also be included in the notification. This SPR applies only to mechanical treatment activities and all treatment types, including treatment maintenance.	No	N/A	N/A

### 3.13 Recreation

Impacts and Discussions	PEIR-Specific			Project-Specific			
	Identify Location of Impact Analysis in the PEIR	SPRs & MMs Applicable to the Impact Analysis in PEIR	Identify Impact Significance in the PEIR	Does the Impact Apply to the Project Treatments Proposed	SPRs & MMs Applicable to the Project Impact Analysis	Impact Significance for the Treatment Project	No New Impact
<b>Impact REC-1:</b> Directly or indirectly disrupt recreational activities within designated recreation areas	Impact REC-1, pp. 3.14-6-3.14-7	SPR REC-1	LTS	Yes	SPR REC-1	LTS	<input checked="" type="checkbox"/>

**Impact Discussion:**

The project study area spans across the south coast of the County, which includes unincorporated areas of the County and the City of Goleta. The impacts to recreational resources within the County, the City of Goleta, and the City of Santa Barbara are described below.

**County of Santa Barbara**

Recreational resources in treatment areas within the County are limited to Arroyo Hondo Preserve, Baron Ranch, and San Marcos Foothills Preserve (County of Santa Barbara n.d.; City of Santa Barbara 2023b). The remainder of the treatment areas within the County are privately owned or are not recreational resources. The project has the potential to have short-term impacts to recreation areas or temporarily restrict public access to treatment areas; however, the period of restricted access would be limited to an approximately 1-week time period for the completion of herbivory treatments at each site, and in some cases may only include partial closures of recreational areas within portions of the treatment areas. Further, the project would implement SPR REC-1, which requires coordination with recreational facilities and notice of temporary closures. As the implementing agency, SBCFD would ensure that all park staff and visitors are informed of treatment activities. With regulatory compliance, implementation of SPRs including SPR REC-1 the impact to recreational resources would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

**City of Goleta**

Treatment areas within the City of Goleta are generally located within city-owned parks and recreational facilities (City of Goleta n.d.). Parks and recreational facilities that are located within project treatment areas include Santa Barbara Shores Park (Ellwood Mesa treatment area), Campus Glen Park (Ellwood Mesa treatment area), Goleta Butterfly Grove (Ellwood Mesa treatment area), Evergreen Park (Evergreen Park treatment area), Lake Los Carneros County Park (Lake Los Carneros treatment area), La Goleta Open Space (La Goleta South and La Goleta North treatment areas) and Oro Verde Open Space (Via Salerno North and Via Salerno South treatment areas). The project has the potential to have short-term impacts to recreation areas or temporarily restrict public access to treatment areas; however, the period of restricted access would be limited to the approximately 1-week time period for the completion of herbivory treatments and in some cases may only include partial closures of recreational areas within portions of the treatment areas. Further, the project would implement SPR REC-1, which requires coordination with recreational facilities and notice of temporary closures. As the implementing agency, SBCFD would ensure that all park staff and visitors are informed of treatment activities. With regulatory compliance and implementation of SPRs including SPR REC-1, the impact to recreational resources would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

**City of Santa Barbara**

The only treatment area within the City of Santa Barbara is San Roque South. The San Roque South treatment area does not contain any park or recreational facilities (City of Santa Barbara 2023b). Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<b>Other Impacts to Recreation:</b> Would the project result in other impacts to recreation that are not evaluated in the CalVTP PEIR?	N/A	N/A	N/A	No	N/A	☒
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**Impact Discussion:**

The project is consistent with the CalVTP PEIR and the site-specific characteristics are consistent with the regulatory and environmental setting in Section 3.14 of the PEIR. The inclusion of land outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR and the use of prescribed herbivory on slopes greater than 50% represents a change to the PEIR. However, the environmental conditions of the treatment areas outside the treatable landscape and within the treatable landscape were determined to be essentially the same as those addressed in the PEIR. Areas with slopes exceeding 50% were evaluated by a Dudek Certified Engineering Geologist and best practices for project implementation were developed, including avoiding grazing activities on established trails in areas with slopes greater than 50% to prevent erosion or trail impacts (Attachment F). This would further ensure the project would not result in ongoing impacts to recreational resources. The impacts associated with the proposed treatment activities were determined to be consistent with the PEIR and would not result in a more significant impact. Therefore, the project would not result in other impacts on recreation not addressed in the PEIR.

SPRs and MMs	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
<b>SPR REC-1 Notify Recreational Users of Temporary Closures:</b> If a treatment activity would require temporary closure of a public recreation area or facility, the project proponent will coordinate with the owner/manager of that recreation area or facility. This SPR applies to all treatment activities and treatment types, including treatment maintenance.	Yes	Prior-During	<u>SBCFD</u>

### 3.14 Transportation

Impacts and Discussions	PEIR-Specific			Project-Specific			
	Identify Location of Impact Analysis in the PEIR	SPRs & MMs Applicable to the Impact Analysis in PEIR	Identify Impact Significance in the PEIR	Does the Impact Apply to the Project Treatments Proposed	SPRs & MMs Applicable to the Project Impact Analysis	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact TRAN-1:</b> Result in temporary traffic operations impacts by conflicting with a program, plan, ordinance, or policy addressing roadway facilities or prolonged road closures	Impact TRAN-1, pp. 3.15-9 -3.15-10	SPR TRAN-1 SPR AD-3	LTS	Yes	SPR TRAN-1 SPR AD-3	LTS	<input checked="" type="checkbox"/>

**Impact Discussion:**

The project would temporarily increase vehicular traffic along the existing public road network. The treatment areas would be accessible from existing public and private roads. The increase in traffic would be related to trucks hauling animals and materials to the treatment areas, as well as personal vehicles for project staff who would travel to treatment areas prior, during, or after project implementation, including staff from SBCFD, Santa Barbara Fire Safe Council, and contracted grazers. The impact on traffic would be short term and only a limited number of vehicles would be required to complete the proposed treatments. No prolonged road closures would result from the project. Further, increases in vehicular traffic would only occur during the beginning and end of treatments during the placement and removal of animals from the treatment areas. Therefore, the increase in traffic would be limited throughout the project timeline. As previously discussed, SPR AD-3 is applicable to the project and treatments would be consistent with local policies such as the County Comprehensive Plan Circulation Element, County Municipal Code, the Transportation Element of the City of Goleta General Plan/Local Coastal Plan, the City of Goleta Municipal Code, City of Santa Barbara General Plan Circulation Element (City of Santa Barbara 2011b), and City of Santa Barbara Municipal Code. SPR TRAN-1 would be implemented and the project proponent would refer to the California Department of Transportation and the County to determine whether a Traffic Management Plan is needed. All appropriate permits would be obtained.

Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<b>Impact TRAN-2:</b> Substantially increase hazards due to a design feature or incompatible uses	Impact TRAN-2, pp. 3.15-10-3.15-11	SPR TRAN-1 SPR AD-3	LTS	Yes	SPR TRAN-1 SPR AD-3	LTS	<input checked="" type="checkbox"/>
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**Impact Discussion:**

Existing roads would be used to access the treatment areas for project implementation. The project does not include the construction of new roads or the redesign or alteration of current roadways. Per SPR TRAN-1, prior to the initiation of vegetation treatment, local traffic agencies having jurisdiction would be consulted to ensure that the activities do not increase road hazards or require a Traffic Management Plan. Additionally, per SPR AD-3, the project would be implemented consistent with local plans, policies, and ordinances.

Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<b>Impact TRAN-3:</b> Result in a net increase in VMT for the proposed CalVTP	Impact TRAN-3, pp. 3.15-11-3.15-13	MM AQ-1	PSU	Yes	N/A	LTS	<input checked="" type="checkbox"/>
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**Impact Discussion:**

The project would temporarily increase vehicle miles traveled (VMT) above baseline conditions. The project would require multiple trips to access the treatment areas. Vehicular travel associated with the implementation of the treatment actions would primarily originate from respective business locations of any contractors hired to complete the work. Per the analysis methodologies presented in the PEIR, projects that generate or attract fewer

than 110 trips per day generally may be assumed to cause a less-than-significant transportation impact. As presented in the PEIR, this would allow for up to 50 vehicles bringing crews and equipment to the project site in a single day. Because of the small sizes of the crews needed for the proposed project (it is estimated that 1–2 personnel would be traveling to/from the project site during grazing activities and 4–6 personnel would be traveling to/from the project site at the beginning and end of treatments during the placement and removal of animals from the treatment areas) and because vehicle traffic would be primarily concentrated at the beginning and end of the project during the transportation of animals, it is highly unlikely that the total VMT would exceed 110 trips per day. The majority of the treatments would be grazing activities, which would not require extensive vehicle trips. Further, the vehicle trips would be dispersed across multiple roadways. As such, impacts related to a potential increase in VMT would be less than significant. MM AQ-1 would not apply to the impact because the impact would be less than significant.

Therefore, the potential to increase VMT would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<b>Other Impacts to Transportation:</b> Would the project result in other impacts to transportation that are not evaluated in the CalVTP PEIR?	N/A	N/A	N/A	No	N/A	N/A	<input checked="" type="checkbox"/>
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**Impact Discussion:**

The site-specific characteristics are consistent with the regulatory and environmental setting in Section 3.15 of the PEIR. The inclusion of land outside the CalVTP treatable landscape constitutes a change to the geographic extent presented in the PEIR and the use of prescribed herbivory on slopes greater than 50% represents a change to the PEIR. However, the environmental conditions of the treatment areas outside the treatable landscape and within steep slopes were determined to be essentially the same as the rest of the project site and those addressed in the PEIR, with respect to transportation. The impacts associated with the proposed treatment activities are consistent with the PEIR and would not result in a more significant impact. Therefore, the project would not result in impacts on transportation that were not addressed in the PEIR.

SPRs and MMs	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/Monitoring Entity
<b>SPR TRAN-1 Implement Traffic Control during Treatments:</b> Prior to initiating vegetation treatment activities the project proponent will work with the agency(ies) with jurisdiction over affected roadways to determine if a Traffic Management Plan (TMP) is needed. This SPR applies to all treatment activities and treatment types.	Yes	<u>SBCFD</u> Prior-During	<u>SBCFD</u>

### 3.15 Public Services, Utilities, and Service Systems

Impacts and Discussions	PEIR-Specific			Project-Specific			
	Identify Location of Impact Analysis in the PEIR	SPRs & MMs Applicable to the Impact Analysis in PEIR	Identify Impact Significance in the PEIR	Does the Impact Apply to the Project Treatments Proposed	SPRs & MMs Applicable to the Project Impact Analysis	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact UTIL-1:</b> Result in physical impacts associated with provision of sufficient water supplies, including related infrastructure needs	Impact UTIL-1, 3.16	N/A	LTS	Yes	N/A	N/A	<input checked="" type="checkbox"/>
<b>Impact Discussion:</b> The proposed project would include prescribed herbivory. The project would not include road maintenance, mechanical treatment, or prescribed burning. As such, the project would not require on-site water supplies for fire suppression or dust controls. As discussed in Section 3.11, Land Use and Planning, Population, and Housing, implementation of the project would not require residential development or induce significant population growth in the area that would increase the water demand or require additional infrastructure. There are no SPRs applicable to this impact. Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR..							
<b>Impact UTIL-2:</b> Generate solid waste in excess of state standards or exceed local infrastructure capacity	Impact UTIL-2, 3.16	SPR UTIL-1	PSU	No	N/A	LTS	<input checked="" type="checkbox"/>
<b>Impact Discussion:</b> Herbivory would not produce significant biomass as the animals (goats and sheep) would consume the hazardous fuels. Waste generated during project implementation would be minimal and disposed of appropriately. SPR UTIL-1 would not be applicable to the project because the project would not include mechanical or manual treatments. Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR..							
<b>Impact UTIL-3:</b> Comply with federal, state, and local management and reduction goals, statutes, and regulations related to solid waste	Impact UTIL-3, 3.16	SPR UTIL-1	LTS	No	N/A	LTS	<input checked="" type="checkbox"/>

**Impact Discussion:**

The project treatment activities would not generate substantial amounts of solid waste and would be consistent with solid waste regulations. Treatment activities associated with grazing would result in vegetation being consumed on site by the animals. SPR UTIL-1 would not be applicable to the project because the project would not include mechanical or manual treatments. Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR..

<b>Other Impacts to Public Services, Utilities, and Service Systems:</b> Would the project result in other impacts on public services, utilities, and service systems that are not evaluated in the CalVTP PEIR?	N/A	N/A	N/A	No	N/A	N/A	<input checked="" type="checkbox"/>
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**Impact Discussion:**

The project site-specific characteristics are consistent with the regulatory and environmental setting in Section 3.16 of the PEIR. The project includes land that is outside the CalVTP treatable landscape, which constitutes a change in the geographic extent presented in the PEIR, and the use of prescribed herbivory on slopes greater than 50% represents a change to the PEIR. However, the environmental conditions of the project study area outside the treatable landscape and within steep slopes were determined to be essentially the same as the rest of the project site with respect to public services, utilities, and service systems. The impacts associated with the proposed project were also determined to be consistent with the PEIR and would not result in a more significant impact. Therefore, the project would not result in impacts on public services, utilities, and service systems that were not addressed in the PEIR.

<b>SPRs and MMs</b>	<b>Applicable</b>	<b>Implementing Entity &amp; Timing Relative to Implementation</b>	<b>Verifying/ Monitoring Entity</b>
<b>SPR UTIL-1 Solid Organic Waste Disposition Plan:</b> For projects requiring the disposal of material outside of the treatment area, the project proponent will prepare an Organic Waste Disposition Plan prior to initiating treatment activities. This SPR applies only to mechanical and manual treatment activities and all treatment types, including treatment maintenance.	No	N/A	N/A

### 3.16 Wildfire

Impacts and Discussions	PEIR-Specific			Project-Specific			
	Identify Location of Impact Analysis in the PEIR	SPRs & MMs Applicable to the Impact Analysis in the PEIR	Identify Impact Significance in the PEIR	Does the Impact Apply to the Project Treatments Proposed	SPRs & MMs Applicable to the Project Impact Analysis	Identify Impact Significance for the Treatment Project	No New Impact
<b>Impact WIL-1:</b> Substantially exacerbate fire risk and expose people to uncontrolled spread of a wildfire	Impact WIL-1, pp. 3.17-14-3.17-15	SPR HAZ-2 SPR HAZ-3 SPR HAZ-4	LTS	Yes	SPR HAZ-3 SPR HAZ-4	LTS	<input checked="" type="checkbox"/>

**Impact Discussion:**

The proposed treatment activities aim to reduce herbaceous fuel loads through prescribed herbivory. These strategic treatments would help to reduce fire intensity during wildfires including reductions in wildfire spread and spotting, protect sensitive resources, increase defensible space around critical facilities, and decrease the risk of ignitions through the reduction of high receptive flashy fuels. The project would also reduce invasive species that pose an additional fire risk. Prescribed herbivory treatments would reduce potential wildfire impacts to thousands of habitable structures within the PIZ. The proposed project could result in a temporary increase in fire risk, as the use of vehicles and trucks arriving to the project site and setting up treatments could result in an accidental ignition. The project would not include the use of prescribed fire. The potential increase in exposure to wildfire from the implementation of treatment activities was examined in the PEIR. The project would not include manual treatments, including the use of handheld equipment (e.g., chainsaws), to cut vegetation. If used for other purposes, machine powered hand tools would comply with SPR HAZ-3 and would have federal or state approved spark arrestors. The project proponent would prohibit smoking in vegetated areas, per SPR HAZ-4; designated smoking areas would be barren or cleared to mineral soil with a minimum 3-foot diameter to reduce the possibility of accidental fire ignition. Therefore, impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR..

<b>Impact WIL-2:</b> Expose people or structures to substantial risks related to post-fire flooding or landslides	Impact WIL-2, pp. 3.17-15 - 3.17-16	SPR AQ-3 SPR GEO-3 through SPR GEO-5 SPR GEO-8	LTS	Yes	SPR GEO-1 SPR GEO-24 SPR GEO-8	LTS	<input checked="" type="checkbox"/>
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**Impact Discussion:**

The proposed project would include prescribed herbivory. Steep slopes are present in the project site; however, the removal of vegetation through grazing is unlikely to result in slope instability, as roots, large shrubs, and trees would be left in place and the project would aim to reduce 80% of

herbaceous fuels, either through consumption or trampling. Analysis of potential erosion impacts (SPR GEO-8), included in Section 3.6, revealed that the likelihood for erosion impacts is low if grazing best practices are implemented as outlined in Attachment F, including avoidance of slopes greater than 75%. No broadcast burning is proposed as part of the project, nor is any other type of prescribed burning. There would be no mechanical treatment on the project site.

While steep slopes are present in the project site, SPR GEO-1, SPR GEO-2, SPR GEO-4, and SPR GEO-8 would be implemented, which would minimize issues related to slope instability. Additionally, "no-work zones" have been established in areas of sensitive environmental resources and environmental constraints such as steep slopes. The project does not include any compacted and/or bare linear treatments and would not denude the landscape of vegetation.

Therefore, the project would not expose people or structures to substantial risks from post-prescribed burning landslides or flooding. Impacts would be less than significant, which is consistent with the PEIR and would not constitute a substantially more severe significant impact than was analyzed in the PEIR.

<b>Other Impacts Related to Wildfire:</b> Would the project result in other impacts related to wildfires that are not evaluated in the CalVTP PEIR?	N/A	N/A	N/A	No	N/A	N/A	<input checked="" type="checkbox"/>
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**Impact Discussion:**

The project site-specific characteristics are consistent with the regulatory and environmental setting in Section 3.17 of the PEIR. The project includes land that is outside the CalVTP treatable landscape, which constitutes a change in the geographic extent presented in the PEIR, and the use of prescribed herbivory on slopes greater than 50% represents a change to the PEIR. However, the environmental conditions of the project study area outside the treatable landscape and within steep slopes were determined to be essentially the same with regards to wildfire. The impacts associated with the proposed project were also determined to be consistent with the PEIR and would not result in a more significant impact. Therefore, the project would not result in other impacts to wildfire that were not addressed in the PEIR.

### 3.17 Administrative Standard Project Requirements

SPRs and MMs	Applicable	Implementing Entity & Timing Relative to Implementation	Verifying/ Monitoring Entity
<b>SPR AD-1 Project Proponent Coordination:</b> For treatments coordinated with CAL FIRE, CAL FIRE would meet with the project proponent to discuss all natural and environmental resources that must be protected using SPRs and any applicable mitigation measures; identify any sensitive resources onsite; and discuss resource protection measures. For any prescribed burn treatments, CAL FIRE would also discuss the details of the burn plan in the incident action plan (IAP). This SPR applies to all treatment activities and treatment types.	Yes	<u>SBCFD</u> Prior	<u>SBCFD</u>

<p><b>SPR AD-2 Delineate Protected Resources:</b> The project proponent will clearly define the boundaries of the treatment area and protected resources on maps for the treatment area and with highly-visible flagging or clear, existing landscape demarcations (e.g., edge of a roadway) prior to beginning any treatment to avoid disturbing the resource. “Protected Resources” refers to environmentally sensitive places within or adjacent to the treatment areas that would be avoided or protected to the extent feasible during planned treatment activities to sustain their natural qualities and processes. This work will be performed by a qualified person, as defined for the specific resource (e.g., qualified Registered Professional Forester or biologist). This SPR applies to all treatment activities and treatment types.</p>	<p>Yes</p>	<p><u>SBCFD</u> Prior</p>	<p><u>SBCFD</u></p>
<p><b>SPR AD-3 Consistency with Local Plans, Policies, and Ordinances:</b> The project proponent would design and implement the treatment in a manner that is consistent with applicable local plans (e.g., general plans, Community Wildfire Protection Plans, CAL FIRE Unit Fire Plans), policies, and ordinances to the extent the project is subject to them. This SPR applies to all treatment activities and treatment types.</p>	<p>Yes</p>	<p><u>SBCFD</u> Prior-During</p>	<p><u>SBC FD</u></p>
<p><b>SPR AD-4 Public Notifications for Prescribed Burning:</b> At least three days prior to the commencement of prescribed burning operations, the project proponent would: 1) post signs along the closest public roadway to the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information would be provided with the notice) if they have questions or smoke concerns; 2) publish a public interest notification in a local newspapers or other widely distributed media source describing the activity, timing, and contact information; 3) send the local county supervisor and county administrative officer (or equivalent official responsible for distribution of public information) a notification letter describing the activity, its necessity, timing, and measures being taken to protect the environment and prevent prescribed burn escape. This SPR applies only to prescribed burn treatment activities and all treatment types.</p>	<p>No</p>	<p><u>N/A</u></p>	<p><u>N/A</u></p>
<p><b>SPR AD-5 Maintain Site Cleanliness:</b> If trash receptacles are used on-site, the project proponent will use fully covered trash receptacles with secure lids (wildlife proof) to contain all food, food scraps, food wrappers, beverages, and other worker generated miscellaneous trash. Remove all temporary non-biodegradable flagging, trash, debris, and barriers from the project site upon completion of project activities. This SPR applies to all treatment activities and all treatment types.</p>	<p>Yes</p>	<p><u>SBCFD</u> During-Post</p>	<p><u>SBCFD</u></p>
<p><b>SPR AD-6 Public Notifications for Treatment Projects:</b> One to three days prior to the commencement of a treatment activity, the project proponent would post signs in a conspicuous location near the treatment area describing the activity and timing, and requesting persons in the area to contact a designated representative of the project proponent (contact information would be provided with the notice) if they have questions or concerns. This SPR applies to all treatment</p>	<p>Yes</p>	<p><u>SBCFD</u> Prior</p>	<p><u>SBCFD</u></p>



<p>activities and all treatment types, including treatment maintenance. Prescribed burning is subject to the additional notification requirements of SPR AD-4.</p>			
<p><b>SPR AD-7 Provide Information on Proposed, Approved, and Completed Treatment Projects:</b> For any vegetation treatment project using the CalVTP PEIR for CEQA compliance, the project proponent will provide the information listed below to the Board or CAL FIRE during the proposed, approved, and completed stages of the project. The Board or CAL FIRE will make this information available to the public via an online database or other mechanism. This SPR applies to all treatment activities and all treatment types.</p>	<p>Yes</p>	<p><u>SBCFD</u> Prior-During-Post</p>	<p><u>SBCFD</u></p>
<p><b>SPR AD-8 Request Access for Post-Treatment Assessment:</b> For SBCFD projects, during contract development, SBCFD would include access to the treated area over a prescribed period (usually up to three years) to assess treatment effectiveness in achieving desired fuel conditions and other CalVTP objectives as well as any necessary maintenance, as a contract term for consideration by the landowner. For public landowners, access to the treated area over a prescribed period would be a requirement of the executed contract. This SPR applies to all treatment activities and all treatment types.</p>	<p>Yes</p>	<p><u>SBCFD</u> Post</p>	<p><u>SBCFD</u></p>

### 3.18 Mandatory Findings of Significance

	New Impact that is Significant or Potentially Significant	New Impact that is Less Than Significant with Mitigation Incorporated	New Impact that is Less Than Significant Impact	No New Impact
a) Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of an endangered, rare, or threatened species, or eliminate important examples of the major periods of California history or prehistory?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
b) Does the project have impacts that are individually limited, but cumulatively considerable? (“Cumulatively considerable” means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
c) Does the project have environmental effects that will cause substantial adverse effects on human beings, either directly or indirectly?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

#### Discussion

No additional comments.

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## 4 References and Preparers

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## 4.2 List of Preparers

### Dudek

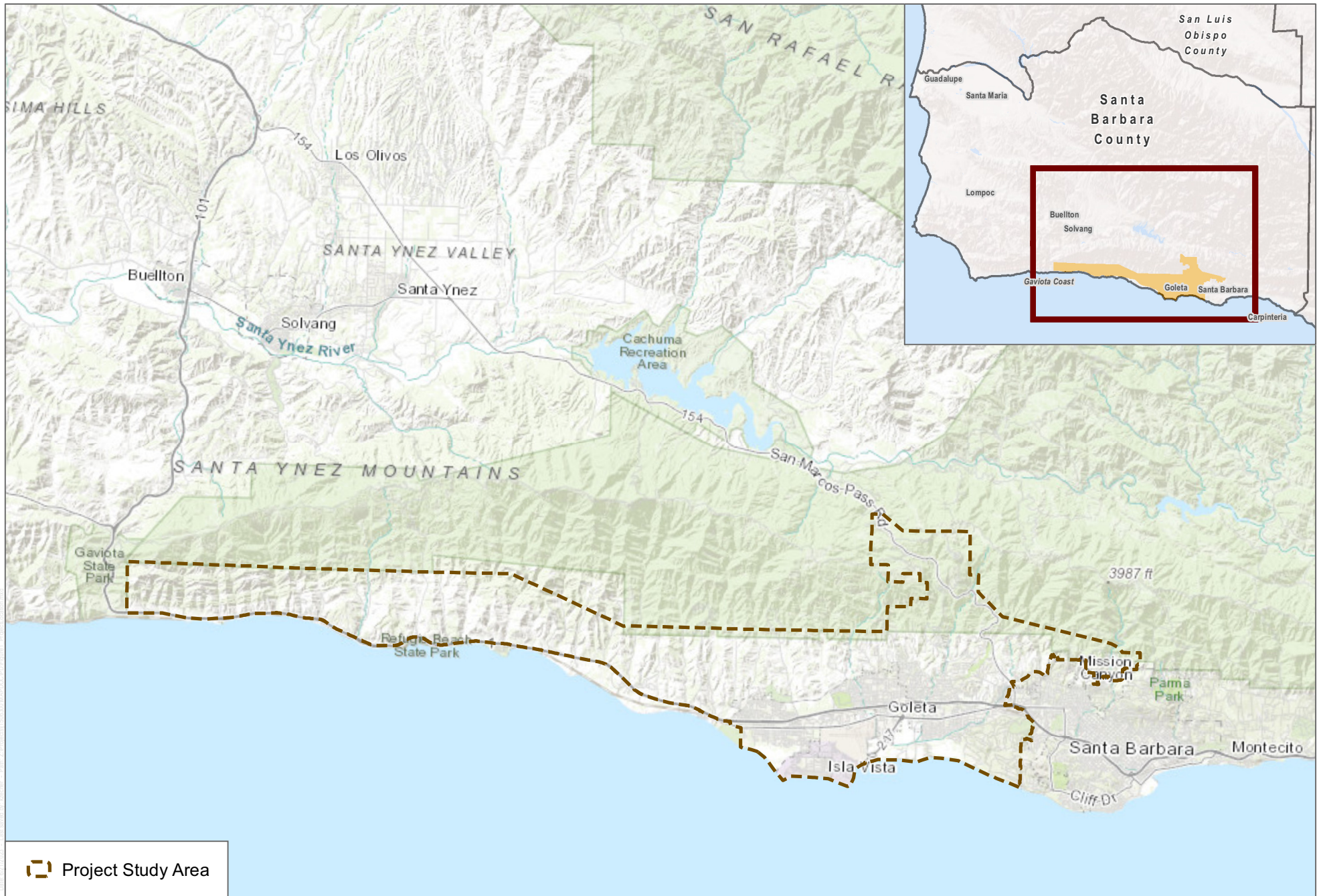
Dana Link-Herrera, Project Manager  
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Matthew Crocket, Wildfire Planner  
David Compton, Senior Biologist  
Rachel Swick, Biologist  
Heather McDevitt , Senior Cultural Resources Specialist  
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Carolyn Groves, Coastal Planner  
Perry Russell, Certified Engineering Geologist

### Santa Barbara County Fire Department

Rob Hazard, Fire Marshall

### Santa Barbara County Fire Safe Council

Paul Van Leer  
Kate Furlong  
Jessie Tobin



SOURCE: USGS National Map



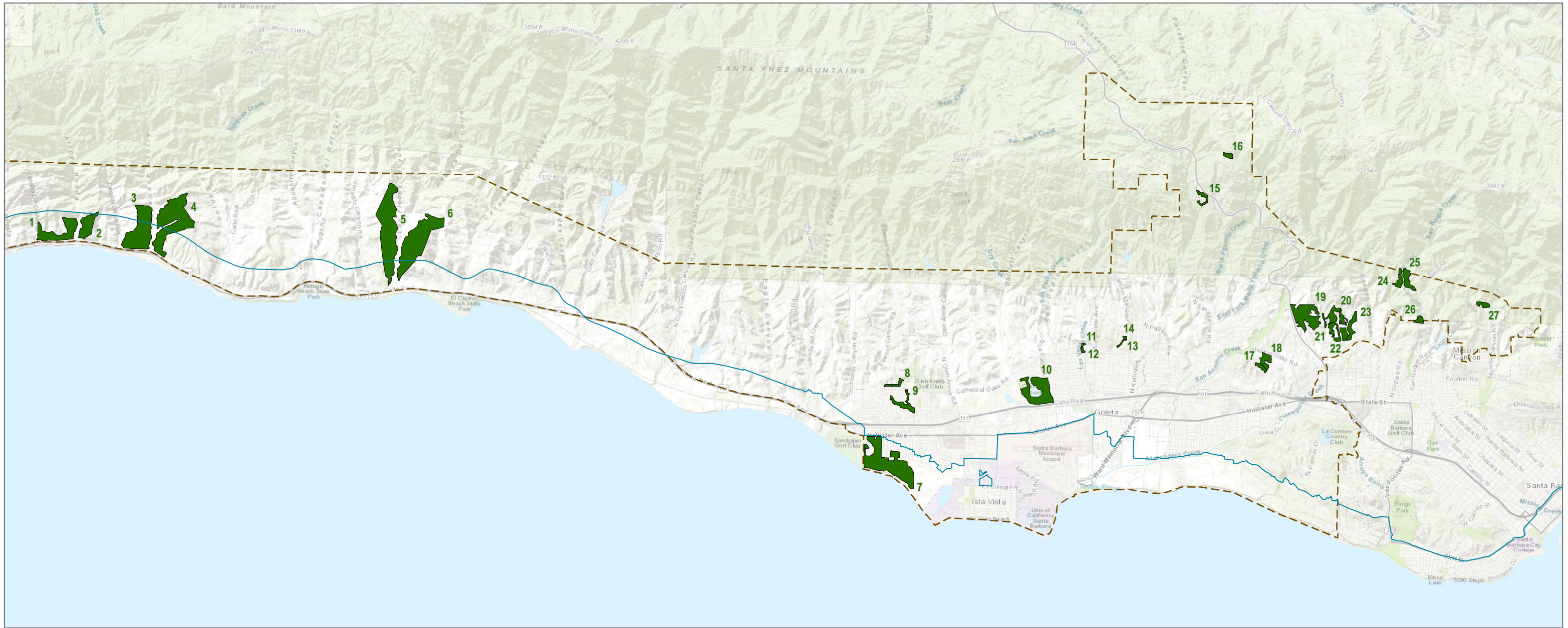
FIGURE 1

Project Location

Santa Barbara South Coast Herbivory Project

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Project Study Area  
 Coastal Zone Boundary

Project Sites  
 1 : Arroyo Hondo West  
 2 : Arroyo Hondo East  
 3 : Baron Ranch West  
 4 : Baron Ranch East  
 5 : Las Flores  
 6 : Coral Canyon  
 7 : Ellwood Mesa  
 8 : Northgate

9 : Evergreen Park  
 10 : Lake Los Carneros  
 11 : La Goleta North  
 12 : La Goleta South  
 13 : Via Salerno South  
 14 : Via Salerno North  
 15 : Trout Club  
 16 : Painted Cave South FB  
 17 : Oak Grove

18 : County Range  
 19 : West Mesa  
 20 : SM Foothills  
 21 : Preserve SM Private  
 22 : Preserve SM HOA  
 23 : SM Foothills East  
 24 : San Roque West  
 25 : San Roque East  
 26 : San Roque South  
 27 : Tunnel Rd FB

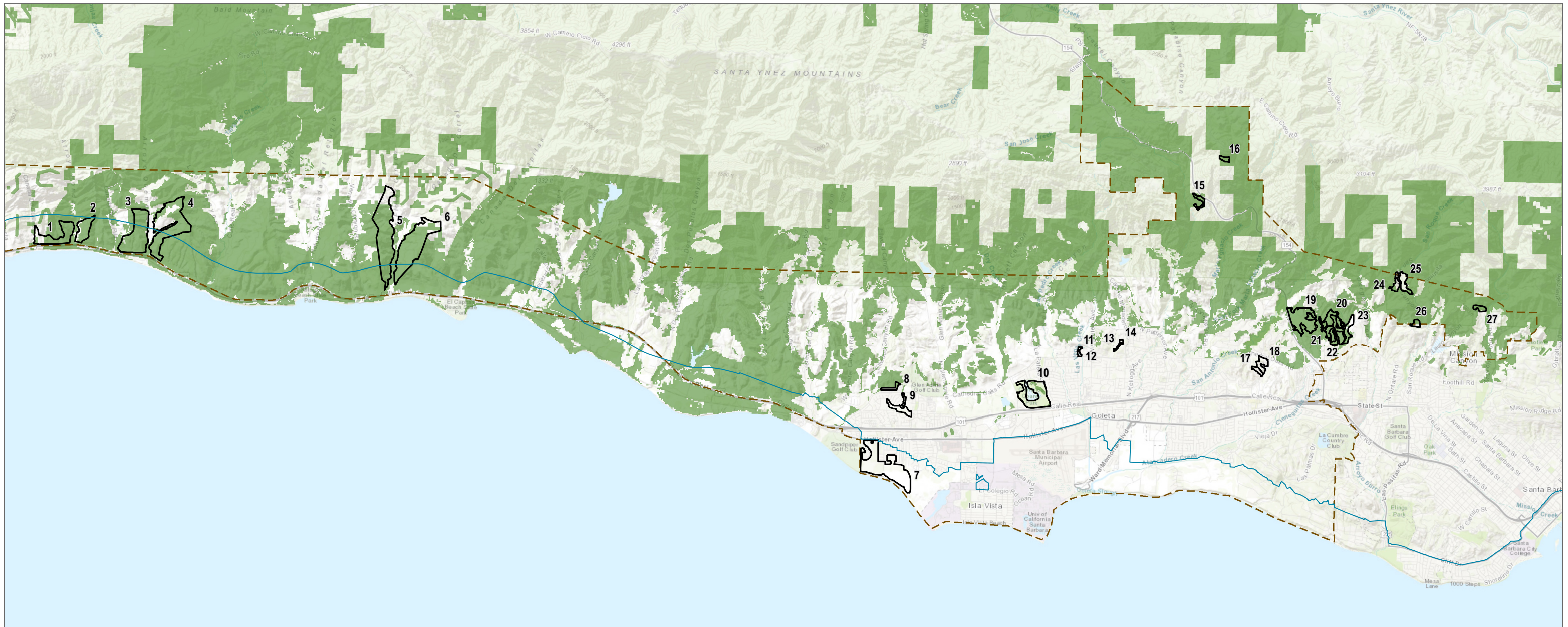
SOURCE: USGS National Map



**FIGURE 2**  
 Project Site

Santa Barbara South Coast Herbivory Project

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Project Study Area

Coastal Zone Boundary

CaIVTP Treatable Landscape

Project Sites

1 : Arroyo Hondo West

2 : Arroyo Hondo East

3 : Baron Ranch West

4 : Baron Ranch East

5 : Las Flores

6 : Coral Canyon

7 : Ellwood Mesa

8 : Northgate

9 : Evergreen Park

10 : Lake Los Carneros

11 : La Goleta North

12 : La Goleta South

13 : Via Salerno South

14 : Via Salerno North

15 : Trout Club

16 : Painted Cave South FB

17 : Oak Grove

18 : County Range

19 : West Mesa

20 : SM Foothills

21 : Preserve SM Private

22 : Preserve SM HOA

23 : SM Foothills East

24 : San Roque West

25 : San Roque East

26 : San Roque South

27 : Tunnel Rd FB

SOURCE: USGS National Map



FIGURE 3

CaIVTP Treatable Landscape

Santa Barbara South Coast Herbivory Project

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# **Attachment A**

## Mitigation Monitoring and Reporting Program



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# **Attachment B**

## Soils Report





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# **Attachment C**

## Cultural Report



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# **Attachment D**

Biological Technical Memorandum for the South Coast  
Herbivory Cal-VTP Project



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# **Attachment E**

## Soils Report



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# **Attachment F**

## Grazing Best Management Practices





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# **Attachment G**

## Completed SPRs and MMs

