

4.4 SAFETY

Both the DFPMP and Off-Leash Dog Park Locations Study Initial Studies conclude that there would be no impacts to fire hazards as a result of the project. The following issues related to safety are discussed in this EIR: risk of accidental exposure to hazardous substances; creation of health hazards; and exposure of people to existing sources of potential health hazards. Sections 4.1 AIR QUALITY and 4.6 WATER RESOURCES discuss safety pertaining to air and water contamination. The focus of this section is on dog-related public safety issues, as well as hazardous materials and physical site hazards to dogs resulting from the project. The information contained below is based on the Dog Management and Safety Assessments for each of the three sites, prepared by Jones & Stokes Associates (August, 2000, Appendix 1, separately bound), which are incorporated by reference.

4.4.1 Setting

a. Douglas Family Preserve. Dogs are allowed off-leash at the DFP with no restrictions on days and times of use. A survey of the DFP site users conducted by Rincon Consultants (Rincon, March 2002) indicates that the majority of the users surveyed (76 percent) was accompanied by dogs, and users indicated their primary use of the site as recreation with their dogs (75 percent). About 97 percent of the respondents feel comfortable in a park where dogs are off-leash. About 63 percent feel comfortable under any circumstance, while 34 percent feel comfortable when the dog is under verbal control of its owner. Approximately 3 percent are most comfortable when dogs are on-leash or off-leash in a designated area. It should be noted that the survey only included people who actually use the DFP. There is likely a population that would like to visit the DFP, but are discouraged from doing so because they are not comfortable with dogs off-leash; this population was not represented in the survey.

There are ~~“mutt mitt”~~ dog waste stations at each of the following four access points to the DFP: Medcliff Road, Borton Drive, Mesa School Lane, and at the intersection of Las Positas Road and Cliff Drive. ~~Mutt mitt~~ Dog waste stations consist of small dispensers for plastic mitts or waste bags to pick up dog feces, and disposal containers to deposit feces. On a daily basis, Parks and Recreation Department staff removes dog waste from the ~~mutt mitt~~ stations and any feces remaining on the ground in the immediate area, as well as replenishes the supply of waste bags or mitts.

Parks and Recreation Department rangers patrol the site approximately twice weekly, and also respond to incidents and disturbances reported at the DFP. As warranted, City Police officers may also respond to calls at the DFP, especially during late evening and early morning hours. However, police officers do not respond to leash law infractions. City Animal Control officers may respond to animal related incidents, as necessary.

There is signage near the dog waste dispenser and disposal locations at the DFP (Medcliff

Road, Mesa School Lane, Borton Drive entrances) indicating that dog waste must be picked up and properly disposed, as well as listing other relevant Preserve regulations pertaining to hours of operation (sunrise to 10:00 P.M.), dogs off and on-leash, dog use restrictions, and areas dogs may not access, among others. In particular, dogs and people are not allowed to access the coastal bluff edges due to erosion and safety concerns, and may not veer off the oak woodland trail due to habitat, erosion and safety concerns (pursuant to SBMC 15.16.150). The Las Positas/Cliff Drive entrance has a sign indicating that owners are required to pick up after their dogs.

In the past five years, the Animal Control Division of the City Police Department has responded to nine incidents of off-leash dogs going over the cliffs at the DFP, sometimes with their owners, as the owners attempt to rescue the dogs. In these situations, owners are typically cited by the animal control officers for not having their dogs under control. The most recent of these episodes occurred in November 2002, and was the second time that this particular dog went down the bluff. Animal Control staff responds to such incidents, rescuing people and dogs, often rappelling down the cliffs to reach the victims. Of the incidents in the last five years, there has been one serious injury to a dog and one dog death. No humans have been injured.

Based on a study of dog management and safety prepared by Jones & Stokes (August 2002), injuries to patrons at the DFP have been no greater than those reported for similar facilities. Due to its size, the DFP sufficiently accommodates the coexistence of other non-dog-related activities. However, because off-leash and unrestrained dogs are viewed as a threat to some non-dog owners, as well as some dog owners themselves, the potential for safety concerns related to dogs currently exists on the site (Jones & Stokes, August 2002).

There have been incidents of dog-related conflicts, such as bites and attacks, reported at the DFP. In the last year, there have been six reports of dogs biting humans. While the City Animal Control Division does not register bites between dogs, six of these have also been noted. In the last year, forty-four dog-related citations have been issued to owners of dogs on the DFP for various instances of noncompliance with regulations. It is important to note that the City keeps track of dog bites and other injuries only if they are reported from the site where the incident occurred. If the attack occurred at the DFP, but was reported to City officials from an individual's home, for example, this incident would not be included in the statistics noted above. As such, statistics may be understated.

Poison oak is occasionally sprayed with an herbicide in the 6-foot diameter clearance area needed for emergency access to fire hydrants. The frequency of herbicide use is indicated by the extent of vegetative growth; removal usually occurs once every two years.

b. Hale Park. One ~~mutt mitt~~dog waste station is located at the Camino Viejo entrance to the park, at which there is signage indicating that dog waste must be picked up and properly disposed of. Parks & Recreation Department staff visits the site to dispose of the contents in the container and replenish the mitts about once each week. Additionally, one volunteer helps stock the mitts. Presently, dogs are allowed on-leash

only at Hale Park, however, both on-leash and off-leash dog use has been observed here. Park rangers regularly patrol Hale Park, and City Animal Control officers respond to animal related incidents.

The City requires that dogs at Hale Park be on-leash (SBMC Section 6.08.020). Based on a survey of Hale Park users conducted by Rincon Consultants, Inc. (March 2002), the majority (62 percent) surveyed was accompanied by dogs, and 58 percent of those surveyed indicated that their primary use of the site is to recreate with a dog. Approximately 52 percent of those surveyed are comfortable in a park where dogs are allowed off-leash under verbal control. Eighteen percent are comfortable in a park where dogs are allowed under any circumstance. In higher percentages than the other two sites, 20 percent of the respondents are most comfortable in a park where dogs are required to be on leash, while 10 percent are most comfortable with a designated area for dogs. The greater percentages in the latter categories may be explained by the fact that Hale Park allows only on-leash dogs, so that some people may be more comfortable when dogs are under some form of physical control.

At Hale Park, there have been two dog-related citations, but no dog bites or other attacks have been reported in the last year. The potential for safety concerns exists to a minor extent currently at Hale Park, given that there is use by dogs both off- and on-leash.

Herbicide is not used regularly at Hale Park. Herbicide was last sprayed three years ago to control the regrowth of Eucalyptus sprouts.

c. Shoreline Beach Area. No mutt-mittdog waste stations exist on the beach, although there are three stations at Shoreline Park, above the beach. The dog waste disposal containers at Shoreline Park are emptied once daily by Parks & Recreation Department staff. There are three mutt-mittdog waste stations at Arroyo Burro Beach County Park, in the western portion of the SBA. Waste is removed and mutt-mittbag dispensers stations replenished daily by County staff. There is one mutt mitt station at the Mesa Lane steps leading to the beach, which is emptied daily by City staff.

Per City regulations (SBMC 6.08.070), dogs are prohibited from all beaches, except in the Shoreline Beach Area (i.e., at any point between the Shoreline Park stairs and the westerly City limits), where they are allowed on-leash. However, dogs are currently allowed off-leash on the portion of beach directly below the DFP bluffs. Per the Santa Barbara County Code (Chapter 26, Article III), dogs off-leash are prohibited on all County recreation areas. No information has been formally gathered; however, City staff estimates that many of the dogs in the Shoreline Beach Area are off-leash. The City is responsible for enforcing the leash law throughout the SBA area, including the County Park portion.

Based on the results of the user survey conducted by Rincon Consultants, Inc., the majority of users along the stretch of beach were accompanied by dogs (62 percent), and the majority of users (58 percent) reported that their primary use of the site involves recreating with their dog. Approximately 42 percent surveyed are comfortable in a park where dogs are off-leash, yet under verbal control. About 40 percent are comfortable

where dogs are allowed under any circumstances, and 16 percent are comfortable when dogs are on-leash. One person is most comfortable with dogs in a designated area. A caveat similar to that identified for the DFP and Hale Park surveys applies here; the survey only included people who actually use the SBA, which is the only City beach where dogs are allowed. Therefore, people not comfortable with dogs, especially those that are unleashed, may not use this beach and are not fully represented in the results.

There is signage near the dog waste dispenser and disposal locations at Shoreline Park and Arroyo Burro Beach County Park indicating that owners or other responsible persons must pick-up after their dogs and properly dispose of the waste. Signage identifying various park rules, including leash restrictions, is posted at Shoreline Park (including at the base of the Shoreline Park staircase, on the beach), as well as at Arroyo Burro Beach County Park. At the Mesa Lane stairs leading to the beach, a sign indicates that dogs must be on-leash. However, there is no dog-related signage at the 1000 Steps beach access.

There have been incidences of dog bites and other dog-related incidents in the Shoreline Beach Area. Only those that were reported from the SBA are included in the statistics. In the portion of beach between Arroyo Burro Creek and the Mesa Lane steps, there have been five reports of dog bites, thirty-six dog-related citations, and twenty-two stray dogs impounded (dogs found without owners) in the last year. In the area of 1000 Steps, four stray dogs were impounded and eight dog-related citations issued in the last year. Because off-leash and unrestrained dogs are viewed as a threat to some non-dog owners and even some owners with dogs, combined with the dog incident statistics, the potential for safety concerns related to dogs currently exists at the SBA.

No herbicide is used in the Shoreline Beach Area.

4.4.2 Policy

Title 6 of the Santa Barbara Municipal Code (SBMC) stipulates the City-wide rules and regulations pertaining to the care and keeping of animals, including dogs. The most pertinent regulations, as they relate to all three sites of the proposed project, are briefly summarized below. (Appendix 3, bound separately, contains the full text of Title 6 of the SBMC).

Dogs in Public:

- Dogs are not permitted on a street or other public place, unless they are leashed and under the immediate care and control of the owner or other responsible person.
- Any person owning or having custody or control of a dog in the City shall obtain a license.
- No license shall be issued for a dog until it has been vaccinated.

- The Animal Control Supervisor and all animal control officers may capture any dog that is found running at large, upon or in any place within the City and confine the dog at the animal control facility.

Off-Leash Dog Areas in City Parks:

- Off-leash dog parks in the City are the Douglas Family Preserve and portions of Elings Park.
- Properly licensed and tagged dogs that are not vicious, dangerous or aggressive may be exercised on the Douglas Family Preserve and Elings Park.
- The person responsible for the dog must remain present within the off-leash dog park at all times, must carry a leash, must leash the dog at the first sign of aggression, and must clean up dog feces created by the dog, and is responsible for filling any holes or repairing any damage created by the dog.
- Dogs that are sick or diseased, are in heat, are not properly licensed and tagged, are vicious or have bitten any person are not allowed off-leash within off-leash dog parks.
- Dogs are permitted on-leash on the beach at any point between Shoreline Park staircase and the westerly City limits. (As described in Section 2.0 PROJECT DESCRIPTION, the beach area directly below the DFP bluffs is considered part of the DFP for these purposes, and so off-leash dogs are allowed only in this specific area of beach).

Nuisance:

~~? Any animal, which in the opinion of the Animal Control Supervisor or designee, is vicious or ferocious, or has shown a capacity for attacking persons, animals or property, may be declared a public nuisance. The City or a resident may maintain an action to abate the nuisance, and the owner may be enjoined from permitting the animal to remain a menace to the public. If an animal at large bites, attacks or causes injury to any person or other animal, the violation may be charged and prosecuted as an infraction or misdemeanor. Any violation of SBMC Section 6.08.020D states any violation will be charged and prosecuted as an infraction. If the person charged has been previously convicted of violating Section 6.08.020 and the animal at large bites, attacks or causes injury to any person or other animal, the violation of this Section may be charged and prosecuted as an infraction or a misdemeanor in accordance with Section 1.28.010 of this Code. The Animal Control Supervisor and all animal control officers, park rangers and police officers have the authority to enforce this Section.~~

- A dog owner or other responsible person shall not knowingly or through failure to exercise due care or control allow the dog to defecate or commit any other nuisance, and allow it to remain on any beach, public park, or

other public property. However, a person shall not be considered in violation if he or she takes immediate action to remove the nuisance.

The State of California has approved legislation that would result in a dog being classified as potentially dangerous and/or vicious under some circumstances and then requires these dogs to be properly handled (Food and Agriculture Code Section 31603). Within the Civil Code Section 3342, a dog's owner is liable for any dog bite to a person that occurs off of the owner's property. Additionally, a City or County may adopt or enforce its own program for the control of potentially dangerous and/or vicious dogs, as in the case of the City of Santa Barbara, as described above.

Section 30253 of the Coastal Act states that:

New development shall...assure stability and structural integrity, and neither create nor contribute significantly to erosion, geologic instability, or destruction of the site or surrounding area or in any way require the construction of protective devices that would substantially alter natural land conditions along bluffs and cliffs.

There are no known applicable policies regarding dogs using public recreation sites and interacting with other animals and humans, except as stipulated in the SBMC, as summarized above.

4.4.3 Impact Analysis and Mitigation

a. Significance Thresholds. The project would have a significant impact if it would result in any of the following:

- Substantially increase the probability of a dog biting or physically attacking a person within the DFP, Hale Park or Shoreline Beach Area.
- Substantially increase the probability of non-aggressive dog-related injuries to a person.
- Substantially increase the probability of a dog biting or physically attacking another dog within the DFP, Hale Park or Shoreline Beach Area.
- Substantially increase the probability that dogs and automobiles could collide along roadways adjacent to the DFP, Hale Park or Shoreline Beach Areas.
- Expose persons or dogs to endangerment associated with the cliffs at the DFP.
- Substantially increase the exposure of workers to harmful ingredients in herbicides.

b. Project Impacts and Mitigation. The following text describes the safety impacts associated with the DFPMP and the range of dog use alternatives being considered at the DFP, Hale Park, and the Shoreline Beach Area.

Impact Safety-1	The use of herbicides proposed in the DFPMP may result in an accidental exposure to hazardous substances that could harm those applying the herbicides.
------------------------	--

Douglas Family Preserve Management Plan. The DFPMP proposes habitat restoration and vegetation maintenance activities that may involve the use of herbicides in instances where hand pulling of vegetation is not feasible. Herbicides are currently used at the DFP on an infrequent basis, roughly every two years, to maintain clearance around fire hydrants. With implementation of the Plan and efforts to improve habitat, the use of herbicides could increase for invasive plant eradication. Although the precise frequency and extent of use is not yet known, it is expected that herbicide use would be limited, since the DFPMP indicates that other non-chemical methods to remove invasive plants would be employed as much as possible and that the use of herbicides shall be only as necessary. This could lead to an increased probability of worker exposure to herbicides, which may contain hazardous materials such as glyphosate. Since the extent of usage of herbicides upon implementation of the DFPMP is not known, this impact would be *potentially significant, mitigable*, and proper protections would be required during application.

Off-Leash Dog Park Locations. There are no proposals to initiate or increase the use of herbicides at the DFP, Hale Park, and Shoreline Beach Area as a result of implementation of any of the dog use alternatives. Therefore, impacts for all dog use alternatives at these three sites would be *less than significant*.

Refer to Section 4.6 WATER RESOURCES for a discussion of potential impacts to surface and groundwater from the use of chemicals on the DFP, Hale Park and Shoreline Beach Area sites.

Mitigation Measures. The following mitigation measure is **required** for the DFPMP. Additionally, MM Water-9-8 would be **required** to mitigate herbicide applicator safety impacts resulting from the DFPMP. Mitigation measure Water-9-8 states that all applicable laws and manufacturer's requirements and directions regarding the transportation, storage, use and disposal of herbicides be followed. It also states that all applications of herbicides shall be performed under the supervision of a chemical applicator licensed in the State of California.

MM Safety-1	The Parks and Recreation Department shall minimize applicator exposure to glyphosate and other hazardous materials commonly found in herbicides. Workers mixing herbicides with such ingredients shall wear eye protection and gloves to minimize exposure to face and
--------------------	---

hands. When pouring herbicides, workers shall keep containers below eye level. No aerial spraying shall be allowed. All spraying shall take place when rain is not predicted within six hours.

Residual Impact. Impacts would be *less than significant* upon implementation of the above mitigation measure and mitigation measure Water-9.

Impact Safety-2	Implementation of the various dog-use alternatives at the DFP, Hale Park, and Shoreline Beach Area may substantially increase the likelihood of accidental or intentionally aggressive dog-to-human or dog-to-dog attacks and altercations, including bites and injuries.
------------------------	--

Dog safety issues involve both the safety of people and the safety of dogs. Dogs may bite humans either accidentally while excited or while motivated by aggression or fear. Dogs may also attack other dogs for a variety of reasons; larger breeds may view smaller dogs as prey, and some larger dogs have a tendency to attack smaller breeds. Large dogs can injure elderly or small stature people, such as children, by bowling them over, though intending no harm. The dog-child interaction is an especially heightened concern, as children are not sufficiently educated about, or able to understand, appropriate dog interaction, and they are often not large enough to defend themselves against attack. Therefore, children are often the victims of dog bites. Additionally, humans may accidentally be injured while trying to stop altercations between dogs. For the purposes of this EIR, and based on the information provided in Section 4.4.1 Setting, it is assumed that the potential for safety concerns currently exists at the DFP, Hale Park and the Shoreline Beach Area.

Given the available research and information, considering the high use levels of many urban area dog parks in various communities, there are relatively few serious instances of reported dog bites. This may be because dog park facilities have been effectively managed to minimize risk. On the other hand, this may be due, in part, to under-reporting. Recording of dog bite incidents by the location from where they were reported, as opposed to the location where the dog bite actually occurred, could reduce the ability to accurately quantify the incidents. City Animal Control Division staff indicates that not all dog bite victims bitten at a given public park or recreation site would be appropriately represented, since a person bitten sometimes contacts the authorities and files a report after leaving the facility. For this reason, the exact number of dog bites that occurred at Santa Barbara area parks cannot be accurately estimated. However, based on the available statistics, in the last year there ~~have~~ been ~~a substantial number of~~ several dog bites in the project area. These include five dog-human bites in the Shoreline Beach Area between the Arroyo Burro Creek and the Mesa Lane stairs, six dog-human bites on the DFP, and six dog-dog bites on the DFP.

Both dogs on- and off-leash have the potential to become involved in conflicts with other dogs and with humans. Dogs off-leash may be more inclined toward these types of

situations, since the owner would commonly have less physical control over the dog. Off-leash and unrestrained dogs are viewed as a threat to many non-dog owners, as well as some dog owners themselves. For the purposes of this analysis, both on- and off-leash dogs are assumed to substantially contribute to safety concerns, although the concern is greater with off-leash dogs.

As described in Section 2.0 PROJECT DESCRIPTION, implementation of Alternatives A (dogs off-leash all the time) and C-F (dogs off-leash with varying restrictions on day/times of use) at each of the DFP, Hale Park, and Shoreline Beach Area locations is anticipated to substantially increase dog use of the sites. This substantial increase in dog use would result in a corollary substantial increase in the potential for park utilization conflicts. These conflicts could include dog bites and injuries, as well as other types of attacks and altercations that may pose safety threats to both humans and dogs, and involve both dogs on- and off-leash.

The greatest impacts would be associated with alternatives that maximize the amount of time that dogs are allowed off-leash, since dogs off-leash may generally contribute more to conflicts than dogs on-leash, and these are also the alternatives under which a substantial increase in dogs is expected. Therefore, in descending order, Alternative A would have the most impact, followed by Alternative E (dogs on-leash two days and off-leash five days of the week), Alternative D (dogs prohibited two days a week and allowed off-leash five days a week). Alternative F (dogs on-leash on odd days of the month and otherwise off-leash) and Alternative C (dogs on-leash everyday between 10 AM and 3 PM, otherwise off-leash) would have similar impacts, and the least impacts of the off-leash alternatives. While the extent of impact may vary among these alternatives, the conclusion of level of significance is the same for Alternatives A and C-F. At the DFP and Hale Park sites, Alternatives A and C-F would result in *potentially significant and mitigable* impacts to dog safety. At the Shoreline Beach Area, Alternatives A and C-F would result in *unavoidably significant* impacts. These conclusions are discussed below under each site heading.

Alternative B requires that dogs be leashed at all times. This alternative is not expected to result in a substantial increase in dog use at the DFP, Hale Park and the Shoreline Beach Area. Rather, the overall number of dogs at each site is expected to stay about the same, and dogs would be largely under owner control. Since the number of dogs under Alternative B is anticipated to remain about the same, impacts associated with dog safety concerns at each of the three sites would be considered *less than significant*.

There are a few management strategies to establish a safe outdoor recreational opportunity where dogs are allowed off-leash. These strategies, which vary in effectiveness, include: the use of spatial buffering, physical barriers, and temporal separation. Spatial buffering can take many forms, but requires that sufficient distance occur between potentially conflicting activities so that the likelihood of conflict is either eliminated or reduced to an acceptable level. This is usually accomplished through designation of certain areas for certain types of uses. The amount of spatial separation usually depends on the available space at the facility. The size of an area designated for

off-leash dog use varies, but is usually at least 3-4 acres. The most common physical barrier is a fence, used to partition off a portion of the facility for dogs off-leash. Sometimes, smaller, fully fenced areas within the larger fenced dog areas are designated for use by small dogs (i.e., under 20 pounds), avoiding the potential conflict between large and small dogs. Temporal separation is accomplished through appropriate scheduling of activities so that off-leash dog use is allowed during a certain time or on a certain day, which then allows other types of recreation to occur free of potential conflicts with dogs.

A discussion of the particular options for mitigating the significant impacts for Alternatives A and C-F at each of the three sites is provided below.

Douglas Family Preserve. Off-leash dogs would have a substantially increased potential for conflict with humans and other dogs. Alternative A (dogs off-leash at all times) is anticipated to result in a substantial increase in dogs using the site, especially off-leash dogs, and would also offer no opportunities for visitors to use the Preserve when dogs are on-leash. Therefore, a substantial increase in the potential for dog-related safety concerns would occur, leading to *potentially significant, mitigable* impacts. Alternatives C-F (dogs off-leash but with some restrictions on days/times) utilize temporal separation, providing periods when off-leash dogs are prohibited, which would limit potential conflicts to some extent. However, even with this temporal separation, *potentially significant, mitigable* impacts to dog safety would remain for these four alternatives, since there would still be opportunities for non dog-related recreation activities to occur in the same area with dogs, particularly those off-leash.

Alternative A would have the greatest impact of the five off-leash alternatives since it would maximize the time that dogs are allowed off-leash. To varying degrees, Alternatives C-F would reduce the potential somewhat for incompatible use conflicts, since unleashed dogs would be allowed only during certain days and times, and would reduce the potential for safety impacts associated with off-leash dog use. However, the impacts would still be considered *potentially significant, mitigable*.

Spatial buffering may be effective in reducing these conflicts since there is sufficient space at the DFP to accommodate this method, although the most effective approach would be a physical barrier, such as a fence, which offers more certainty that off-leash dogs will not wander from the designated area. The latter would better limit the potential for off-leash dogs coming into conflict with on-leash dogs and other non dog-related recreation, although conflicts with other off-leash dogs and their owners would continue to exist within the fenced area. A vegetative barrier would not be as reliable as a fence when considering physical barriers, since dogs may jump over or crawl under or through gaps often found in vegetation. However, vegetation may be used in conjunction with a fence to conceal the fence for aesthetic purposes. The creation of a spatial buffer or a fence would be required to mitigate impacts deriving from Alternatives A and C-F at the DFP to a less than significant level. Additionally, measures that establish a dog-park complaint hotline, a policy for uncontrollable dogs, and park management guidelines are required to be implemented.

The only aspect of the DFPMP that would result in dog-to-human or dog-to-dog safety conflict impacts is the off-leash dog-use component of the Plan. This impact has already been considered above in the discussion of the dog use alternatives at the DFP site.

Hale Park. Given the physical characteristics of Hale Park, especially the steep slopes, heavy vegetation, and riparian area, both non-dog related and dog-related (off- and on-leash) recreation activities would tend to concentrate in the generally flat area in the eastern portion of the park. However, this area is small, and would be unable to safely accommodate all of these types of activities.

As described above for the DFP, Alternatives A (dogs off-leash at all times) and C-F (dogs off-leash but with some restrictions on days/times) are anticipated to result in a substantial increase in dogs using the site, especially dogs off-leash, and therefore a substantial increase in the potential for dog-related safety concerns, leading to *potentially significant, mitigable* impacts. Alternative A would have the greatest impact of the six alternatives, since it would maximize the time that dogs are allowed off-leash, and would offer no opportunity for individuals to visit the park when dogs are not off-leash. The remaining off-leash dog use alternatives offer some temporal separation as a way to manage dog use of the site, and lessen the potential for conflicts. Yet, impacts would still be *potentially significant, mitigable* because non-dog related recreation and on-leash recreation could still occur at the park during the days and times when off-leash dog use is permitted.

Given the space limitations at Hale Park presented by vegetation and terrain, a spatially buffered off-leash dog area is not feasible for Alternatives A and C-F. Therefore, a fenced off-leash dog area would be required to mitigate effects to a less than significant level; as noted in the discussion of the DFP, a fence offers the most reliable method of ensuring that dogs remain in the designated area. Other measures, including instituting a dog-park complaint hotline, establishing policies for uncontrollable dogs and park management guidelines would also be necessary.

While both on- and off-leash dogs have the potential to become involved in conflicts, there would probably be less conflict with on-leash dogs since owners usually have more control over their pets. Compared to Alternative A, Alternative C (dogs on-leash every day from 10:00 AM to 3:00 PM, and otherwise off-leash) would reduce the potential safety impacts, since the amount of time dogs would be off-leash would be limited to early morning and late afternoon and evening. Even though it is assumed that Alternative C would result in a substantial increase in dogs using the park, there would be somewhat less potential for conflict during most of the day since dogs would be leashed. People uncomfortable with off-leash dogs may be more apt to use the park at these times (10:00 AM through 3:00 PM), thereby reducing the potential for conflict during dogs off-leash hours. The pre-10:00 AM and post-3:00 PM hours, however, would create a relatively greater potential for safety concerns, when off-leash dogs would interact with other dogs and humans. Both scenarios would result in *potentially significant, mitigable* impacts.

Alternatives D, E and F, which provide some limitations on when dogs can be off-leash, would result in somewhat less impacts than Alternative A, given the amount of time dogs would be off-leash. Alternative D prohibits dogs on-site two days per week, including one weekend day, and allows dogs off-leash at all other times. Alternative E states that dogs would be on-leash two days each week, including one weekend day, and allowed off-leash at all other times. Alternative F allows dogs off-leash on odd days of the month, otherwise they would be required to be on-leash. After Alternative A, Alternative E would result in the most impacts, followed by Alternative D, and then Alternatives C and F, when considering the extent of time off-leash dogs would be permitted on-site.

Alternatives C, D, E and F would provide periods of time when dogs off-leash are prohibited at Hale Park, which then offers an opportunity for people not comfortable with unleashed dogs to use the park. Alternatives C and F in particular provide an extended timeframe when off-leash dogs would not use the site. If it were possible to determine, upon designation of Hale Park as an off-leash dog park, the times when use by off-leash dogs would be the least popular and would be very limited, such that off-leash dogs could safely recreate with other users in the small space at the park, both a fenced area and an area with spatial separation may be practicable. In this case, assuming that for Alternative C the pre-10:00 AM period has a very limited amount of dogs recreating off-leash, a spatially buffered off-leash dog area could be established in the flatter portion of the park, toward the eastern edge, for use during these hours, in addition to a fenced area (see below). The borders of this area would be established by the site's physical barriers. If late afternoons have a higher concentration of unleashed dogs, a fenced off-leash dog park could be established for the post-3:00 PM period. This would enable some off-leash dog recreation to occur outside of a fenced enclosure when there is only a limited chance for recreational conflicts. Nonetheless, the effectiveness of this approach is not assumed, since it cannot be known with certainty now how many off-leash dogs might use the site and when the areas of high and low use by off-leash dogs at Hale Park will be upon a change in its on-leash dog only designation.

Shoreline Beach Area. Alternatives A and C-F would result in *unavoidably, significant* impacts for dog-related safety. All of these alternatives would result in a substantial increase in dog use of the site, particularly off-leash dog use, which could increase the likelihood of conflicts between dogs and humans and among dogs. For the same reasons discussed for Hale Park and the DFP, Alternative A (dogs off-leash all the time) would have the greatest impact of the off-leash alternatives, followed by Alternative E (dogs off-leash two days and off-leash five days of the week), then Alternative D (dogs prohibited two days a week and allowed five days a week). Alternative F (dogs on-leash on odd days of the month and otherwise off-leash) and Alternative C (dogs on-leash everyday between 10 AM and 3 PM, otherwise off-leash) would have similar impacts, and the least impacts of the off-leash alternatives.

The narrow, linear character of the beach makes interaction between users more likely than at the DFP, which has more space to separate uses, and Hale Park which has slightly more space. If a discrete portion of the Shoreline Beach Area, with a fence or a spatial buffer, were designated for off-leash dogs only as a mitigation measure for impacts, it

would need to be at least 3-4 acres in size. Considering tidal action and storm surf, an area of this size would be impossible to delineate, and so the available area would be smaller. It would also be necessary to continue to provide beach access to other users and dogs on-leash, allowing them to pass through the designated area, thereby resulting in potential user conflict concerns. Moreover, a fence is not a practical solution on a narrow strip of beach such as this.

Given the aesthetic, legal, and access concerns with locating a fenced enclosure on the beach, ~~the most likely option is to establish a spatially buffered area for dogs off-leash. This discrete area would need to avoid biologically sensitive areas of the beach, such as tide pools (refer to Section 4.2 BIOLOGICAL RESOURCES). This spatially buffered area would result in less than significant impacts on recreational opportunities, since large portions of the beach would remain outside of this area and be available for non-off-leash dog use. There is no feasible alternative available to spatially separate off-leash dog users from other site users.~~ Therefore, this impact remains **unavoidably significant**.

Even with only a portion of the Shoreline Beach Area open to off-leash dogs, even a section no larger than the existing off-leash area, an official designation by the City would create more public awareness and publicity about the availability of this beach area for this type of dog use. This would still lead to a substantial increase in dog use, although less than if the whole site was designated. However, even with this mitigation, and measures that include instituting a dog-park complaint hotline and establishing policies for uncontrollable dogs and park management guidelines, impacts would not be reduced to a less than significant level, since a substantial potential for conflict would still exist as beach visitors pass through the designated off-leash dog area.

Table 4.4-1 below summarizes whether a fence or spatial buffer would be required to reduce impacts to less than significant levels for each alternative at each of the three sites.

Table 4.4-1 Mitigation Measures Involving Physical Separation of Off-Leash Dogs

<i>Alternative</i>	Douglas Family Preserve	Hale Park	Shoreline Beach Area¹
<i>A</i>	Fence or Spatial Buffer	Fence	Spatial Buffer ⁺ <u>None</u>
<i>B</i>	None	None	None
<i>C</i>	Fence or Spatial Buffer	Fence	None ⁺ <u>Spatial Buffer</u>
<i>D</i>	Fence or Spatial Buffer	Fence	None ⁺ <u>Spatial Buffer</u>
<i>E</i>	Fence or Spatial Buffer	Fence	None ⁺ <u>Spatial Buffer</u>
<i>F</i>	Fence or Spatial Buffer	Fence	None ⁺ <u>Spatial Buffer</u>

¹ At the Shoreline Beach Area, ~~the spatial buffer would not~~ there is not mitigation available to mitigate the significant impacts to a less than significant level.

The following paragraphs describe the potential environmental impacts resulting from locating either a fenced, or unfenced but spatially separated, off-leash dog area at the DFP and Hale Park.

The potential dog off-leash area at the DFP as shown in DEIR Figure 4.4-1, is not within an area of particular erosion concern, such as near the bluffs or along creek banks, and so would not result in a significant erosion impact. Dust impacts from possible erosion in the 3-4 acre area would be considered adverse, but not significant. Therefore, impacts from erosion and dust would be *less than significant*. Nonetheless, MM Water-6 is recommended to minimize the effects of dust and erosion from use of the off-leash dog area.

Section 4.6.3 of this EIR states that even with the increased dog use anticipated with the off-leash dog use alternatives, erosion and sedimentation water quality impacts at Hale Park would be less than significant. It further states that the amount of erosion would be small, given the limited site area where dogs would be allowed near the on-site drainage. Dog activity in the potential off-leash dog park at Hale Park could increase erosion and dust, but again the impacts would be *less than significant* and possibly less than if a fenced area is not created, since the fenced dog park would even further limit access and exposure to the drainage feature on-site. Recommended mitigation measure Water-5 provides for monitoring of the grass area, and maintenance as needed, which would address any erosion and dust concerns.

Since Section 4.2 BIOLOGICAL RESOURCES finds that there are no sensitive species or their habitat, or other biologically sensitive habitat, on the DFP mesa and Hale Park, there would be no significant biological concern with the location of the 3-4 acre off-leash dog area. Impacts would be *less than significant*.

While designation of the DFP as an off-leash dog park is expected to result in a substantial increase in dog use, the overall park usage is expected to remain about the same as existing (e.g., some people may decide not to frequent the preserve as much once the site is officially designated as an off-leash dog park). Therefore, overall park noise would probably not change much. There may be an increase in dog barking and other dog-related noises, particularly within the designated dog off-leash area, but this would be incremental since there is already dog noise at the site, and the noise would be intermittent and distributed throughout the 3-4 acre area. While this noise impact may be adverse, it is not considered a significant impact. Impacts would be *less than significant*. The majority of dog use would occur during the daytime hours, and the DFP is closed during the night. (The Preserve currently closes at 10:00 PM and reopens at sunrise. The DFPMP proposes to close the Preserve ½ hour after sunset, and reopen at sunrise). The potential location of the off-leash dog area shown in Figure 4.4.1 is not a final location, and the mapped area is larger than 3-4 acres, so that the eventual off-leash area may not necessarily border the residences on the eastern site boundary. The area could be designated so that the neighboring homes are sufficiently distanced from the potential dog barking. Moreover, as described above, the off-leash area may be self-limiting, so that owners may not choose to recreate with their dogs in the designated area when there is a substantial number of dogs already using it. Therefore, impacts would be less than significant.

Designating Hale Park for off-leash dogs would likely increase dog noise, but overall noise at the site would probably not change much, since the DEIR assumes that overall

usage of the site would not noticeably change. The flat grassland area of the site, where the off-leash dog area would be located, is not located adjacent to any residential uses. So, noise impacts from the fenced off-leash dog area may be adverse, but *less than significant*.

The fence is proposed as a mitigation measure because it would eliminate many safety concerns, particularly reducing potential safety impacts on especially sensitive populations, such as the elderly and children, and those averse to unleashed dogs. Such a fence would not present a significant safety concern from dogs congregating in a discrete area. The vast majority of off-leash dog parks in California are fenced. Three to four acres is a relatively large area for dogs to run and exercise freely. It is likely that a fenced or spatially separated off-leash dog area would be self-limiting, with the quality of experience declining as the designated area becomes filled with dogs, such that dog owners may not choose to enter the area when they perceive that it is congested. Safety impacts from the fence or spatially separated area would be *less than significant*.

Odors from dog waste would likely be less of a concern in the designated off-leash dog areas of Hale Park and the DFP. Dog waste left in the off-leash dog park boundaries would be picked up as required in mitigation measure Air-3, along with dog waste left at site entrances and along trails; pick-up would likely be easier and more reliable since the off-leash dog park would be a discrete, partitioned area, and most dog waste left on the ground would probably be found in this area, as opposed to being spread more around the DFP amongst vegetated areas. Air quality impacts from odor nuisance would be *potentially significant and mitigable* for the off-leash dog use alternatives; a fenced or spatially separated off-leash dog area would not add to this impact.

With regard to aesthetic impacts, mitigation measure Safety-5 requires a 3-4 acre off-leash dog area, in which there is the option to fence the area OR to provide an unfenced spatially separated area designated with signage. Therefore, a fence is not necessarily required. In any case, mitigation measure Safety-5 is self-mitigating from an aesthetic perspective, since it states that the fence must be aesthetically pleasing and harmonious with the natural character of the site, and that it shall be approved by the City Architectural Board of Review. A properly designed fence would not result in adverse aesthetic impacts at the DFP. The City may choose to provide vegetative screening along the fence as well. Additionally, mitigation measure Safety-6 for the Hale Park site includes the same language for design parameters and ABR review as that of Safety-5, and so any aesthetic impacts would also be self-mitigating. Therefore, aesthetic impacts would be *less than significant*.

Mitigation Measures. The following mitigation measures are **required** for Alternatives A and C-F at the DFP, Hale Park, and the Shoreline Beach Area to mitigate potentially significant public safety impacts. If Alternative B is selected, the following mitigation measures are not required.

MM Safety-2

A set of park management guidelines shall be formulated and implemented to govern dog-related use at the DFP, Hale Park and the Shoreline Beach Area, and shall be posted at each mutt mitt station at the three sites. Signs shall be aesthetically appropriate and compatible with the natural character of the sites. Guidelines shall, at a minimum, incorporate the following types of restrictions: 1) Dogs must be leashed while entering or exiting the off-leash dog park area; 2) Aggressive dogs, dogs declared dangerous, and dogs in heat are prohibited; 3) Sick dogs are prohibited; 4) Dogs under 4 months of age are prohibited; 5) Dogs must be removed if they exhibit aggressive or uncontrollable behavior; 6) Dogs must have current license/vaccination and wear current tags; 7) Dog owners must remain in the off-leash area with their dogs(s); 8) Dog owners must carry a leash at all times; 9) Dogs must be under voice control; 10) Small children and infants must be under strict supervision and within arms reach of their parent or other responsible person when in or adjacent to the off-leash dog area; 11) Dog owners must pick up their dogs' feces and dispose of it in containers provided for that purpose; 12) Owners shall fill in any holes dug by dogs within their charge at the DFP and Hale Park. Additionally, the days and times when dogs are allowed off-leash, and where they are permitted, shall be posted in these same areas.

The City staff or designated individual or entity shall periodically monitor each site, and inform offenders of the rules (periodically is defined as once or multiple times per day for a total of one hour). This monitoring may be combined with the required monitoring of dog waste pick-up at the site. After one year, the schedule and extent of monitoring may be adjusted based on compliance; any adjustment shall be approved by the City Environmental Analyst. If the monitor(s) observe a person repeatedly not complying with the rules, they shall obtain the necessary identification information from the offenders, as appropriate and feasible, to forward to the City authorities for a third-party citation. The monitor shall note specifically where the incident occurred at the site. Repeat infractions may result in the loss of park privileges for a period of one month. Further infractions shall result in permanent forfeiture of park/ beach dog use privileges.

MM Safety-3

~~The City of Santa Barbara Parks and Recreation Department shall establish a dog park complaint hotline to accommodate potential complaint calls or notify the city of a dangerous dog-related situation at the DFP, Hale Park, and the Shoreline Beach Area. The phone number of the City Animal Control Division shall be posted at the established entrances to the DFP, Hale Park and the Shoreline Beach Area, with a brief statement noting that the Animal Control Division may be called for dog-related complaints or to notify the City of a dangerous dog-related situation. hotline phone number shall be posted at the established entrances to each of the three sites.~~

MM Safety-4

The following policy shall be posted at the established entrances to each of the DFP, Hale Park and the Shoreline Beach Area sites: If at any time a dog located within the off-leash dog area becomes uncontrollable, the owner shall remove the dog, on a leash, from the facility immediately. If a dog persistently becomes uncontrollable, the owner of that dog shall be required to remove that animal for a period of no less than one month. If upon return, the dog is still uncontrollable, that owner shall be required to remove the dog from the facility permanently.

The following mitigation measure is **required** for Alternatives A and C-F at the DFP only. Either option a) or b) may be selected. Option b) would be more effective than option a) in limiting the possibility of dog-to-dog and dog-to-human hazards, since it offers more certainty that dogs will not wander from the designated off-leash area. If neither option a) nor b) is selected, the impacts would remain unavoidably significant. Figure 4.4-1 shows a potential area for the off-leash dog park on the mesa. If Alternative B is chosen, the following mitigation measure is not required.

MM Safety-5

a) A designated area with sufficient buffer space shall be created at the DFP for off-leash dog use only. The area shall consist of at least ~~3-5~~4 acres on the mesa portion of the DFP, as far from the coastal bluff and sensitive habitat as practicable. The outside 50 yards of the boundaries shall be considered a buffer area, and dog owners shall be instructed to position their dogs toward the central portion of that area. The buffer and off-leash dog park areas shall be clearly designated by aesthetically appropriate signage, which shall also indicate the days and times when dogs are allowed off-

leash in the area and a warning to the general public regarding the potential for dogs off-leash.

Or

b) A fully fenced 3-4 acre location on the top of the mesa at the DFP shall be created and designated for off-leash dog use only. The fenced area shall be located as far from the coastal bluff and sensitive habitat as practicable. This area shall be clearly designated with appropriate signage, which shall also indicate the days and times when dogs are allowed off-leash in this area. Non dog-related recreation shall not be permitted within the designated area. The fence shall be of sufficient height (at least 4-6 feet) and design to ensure that dogs remain inside the limits. The fencing shall include one or two double gated, self-closing entries. The fence and gate design shall be aesthetically pleasing and harmonious with the natural character of the site, and may be screened by vegetation, as appropriate. The fence and gate shall be approved by the City Architectural Board of Review.

The following mitigation measure is **required** for Alternatives A and C-F at Hale Park only to mitigate potentially significant public safety impacts to a less than significant level. If Alternative B is selected, the following mitigation measure is not necessary.

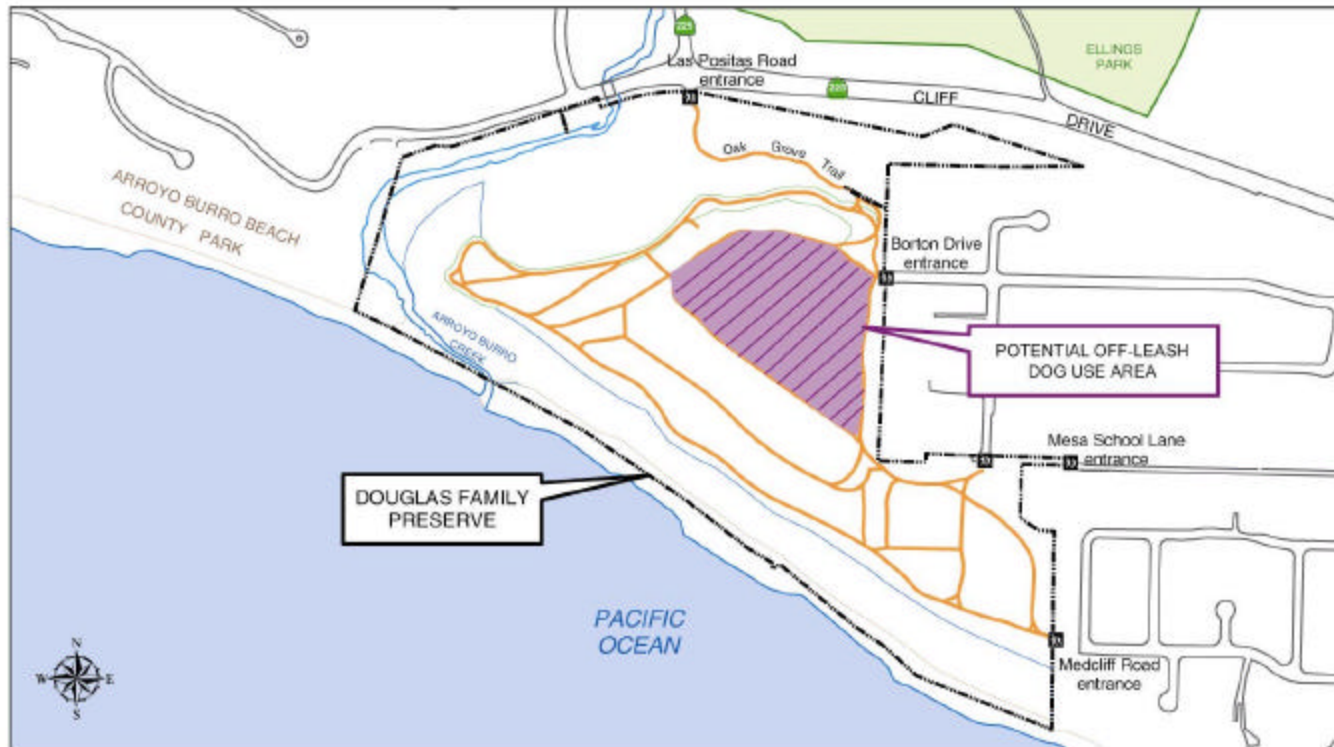
MM Safety-6

A fully fenced area for off-leash dog use shall be constructed within the flatter portion of Hale Park toward the eastern edge of the park, outside of the seep area, and shall be at least 3-4 acres in size. The area shall be used only for dog off-leash recreation, and shall be clearly designated by aesthetically appropriate signage, which shall list the days and times that off-leash dogs are allowed. The fence shall be of sufficient height (at least 4 to 6 feet) and design to ensure that dogs remain inside the limits. The fencing shall include one or two double gated, self-closing entries. Because of the high visibility of this location, the fencing shall be aesthetically pleasing and harmonious with the natural character of the site, and shall be approved by the City Architectural Board of Review

~~The following mitigation measure is **required** for Alternatives A and C-F at the Shoreline Beach Area only, in order to mitigate potentially significant public safety impacts. If Alternative B is chosen, the mitigation measure listed below is not required.~~

Figure 4.2-4, in Section 4.2 Biological Resources, shows the area designated in MM Safety 7.

~~MM Safety 7 A designated area for off-leash dog use shall be created in the City-owned beach area west of Arroyo Burro Beach County Park and extending to the western City limits and/or the area from Mesa Lane steps to Shoreline Park stairs. This area shall be limited to off-leash dog recreation only, except that beachgoers may pass through the area. However, dogs shall remain on-leash in this area from November 1st until March 1st each year. Fifty yards from the western boundary and fifty yards from the eastern boundary shall be considered buffer areas, and dog owners shall position their dogs toward the central portions of the off-leash dog area. These locations shall be clearly designated by aesthetically appropriate signage, indicating the days and times that off-leash dogs are allowed, and a warning to the general public regarding the potential for dogs off-leash. Signs shall be placed at the top of the Mesa Lane steps and Shoreline Park stairs, and/or in or adjacent to the Arroyo Burro Beach County Park.~~



Source: Jones and Stokes

Figure 4.4-1
 City of Santa Barbara
 Douglas Family Preserve
 Potential Off-Leash Dog Use Area

Other Features

-  Douglas Family Preserve
-  City Park
-  Shore line
-  Road - curb line
-  Trail
-  Access Point



Section 4.4 SAFETY

~~considered buffer areas, and dog owners shall position their dogs toward the central portions of the off-leash dog area. These locations shall be clearly designated by aesthetically appropriate signage, indicating the days and times that off-leash dogs are allowed, and a warning to the general public regarding the potential for dogs off-leash. Any signs shall be placed at the top of the Mesa Lane steps and Shoreline Park stairs, and/or in or adjacent to the Arroyo Burro Beach County Park.~~

Residual Impacts. Since complete compliance and enforcement of dog-related regulations called for in the mitigation measures for Alternatives A and C-F at the DFP and at Hale Park are not feasible, there remains the potential for dog-related conflicts upon implementation of the mitigation measures. However, the remaining impacts would be *less than significant*. For Alternatives A and C-F at the DFP, the fenced off-leash dog area (option b) would be more effective than a spatially-separated off-leash dog area (option a) in limiting the possibility of dog-to-dog and dog-to-human hazards, although both would still reduce impacts to a less than significant level. If the mitigation measures calling for either a spatially-buffered or fenced off-leash dog area at the DFP, or the fence at Hale Park, were found to be infeasible, impacts would remain unavoidably significant for Alternatives A and C-F at the DFP and Hale Park. Also, MM Safety-2 (required for Alternatives A and C-F at all sites) may necessitate additional City staff or volunteer efforts. If MM Safety-2, as well as any of the other mitigation measures, are found infeasible due to staffing or other concerns, impacts would remain significant and unavoidable. A determination of feasibility would be made by the City Council.

Alternatives A and C-F at the Shoreline Beach Area would remain *unavoidably significant*, even with the spatially-buffered off-leash dog area and the other listed required mitigation measure, since a significant potential for conflict among beach users would remain as beachgoers pass through the unleashed dog area.

Impact Safety-3	Implementation of the various dog-use alternatives at Hale Park may substantially increase the potential for collisions between dogs and cars along Camino Viejo Road.
------------------------	---

There is presently no dog-proof barrier between the eastern boundary of Hale Park and Camino Viejo. While there have been no known reported incidents of dogs colliding with motorists along Camino Viejo at Hale Park, the potential for this currently exists, but is not considered significant, given the limited use of the park. Alternatives A, C, D, E and F would result in a substantial increase in dog use, including off-leash dogs, at the park. For reasons noted above, most of the dogs are likely to utilize the flatter portion of the

Section 4.4 SAFETY

park, which is near Camino Viejo. Camino Viejo is a two-lane road that curves near Hale Park, such that motorists have a limited view of the park before passing along it. Without a continuous dog-proof physical barrier along the road, the potential for dogs colliding with motorists would substantially increase with these alternatives, resulting in a *potentially significant, mitigable* impact. In descending order, Alternative A would result in the greatest potential for hazards, followed by Alternatives E, D, and F and C, when considering the amount of time that dogs would be allowed off-leash at Hale Park. Off-leash dogs would be more likely to encounter motorists than on-leash dogs, given that the latter are often under more direct control of the owners; however, both leashed and unleashed dogs may contribute to this hazard.

For Alternatives A, C, D, E and F, this impact could be mitigated through implementation of mitigation measure Safety-6, which requires a fully fenced off-leash dog area. Dogs could still enter the roadway, even though there is a fenced off-leash enclosure. Some select, but limited number of, breeds of dogs may still be able to jump over a tall fence. Off-leash dogs may also escape from their owners while exiting the fenced enclosure. However, the fence would substantially reduce the potential collision hazard to a *less than significant* level.

Since the number of dogs utilizing Hale Park under Alternative B (dogs on-leash only) is expected to remain roughly the same, Alternative B would not result in an increased potential for dogs colliding with motorists on Camino Viejo. Therefore, impacts would be *less than significant*.

At the Shoreline Beach Area and the DFP, there are either no roadways adjacent to the proposed off-leash dog areas, or in the general areas to be used by both off- and on-leash dogs, that present a hazard concern. Either the sites' physical characteristics, including topography, or the adjacent street design or location, serve as sufficient barriers to substantially limit the possibility of a collision.

Mitigation Measures. Mitigation measure Safety-6, listed above, would be **required** for Alternatives A and C-F at Hale Park to mitigate Impact Safety-3. No other mitigation measures are required.

Residual Impacts. Upon implementation of the required mitigation measure, impacts would be reduced to a *less than significant* level. If the Hale Park dog park fence were found by the City Council to be infeasible for various reasons, the impact would remain unavoidably significant.

Impact Safety-4	Implementation of the DFPMP or the various dog-use alternatives at the DFP may further expose dogs and their owners to hazards associated with the bluffs at the DFP.
------------------------	--

Currently, there is the potential for exposure of humans or dogs to endangerment associated with the coastal bluffs on-site. Dogs on- and off-leash have the potential to

Section 4.4 SAFETY

intentionally or accidentally go over the bluffs at the DFP and become hurt or stranded. However, off-leash dogs are more prone to this situation since owners usually have less physical control over unleashed dogs. In an attempt to rescue their dogs, owners may also go off the bluff edge and become stranded.

At present, downed logs currently at the site reduce access to the bluff edges. The DFPMP calls for fallen logs to be placed near the bluff edge in much of the Preserve (with the exception of areas approved for hang-gliding or para-gliding take-off and landing). This would reduce the numbers of dogs and their owners that could be stranded on the bluff. In general, the Plan states that warning signs to ensure public safety should be placed near the DFP site entrances; however the Plan does not specifically indicate which safety concerns should be placed on such signage.

Alternatives A and C-F at the DFP are expected to result in a substantial increase in dogs on the site, particularly unleashed dogs, which could increase the potential for dogs and their owners going over the bluffs and being trapped. With Alternative B (on-leash dogs only), this potential is substantially reduced, since ~~the no~~ increase in dog use is expected ~~to be minimal~~ and dogs would be on-leash and therefore under more direct control. The greatest impacts would be associated with alternatives that maximize the amount of time that dogs are allowed off-leash, since dogs off-leash may be more prone to bluff hazards. In descending order, Alternative A would have the most impact, followed by Alternative E (dogs on-leash two days and off-leash five days of the week), Alternative D (dogs prohibited two days a week and allowed off-leash five days a week). Alternative F (dogs on-leash on odd days of the month and otherwise off-leash) and Alternative C (dogs on-leash everyday between 10 AM and 3 PM, otherwise off-leash) would have similar impacts, and the least impacts of the off-leash alternatives. While the extent of impact may vary among these alternatives, the conclusion of level of significance is the same for Alternatives A and C-F.

The deterrents proposed in the DFPMP, such as further utilizing logs as obstacles to bluff access, would reduce this hazard. Mitigation measure Safety-5, which requires either a spatially separated area (option a) or a fenced area (option b) for off-leash dog use, would significantly reduce the likelihood that off-leash dogs would be recreating in the vicinity of the bluffs. In particular, option b) of MM Safety-5 would be preferable considering bluff hazards, since off-leash dogs would recreate in a fenced area, which is more effective than a spatially-buffered area in limiting dogs to a certain location. Lastly, mitigation measures Safety-2 and -4 would minimize the potential for uncontrollable dogs at the DFP. Nonetheless, the bluffs would still present a substantial potential hazard to on-leash dogs and off-leash dogs that escape their owners' control. Impacts would still be considered *potentially significant, mitigable* for Alternatives A and C-F. Under Alternative B, dogs would be on-leash at all times, and the amount of dogs on-site is expected to remain about the same; therefore, impacts would be *less than significant* for Alternative B.

Warning signs that note the possibility of accidents near the bluff, and the regulations and citation and misdemeanor policies in effect at the DFP, should be placed at the Preserve

Section 4.4 SAFETY

entrances. In the Plan, this location is suggested for warning signs in general. Warning signs would not totally eliminate the possibility of dogs and owners going over the bluffs. In particular, owners may be aware of the danger and regulations, but some dogs may still escape from the owners' control and proceed over the bluff. Similarly, the logs may effectively limit access to the bluff for most dogs, but not for all, especially larger breeds and those that are skillful jumpers. However, the signs would serve to make dog owners more aware of the potential hazard and consequences of not complying with the regulations to keep dogs away from the coastal bluff. Being better informed, owners may be more vigilant and more likely to restrict their dogs from recreating in the vicinity of the bluffs. With the addition of this signage, along with other required mitigation measures Safety-2, -4 and -5, impacts would be reduced to a less than significant level.

Other areas of the DFP where there are bluffs would not pose a substantial threat, like that of the coastal bluffs. For the most part, the other bluffs are not as steep and are not prone to as much erosion and instability as those fronting the coast. Additionally, dog recreation is most common on the flat mesa portion of the DFP, and, in some cases, vegetative growth forms a sufficient barrier to bluff access.

The only aspect of the DFPMP that would result in dog-related bluff hazards is the off-leash dog-use component of the Plan. This impact has already been considered above in the discussion of the dog use alternatives at the DFP site.

Mitigation Measures. Mitigation measures Safety-2, -4 and -5 would also be **required** for Impact Safety-4 for Alternatives A and C-F at the DFP. Additionally, the following is **required** for Alternatives A and C-F at the DFP:

MM Safety-8 Warning and regulatory signs indicating the potential for accidents near the bluff, and the regulations and citation and misdemeanor policies in effect, shall be placed at the entrances to the DFP. Signs shall be aesthetically appropriate, and compatible with the natural character of the site, but clearly visible.

Residual Impact. Upon implementation of MM Safety-2, -4 and -5, impacts from implementation of Alternatives A and C-F at the DFP would be reduced to a ***less than significant*** level. Under MM Safety-5, option b) would be more effective than option a) in limiting the potential for dogs to access the bluffs, although both options would result in less than significant impacts. Since complete compliance with and enforcement of dog-related regulations called for in the mitigation measures for Alternatives A and C-F at the DFP is probably not possible, there remains the potential for dog-related conflicts upon implementation of the mitigation measures. However, the remaining impacts would be ***less than significant***. If the fence or spatially-buffered area called for in MM Safety-5, as well as any of the other mitigation measures, are found to be infeasible, the impacts would remain significant, unavoidable.

Section 4.4 SAFETY

c. Policy Consistency. The project would be consistent with Section 30253 of the Coastal Act upon implementation of the required measures to mitigate potential hazards associated with the bluff resulting from dog and human access. Moreover, the project would be consistent with all applicable regulations contained in the Santa Barbara Municipal Code relating to dogs, except where the dog-use alternatives aim to amend the relevant City ordinances regarding where and when dogs are allowed off-leash.

d. Cumulative Impacts. The dog use alternatives at the DFP, Hale Park and the Shoreline Beach Area would not contribute to a cumulative safety concern after mitigation measures have been implemented. While at the project level, the safety impact would be significant for the Shoreline Beach Area, on a City- or County-wide basis, and considering other projects in the area, the project contribution to cumulative safety impacts would not be substantial. Compared to other types of parks and recreation facilities, there are a small number of dog off-leash parks situated in the South Coast region. Overall, there is a relatively small amount of incidences of dog-to-dog or dog-to-human conflicts throughout the facilities investigated (Jones & Stokes, August 2000). Besides the DFP, the only other existing dog off-leash park is Elings Park in the City of Santa Barbara. Only one other dog off-leash project is being considered, although not yet formally proposed, in the South Coast – that of the County of Santa Barbara (see Section 2.7 OTHER RELEVANT PROJECTS). The project would not significantly add to the existing or reasonably conceivable future cumulative safety concern, considering the other limited off-leash dog facilities. It is not expected that other past, present and future projects in the southern Santa Barbara County area would substantially increase dog safety concerns, since these areas are largely built out and no projects have been identified that would increase the public safety concerns from dogs in the area. Also, the City may decide not to approve off-leash dog use at the Shoreline Beach Area. This would mean that the project would contribute very little, and at a less than significant level, to the cumulative safety impact. Therefore, the cumulative impacts for the project as a whole would be considered *less than significant*.

The risk of injury due to dogs or humans being stranded on the bluff occurs occasionally in the City. The rate is not expected to increase substantially. Therefore, this cumulative impact would be *less than significant*, given implementation of the required mitigation measures. The potential cumulative impact from using herbicides at the DFPMP would be *less than significant*, since the frequency of application at the DFP would be limited, and methods to reduce the adverse effects of the herbicides would be employed.