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Steve Nissen
ACTING DIRECTOR

Notice of Preparation

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CITY OF SANTA BARBARA
PLANNING DIVISION

December 7, 2000

To: Reviewing Agencies
Re: Douglas Family Preserve Management Plan
SCH# 2000121013

Attached for your review and comment is the Notice of Preparation (NOP) for the Douglas Family Preserve Management Plan draft Environmental Impact Report (EIR).

Responsible agencies must transmit their comments on the scope and content of the NOP, focusing on specific information related to their own statutory responsibility, within 30 days of receipt of the NOP from the Lead Agency. This is a courtesy notice provided by the State Clearinghouse with a reminder for you to comment in a timely manner. We encourage other agencies to also respond to this notice and express their concerns early in the environmental review process.

Please direct your comments to:

Janice M. Hubbell
City of Santa Barbara
630 Garden Street
Santa Barbara, CA 93102-1990

with a copy to the State Clearinghouse in the Office of Planning and Research. Please refer to the SCH number noted above in all correspondence concerning this project.

If you have any questions about the environmental document review process, please call the State Clearinghouse at (916) 445-0613.

Sincerely,

Scott Morgan
Project Analyst, State Clearinghouse

Attachments
cc: Lead Agency

**Document Details Report
State Clearinghouse Data Base**

SCH# 2000121013
Project Title Douglas Family Preserve Management Plan
Lead Agency Santa Barbara, City of

Type **NOP** Notice of Preparation
Description A proposal by the City of Santa Barbara Parks and Recreation Department to adopt and implement the Douglas Family Preserve Management Plan. The Plan includes habitat restoration, removal of invasive non-native plants, minor improvements to some trails and eradication of others, several alternatives for possible off-leash dog use, and possible construction of a caretaker's residence and restroom.

Lead Agency Contact

Name Janice M. Hubbell
Agency City of Santa Barbara
Phone 805/564-5470 **Fax**
email
Address 630 Garden Street
City Santa Barbara **State** CA **Zip** 93102-1990

Project Location

County Santa Barbara
City Santa Barbara
Region
Cross Streets Medcliff Road/ Borton Drive/ Cliff Drive/ Las Positas Road
Parcel No. 047-140-001, 002, 003 and 005
Township **Range** **Section** **Base**

Proximity to:

Highways 225/ U.S. 101
Airports
Railways UPRR
Waterways Arroyo Burro Creek
Schools Monroe Elementary
Land Use Land Use: Douglas Family Preserve
 General Plan; Residential, 3 and 5 units/acre; Proposed Park; Open Space (north facing bluff and creek); Creek/Buffer (Arroyo Burro Creek); Vista (eastern point); Bikeway
 Zoning: Park and Recreation and Coastal Overlay Zones; P-R, S-D-3

Project Issues Aesthetic/Visual; Archaeologic-Historic; Coastal Zone; Geologic/Seismic; Traffic/Circulation; Vegetation; Water Quality; Wetland/Riparian; Wildlife

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Forestry and Fire Protection; Office of Historic Preservation; Department of Parks and Recreation; Department of Fish and Game, Region 5; Native American Heritage Commission; State Lands Commission; Caltrans, District 5; California Highway Patrol; Regional Water Quality Control Board, Region 3

Date Received 12/06/2000 **Start of Review** 12/07/2000 **End of Review** 01/05/2001

CITY OF SANTA BARBARA

Community Development Department Planning Division

Revised Initial Study/Environmental Checklist Mst1999-01031 **Project Title: Douglas Family Preserve Management Plan**

This Initial Study has been completed for the project described below because the project is subject to review under the California Environmental Quality Act (CEQA) and was determined not to be exempt from the requirement for the preparation of an environmental document. The information, analysis and conclusions contained in this Initial Study are the basis for deciding whether a Negative Declaration (ND) is to be prepared or if preparation of an Environmental Impact Report (EIR) is required to further analyze impacts. Additionally, if preparation of an EIR is required, the Initial Study is used to focus the EIR on the effects determined to be potentially significant.

PROJECT DESCRIPTION (See Vicinity Map, Exhibit 1, and Management Units, Exhibit 2)

Douglas Family Preserve Management Plan:

Crawford Multari Clark & Mohr (CMCM) has prepared the Draft Douglas Family Preserve (DFP) Management Plan for the City Parks and Recreation Department. CMCM was hired by the City to assist the DFP Advisory Committee in the development of this Plan. The Advisory Committee has met for two years to develop the Plan. A number of public meetings have been held, culminating in recommended changes to the Draft Plan by the Advisory Committee, the Parks and Recreation Commission and the City Council.

The Plan divides the DFP into four (4) management units, including the Riparian/Estuary, Coastal Bluff Scrub, Oak Woodland and Mesa. These are shown in Exhibit 2. The primary focus of the Plan is to maintain the natural qualities of the site and continue and enhance public access to the site.

Summary of Management Plan Recommended Actions:

- » **Habitat Access/Trail Eradication:** Discourage entry into the coastal bluff scrub, riparian/estuary and oak woodland management units through removal of unauthorized trails as a means of protecting and expanding these sensitive areas and preventing access to the bluffs. This may be accomplished by reseeding the surfaces with native seed mix, planting native vegetation and blocking access with downed wood. A policy has been added to the Master Plan that requires the planting of native vegetation along the base of the oak grove trail to strongly discourage access by dogs and people to the creek area, and the nearby archaeological site.
- » **Trail Improvements:** The main loop trail on the Mesa would be improved sufficiently to allow for universal access (i.e., disabled and able access) to the Preserve. Improvements would be minor. Where the cross-pitch (slope across the trail) is too sloped, some very minor grading would be done to reduce the pitch for better access. Some potholes may be filled and compacted to create a smoother trail. However, puddles and pools would not be repaired. Instead, access around such pools would be created by using already worn areas as additional access. Again, minor grading might be necessary to create proper cross pitch and smooth the trail. Changes to the oak grove trail would only occur if erosion becomes a problem as the existing asphalt wears away.

- » **Habitat Restoration/ Invasive Plant Eradication:** The Management Plan calls for habitat restoration in several locations. Restoration ranges from eradication of invasive exotic plant species to planting new native vegetation. Restoration may include Arroyo Burro Creek improvements including widening the banks by laying back the slopes and planting with appropriate riparian vegetation. Exotic plant removal techniques include hand clearing, machine clearing and, where necessary, spraying with [herbicides such as](#) Rodeo™ or Roundup™. Invasive exotic plant species ~~are proposed to would~~ be controlled in the coastal bluff scrub, riparian/estuary and oak woodland management units. In the mesa management unit, invasive exotic species that are in direct competition with native species would be incrementally removed, except within established windrows and the butterfly grove. This may be accomplished by hand clearing or spraying, where necessary or plants are particularly stubborn.
- » **Cultural Resources:** A policy has been added to the Master Plan that requires that additional archaeological analysis to determine site boundaries and depth prior to developing a plan for habitat and creek restoration near the site and requires that restoration shall avoid the site and shall follow the recommendations of the study.
- » **Bluff Access:** Use downed wood to reduce access to bluff edges in selected areas. Access for paraglider launching and sunset and ocean viewing would be maintained at key points.
- » **Fire Management:** The Management Plan provides for typical fire management procedures (mowing grasses and trimming shrubs and trees) within identified buffers. The buffers include a 7.5-foot buffer on either side of the loop and interior trails and a 60-foot buffer on the park side of the residential areas that abut the Preserve. Procedures for protecting native species from fire safety mowing would be continued.
- » **Signage:** Allow signage within the established buffers identified above and at the intersection of the mesa loop and oak grove trails.
- » **Hang-gliding:** The Management Plan would continue to allow hang-gliders to take-off and land on the ocean bluff in the Preserve. However, in order to minimize bluff erosion at the launch site, revegetation would take place, along with the retention of woody debris and/or addition of materials mulched on-site.
- » **Waste pickup:** A policy has been added to the [Master Management](#) Plan requiring the City to provide daily pick-up of dog feces and daily enforcement patrols to keep dogs out of sensitive areas.
- » **Off-Leash Dog Use Alternatives:** Several proposals were considered for allowing dogs off-leash at the Douglas Family Preserve (DFP). The recommendations from the various reviewers are outlined below, with the final decision by the City Council following.

Draft DFP Management Plan: Dogs would be on-leash between the hours of 10 AM and 3 PM, seven days a week. The remaining hours, early morning and late afternoon, dogs would be allowed off-leash. Dogs would be prohibited at all times from the identified sensitive areas, which include the riparian/estuarine, oak woodland and coastal bluff scrub management units.

DFP Advisory Committee: Prohibit dogs from the Preserve two days a week – Sunday and Wednesday. Dogs would be prohibited at all times from the sensitive areas identified above.

Parks and Recreation Staff: Dogs remain on-leash at all times on the Preserve, except for an off-leash fenced area on the Mesa top, consisting of three to five acres. Dogs would be prohibited at all times from the sensitive areas identified above.

Parks and Recreation Commission: The Commission supported the Parks and Recreation staff proposal, as long as other sites are evaluated for off-leash dog use and the fence is unobtrusive.

City Council: City Council directed staff to study:

- A. Dogs off-leash all the time.
- B. Dogs on-leash all the time.
- C. Dogs on-leash every day from 10 AM to 3 PM, seven days a week and otherwise off-leash.
- City Council: While Council has not made a final decision, Council requested that, at a minimum, the Plan provide: (1) opportunities for dog averse people to use the site comfortably; (2) that dogs on site shall be on-leash two days per week, including one weekend day; and (3) that dogs would be allowed on-site off-leash at all other times.
- D. Dogs prohibited on the Preserve two days a week, including one weekend day; and (3) that dogs would be allowed on-site off-leash at all other times.
- E. Dogs on-leash two days a week, including one weekend day, and would be allowed off-leash at all other times.
- F. Dogs allowed off-leash on odd days of the month; otherwise they would be required to be on-leash.

at all times. Dogs (and humans) Dogs and humans would be prohibited at all times from the sensitive areas identified as the riparian/estuarine, oak woodland and coastal bluff scrub management units. However, Council directed that the full range of off-leash alternatives such as dogs off-leash at all times, dogs off-leash at scrub, particular times, days, etc., and dogs on-leash at all times should be considered in an alternatives analysis.

- » **Facilities:** The following facilities may be added to the site in the future: a caretakers residence on a foundation set back at least 25 feet from the bluff, a single toilet facility with sewer, trash receptacles and backless benches. Signage and “mutt mitt” stations (small kiosk dispensers for plastic mitts to pick up dog feces) would also be allowed on site.

Caretaker’s Residence: Presently, a caretaker resides at the DFP in a trailer parked near the Medcliff Road entrance. The Management Plan recommends that this trailer be replaced with a permanent house. The caretaker residence is proposed to be located near the Medcliff Road entrance (the plan also previously Road entrance, considered locating the caretaker residence near the Borton Drive entrance). This would require extension of sewer and other utilities onto the property to serve the residence, if built. It should be noted that Parks and Recreation staff has recommended that before making a final decision about whether or not to build a permanent caretaker’s residence, the present caretaker’s trailer should be removed. The DFP would then be served solely by The DFP would then be served solely by the Park Ranger Program and the Police Department for at least one year. At the end of that period, the DFP’s condition and the number and types of complaints received would be evaluated to determine if it is necessary to have an on-site caretaker. If it is found to be unnecessary, the caretaker’s residence would not be built.

Restroom: The Management Plan calls for the installation of a single seat restroom. This facility would be located near either the Medcliff Road or Borton Drive entrances. This would require

the extension of sewer to the facility, if built.

Other Miscellaneous Structures: Other minor structures are also allowed by the Management Plan, including trash receptacles, backless benches and mutt mitt stations.

- » **Management Plan Policies:** A complete listing of all the proposed Management Plan policies is attached as Exhibit 3, Executive Summary. Implementation of the Management Plan would result in several operational and physical changes and may also result in changes in public usage. These changes are discussed below and related impacts are assessed in each of the resource areas.

Operational and Physical Changes: The most significant operational change would be related to how dogs are allowed in the Douglas Family Preserve. Other operational changes, such as holding nature classes and hikes on site, are expected to be minimal. There may also continue to be informal gatherings for weddings and similar events. However, the Management Plan does not call for a formal reservation system for such events. The DFP would not become an active recreational park with organized games and similar activities. The proposed P-R (Parks and Recreation) Zone designation with placement of the DFP into the category of “Open Space” would limit the uses allowed on-site.

Usage Changes: The Management Plan is focused on physical improvements to the Douglas Family Preserve. Whether or not these improvements occur, public usage of the preserve is likely to increase as it becomes more established and better known. The minimal scope of physical and operational improvements would not be expected to substantially influence the level of usage of the preserve. Off-leash dog use is already allowed on the DFP property and is therefore part of the baseline for impact analysis.

~~preserve.~~

If the DFP is designated as an off-leash dog use ~~area, public usage is not expected to increase, given that off-leash dog use is already allowed.~~ area under Alternatives A and C-F, it is assumed that public usage on the whole would not substantially change, since the designation may increase use by some people and may decrease use by others, depending on their preferences for off-leash dogs on the site. However, use by dogs and their owners has the potential to increase substantially, given that such a designation by the City would create more public awareness and publicity about the availability of the DFP for this type of dog use. Even with the availability of other dog park facilities and possibly Hale Park and the Shoreline Beach area, this assumption would remain (refer to Section 10. Recreation). The assumption of substantially increased use is essentially an educated estimate, since the consequent level of usage cannot be predicted with any certainty at this time, and cannot be definitively quantified. However, the assumption of substantially increased use by dogs and their owners is a reasonable, worst-case assumption (i.e., a maximum use scenario that is reasonably foreseeable), which is appropriate to employ when evaluating potential impacts. Increased dog use of the park is likely to reduce the number of people using the site who are uncomfortable being around dogs.

Other: A small parcel (1.46 ac.) along Cliff Drive, while owned by the City, is actually in unincorporated Santa Barbara County jurisdiction. Annexation of this parcel to the City has been initiated as part of the Elings Park (former Jesuit property) annexation. The County is a responsible agency.

APPLICANT/PROPERTY OWNER NAME AND ADDRESS

Allyson Biskner, Associate Parks Planner
Agent for the City of Santa Barbara Parks and Recreation Dept.
630 Laguna St.
Santa Barbara, CA 93101

PROJECT ADDRESS/LOCATION (See Vicinity Map, Exhibit 1)

Douglas Family Preserve: 2551 Medcliff Rd

ENVIRONMENTAL SETTING

This nearly 70-acre site is bordered on the north and west sides by a steep slope vegetated with southern oak woodland and on the south by a coastal bluff vegetated with coastal bluff scrub. Arroyo Burro Creek [isruns](#) along the west and part of the north sides at the base of the bluff. Between the bluff and Cliff Drive on the northerly side there is an unnamed tributary of Arroyo Burro Creek, creating a small riparian area intermixed with southern oak woodland. To the east of the property is the Mesa neighborhood with single-family homes on lots that are generally 7,500 square feet in area. Borton Drive, Mesa School Lane and Medcliff Road all provide entry to the property from the west. A narrow roadway that remains from the days of the property's use as a nursery leads up the northerly bluff from the intersection of Cliff Drive and Las Positas Road to the mesa portion of the site. This road is used by pedestrians and, to a lesser extent, bicyclists to access the site. The mesa top portion of the site is relatively flat with a number of existing dirt and/or paved paths. The mesa top is composed of a mixture of Coastal Sage Scrub, Annual Grasslands and a variety of exotic vegetation. The mesa includes a variety of significant trees, including coast live oaks, Monterey pine, Monterey cypress and some fruit trees. More detailed discussions of the environmental setting are included under the individual issue discussions below.

PROPERTY CHARACTERISTICS

Assessor's Parcel Number:	047-140-001, 002, 003 and 005	General Plan Designation:	Residential, 3 and 5 units/acre; Proposed Park; Open Space (north facing bluff and creek); Creek/Buffer (Arroyo Burro Creek); Vista (eastern point); Bikeway
Zoning:	Park and Recreation and Coastal Overlay Zones; P-R, S-D-3	Parcel Size:	69.81ac
Existing Land Use:	Open Space/Park	Proposed Land Use:	Open Space/Park
Slope:	By Parcels: 47-140-01 – 4%; -02 –7%; -03 – 47%; -04 – 17%; By entire property: 24.3%		
Surrounding Land Uses:			
North:	Cliff Drive, Elings Park		
South:	Ocean		
East:	Arroyo Burro Beach County Park		
West:	Single Family Residential		

PLANS AND POLICY DISCUSSION

The project site has General Plan and Local Coastal Plan designations of Residential, 3 and 5 units per acre, Open Space (north facing bluff and the creek area), Creek/Buffer (Arroyo Burro Creek), Vista and Bikeway. The site is zoned P-R, S-D-3, Park and Recreation and Coastal Overlay Zones. The site is in the Coastal Commission's appealable jurisdiction. The required discretionary action is approval of the Douglas Family Preserve Management Plan. Individual projects necessary to implement the plan would require coastal review, which may or may not include a Coastal Development Permit.

The policies from the City General Plan and Local Coastal Plan, and the California Coastal Act that may be applicable to the Management Plan are included in Exhibit 4. Policies related to protection of visual resources, biological resources, cultural resources and water quality, as well as policies intended to protect the public from bluff erosion, raise questions about the Plan's consistency or inconsistency related to these policies. These will be evaluated further based on impact analysis included in the EIR.

MITIGATION MONITORING AND REPORTING PROGRAM (MMRP)

A Mitigation Monitoring and Reporting Program will be prepared for the subject project in compliance with Public Resources Code §21081.6, as part of the EIR. The MMRP will include mitigation measures from both the Initial Study and the EIR.

ENVIRONMENTAL CHECKLIST

The following checklist contains questions concerning potential changes to the environment that may result if this project is implemented. If no impact would occur, **NO** should be checked. If the project might result in an impact, check **YES** indicating the potential level of significance as follows:

Known Significant: Known significant environmental impacts. Further review needed to determine if there are feasible mitigation measures and/or alternatives to reduce the impact.

Potentially Significant: Unknown, potentially significant impacts which need further review to determine significance level.

Significant, avoidable: Potentially significant impacts which can be mitigated to less than significant levels.

Less Than Significant: Impacts which are not considered significant.

1. AESTHETICS. Could the project:	NO	YES
		Level of Significance
a) Affect a public scenic vista or designated scenic highway or highway/roadway eligible for designation as a scenic highway? a) <u>Affect a public scenic vista or designated scenic highway or highway/roadway eligible for designation as a scenic highway?</u>		Potentially Significant <u>Significant, avoidable</u>
b) Have a demonstrable negative aesthetic effect in that it is inconsistent with Architectural Board of Review or Historic Landmarks Guidelines or guidelines/criteria adopted as part of the Local Coastal Program?		Significant, avoidable <u>Less than significant</u>
e) Create light or glare?	✓	
c) <u>Create light or glare?</u>		<u>Less than significant</u>

Discussion:

Existing Setting. The DFP property, formerly known as the “Wilcox Property,” is recognized by the community and in the policies of the General Plan and Local Coastal Plan (LCP) as an important visual resource. It forms a prominent headland that is visible along the shore and from the ocean. Its oak woodland is very visible as people travel south through Las Positas Valley, as well as from the foothills beyond. The oak woodland and creek areas have been designated as Open Space in the General Plan. A vista point has been designated under the LCP at the westerly end of the ~~of the~~ mesa. The property is visually pleasing, with its windrows of Monterey Pine and Monterey Cypress, groves of Coast Live Oaks and eucalyptus trees, open meadow areas and views. The “windrow trees” that were originally planted to provide windbreaks for the nursery have become important skyline trees that are visible throughout the neighborhood and the surrounding area, including from the ocean and from Las Positas Valley. Trails wonder through the various areas of the mesa and through the oak woodland to Cliff Drive, offering different views around every corner.

1.a. Most activities in the Management Plan are not expected to have negative effects on the existing scenic character of the property. The Management Plan was written with the intent to retain or improve public vistas. Windrows and most other trees would be preserved. At the Medcliff Road entrance, the Management Plan would require that the caretaker’s residence and toilet facility, if constructed, be no closer than 25 feet from the bluff edge. This setback may be even further from the bluff edge, depending on the location of the 75-year bluff setback required by the LCP (see Geophysical for additional discussion). Given the setback and the presence of vegetation along the bluff edge, it would be hidden from the views of people along the beach or in the ocean. There would be ~~no~~less than significant impacts on public vistas if the caretaker’s residence and restroom were located at the Medcliff Road ~~entrance~~ entrance.

~~There would be potentially significant public view impacts if the restroom were located at the Borton Drive entrance, depending on where the structure is placed. If the structures are placed to the west of~~

~~the north-south path, in the annual grassland area, expansive views from the north-south trail up Las Positas Valley, including the Elings Park property, the hang-glider take-off area and the mountains, could be impacted. It will be necessary to complete a viewshed analysis to determine if any location for the residence would not result in significant view impacts.~~ If only a small restroom is placed at the Borton Drive entrance, significant impacts on view could be avoided by tucking the structure close to the vegetation along the property border (see Aes-1).

~~The Parks and Recreation Department recommendation for allowing off-leash dogs on the Preserve would call for fencing an area of the mesa. Within the fenced area, dogs would be allowed off-leash. Outside of this area, dogs would be required to be on-leash. The fenced area would be about three to five acres in size and would be inside the middle loop trail, abutting the southern side of the loop (see Exhibit 5). The perimeter fencing would be rustic in design and materials. The vegetation in the area under consideration is mostly coastal sage with patches of ornamental vegetation on the edges and oak woodland in the middle. It is likely that there would be a loss of natural character due to the construction of the fence. Major public views to and from the preserve would not be disrupted. However, public views within the preserve would be affected, resulting in an unknown, but **potentially significant** public view impact. Other off-leash dog alternatives do not include significant structural components and would have no adverse visual impacts.~~

Dogs on the property leave fecal and urine deposits, which are odorous. This may result in a potential source of localized short-term odor nuisances, an aesthetic problem. This issue is discussed in more detail under Air Quality. Quality. The aesthetic impact of the odor would be short term and would be less than significant. Mitigation measures required to protect water quality call for regular removal of fecal matter not picked up by owners and regular emptying of trash receptacles. This would further reduce this less than significant impact

- 1.b. The caretaker's residence, and restroom facilities would be subject to review by the Architectural Board of Review. This will assure that their designs, colors and materials would be consistent with City design guidelines. Signage would be required to meet the City sign ordinance and related guidelines and may require review by the Sign Committee, assuring that any signs would be appropriate to the site. It is expected that these simple structures and facilities could be designed to meet City design guidelines.

As discussed under Cultural Resources, ~~it will be necessary one option available to reduce trespass at the archaeological site is~~ to install a fence barrier of dense, thorny, native vegetation along the lower part of the oak grove trail in order to minimize access and damage to an archaeological site that is located between the base of the bluffs and Arroyo Burro Creek. ~~This fence could result in adverse effects on aesthetics and the natural appearance of the area.~~ In order to assure that this area remains as natural and as aesthetically pleasing as possible, it is recommended that the fence barrier be reviewed by the Architectural Board of Review and be designed to be as unobtrusive and natural appearing as feasible (see recommended mitigation measure Aes-3 below). ~~This same provision would also apply to a fenced off-leash dog area if that is the alternative selected for dog use.~~

The LCP contains a Visual Quality policy stating that existing views to, from and along the ocean and scenic coastal areas shall be protected. The Coastal Act also states that development shall minimize the alteration of natural landforms and be visually compatible with the character of the surrounding area. The caretaker's residence, the restroom, vegetative barrier and the signage would be subject to coastal review when these individual projects are proposed for implementation. The review may or may not result in a requirement for a Coastal Development Permit. At that time, these elements would

specifically be assessed for consistency with LCP Visual Policies and the Coastal Act. As now presented, all of these elements have the potential to be consistent with LCP Visual Policies and the Coastal Act, since none of the development proposed would obstruct views, and would be designed to be visually compatible with the DFP site. Also, no substantial alteration of landforms would be necessary for the development. Therefore the project impacts would be less than significant.

The Conservation Element of the General Plan includes several Visual Resources policies related to the protection of trees and creek and riparian environments, as well as new development not obstructing scenic view corridors. The Plan includes several policies consisting of restoring and maintaining sensitive habitats, and all new development (i.e., signs, benches, caretaker's residence, etc.) would be consistent with maintaining scenic view corridors. Therefore, impacts from inconsistency with City and LCP design guidelines and criteria and the General Plan are expected to be **less than significant** for all alternatives.

- 1.c. There is no existing lighting on site. The project ~~would not~~has the potential to create light or glare because ~~no lighting is proposed as part of this project.~~lighting could be proposed for the caretakers residence and for security purposes at the restroom. The park is proposed to open at sunrise and close 30 minutes after sunset, so it would not be necessary to provide exterior lighting for ~~the toilet facility.~~There may be some area lighting other purposes. Lighting around the caretaker's residence, if ~~constructed; however, it~~constructed, and the security lighting at the toilet facility would be required to be consistent with the City's lighting ordinance, which would require that lighting be directed to the ground and away from other residences. Also, Architectural Review Board review of proposed structures and lighting would be required and this would provide an additional level of assurance that project lighting would be less than significant. Thus, ~~no significant~~less than significant lighting impacts are expected to occur that would be mitigated by installing lighting consistent with the lighting ordinance that requires lighting to be shielded from adjacent uses.

Mitigation Measures:

Aes-1 ~~If a restroom structure is placed at the Borton Drive entrance, it shall be placed to the east of the existing north-south trail. It shall be placed in such a way that it would be between viewers and~~Any toilet facility proposed at the Borton Drive entrance shall be sited to minimize views of the facility from available public view points by locating it in an area near the property line near existing vegetation and by adding additional vegetative screening where necessary. The toilet facility, including its location so that views to the north from the trail are not impacted, and proposed vegetative screening, and the caretaker residence shall be subject to review and approval by the Architectural Board of Review. These facilities shall be designed to be as unobtrusive and natural appearing as possible, including but not limited to the use of vegetative screening.

Recommended Mitigation Measure:

Aes-2 ~~The fence required to be installed at the base of the oak grove trail shall be subject to review and approval by the Architectural Board of Review. It shall be designed to be as unobtrusive and natural appearing as possible, including but not limited to the use of vegetation to disguise its appearance. This same provision shall apply to the fenced-off-leash dog area if that is the alternative selected for off-leash dog use.~~

Residual Impacts:

~~Impacts on views related to the caretaker's residence and the fenced-off-leash dog area alternative are unknown and potentially significant, and would be determined in the EIR. With the inclusion of the above mitigation measures, there would be no other significant impacts on aesthetics.~~Less than significant

2. AIR QUALITY.	NO	YES
Could the project:		Level of Significance
a) Violate any air quality standard or contribute to an existing or projected air quality violation?		Less Than Significant
b) Expose sensitive receptors to pollutants?		Less Than Significant
c) Create objectionable odors?		Less Than Significant
Is the project consistent with the County of Santa Barbara Air Quality Attainment Plan? Yes		

Discussion:

- 2a. The Federal Clean Air Act Amendments of 1970 established National Ambient Air Quality Standards (NAAQS) for six "criteria pollutants." These include photochemical ozone, carbon monoxide, sulfur dioxide, nitrogen dioxide, particulate matter, and lead. The California Clean Air Act of 1977 created stricter California Ambient Air Quality Standards (CAAQS) for the state. Additionally, the California Air Resources Board has designated areas of the state that are in attainment or nonattainment of the CAAQS. An area is in nonattainment for a pollutant if the applicable CAAQS for that pollutant has been exceeded more than once in three years.

For environmental review purposes, the City of Santa Barbara utilizes CAAQS, as these standards are more stringent than the NAAQS. Presently, the County of Santa Barbara is in nonattainment with CAAQS for ozone (O₃) and particulate matter (PM₁₀). There are also heavily congested intersections within the City that may approach the California 1-hour standard of 20 parts per million for carbon monoxide (CO) during peak traffic hours.

The City of Santa Barbara uses the Santa Barbara Air Pollution Control District's (APCD) thresholds of significance for air quality impacts. The APCD has determined that a proposed project would not have significant air quality impact on the environment, if operation of the project would:

- emit (from all project sources, both stationary and mobile) less than 240 pounds per day for ROC and NO_x (ozone is formed in the atmosphere through a series of photochemical reactions involving oxides of nitrogen [NO_x] and reactive organic compounds [ROC], referred to as ozone precursors, and sunlight occurring over a period of several hours), and 80 pounds per day for PM₁₀ (sources of PM₁₀ include mineral quarries, grading, demolition, agricultural tilling, road dust, and vehicle exhaust). For CO, the significance threshold may be triggered if the project contributes more than 800 peak hour trips to an individual intersection; and
- emit less than 25 pounds per day of ROC or NO_x from motor vehicle trips only; and
- not cause or contribute to a violation of any California or National Ambient Air Quality Standard (except ozone); and
- not exceed the APCD health risks, public notification thresholds adopted by the APCD Board; and
- be consistent with the adopted federal and state air quality plans for Santa Barbara.

Short-Term (Construction) Impacts: If a caretaker's residence and/or restroom is built, it would involve minor grading (~~less than 50 cy~~) which could cause localized nuisance dust ~~related impacts resulting in~~ minor increases in particulate matter (PM₁₀). Minor grading may also be necessary for the trails to correct drainage problems. Total grading on the site would result in less than 50 cubic yards of cut and fill. Dust-related impacts are not considered ~~potentially~~ significant given the small scope and temporary nature of project activities; however, the application of standard dust control mitigation measures is recommended to minimize the effect. It should be noted that cut and fill would ~~most likely~~ most likely be balanced on-site, so it is not necessary to protect against dust on the roadways from uncovered vehicles or detritus from vehicles entering and leaving the site. ~~However, ten~~ Ten or fewer one-way trips would be required if additional fill were necessary. This limited number of trips would not result in

significant particulates or nuisance dust impacts and would not warrant measures for tire washing or similar practices to reduce dust leaving the site.

Construction equipment would also emit NO_x and ROC. However, in order for NO_x and ROC emissions from construction equipment to be considered a significant environmental impact, a proposed project would need to be ~~considered~~ a major project involving extensive use of construction equipment over a long period of time. Based on the limited size of the proposed project, emissions of NO_x and ROC are anticipated to be less than significant. Standard measures requiring construction equipment to be properly maintained would minimize these short-term construction impacts.

Long-Term (Operational Emissions) Impacts: For the long term maintenance of the DFP identified in the Management Plan, the only traffic generation would be periodic maintenance, usually involving one vehicle per day to transport hand tools, remove trash, etc. A caretaker residence already exists and so no new As such, no traffic trips would be generated by this use. No significant long-term air quality impacts are expected from maintenance described in the DFP Management Plan. Visitors to the DFP would be expected to continue to arrive by a variety of transportation modes, including walking, bicycling and vehicles and overall park and vehicles usage is not expected to increase dramatically as a result of proposed improvements. The project management proposals would not be expected to substantially contribute to increased generation of motor vehicle trips or associated mobile source emissions. Long term project air emission impacts would be less than significant.

- 2.b. Sensitive receptors are defined as children, elderly, or ill people that can be more adversely affected by air quality problems. Types of land uses typically associated with sensitive receptors include schools, parks and open space, playgrounds, childcare centers, retirement homes, convalescent homes, hospitals, and clinics. Stationary sources are of particular concern to sensitive receptors. ~~This project~~ None of the alternatives contains ~~no~~ stationary sources of air emissions and ~~no significant~~ substantially increased mobile source emissions. The on-site vegetation provides beneficial effects to localized air quality conditions. Therefore, ~~no less than~~ significant air quality impacts that would affect sensitive receptors are expected to occur.

The DFP is frequented by individuals that may be defined as sensitive receptors. If the caretaker's residence, and restroom are constructed and trails are reconstructed, the proposed project would temporarily generate nuisance dust and PM₁₀ that would be further reduced through application of dust control mitigation measures. The ~~insignificant amounts~~ small amounts and temporary nature of these pollutants are anticipated to result in ~~an insignificant~~ less than significant exposure of sensitive receptors to particulate pollutants.

- 2.c. The proposed project does not contain any features with the potential to emit odorous emissions from sources such as cooking equipment, combustion or evaporation of fuels, sewer systems, or solvents and surface coatings.

Dogs on the property leave fecal deposits, which are odorous. This may result in a potential source of localized short-term odor nuisances. The Management Plan requires that dog owners pick up fecal material left by their dogs and properly dispose of such material. The Plan includes installation of "mutt mitt" stations to encourage compliance. This is the current policy as well as being and is also a policy identified in the Plan. Either a park ranger or Animal Control officers would cite violators. If dogs are on leash, it would be relatively easy for owners to locate and pick up ~~such deposits~~ their pets fecal matter. If dogs are off-leash, dogs may leave such deposits where it is more difficult for owners to retrieve. However, as fecal deposits dry, odors disappear and long-term significant odors are

unlikely even less likely to create an air quality impact. Finally, Policy DM-6 of the Management Plan would establish a regular schedule for emptying pet waste containers and would include a complaint log so that the collection schedule could be adjusted in response to complaints. Also, if there are sufficient complaints about fecal deposits not being picked up by dog walkers, additional enforcement could be arranged. Odor impacts related to dog waste is identified as less than significant but due to issues raised in scoping comments is this issue will be discussed in an EIR.

Consistency with the Clean Air Plan: Consistency with land use and population forecasts in local and regional plans, including the Clean Air Plan (CAP), is required under CEQA for all projects. Proposed projects subject to 1998 CAP consistency determinations include a wide range of activities such as commercial, industrial, residential, and transportation projects. By definition, consistency with the CAP means that direct and indirect emissions associated with the project are accounted for in the CAP's emissions growth assumptions and the project is consistent with policies adopted in the CAP. The CAP relies primarily on the land use and population projections provided by the Santa Barbara County Association of Governments and Air Resources Board on-road emissions forecast as a basis for vehicle emission forecasting.

The proposed project is an existing use and does not include provisions that would generate population growth. The project is consistent with land use and population forecasts and the adopted CAP. The project includes no stationary sources and is consistent with APCD rules and regulations. Therefore, the proposed project is consistent with the CAP.

Recommended Mitigation Measure(s):

AQ-1. During site grading and transportation of fill materials, regular water sprinkling shall occur using reclaimed water. During clearing, grading, earth moving or excavation, sufficient quantities of water, through use of either water trucks or sprinkler systems, shall be applied to prevent dust from leaving the site. Each day, after construction activities cease, the entire area of disturbed soil shall be sufficiently moistened to create a crust.

Throughout construction, water trucks or sprinkler systems shall also be used to keep all areas of vehicle movement damp enough to prevent dust raised from leaving the site. At a minimum, this would include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency would be required whenever the wind speed exceeds 15 mph.

AQ-2. After clearing, grading, earth moving or excavation is completed, the entire area of disturbed soil shall be treated to prevent wind pickup of soil. This may be accomplished by:

- A. Sufficiently wetting the area down to form a crust on the surface with repeated soakings as necessary to maintain the crust and prevent dust pickup by the wind; and/or
- B. Completion of a revegetation plan; and/or
- C. Other methods approved in advance by the Air Pollution Control District.

Residual Impact:

Implementation of the above mitigation measures would further reduce the adverse effects of dust generation during construction.

3. BIOLOGICAL RESOURCES. Could the project result in impacts to:	NO	YES Level of Significance
a) Endangered, threatened or rare species or their habitats (including but not limited to plants, fish, insects, animals, and birds)?		Potentially Significant
b) Locally designated historic, Landmark or specimen trees?		Less than Significant
c) Natural communities (e.g. oak woodland, coastal habitat, etc.).		Potentially significant
d) Wetland habitat (e.g. marsh, riparian, and vernal pool)?		Potentially significant
e) Wildlife dispersal or migration corridors?		Potentially significant

Discussion:

Existing Setting

The biological setting is ~~described in some detail here~~ [summarized below](#). A more complete discussion can be found in the [Management Plan Biological Resources Technical Report appended to the Draft EIR](#).

Habitats. The Douglas Family Preserve supports a variety of habitats, as discussed below.

Estuarine – Estuarine habitat extends from the mouth of Arroyo Burro Creek to the bridge across Cliff Drive. The estuary changes through the seasons based on whether the mouth of the creek is open to direct tidal influence or is closed, so that only minimal seepage from the ocean occurs. Estuaries occur where fresh water from streams mixes with water from the ocean. Large variations in salinity and water levels occur within the estuary due to the indirect influence of the tides and seasonal changes in freshwater runoff from Arroyo Burro Creek and its tributaries. Several fish species occur in this estuary, along with the birds that feed on them. In addition, various shorebirds are found in and around the estuary, feeding on the rich mix of vegetation commonly found in estuaries. Among other species, the tidewater goby, listed as endangered under the Federal Endangered Species Act, inhabits the Arroyo Burro Creek estuary. In addition, Arroyo Burro Creek, including its estuary, has been designated a Critical Habitat for the Steelhead trout, another species listed as endangered under the Federal Endangered Species Act (see additional discussion of these species below).

Riparian Forest – This habitat is located along the creek tributary that extends from Arroyo Burro Creek up the small valley between Cliff Drive and the oak woodland. Additional habitat is adjacent to the easterly side of Arroyo Burro Creek below the Cliff Drive bridge. This is a moist environment along the banks of creeks and streams. Riparian forests include a variety of plants and animals. Individual coast live oak trees, willow and bulrush are found at the DFP, along with a variety of amphibians and small mammals that adapt to more urban locations, including raccoons, opossums and skunks. Because of the size of the site, there may be mule deer as well. Predators, such as coyote and gray fox, are also likely to be present. There is also a large variety of bird life associated with riparian forest habitats.

Willow Scrub – Willow scrub communities consist of scrubby, somewhat low growing thickets of various willow species. They occur in a variety of locations adjacent to flowing stream channels or seasonally flooded arroyos. They may also occur in depressions located close to ground water. ~~They often qualify as Arroyo Willow is wetland. At the DFP, they considered to be a wetland species. At the DFP, willow scrub communities~~ are found in small scattered patches in the eastern and southeastern portion of the mesa. It is likely that groundwater levels are high or that the soils are low in permeability. These isolated areas of willow scrub provide some cover and nesting opportunities for a variety of songbirds.

Coastal Bluff Scrub – Coastal bluff scrub is located on the ocean-facing bluff of the Preserve. This habitat is exposed to nearly constant coastal breezes. Most of the flora consists of shrubby and herbaceous vegetation. Numerous birds live on or forage in the coastal bluff, including various raptors. Various small mammals (mice and rabbits) and reptiles also live on the bluff.

Coastal Sage Scrub – Coastal sage scrub appears in scattered locations throughout the Preserve, especially in the eastern and southeastern part of the site, and consists primarily of shrubs and herbaceous plants. There is also a narrow strip of coastal sage scrub between the oak woodland and the riparian habitat at the base of the north-facing slope. This habitat forms a mosaic with other habitat

types including annual grassland, oak woodland, willow scrub, windrows and ornamental vegetation. Unfortunately, much of this habitat on site also includes a high percentage of invasive exotic plants, such as fennel, mustard and European annual grasses. Although this habitat is somewhat degraded, it does support an abundance of small species that, in turn, provide food for several predator species, including gopher snakes, raccoons, gray fox and coyotes, as well as various raptors. The white-tailed kite, a protected and sensitive species, forages in coastal sage scrub, as well as nearby grasslands. There are also a large variety of resident and migratory song birds that use this habitat.

Annual Grassland – Like the willow scrub and coastal sage scrub, annual habitat is part of the mosaic of habitats that occur on the mesa. This habitat consists of both native and non-native grasses and other herbaceous plants and weeds. However, many locations also include ornamental plants that remain from the site's former use as a nursery. Raptors use grasslands for foraging and there are a variety of ground nesting birds, such as meadowlarks. The variety of mammals and reptiles is similar to those found in coastal sage scrub.

Coast Live Oak Woodland – This habitat is found primarily on the north-facing slopes and the northern mesa area of the Preserve. The Coastal Commission and the City Local Coastal Plan consider this habitat to be an environmentally sensitive habitat. On the slopes, this habitat forms a nearly continuous canopy which opens up as the woodland spreads onto the mesa. The overstory of this habitat is dominated by coast live oak, but also includes a variety of shrubby and herbaceous plants. A substantial amount of non-native invasive plants also occur in the oak woodland, including nasturtium and German ivy. Both species, but most especially nasturtium, have a detrimental effect on the habitat due to aggressive growth and competition with native plants. The oak woodland supports a diversity of wildlife.

Windrows – There are several rows of trees on the Preserve, originally planted as part of the nursery to establish windbreaks to protect planted areas on the mesa. Where eucalyptus trees grow, primarily along the bluff and in the southeastern portion of the property, native plants are almost entirely absent due to the acidity of the leaves. There are also windrows of Monterey pine and Monterey cypress, both native to California, but not to this area. All of these trees are frequently used for nesting and roosting by a variety of raptors (red-shouldered and red-tailed hawks, barn and great horned owls). The dense stands of eucalyptus are also used as roosting sites for overwintering monarch butterflies. Finally, fallen trees, snags and related woody debris provide cover and nesting opportunities for a number of smaller birds.

Ornamental and Invasive Exotics – These are plant species that are not native to this area. Many of them are ornamental species left from the property's previous use as a nursery. Some plants have stayed in the areas where they were originally planted and have not spread elsewhere on the mesa. In some cases, they may contribute to the native habitats in which they are found. Others are highly invasive and have impacted the natural habitats because they have little food value and compete with the native vegetation. While these plants are intermixed with most of the habitats, they are particularly concentrated in clusters in the central portion of the mesa and near the southeasterly border. There is also a mix of oak woodland and ornamental plantings along the easterly border. Finally, there are a significant amount of giant reed (*arundo donax*) and several stands of pampas grass in the Arroyo Burro Creek drainage and that of its unnamed tributary.

Ruderal – Ruderal vegetation, or disturbed habitat, includes areas that have been significantly disturbed by agriculture, construction and other land clearing activities. Plant species commonly found in such areas include non-native wild mustards and radishes, sweet fennel (also non-native) and a variety of non-native grasses. Ruderal habitats have established themselves adjacent to trails and along Cliff Drive. They have intermixed with annual grassland and coastal sage scrub in these areas. Ruderal

habitats provide very little habitat value. However, when intermixed with other habitats, they do provide cover and food for small mammals and birds.

Endangered, Threatened and Other Sensitive Species. Based on habitat types found at this site, there are several sensitive species that could be supported by habitat in the Preserve, as outlined in Table 2 of the Draft Management Plan. However, further review has shown that many of these species have not actually been observed in the Preserve. The following table outlines those species which have been recorded in the Preserve or have designated Critical Habitats within the Preserve.

Special Status Plants and Animals with Potential to Occur in the Vicinity of the Douglas Family Preserve		
Scientific Name	Common Name	Legal Status
Plants		
<i>Baccharis plummerae, ssp. Plummerae</i>	Plummer's baccharis	CNPS List 4
Animals		
<i>Danaus plexippus</i>	Monarch Butterfly	*
<i>Eucyclobius newberryi</i>	Tidewater goby	FE
<i>Oncorhynchus mykiss</i>	Steelhead – Southern California ESU	FE, CSC
<i>Clemmys marmorata pallida</i>	Southwestern pond turtle	CSC
<i>Ictera virens</i>	Yellow-breasted chat (song bird)	CSC
<i>Elanus leucurus (nesting)</i>	White-tailed kite	*
<i>Accipiter cooperii</i>	Cooper's hawk	CSC
<i>Accipiter striatus</i>	Sharp-shinned hawk	CSC
Status Codes: Plants: California Native Plant Society (CNPS) List 4 = plants of limited distribution; a watch list	Wildlife: SE – State-listed endangered ST – State-listed threatened CSC – California Species of Special Concern FE – Federal-listed endangered FT – Federal-listed threatened SSC – Federal Species of Special Concern	* Species that are biologically rare, restricted in distribution, declining throughout their range, or closely associated with a habitat that is declining throughout California

More detail on those species observed in the Preserve (or with designated critical habitat) is included below.

Plummer's baccharis is considered a plant species of local concern and is listed on the California Native Plant Society's List 4, which catalogs plants of limited distribution. It is a small evergreen shrub with inconspicuous yellowish flowers. Plummer's baccharis is a local coastal endemic known to grow in coastal sage scrub, oak woodland, riparian and chaparral habitats. It is known to be located on the northernmost portion of the site, within the coast live oak habitat, within the fringe of the riparian corridor of the unnamed tributary, and alongside the existing trail from Cliff Drive to the mesa area beneath the oak woodland canopy. Because it is commonly found there, it may also be located elsewhere within the oak woodland habitat on the north slope. However, a survey for its presence has not been completed due to the steep slopes and heavy undergrowth. It is not found near the oak grove trail and would not be impacted by any proposed activities along the trail.

The Tidewater goby, a federally-listed endangered species of fish, is known to inhabit the estuarine habitat of the Arroyo Burro Creek. It is a small fish that is endemic to coastal lagoons in California, where water ranges from brackish to fresh.

The Steelhead trout, recently listed as federal endangered, and as a California species of special concern, historically used the Arroyo Burro Creek watershed. However, there are no records of its presence in Arroyo Burro Creek. All south coastal watersheds, including Arroyo Burro Creek, have been defined as critical habitat for steelhead, meaning that they are either suitable for steelhead or could be made suitable.

The Southwestern pond turtle, a California species of special concern, lives in riparian and estuarine habitats. Arroyo Burro Creek and the unnamed tributary could provide year-round habitat for the turtle. However, its presence has not been recorded within the preserve.

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Habitat Maintenance and Restoration Activities: The maintenance and restoration activities described in the Management Plan may cause potential temporal (short-term) impacts on native plant communities, including a species of concern (Plummer's Baccharis), and special status bird species in the riparian/estuarine communities. The Management Plan Policies, however, include measures to offset potential impacts, including avoiding sensitive plants, working outside of the annual breeding season, avoiding nests, erosion control and other measures.

The maintenance and restoration plans are intended to protect and enhance the natural plant communities and wildlife habitat, especially special status species. However, temporary adverse, but not less than significant impacts could result from disturbance that may occur during implementation activities, such as exotic plant eradication, vegetative fuels management, bank stabilization techniques, etc. Such disturbance can disrupt nesting and breeding. Restoration would result in increased quality and less fragmented habitat, including potential for improved wildlife dispersal and migration corridors, increased bank stabilization resulting in reduced sedimentation in the creek areas, and less competition for native plant species. A mitigation measure has been added that requires that habitat maintenance and restoration activities occur in such a way as to minimize effects on sensitive species of flora and fauna (Measure Bio-4).

Currently, the oak woodland and riparian/estuarine habitats are relatively intact; however, some areas have been invaded by exotic plant species. Some removal methods would be limited in disturbance; others would cause substantial impacts such as trampling and damage to existing native species. These disturbances would be temporary and vegetative growth would regenerate naturally or with revegetation measures. If Plummer's baccharis is found during work in these habitats, it would be marked and avoided (see mitigation measure Bio-4). The restoration planning in the document is in a conceptual stage and would require details such as planting plans, locations, timing, specific methods for erosion and sediment control and monitoring procedures.

Rodeo™, a herbicide that is certified aquatic safe, may be used to control non-native invasive plant species found in the area of Arroyo Burro Creek and the unnamed tributary. Roundup™, for control of non-native invasive terrestrial plant species, more than likely would be used to pull remove the poison oak away from from around the existing fire hydrants on the mesa portion of the property. They may also be used to control invasive species elsewhere on the property. If either one of these products is not used properly, they have the potential to result in loss (temporal or permanent) or potential damage to habitat, native flora and fauna, and rare plants and animals and their habitats. Only licensed applicators would be allowed to use these materials on the property. Mitigation measures have been included to reduce the potential impacts to less than significant levels (see measure Bio-7).

Conceptual monitoring procedures and mitigation measures have been included in the plan so as to limit disturbance to special status species, native plant communities, and to reduce the spread of invasive exotic plants by eradication methods. Such mitigations include specifying particular exotic eradication operation procedures such as: avoiding exotic plant removal operations during typical breeding and nesting periods, and replanting with native plant species collected on site or from nearby Santa Barbara coastal locations (see mitigation measures and Appendix G of the Plan).

As part of restoration of the Arroyo Burro Creek area, it may be appropriate to lay back the bank to expand habitat, reduce flood damage potential and stabilize the bank. This may result in **potentially significant, but mitigable** impacts on the Tidewater Goby, which inhabits Arroyo Burro Creek between its mouth and Cliff Drive. There are methods available to reduce impacts on the Goby to less than significant levels. The most important measure is to avoid work during the Goby's breeding season from spring through July 1st of each year (see Mitigation Measure Bio-4). Other measures include relocation of gobies, water diversion and sedimentation control (see Mitigation Measure Bio-5).

Caretaker's Residence and Restroom Facility: The caretaker's residence and restroom facility are being considered for construction. The caretaker's residence would be constructed at the Medcliff Road entrance. The restroom could be constructed in one of two locations: at the Medcliff Road entrance, near the present location of the caretaker's trailer; or, at the Borton Drive entrance. It is possible that placement of the caretaker's residence with required foundations at the Medcliff Road location now occupied by the caretaker's trailer would result in impacts on the root system of the eucalyptus grove that is present. However, the Management Plan is not explicit about where, at the Medcliff Road entrance, the residence could be placed other than requiring it to be 25 feet from the top of the bluff. It could be located north of the existing entrance trail in an area that consists of a combination of ruderal and coastal sage scrub habitat (the immediate area is mostly ruderal in vegetation). If the restroom is placed at the Borton Drive site, there could be impacts on oak trees in the area. A mitigation measure (Bio-1) has been included to require that ~~these structures~~ these structures be located outside the driplines of native trees. Construction of the residence and restroom at either of the proposed locations could result in the relocation of existing trails. This secondary impact from the placement of this structure would be adverse, but not significant as long as the driplines of native trees are avoided. A mitigation measure has been added to ~~this effect~~ require protection of native trees within driplines (Bio-2).

Other Minor Structures: Backless benches, trash receptacles, signage (including a comprehensive interpretive sign program) and "mutt mitt" stations would be allowed on the property. Most of the signage and mutt mitt stations would be located at park entrances and at the top of the oak grove trail. Vegetation in these locations is generally ornamental in nature and would not be adversely affected by signs and stations. As long as benches, trash receptacles and other minor structures are not placed within the driplines of native trees or in the middle of sensitive habitats, no significant adverse impacts would be expected to occur. A mitigation measure (Bio-3) ~~to this effect has been included~~ has been included to address this issue.

Trail Eradication: Several unauthorized trails are proposed for removal. Access to such trails would be blocked off and a revegetation program would be carried out. The type of revegetation would depend on the trail location. They would either be reseeded or planted with native vegetation that carries out the goals of the Management Plan. No adverse biological resources impacts are expected to occur. In fact, this part of the Management Plan would be considered to have beneficial biological resources impacts.

Trail Improvements: Some trails need minor improvements. The main loop trail would be improved sufficiently to allow universal access to the Preserve. However, to maintain the present ambience of the

Preserve, existing puddle and pond areas in the middle of the trail would not be improved. Instead, existing informal access around such areas would be formalized. Where necessary, the Main and Middle Loop Trails would be regraded to minimize the cross-pitch or slope. Some potholes would be filled to smooth the trail to maintain universal access. These informal access areas are not vegetated for the most part, with the exception of some ruderal (non-native grass) species. Concerns have been expressed about the potential impacts of the oak grove trail on the surrounding oak trees. The Management Plan calls for no changes to the trail, which has existed for many years with minimal effects on oak trees, unless future erosion calls for improvements. Because the potential for future erosion is ~~somewhat~~ speculative and the techniques necessary to resolve such erosion are unknown, further environmental analysis may be needed at that time if erosion control becomes necessary in the future. Significant impacts on biological resources would not be ~~anticipated.~~
~~expected to occur.~~

Fire Safety Management: The Management Plan calls for 7 ½-foot buffers on either side of the main loop and middle loop trails and a 60-foot wide buffer adjacent to residential areas along the easterly property line. The Plan indicates that these buffer areas would be mowed and trimmed to reduce fire hazards. Vegetation would not be cleared, but would be thinned in a “mosaic pattern” to retain habitat value. Prior to carrying out these activities, native forbs, shrubs and trees, ~~which that~~ could be damaged by the mower would be tagged to increase their visibility so they could be avoided. In addition, a weed whip would be used to remove other plants within a ~~three-foot~~~~three-foot~~ radius of tagged vegetation. Finally, the City arborist or a designated representative would be on-site and would be authorized to stop work to make sure that native plants are protected (Policies RM-4 and 5). Another policy (WM-10) requires that tree trimming not occur during the nesting season of birds.

Off-Leash Dog Use: Unrestricted off-leash dog activities may have **unknown, but potentially significant** impacts on the native flora and fauna, and rare plants and animals and their habitats. Off-leash dog activities such as running on steep banks of the coastal bluffs, the oak woodland and the riparian area may cause increased erosion hazard and sedimentation, resulting in greater disturbance of the habitats. Small trails on the steep slopes created by dog activity may cause increased run-off to Arroyo Burro Creek, and accelerate slope failure processes by destabilizing slopes by removing vegetation cover. Unrestricted activity can also inadvertently cause trampling of sensitive species, and dogs digging holes in pursuit of rodents may increase erosion and cliff failure potential. Additionally, unleashed dogs could harass area fauna. It is unknown if unrestricted activity by off-leash dogs may significantly impact native fauna using the site, especially nocturnally dependent species.

The Management Plan ~~includes a provision that allows~~~~could allow~~ dogs to be off-leash in the DFP, ~~except for two days each week under different alternatives identified in the project description.~~ ~~Other alternatives include allowing dogs to be off-leash all of the time or on odd-numbered days.~~ Finally, dogs could be required to be on-leash all of the time. Concerns have been raised that off-leash dogs would disturb sensitive habitat and/or sensitive plant and animal species. In addition, fecal matter and urine left by dogs could affect some plants' ability to grow and propagate, potentially affecting sensitive habitats. Also, especially during the rainy season, such materials could drain or leach into Arroyo Burro Creek and/or the unnamed tributary. This could result in water quality problems in the creeks, potentially affecting sensitive wetland and riparian species and habitats. It is unclear if the potential extent of this effect would be significant.

Another alternative for off-leash dog use involves establishing a three to five acre fenced area where dogs could be off-leash. Outside of this area, dogs would be required to be kept on-leash. As discussed under Aesthetics, most of this proposed area is in coastal sage scrub habitat. There are some areas along

the edge [of the coastal sage scrub habitat](#) that consist of exotic plants. There are also a couple of patches of oak woodland in the middle. While this approach would reduce the effects of dog feces deposits and wildlife harassment for most of the Preserve, it could increase vegetation loss in the fenced area. Dogs would be concentrated in this area and would trample the vegetation, since dogs often do not stay on trails. In the fenced area, it may be more likely that dog owners would pick up dog feces because it would be more accessible than in heavily vegetated areas and on the bluffs elsewhere on site.

As requested by City Council, all of the dog use alternatives outlined in the Project Description will be analyzed at the same level [in in thean](#) EIR. This approach will provide more factual comparative information on which to base the final decision.

Other Operational Changes: Informal group use, hang-gliding and other uses are already occurring on site. No changes in such uses are expected to occur. There would be no increased impacts.

- 3.b There are no designated historic or landmark trees in the project area. However, the windrow trees (eucalyptus, pine and cypress) could be considered specimen or “skyline” trees that contribute to the area both visually and as nesting and roosting sites for raptors and an overwintering site for Monarch butterflies. The Management Plan policies call for protection of windrows, including replacement of trees with like species as they die. There would be no significant impacts on windrow trees.

Mitigation Measure(s):

- Bio-1 If the Borton Drive site is selected [as the location](#) for the ~~caretaker’s residence and~~ restroom, the structures shall be placed as close to the easterly property line as possible while protecting oak trees from damage by keeping the structures outside the dripline of all oak and other native trees. If the caretaker’s residence and/or restrooms are located near the Medcliff Road entrance, they shall be placed outside the dripline for all native trees, as well as any eucalyptus trees.
- Bio-2 If it is necessary to relocate trails in order to construct the caretaker’s residence and restroom, the trail relocation(s) shall be designed to stay out of the dripline of all native trees.
- Bio-3 All minor structures, including but not limited to benches, trash receptacles, signs and mutt mitts shall be located outside the driplines of any native trees. No such structures shall be located in a sensitive habitat. Such structures placed at the edges of such a habitat shall be placed based on a recommendation from a qualified biologist.

Mitigation Measures That Apply to Restoration and Ongoing Maintenance:

- Bio-4 Prior to vegetation removal, a qualified biologist shall temporarily relocate any special status wildlife species (turtles, steelhead, red-legged frogs, etc.) and/or identify sensitive flora to avoid (Plummer’s baccharis), or be transplanted, found in or near the proposed work area. Shrubs and trees with nesting birds shall be avoided until the nestlings are fledged. Breeding seasons for sensitive fauna shall be avoided.
- Bio-5 If it is necessary to disturb the banks of Arroyo Burro Creek within the estuary to carry out habitat restoration, the following measures shall be carried out to reduce impacts to the Tidewater goby to less than significant levels:

- No construction work shall be scheduled in the water anywhere in the estuary from mid-December to the end of June.
- A construction enclosure shall be created around the bank area to be restored. All parts of the barrier shall be made of impermeable materials. The first barrier piece installed shall be in the estuary, parallel to the bank to be restored. The upper end of the enclosure shall be installed next.
- Qualified biologists shall walk downstream from the upper end of the area to be enclosed in a zigzag pattern to herd as many fish as possible from the area to be enclosed.
- Immediately dam the downstream end of the enclosure.
- Qualified biologists shall seine the entire enclosure thoroughly to remove any gobies and other large organisms and place them in the remaining estuary.
- Commence pumping water from the enclosure with pump intakes fitted with 1/8" mesh screens.
- Qualified biologists shall monitor the enclosure and seine it thoroughly at least twice weekly.
- When restoration is completed, the downstream wall of the enclosure shall be removed first, followed by the upstream end and then the remaining barrier.

Bio-6 To the extent feasible, exotic eradication activities shall occur in a mosaic pattern or in small areas that preserve enough vegetation to provide diverse habitats.

Bio-7 Use of herbicides on the DFP shall be subject to approval by the Parks and Recreation Director, Assistant Parks and Recreation Director or the Department's Associate Park Planner. Hand spraying or wicking shall be used. All spraying shall take place when wind speeds are at or below five miles per hour and rain is not predicted within six hours. Herbicides shall be applied selectively, only to specific problem vegetation. Invasive weeds shall be reduced by selective spraying and hand-removal of propagules. Trained personnel shall do all hand work and spraying. Sprayers shall be filled outside of the sensitive management units.

Bio-8 After vegetation removal, appropriate native plants or those included in the restoration plans shall be planted at appropriate times, and as necessary to assist in reestablishment of lost habitat, in consultation with a qualified restoration biologist.

Mitigation Measures Applicable to Carrying Out Initial Restoration Plans:

Bio-9 Plants used in the restoration plans shall be propagated from the project site or within coastal Santa Barbara County, as approved by a qualified biologist. It is preferable to use smaller propagules for establishment of habitat such as liners, cuttings, or ~~one-gallon~~one-gallon containers.

Bio-10 A two-year maintenance period shall begin immediately after the implementation of the restoration. To receive final acceptance of the restoration, the site (s) shall be inspected and approved by a qualified restoration specialist/biologist involved in the design and/or implementation of the mitigation plan.

During the two year maintenance period following initial restoration:

- Routine activities will be conducted to maintain the plantings and seeded areas in a healthy condition and control erosion of the site.
- The site (s) will be inspected by a qualified restoration specialist/biologist for necessary repair or remedial measures a minimum of four times a year.
- At the end of the maintenance period, the restoration specialist/biologist will conduct a final inspection. Any outstanding items will need to be completed prior to final approval and acceptance of the restoration.

Maintenance activities will include routine watering or irrigation inspection, replanting or reseeding, repair of damaged areas, weeding, remedial erosion control and removal of excess sediment from areas if the sediment has clearly eroded from the mitigation site.

Semi-annual reports in April and November on the status of the restoration work shall be submitted to the Environmental Analyst, including the following information:

- A quantitative analysis of attainment of annual performance standards and progress toward meeting final performance standards.
- A list of names, titles and affiliations of persons conducting the monitoring and preparing the report.
- A copy of the Corps and other agency permits, if applicable, including special conditions and any letters of modification.
- Photographs taken at photo-documentation points.
- Relevant maps.
- Summary results of previous years' monitoring.

Bio-11 During the five year monitoring period that follows the two-year maintenance program, accepted vegetation sampling methods shall be used. For example, plant species composition and percentages would be determined for the mitigation site by sampling throughout the site and recording relevant data, such as:

- Species occurring within the area, the species wetland or riparian indicator status and whether the species is native or introduced.
- Percent plant cover.

Qualitative information about weather and site conditions shall also be collected. There shall also be permanent photo-documentation points established. Color photographs shall be taken from the same point each year to assist in documentation of mitigation status.

Based on the findings of the annual monitoring report, additional weeding could occur if necessary to meet the performance goals for plant cover and species diversity.

Bio-12 A report on the condition of mitigation site vegetation shall be prepared at the end of the ~~two-year~~two-year maintenance period. During the 5-year monitoring period, annual reports describing the results of mitigation monitoring shall be submitted to the Environmental Analyst and other interested agencies before the end of each November.

The annual monitoring reports shall contain the following information:

- A quantitative analysis of attainment of annual performance standards and progress toward meeting final performance standards.
- A list of names, titles and affiliations of persons conducting the monitoring and preparing the report.
- A copy of permits, including special conditions and any letters of modification.
- Photographs taken at photo-documentation points.
- Relevant maps.
- Summary results of previous years' monitoring.

Residual Impact: With the inclusion of the above ~~stated~~ mitigation measures, impacts of maintenance and restoration on biological resources would be reduced to less than significant levels for all activities except unleashed dog activity. The impacts of unrestricted off-leash dog use are unknown and potentially significant and ~~must be evaluated in a biological section of the EIR for this project and the Dog Study.~~ need further review to determine significance level.

4. CULTURAL RESOURCES.	NO	YES
Could the project:		Level of Significance
a) Disturb archaeological resources?		Potentially Significant
b) Affect a historic structure or site designated or eligible for designation as a National, State or City landmark?	✓	
c) Have the potential to cause a physical change, which would affect ethnic cultural values or restrict religious uses in the project area?	✓	

Discussion:

4 a. The Phase I Cultural Resources Study prepared for this property identifies one recorded Chumash site

(Sba-575) on the property. No other significant sites are expected to be found; however, during riparian restoration activities which could include minor grading, reshaping and/or invasive plant removal, there could be **potentially significant impacts** on this site. Further analysis will need to be completed in the EIR to determine site boundaries and activities that are acceptable or must be avoided on the site. In addition, in order to avoid impacts resulting from dogs and/or humans that could enter this sensitive area, a mitigation measure has been added requiring that a [fence barrier](#) be constructed on the west side of the oak grove trail between the toe of the bluff and the unnamed tributary of Arroyo Burro Creek. Additional measures related to fence appearance [if a fence barrier is used](#) are included in the Aesthetics ~~discussion~~ [Section. A barrier of dense thorny vegetation is the preferred approach in order to minimize adverse aesthetic effects.](#)

4.b, c. No historic, ethnic or religious structures or sites are known to be present in the project area. The project would not have the potential to cause a physical change that could affect cultural values or restrict religious uses.

Mitigation Measure:

CR-1 A [barrier consisting of fence-dense thorny native vegetation](#) shall be constructed on the west side of the oak grove trail between the toe of the bluff and the unnamed tributary of Arroyo Burro Creek.

Residual Impact: [Potentially significant; to be determined in the EIR. With the inclusion of the above mitigation measure, impacts on cultural resources would be reduced to less than significant levels.](#)

5. GEOPHYSICAL. Could the project result in or expose people to:	NO	YES
	Level of Significance	
a) Seismicity: fault rupture?	✓	
b) Seismicity: ground shaking or liquefaction?	✓	
c) Seismicity: seiche or tsunami?	✓	
d) Landslides or mudslides?		Potentially significant
e) Subsidence of the land?	✓	
f) Expansive soils?	✓	
g) Excessive grading or permanent changes in the topography?	✓	

Discussion:

- 5.a., b. The nearest known potentially active fault is the Lavigia Hill Fault located approximately 0.75 miles north of the site. According to the Master Environmental Assessment, the project site is within an area that is subject to low level damage to single family and small 2 to 3 story structures; low to moderate level damage to large structures; and moderate damage to old structures. It is also in an area with minimum liquefaction potential; an area where ground water levels are historically below 40 feet and/or soil densities (at critical depth) are above 80% and/or standard penetration resistance is more than 30 blows per foot. If the caretaker's residence is built, it could sustain ~~low level~~low-level damage by seismic activity ~~but~~and liquefaction damage would not be expected. The Uniform Building Code (UBC) requirements are designed to minimize such impacts. Impacts related to seismic activity would be less than significant.
- 5.c. The portion of the project site that is within an area susceptible to tsunami run-up includes the base of the ocean-facing bluffs, estuary area, and up a portion of the unnamed tributary on the north side of the property. The project would not change the level of exposure to users as there are no plans to change or increase existing human access in these areas. The susceptible areas would continue to be used for informal, casual walks by humans and dogs, except for the area ~~to be fenced off~~where access is to be blocked as discussed under Cultural Resources above. No increased tsunami impacts are expected to occur beyond existing tsunami potential with existing park use.
- 5.d.-f. This project area is in an area of active soil creep – downslope movement of soil observable by topographic features, leaning trees, or damage to trees. The bluffs are an area of active erosion – gullying and sedimentation are active during winter months; and the bluffs themselves are an area of high erosion potential – steep areas (generally over 50%) that are likely to erode if the vegetation is stripped and not replanted before the rainy months. This includes seacliff areas that undergo periodic erosion caused by very high tides and/or storm surge.

The City Local Coastal Plan requires a 75-year setback from the bluff for all structures. One location under consideration for a caretaker's residence is near the bluff and may be within this setback. If it is determined that the residence would be within the bluff setback, there would be **potentially significant impacts** related to bluff erosion. Because of the location of the existing trails on the bluff side of the property and adjacency to the soil creep and active erosion areas, a geologic study will be required to determine the appropriate setback for the bluff area, and to determine the current rate of bluff erosion. A prior study by Hoover Associates (1988) is felt to be dated information and should be revised because, at 12 years old, the then 75-year setback would now be a 63-year setback. Therefore, a soils and geology report will be required as part ~~of~~of the EIR and all recommendations must be followed prior to acceptance of any discretionary application or building permit.

- 5.g. Minor grading (50 CY or less) may occur to adjust topography on the existing main loop trail for Americans with Disabilities Act access, and to balance cut and fill on site for a foundation and utility line extensions if a caretakers residence is built. There would be minor permanent changes to the topography not resulting in any significant impacts. Standard grading and erosion control measures would be applied as specified in the restoration plans, which would ensure that grading would not result in significant erosion or sedimentation impacts (see Water Environment section for mitigation measures).

These minor changes could be a benefit to erosion concerns at the top of the bluffs. Together with the use of logs to discourage entry to the bluff face trails, and revegetation at the top of the bluffs, it is

anticipated that this action could slow the existing accelerated rate of erosion.

Residual Impact:

Impacts related to tsunami, liquefaction and seismicity would be less than significant. Impacts related to bluff erosion will be discussed in in the an EIR.

6. HAZARDS. Could the project involve:	NO	YES
		Level of Significance
a) A risk of accidental explosion or release of hazardous substances (including, but not limited to: oil, pesticides, chemicals or radiation)?	✓	
b) The creation of any health hazard or potential health hazards?	✗	
b) <u>The creation of any health hazard or potential health hazards?</u>		<u>Less than significant</u>
c) Exposure of people to existing sources of potential health hazards?	✓	
d) Increased fire hazard in areas with flammable brush, grass, or trees?	✓	

Discussion:

- 6.a Workers applying the herbicides Roundup™ or Rodeo™ could be exposed to glyphosate, the active ingredient in these herbicides. Mitigation measures addressing herbicide application guidelines have been identified to reduce potential impacts to less than significant levels. See also Section 12, Water Environment, for a discussion of water quality issues related to restoration and maintenance of the project.
- 6.b This project's activities of habitat maintenance and restoration, minor construction related to the caretaker's residence and restroom and other activities do not have the potential to create any health hazards. Hang gliding usage would not change substantially as a result of project implementation, so there would be no increase in related health hazards. Continued off-leash dog use could result in an increased number of negative people/dog interactions, either through over-exuberant playful behavior or dogs' over-protective instincts or other issues if the dogs are not well-watched/well-controlled by their owners. Dogs have occasionally slid down the bluff and become stuck. Owners have sometimes tried to rescue their pets and have also been stuck, resulting in emergency calls to Police and Fire Departments. The number of such calls appears to have increased since the Preserve became a public space. The Management Plan calls for fallen logs to be placed near the bluff edge in much of the Preserve. This would likely reduce the numbers of animals and their owners that could be stranded on the bluff. There is a system of citations and misdemeanors, which the Police Department can, and does, use to deal with issues as they arise. This system also works to encourage compliance with the law. In

addition, the Draft Plan includes Policy DM-7, which would create and maintain a log for dog-related complaints. Based on this log, additional site-specific management guidelines could be established to reduce the nuisance. ~~While this is a nuisance and an important concern to those involved, it does not rise to the level of a significant environmental effect.~~ Project activities may improve public safety considerations in certain ways. However during the scoping hearing it became apparent that there was substantial public concern about the hazards resulting from the exposure of unleashed dogs to people using park facilities and between each other. Therefore public safety concerns have been included in the EIR.

- 6.c A Phase II Environmental Site Assessment was prepared in 1996 by Woodward Clyde (WCC) for the Wilcox property (~~Now~~now known as the DFP). A summary of this report is attached as Exhibit 6. The prior historic uses include oil exploration, and agriculture including row crops, orchards, and nursery operations. A 2000 gallon kerosene storage tank and ~~500-gallon~~500-gallon underground gasoline storage tank were referenced on a listing of Leaking Underground Storage Tanks sites maintained by the State Water Resources Control Board. These were removed from the site in 1989 under State remediation procedures with soil excavations conducted until acceptably low concentrations of petroleum hydrocarbons were achieved. Asbestos was discovered in a pile of debris at the center of the site, which also included empty 55-gallon drums, vegetative trimmings, car parts and other rubble. The City removed it from the site in 1997. Additionally two 30-gallon drums were found on the north slope of the site. The drums were empty and no hazardous residues were detected. In 1998, the remains of the Lincoln oil well were resealed; no hazardous substances were detected at its location on the beach at the southwestern corner of the DFP property. No impacts related to health hazards are expected to occur as a result of this project.
- 6.d The project area is identified as being in a high fire hazard area due to its ~~adjacency~~proximity to Las Positas Valley, the effect that sun downer winds have on that area, and the steep terrain and heavy brush in the oak woodland on the north slope. The Management Plan includes restoration activities that would include a minor increase in riparian and upland vegetation, which would not create an increased fire hazard due to moisture retained in this type of vegetation. The Plan also has a component for vegetative fuels management that was developed in coordination with the Fire Department. The maintenance procedures identified would lessen the fire hazards to nearby residences and the lives of firefighters. No adverse impacts related to fire hazard would occur as a result of the project.

Mitigation Measure:

~~Haz 1 The Parks and Recreation Department shall minimize applicator exposure to glyphosate. Workers mixing either Roundup™ or Rodeo™ 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 wind speeds are at or below five miles per hour and rain is not predicted within six hours.~~

To be determined in the EIR

Residual Impacts: ~~With the imposition of the above-stated mitigation measure and annual vegetative fuels management, hazard impacts would be reduced to less than significant levels.~~To be determined in the EIR.

7. NOISE. Could the project result in:	NO	YES
		Level of Significance
a) Increases in existing noise levels?		Less Than Significant
b) Exposure of people to severe noise levels?	✓	

Discussion:

7a. There would be some short-term noise increases due to minor grading on the trails and removal of concrete foundations at Mesa School Lane entrance. If the caretaker’s residence is built, short-term noise increases would occur due to construction activities. The estimated duration would be about four months. Construction would be subject to standard construction hours limitations, so noise from these activities would occur only during weekdays when the park use is less, and most residential neighbors will be at work away from their homes. The short-term impacts are considered to be adverse, but not significant. To further reduce these adverse impacts, construction equipment maintenance mitigation measures are recommended. No long-term noise impacts are expected to occur because the park has ongoing passive recreation activities already occurring that are not expected to increase substantially in overall intensity.

Park use would continue to have the potential to cause minor intermittent nuisance noise problems to the adjacent residential neighborhood. Most noise would be generated by talking people or barking dogs. Closing the Preserve between 30 minutes after sunset and 30 minutes before sunrise would minimize noise effects. Nuisance noise is governed by the City Noise Ordinance. The Preserve would also be checked periodically by the caretaker or rangePark Ranger and, if necessary, the police could be called. No substantial change to ongoing operational noise levels and no adverse impacts are expected to occur as a result of the project.

Recommended Mitigation Measures:

Noise-1 Noise generating construction activities shall be prohibited Saturdays, Sundays, and holidays and between the hours of 5 p.m. to 8 a.m. Holidays are defined as those days that are observed by the City of Santa Barbara as official holidays by City employees. Work activities shall not begin before 8 am Monday – Friday, and be terminated by 5pm.

Noise-2 All construction equipment, including trucks, shall be professionally maintained and fitted with standard manufacturers’ muffler and silencing devices.

Residual Impacts: Implementation of the above mitigation measures would further reduce the adverse effects of noise during construction. Residual impacts would be less than significant.

8. POPULATION AND HOUSING.	NO	YES
Could the project:		Level of Significance
a) Induce substantial growth in an area either directly or indirectly (e.g. through projects in an undeveloped area or extension of major infrastructure)?		Less Than Significant
b) Displace existing housing, especially affordable housing?		Less Than Significant

Discussion:

8a,b. [The project involves adoption of a management plan with only minor physical improvements.](#) This project would have no effects on population growth or major infrastructure extensions nor would it displace existing housing.

9. PUBLIC SERVICES. Could the project have an effect upon, or result in a need for new or altered services in any of the following areas:	NO	YES Level of Significance
a) Fire protection?	✓	
b) Police protection?	✓	
<u>b) Police protection?</u>		<u>Less than significant</u>
c) Schools?	✓	
d) Maintenance of public facilities, including roads?	✓	
<u>d) Maintenance of public facilities, including roads?</u>		<u>Less than significant</u>
e) Other governmental services?	✓	
<u>e) Other governmental services?</u>		<u>Less than significant</u>
f) Electrical power or natural gas?	✓	
<u>f) Electrical power or natural gas?</u>		<u>Less than significant</u>
g) Water treatment or distribution facilities?	✓	
<u>g) Water treatment or distribution facilities?</u>		<u>Less than significant</u>
h) Sewer or septic tanks?	✓	
<u>h) Sewer or septic tanks?</u>		<u>Less than significant</u>
i) Water distribution/demand?	✓	
<u>i) Water distribution/demand?</u>		<u>Less than significant</u>
j) Solid waste disposal?	✓	
<u>j) Solid waste disposal?</u>		<u>Less than significant</u>

Discussion:

9.a.b. The project site is currently served by the City Fire and Police Departments. The Management Plan has a component specifically written for fire protection - vegetative fuels management – that was written from directives given by the Fire Department. These practices would reduce fire danger to adjacent residences and provide defensible space for fire fighters. This would have a beneficial impact on firefighting services because wildland fire hazards would be reduced. The Plan would not result in any need for additional police hires; and the Parks and Recreation Department Park Ranger Program would maintain the current level of service to the site. No substantial adverse effects would occur but a small increase in police services may be necessary to increase enforcement and responses to complaints.

If a caretaker’s residence is not determined to be necessary after a trial period without ~~one~~one calls that can-not be serviced by the Park Ranger Program (i.e. partying disturbances in late evening and before dawn timeframes) may be forwarded to the Police Department. This represents ~~no~~little change from current practices and some ~~off hour~~off-hour disturbances may be routed to Police Department even with

the caretaker's residence due to the limited nature of the Park Rangers' enforcement capabilities.

Animal Control, a division of the Police Department, does not expect any change in services from any of the dog on/off-leash options (pers. comm.. Animal Control Supervisor, 10/3/00).

- 9.c. This project would not generate population increases and would, therefore, have no effect on the need for increased school capacity.
- 9.d. This project may increase maintenance of the public restroom if it is determined that such a facility is necessary for this site. This is a standard maintenance activity for the Parks and Recreation Department in other city parks and open space areas, and the additional time spent by the parks staff to maintain a restroom of this size to the same standard as other facilities is minimal. No new public roads would be developed by this Plan. There would be no effect on ongoing public roads maintenance.
- 9.e-h The project would not have an effect on other governmental services, electrical power, natural gas, water treatment or distribution facilities. Adequate sewer facilities are available about 35 feet easterly of the property line in Borton Drive and on the property at Medcliff Road to serve the caretaker's residence and/or restroom. The required extension would be short and would ~~have no biological or other impacts result in a small increase in sewage generation and required treatment capacity which is adequate to serve the proposed project.~~ Water is available on the property via a main on the property parallel to the easterly property line between Mesa School Lane and Borton Drive. There is also a lateral water service connection from the intersection of Selrose Drive and Medcliff Road to the existing caretaker's trailer.

The Plan could result in a minimal increase on sewer services by the addition of one restroom for the site, if it is determined that a restroom is necessary. If a caretaker's residence is constructed, electrical power, water and sewer services would be required; however it would not be considered a change because the current residence has these services. If sewer service is required, it would be connected to the existing neighborhood system. Depending on the location of the residence and restroom, sewer lines would need to be extended between 25 and 50 feet onto the property. ~~There would be no impact on services.~~

- 9.i The Plan would have a minimal effect on water distribution/demand. The existing caretaker's trailer already accounts for water demand that would be generated by the caretaker's residence. The restroom would generate an estimated additional demand of 0.05 afy. There would also be some sporadic demand for irrigation water as part of habitat restoration. The total increase would amount to less than 0.25 afy, a minimal increase in water demand. This would result in ~~a no less than significant~~ impact on water supply.
- 9.j Solid Waste. The Plan ~~would not change existing~~ could result in a small increase in solid waste generation or services for the site ~~if dog use of the site increases but could be compensated for by a decrease in municipal solid waste if people without dogs use the park less frequently.~~ Green waste would continue to be separated from dog waste in disposal containers moved to the transfer station. This is done by providing special containers designated for "mutt mitt" disposal. ~~No~~ Less than significant impacts on solid waste collection or storage are expected to occur.

Residual Impact: There would be ~~no residual~~ less than significant impacts.

10. RECREATION. Could the project:	NO	YES
		Level of Significance
a) Increase the demand for neighborhood or regional parks or other recreational facilities?	✓	
b) Affect existing parks or other public recreational facilities?		Less Than Significant

Discussion:

10.a The site currently provides opportunities for recreational activities such as walking, jogging, people walking dogs, hanggliding and parasailing, light bike riding and viewing sunsets. Public use of open undeveloped space would continue to be in demand by the public as the urban area continues to expand. The Management Plan would not substantially change the existing facility nor increase the demand regionally or in the neighborhood. In fact, acquisition of the preserve has assured its availability to meet demand for open space into the future.

10.b. The proposed project would most likely affect existing parks or other public recreational facilities by one component, that being off-leash dog usage. It is anticipated that if the Plan does not allow for off-leash dog activities on the DFP, other parks, beaches, etc. would receive increased off-leash dog activity whether it is allowed or not. This could affect other parks where organized sports (softball, soccer, etc.) take place, or at other facilities such as beaches where there already exist a variety of activities – some more compatible and some less compatible with off-leash dog use. This may require stepped-up Animal Control or Police enforcement to reduce problems, although additional officers are not expected to be required. Additional signage about leash requirements may also be needed if problems occur at a particular park.

Increased usage for off-leash dog purposes is somewhat speculative. There are many parks in the South Coast area and it is unknown where people would go if the DFP is not available for off-leash dogs. Santa Barbara County is considering establishing an off-leash dog area. Dogs are also allowed off-leash at Elings Park, adjacent to the DFP. In any case, the increase is not expected to result in significant impacts on recreation.

Residual Impact Residual recreation impacts would be less than significant.

11. TRANSPORTATION/CIRCULATION.	NO	YES
Could the project result in:		Level of Significance
a) Increased vehicle trips?		Less Than Significant
b) Hazards to safety from design features (e.g. sharp curves, inadequate sight distance or dangerous intersections)?	✓	
c) Inadequate emergency access or access to nearby uses?	✓	
d) Insufficient parking capacity on-site or off-site?		Less Than Significant
e) Hazards or barriers for pedestrians or bicyclists?	✓	

Discussion:

11a. There is no current information about visitor use numbers for the DFP and no information available on vehicle trips to the site. Anecdotal information available from long time users and neighbors of the site indicate an increased number of visitors since the property was acquired by the City, but no corollary information on how much vehicle trips have increased. Several regular users of the site are neighbors; however, there is no information on what percentage of the site users use walking, biking or driving as their mode of transportation to the site. Information gathered from a survey sent to neighbors in January 1999 indicated that the majority of those surveyed did not feel that site users impacted on-street parking or traffic. Given that off-leash dog use is already allowed at this site, Transportation staff has indicated that allowing off-leash dog use long-term will not increase usage of the DFP. Parks and Recreation staff members are expected to visit the site an average of once per day, except for special activities such as annual vegetative fuels management in the summer. Fuels management would likely generate three to four trips daily while pruning and mowing take place. These activities with vehicle trips would primarily occur in off-peak traffic hours and would not be sufficient in number to contribute to a traffic impact. Usage of the site is not expected to increase as a result of the physical improvements proposed at the DFP. As such, Transportation staff concludes that the project would not result in significant traffic impacts.

11b, c This project does not include design or establishment of new streets or new access points. The existing access points and trails used as emergency access trails would be maintained to City Fire Department standards. The required standards are as follows: the required access point width is 16 feet and horizontal clearance is 14 feet; the outer loop trail access is to be free of weeds to a 25 foot width (including 7 ½ foot buffers on each side of the 10-foot wide trail); the middle loop access, used as secondary emergency access is to be free of weeds to a 17 foot width (7 ½ foot buffers on each side of a two-foot wide trail); both the outer loop and middle loop accessways must have 14-foot vertical clearance as well. The access from Cliff Drive and Las Positas Road is no longer considered to be a vehicular access way or an emergency access route as per the City Fire Chief (pers. Comm 6/00).

With adherence to emergency access requirements, and no new streets, no hazards are anticipated from design features and adequate emergency access would be maintained.

11d. There is no current or historical information available on parking capacity, on-site or off-site. City

Council has determined; however, that an on-site parking lot is inappropriate and will not be included as a facility on the site. Therefore, parking for site users traveling by car to the site would generally be on Medcliff, Selrose or Linda Roads, and/or Borton Drive. Parks and Recreation Staff surmise that the primary entrance used is Medcliff Road, the secondary entrance being Borton Drive and Mesa School Lane being the least used entrance.

Anecdotal information available from long time users and neighbors of the site indicate an increased number of visitors since the property was acquired by the City, but no corollary information on whether on street parking has increased. Several regular users of the site are neighbors; however, there is no information on what percentage of the site users use walking, biking or driving as their mode of transportation to the site. Information gathered from a survey sent to neighbors in January 1999 indicated that the majority of those surveyed did not feel that on-street parking was a problem, and did not at all favor a parking lot on-site. Given that off-leash dog use is already allowed at this site, Transportation staff has indicated that allowing off-leash dog use long-term will not increase usage of the DFP. Usage of the site is not expected to increase as a result of the physical improvements proposed at the DFP. As such, Transportation staff concludes that the project would not result in significant parking impacts.

To provide for sufficient disabled parking, it is recommended that parking strips be painted and signed on the street at the Medcliff Road and Borton Drive entrances.

- 11e. The Plan does not contain hazards or barriers for pedestrians or bicyclists. There are four historic access points to the property: Medcliff Road, Borton Drive, Mesa School Lane, and off of Cliff Drive near the intersection of Las Positas Road. All four access points would be retained for pedestrian and bike access. Therefore, there would be no impact to pedestrian or bicycles using the site.

Recommended Mitigation Measure(s):

~~T-1 One or more parking spaces on the street near the Medcliff Road and Borton Drive entrances should be designated for disabled parking.~~ To be determined in an EIR

Residual Impact: ~~There would be no significant impacts on traffic and parking.~~ Traffic and parking impacts will be determined in an EIR.

12. WATER ENVIRONMENT. Could the project result in:	NO	YES Level of Significance
a) Changes in absorption rates, drainage patterns, or the rate and amount of surface runoff?	✓	
b) Exposure of people or property to water related hazards such as flooding?	✓	
c) Discharge into surface waters?		Potentially Significant
d) Change in the quantity, quality, direction or rate of flow of ground waters?	✓	
e) Increased storm water drainage?	✓	

Discussion:

12a. Minor grading (50 CY or less) would occur to balance cut and fill on site for a foundation if a caretaker’s residence and/or restroom is built and to adjust topography on the existing main loop trail for ADA access [and drainage](#). While there would be minor permanent changes to the topography, they would not result in any significant impacts to absorption rates or drainage patterns. Additionally, these minor grading changes would reduce bluff area erosion by reducing surface runoff.

Surface runoff has been identified as a cause of increased bluff erosion leading to cliff failure. It is advantageous to reduce surface runoff in order to slow bluff erosion processes occurring due to water flows over the top of the bluff, non-vegetated soils, and minimizing soil compaction. Minor grading changes and revegetation identified in the Plan would reduce bluff area erosion by reducing surface ~~runoff, reducing existing runoff~~ [runoff that is directed over the cliff and by adding vegetation to protect steep areas from soil erosion](#).

Where minor grading is identified in future restoration plans for the DFP, standard grading and erosion control measures would be applied as specified in the restoration plans. Control measures would ensure that grading would not result in significant erosion or sedimentation impacts. One of the primary purposes of restoration plans is to enhance habitat conditions. Where erosion or sedimentation is a factor, measures are identified in restoration plans to reduce these impacts.

Any increased runoff caused by the development of a caretaker’s residence, and/or restroom would be fully mitigated by means of gutters and a direct connection to area storm drains.

12b. The northern and western portion of the site includes Arroyo Burro Creek and its unnamed tributary and lies within the intermediate Regional and Standard project floodways as mapped by U.S. Army Corps of Engineers. The ~~low-lying~~ [low-lying](#) areas adjacent to the creek are subject to inundation from periodic storms. No changes to existing trails would occur and no new trails would be created in these areas; therefore, the project would not exacerbate potential exposure of people to water related hazards.

12c. Water quality issues associated with the project relate primarily to erosion control and the need to reduce sedimentation to Arroyo Burro Creek and control of contamination from dog feces to the unnamed tributary and Arroyo Burro Creek.

Sediment loading is a known cause of wetland degradation. Sedimentation may cause the filling of wetlands, reduce the depth, size and general configuration of deep pools, which are necessary to particular species (i.e. steelhead trout), and carry contaminants to the water environment. Another negative impact to wetlands that may be caused by sedimentation is increased water temperatures. As wetlands are filled, temperatures may warm due to shallower depths. The tidewater goby and steelhead trout are especially sensitive to increased water temperatures, and the goby's reproduction is dependent on coarse sand bottoms. Sedimentation can change the bed textures. Steelhead trout reproduction is dependent on deep pools, and sedimentation may cause reduction of pool depths. Erosion control is the means to prevent sedimentation. The Plan incorporates erosion control measures. Therefore, there would be no impacts on the creek as a result of sedimentation.

The concern related to dog waste (feces and urine) is that, either through dogs defecating in the creek or through runoff, dog waste could enter Arroyo Burro Creek and the unnamed tributary, and contribute to degraded water quality, resulting in a **potentially significant** impact. It is known that direct deposit of feces contributes fecal coliform and increased nitrate levels in water. However, it is currently unknown whether feces or urine runoff from the property could have potentially significant impacts to water quality. Outstanding questions include: how quickly does waste degrade, in or on the soil, before it becomes innocuous; how much and how quickly is it transported to the water habitat; and at what locations on the property is this an issue. The Plan stipulates that riparian and estuarine areas are off-limits at all times; therefore, direct defecation should be limited if users abide by the use regulations. However, off-leash dogs may deposit fecal matter in areas where people are unwilling to remove it, such as areas of heavy brush, steep slopes or poison oak.

- 12d This project would not have any effect on ground water because drainage patterns would not be affected and there would be a very small increase in non-permeable area as a result of the caretaker's residence and the restroom.
- 12e. Any increased runoff caused by the development of a caretaker's residence, and/or restroom would be fully mitigated by means of drains directed to the storm drains. No other increased stormwater drainage, potential or real, is expected from the Plan.

Mitigation Measure(s):

- WR-1 To the extent feasible, limit grading activities in and around Arroyo Burro Creek and the unnamed tributary to the non-rainy season, while avoiding goby, turtle and bird breeding seasons. If construction during the rainy season is unavoidable, use silt fences, straw bales and other erosion control measures, as necessary, to control siltation of Arroyo Burro Creek and the unnamed tributary during wet periods.
- WR-2 Cover stockpiled soils and other construction materials.
- WR-3 Seed and plant disturbed areas with native vegetation required by the restoration plan immediately following construction activities.
- WR-4 Provide dust control by wetting exposed soil surfaces.
- WR-5 Clean up equipment leaks, drips and spills immediately. Use dry cleaning methods wherever possible.
- WR-6 Apply any other Best Management Practices (BMPs) appropriate to the project to protect surface water quality.

WR-7 If necessary, use straw bales, jute mats or other BMPs on the new channel banks to reduce runoff velocity and erosion while the new vegetation is being established.

Residual Impact: With the incorporation of the above-stated mitigation measures, erosion and sedimentation impacts would be reduced to less than significant levels. Impacts caused by dog feces and urine on water quality will be determined in the EIR.

MANDATORY FINDINGS OF SIGNIFICANCE.		YES	NO
a)	Does the project have the potential to 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, reduce the number or restrict the range of a rare or endangered plant or animal or eliminate important examples of the major periods of California history or prehistory?	✓	
b)	Does the project have the potential to achieve short-term, to the disadvantage of long-term, environmental goals?		✓
c)	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)?	✓	
d)	Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?	✓	

INITIAL STUDY CONCLUSION

On the basis of this initial evaluation it has been determined that:

The proposed project MAY have a significant effect on the environment, and further study in an ENVIRONMENTAL IMPACT REPORT is required on the following issues:

- [Aesthetics/ Public view impacts of caretaker residence, restroom, and fenced dog run](#)
- Biological Resources/ Impacts to sensitive plant and animal species and habitat from off-leash dogs
- Cultural Resources/ Impacts to recorded prehistoric site from grading, restoration, and dogs
- Geophysical/ Impacts to bluff erosion from structure development
- Water/ Impacts to water quality of creeks from dog waste
- [Traffic and Parking Impacts](#)
- [Public Safety Impacts related to off leash dog use](#)

Case Planner/Initial Study Preparer: Janice M. ~~Hubbell~~,Hubbell/Michael Berman, Project
Planner/Environmental Analyst

Environmental Analyst: _____
~~Barbara Shelton~~,Michael Berman, Environmental Analyst

Date: ~~November 17, 2000~~September 24, 2002

Exhibits

1. Vicinity Map
2. Douglas Family Preserve Management Units
3. Draft Douglas Family Preserve Management Plan Executive Summary
4. City and Coastal Act Policies applicable to the Douglas Family Preserve Management Plan
5. Potential Location for Fenced Off-Leash Dog Area
6. Phase II Environmental Site Assessment Summary, Woodward-Clyde Consultants, 1996

LIST OF SOURCES USED IN PREPARATION OF THIS INITIAL STUDY

The following sources used in the preparation of this Initial Study are located at the Community Development Department, Planning Division, 630 Garden Street, Santa Barbara and are available for review upon request.

California Environmental Quality Act (CEQA) & CEQA Guidelines

General Plan Circulation Element

General Plan Conservation Element

1995 Housing Element

General Plan Land Use Element

General Plan Noise Element w/appendices

General Plan Map

General Plan Seismic Safety/Safety Element

Geology Assessment for the City of Santa Barbara

Institute of Traffic Engineers Parking Generation Manual

Institute of Traffic Engineers Trip Generation Manual

Local Coastal Plan (Main & Airport)

Master Environmental Assessment

Parking Design Standards

Santa Barbara Municipal Code & City Charter

Special District Map

Uniform Building Code as adopted by City

Zoning Ordinance & Zoning Map

NOP Distribution List

NOP Distribution List

County: Santa Barbara

SCH# 20001

Resources Agency

- Resources Agency
Nadell Gayou
- Dept. of Boating & Waterways
Bill Curry
- California Coastal Commission
Elizabeth A. Fuchs
- Dept. of Conservation
Ken Trot
- Dept. of Forestry & Fire Protection
Allen Robertson
- Office of Historic Preservation
Hans Krutzberg
- Dept. of Parks & Recreation
Debra Gilbert
Resource Mgmt. Division
- Reclamation Board
Pam Bruner
- S.F. Bay Conservation & Dev't. Comm.
Steve McAdam
- Resources Agency
Nadell Gayou
Dept. of Water Resources

Health & Welfare

- Health & Welfare
Wayne Hubbard
Dept. of Health/Drinking Water

Food & Agriculture

- Food & Agriculture
Ted Bell
Dept. of Food and Agriculture

Fish and Game

- Dept. of Fish & Game
Joe Vincenty
Environmental Services Division
- Dept. of Fish & Game
Donald Koch
Region 1
- Dept. of Fish & Game
Banky Curtis
Region 2
- Dept. of Fish & Game
Brian Hunter
Region 3
- Dept. of Fish & Game
William Laudemilk
Region 4
- Dept. of Fish & Game
Sandy Peterson
Region 5, Habitat Conservation Program
- Dept. of Fish & Game
Gabrina Gatchel
Region 6, Habitat Conservation Program
- Dept. of Fish & Game
Tammy Allan
Region 6, Inyo/Mono, Habitat Conservation Program
- Dept. of Fish & Game
DeWayne Johnston
Marine Region

Independent Commissions

- California Energy Commission
Environmental Office
- Native American Heritage Comm.
Debbie Treadway
- Public Utilities Commission
Andrew Barnedale
- State Lands Commission
Betty Silva

- Colorado River Board
Gerald R. Zimmerman
- Tahoe Regional Planning Agency (TRPA)
Lyn Barnett
- Office of Emergency Services
John Rowden, Manager
- Delta Protection Commission
Debby Eddy
- Santa Monica Mountains Conservancy
Paul Edelman

Dept. of Transportation

- Dept. of Transportation
ISR/Planning
District 1
- Dept. of Transportation
Vicki Roe
Local, Development Review,
District 2
- Dept. of Transportation
Jeff Pulverman
District 3
- Dept. of Transportation
Jean Finney
District 4
- Dept. of Transportation
Lawrence Newland
District 5
- Dept. of Transportation
Marc Blimbaum
District 6
- Dept. of Transportation
Stephen J. Buswell
District 7
- Dept. of Transportation
Mike Elm
District 8
- Dept. of Transportation
Caroline Yee for Kate Walton
District 9

- Dept. of Transportation
Chris Sayre
District 10
- Dept. of Transportation
Lou Salazar
District 11
- Dept. of Transportation
Aleen Kennedy
District 12

Business, Trans & Housing

- Housing & Community Development
Cathy Craswell
Housing Policy Division
- Caltrans - Division of Aeronautics
Sandy Hearnard
- California Highway Patrol
Lt. Dennis Smerette
Office of Special Projects
- Dept. of Transportation
Ron Helgeson
Caltrans - Planning
- Dept. of General Services
Robert Steppy
Environmental Services Section

Air Resources Board

- Airport Projects
Rob Rogan
- Transportation Projects
Ann Geraghty
- Industrial Projects
Mike Tollestrup
- California Integrated Waste Management Board
Sue O'Leary
- State Water Resources Control Board
Diane Edwards
Division of Clean Water Programs

- State Water Resources Board
Greg Frantz
Division of Water Quality
- State Water Resources Board
Mike Falkenstein
Division of Water Rights
- Dept. of Toxic Substances & CEQA Tracking Center
- Regional Water Quality Control Board (RWQCB)**
- RWQCB
Cathleen Hudson
North Coast Region (1)
- RWQCB
Environmental Document Coordinator
San Francisco Bay Region (2)
- RWQCB
Central Coast Region (3)
- RWQCB
Jonathan Bishop
Los Angeles Region (4)
- RWQCB
Central Valley Region (5)
- RWQCB
Central Valley Region (5)
Fresno Branch Office
- RWQCB
Central Valley Region (5)
Redding Branch Office
- RWQCB
Lahontan Region (6)
- RWQCB
Lahontan Region (6)
Victorville Branch Office
- RWQCB
Colorado River Basin Region (7)
- RWQCB
Santa Ana Region (8)
- RWQCB
San Diego Region (9)

SCOPING COMMENTS ON DOUGLAS FAMILY PRESERVE AND OFF-LEASH DOG STUDY EIRs

1. Sharon Diriam, December 3, 2000
2. Carol Hack, December 4, 2000
3. Mr. & Mrs. R.T. Tozer, December 4, 2000
4. Richard Teraoka, December 4, 2000
5. Mary Ann Norbom, December 4, 2000
6. Richard Grossgold and Ruth R. Levine, December 5, 2000
7. Walter Knapp, December 6, 2000*
8. Robin Bisio & Tom Bortolazzo, December 7, 2000
9. Walter Knapp, December 7, 2000*
10. Mrs. G. Griffin, December 8, 2000
11. Native American Heritage Commission, December 11, 2000*
12. Dorrie Tames Powell, December 12, 2000*
13. Weston & Therese Porter, December 12, 2000
14. John Housh, December 12, 2000*
15. Lisa Mangione, U.S. Army Corps of Engineers, December 13, 2000*
16. Wendy Hawksworth, December 14, 2000*
17. Dog PAC, SB Position Paper, October 1997, distributed to Planning Commission, December 14, 2000
18. Jack Sanford, December 15, 2000
19. C.J. & Achilles Carnewal, December 18, 2000
20. Tom Hinshaw, December 21, 2000
21. Susan Whalen, December 21, 2000
22. Environmental Defense Center, Brian Trautwein, December 22, 2001*
23. Raveewan Livesley (for Mango), December 25, 2000
24. J.V. & Stephanie Guy-Bray, December 27, 2000
25. Jack Sanford, December 28, 2000*
26. Citizens for Animal Control, December 29, 2000*
27. Lee E. Heller, Ph.D., January 2, 2001*
28. Harold Jacobson, January 2, 2001
29. Fray A. Crease, January 2, 2001
30. Dr. Andrew J. Flanagin (with attached study from USC, prepared for FREEPLAY), January 3, 2001
31. Surfrider Foundation, Keith Zandona, January 3, 2001*
32. Mary & Claude Williams, January 3, 2001
33. Shelley Bookspan, January 3, 2001
34. Keith Lawler, January 3, 2001
35. Teresa Rounds, January 4, 2001
36. Mrs. Carol Kosterka, January 4, 2001
37. Dr. Miriam J. Metzger, January 4, 2001
38. Audrey Austin, January 4, 2001
39. Douglas Family Preserve Advisory Committee, January 5, 2001**
40. Mary W. Oakley, January 5, 2001
41. Lisa Ann Kelly, January 5, 2001
42. Small Wilderness Area Preserves, Maria Gordon, January 6, 2001*
43. Donna and Jerry O'Toole, January 6, 2001

* Includes recommended changes to one or both Initial Studies or additional issues to be considered in the EIRs.

44. Steve Eltinge, January 6, 2001
45. Connie Ferrer, January 6, 2001
46. Dr. Joyce M. Zarling, January 7, 2001
47. Ann Frye, January 7, 2001
48. Dog PAC, SB, January 7, 2001 (without attachments)*
49. Janet Schmidt, January 8, 2001
50. Mary Anne Morrison, January 8, 2001
51. N. Clancy, January 8, 2001
52. William C. Roberts, January 8, 2001
53. Small Wilderness Area Preserves, Maria Gordon, January 8, 2001
54. Kristi Solberg, January 8, 2001
55. Jeff Cope, Assistant Parks and Recreation Director, January 8, 2001

The above comment letters can be viewed at:

Planning Division,
City of Santa Barbara,
630 Garden Street,
Santa Barbara, California 96102