



Final



Environmental Impact Report *for* Station 3 Site Acquisition and Construction

SCH Number: 2011031094



April 6, 2012

Prepared by:
Montecito Fire Protection District
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Santa Barbara, CA 93108

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EXECUTIVE SUMMARY

OVERVIEW

This Environmental Impact Report (EIR) evaluates the proposal by the Montecito Fire Protection District (MFPD) to acquire a 2.55-acre site and to construct the new MFPD Fire Station 3 in the unincorporated community of Montecito in the County of Santa Barbara, California. The proposed project would include development of a main fire station building and two support structures on a newly created 2.55-acre parcel. Supporting infrastructure would include construction of paved driveways, parking and circulation space, and connections to potable water and sewer. The project also includes landscape buffers, a habitat restoration area, and an offer for dedication of an easement to the County to reserve land for a proposed on-road trail.

In 2003, the MFPD Board of Directors identified the need to establish a new fire station to address areas in eastern Montecito that are not adequately covered by existing emergency response services. A Site Identification Study was completed in August 2008 which recommended further review of the proposed project site for the fire station. This EIR considers the potential impacts of the proposed project on environmental resource areas and suggests mitigation and alternatives to avoid or reduce these impacts to a less than significant level.

PROJECT DESCRIPTION

Project Location

The project site is located at 2500 East Valley Road, on the north side of East Valley Road, east of Sheffield Drive and Romero Canyon Road, and west of Ortega Ridge Road (Figure 2-1). The project site is located on a portion of Assessor Parcel Number (APN) 155-070-008 (76.87 acres), which is owned by the Petan Company.

Project Objectives

The proposed project includes the following major objectives:

- (1) Improve overall emergency services and response times to fires and emergencies in Montecito, especially in the community's east end.
- (2) Construct a high-quality fire station with modern equipment and facilities, staffed 24 hours per day, 7 days per week by trained personnel, that is architecturally compatible with the neighborhood and consistent with the Montecito Architectural Guidelines.
- (3) Coordinate throughout the design and environmental review process with concerned neighbors and interested organizations to ensure that the station location and design meet community concerns and standards.
- (4) Site the station to minimize and avoid, as possible, adverse environmental impacts.
- (5) Provide an Essential Public Services Building for the community to provide for resources such as shelter, food, and support of emergency equipment during disasters.

Project Characteristics

The applicant (MFPD) proposes acquisition of property and development of a District fire station (Station 3) on a site of approximately 2.55 acres located near 2500 East Valley Road in Montecito, California. Structures would include a main building containing the apparatus bay, offices and living quarters, and two supporting structures. Infrastructure would include approximately 0.78 acres of non-structural paved surfaces, including two entry/exit driveways to East Valley Road. The western driveway would typically be used only for visitors and staff vehicle ingress and egress, while the eastern driveway would typically be used for staff vehicle and emergency vehicle ingress and egress. Grading would include approximately 16,500 cubic yards (cy) of cut, with 8,000 cy of the cut exported via haul truck to a site determined to be acceptable at the time of construction. The remaining 8,500 cy would be balanced onsite. The project would require approval of a Major Conditional Use Permit and a Parcel Map Waiver, and issuance of a Certificate of Compliance by the County of Santa Barbara.

ALTERNATIVES

Four alternatives, in addition to the standard "No-Project" Alternative, were selected for evaluation. Each of these considers the ability of a particular alternative to substantially reduce or eliminate the project's environmental impacts while still meeting basic project objectives. In particular, this EIR includes the following alternatives:

- *Alternative 1 – Location at Kimball-Griffith #1 Site:* Under this alternative, Station 3 would be constructed on a 2 or more-acre portion of this 20-acre parcel located on the south side of East Valley Road, east of Ortega Ridge Road. This site slopes relatively steeply upwards from East Valley Road with overall slopes averaging 15 to 25 percent. This parcel is currently undeveloped and is characterized by oak woodland vegetation intermixed with areas of chaparral containing mature coast live oak trees and coastal sage scrub. Construction of Station 3 at this site would require substantial grading and vegetation clearing with associated impacts to erosion, downstream sedimentation and onsite native habitats, and aesthetics. Although this site would provide direct access to an arterial, its location at the eastern end of the community would result in longer response times as compared to the proposed project. Overall, developing Station 3 at this site would result in substantially more severe impacts related to geological hazards and biological and aesthetic resources as compared to the proposed project. In addition, response times would incrementally increase when compared to the proposed project site.
- *Alternative 2 – Location at Birnam Wood Site:* This 2.22-acre site is located within the Birnam Wood Golf Club at the corner of Sheffield Drive and East Valley Road. The site slopes gently to the south to an intermittent drainage in the site’s southeast corner. Many large trees, including native oaks and sycamores are located on site. A floodwall along East Valley Road acts as a barrier to sheet flow and sediment transport during extreme rain events. Site acquisition would be costly due to required demolition and relocation of more than 10,000 sf of Birnam Wood Golf Club’s existing maintenance facilities. In addition, this relocation could create unknown potential impacts at the selected new site for these facilities. Access to East Valley Road would require potentially expensive engineering to protect the South Coast Conduit, and address potential flooding issues as reported by the site owner. Project construction would create potentially significant impacts to biological resources through removal of specimen oak trees and damage to onsite and adjacent riparian areas. Mitigation measures required to protect these resources may limit developable area on this site.
- *Alternative 3 – Location at Palmer Jackson West Site:* This 17.58-acre site is located on the north (mountain) side of East Valley Road east of Sheffield Drive and west of Ortega Ridge Road. The site borders to the east a shared driveway that leads to residences. The site where Station 3 might be constructed is mostly level and slopes gently to the south, surrounded by agricultural or undeveloped land. The parcel has extensive frontage along East Valley Road (approximately 400 feet) and is part of Rancho San Carlos. Romero Creek runs north-south immediately adjacent to the western edge of the property. Impacts associated with development of Station 3 on this site are very similar to those identified for

the proposed project. Greater proximity to residences would result in greater impacts from nuisance noise; however, impacts would be still be less than significant and concentrated along the East Valley Road arterial. Inferior line-of-sight to the west as compared to the proposed project could result in greater impacts to transportation; however, this may not be a major issue due to the height of the fire trucks and their resultant vantage point. The lack of screening from trees along the project frontage would increase impacts to aesthetics, but these impacts could be reduced to less than significant. In summary, some impacts would be incrementally greater than for the proposed project.

- *Alternative 4 – Location at Pines Trust Site:* This site is located on East Valley Road east of Romero Canyon Road and Sheffield Drive and west of Ortega Ridge Road. Romero Creek runs along the western edge and Picay Creek runs along the southern boundary of the property. The site currently contains one single-family residence and equestrian facilities. The most significant issues with potential development of Station 3 on this site would be its close proximity to the existing residences on and adjacent to the property, potential line-of-sight safety concerns, and disruption of the site’s existing equestrian uses and facilities. Generally, constraints are similar to those encountered on the proposed project site.
- *No-Project Alternative:* as required by CEQA, this alternative assumes that existing conditions on the subject parcels would continue. Continuation of the existing site conditions (e.g., light agriculture) would generate no impacts to aesthetics and visual resources, agricultural resources, air quality, biological resources, cultural resources, geologic processes, hazardous materials, land use, noise, recreation, transportation and traffic, or water and flooding. However, not constructing a fire station would result in continued exceedance of the 5-minute response time standard in eastern Montecito, resulting in impacts to fire protection.

Alternatives which were considered and discarded included alternative uses, alternative site configurations, and other sites in eastern Montecito.

Environmentally Superior Alternative

The *Proposed Project* was selected as the environmentally superior alternative because it would have no significant unavoidable long-term impacts, and would meet all project objectives.

SUMMARY OF IMPACTS AND MITIGATION MEASURES

Tables ES-1 through ES-4 summarize the environmental impacts associated with the proposed project, proposed mitigation measures, and residual impacts. The impacts are organized by the level of impact (i.e., Class I, Class II, Class III, or Class IV impacts). Class I impacts are defined as significant, unavoidable adverse impacts that require a statement of overriding considerations to be issued per Section 15093 of the Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines) if the project is approved. Class II impacts are significant adverse impacts that can be feasibly mitigated to less-than-significant levels and that require findings to be made under Section 15091 of the CEQA Guidelines. Class III impacts are considered less than significant and do not require mitigation. Class IV impacts are beneficial and do not require mitigation.

Table ES-1. Class I Impacts - Significant, Unavoidable Impacts That May Not Be Fully Mitigated to Less Than Significant Level		
Impacts	Mitigation Measures	Residual Impacts
No Class I Impacts would occur as a result of the proposed project.		

Table ES-2. Class II Impacts - Significant Impacts That Can Be Mitigated to Less Than Significant Levels		
Impacts	Mitigation Measures	Residual Impacts
<p>BIO-2 The proposed project would result in potentially significant (but mitigable) adverse affects to coast live oaks as a result of project grading, detention basin development, and other construction activities causing damage to existing oaks, the removal of three mature oaks, as well as routine trimming of oaks fronting East Valley Road (Class II).</p>	<p>MM BIO-2 The applicant shall implement a Tree Protection and Replacement Plan, including the following tree protection measures to address potential adverse effects on oak trees:</p> <ul style="list-style-type: none"> • A pre-construction meeting should be held with contractors, prior to commencement of work, to discuss tree protection measures. • Chain link or other acceptable fencing shall be installed, to establish tree protection zones (TPZs) at the outside edge of the drip lines or work areas (if drip lines are encroached upon). Fences must be maintained in upright positions throughout the duration of the project. Tree protection fencing shall also remain upright during landscape installation. Oaks in the drainage channel shall be protected with fencing at the buffer zone and at the edge of the road where it bisects the row of trees. • The TPZs shall be void of all activities, including parking vehicles, operation of equipment, storage of materials and dumping (including temporary spoils from excavation). • All excavation and grading near trees shall be monitored by the project arborist with particular attention to construction of the drainage swale in the site's northwestern corner and of the vegetated swale and detention basin on the southern portion of 	<p>After implementation of the identified mitigation measures, impacts would be reduced to less than significant.</p>

Table ES-2. Class II Impacts - Significant Impacts That Can Be Mitigated to Less Than Significant Levels		
Impacts	Mitigation Measures	Residual Impacts
	<p>the site.</p> <ul style="list-style-type: none"> Excavation within the drip lines but outside of the TPZs shall be done by hand where reasonable. Any roots encountered that are 6 inches and greater shall be cleanly cut. Tree pruning, where limbs may conflict with equipment and proposed structures, shall be done prior to excavation and grading. Pruning shall be performed or supervised by a qualified Certified Arborist. The project arborist shall review the goals with workers prior to commencement of any tree pruning. Tree workers shall be knowledgeable of American National Standards Institute (ANSI) A-300 Pruning Standards and ISA Best Management Practices for Tree Pruning. Results of the soil analysis shall be reviewed and soil shall be treated if necessary, or additional diagnostic protocol shall be performed on stressed trees and treated accordingly. Trees that are impacted from root damage (even minimally) shall be sprayed in the early spring and late summer with permethrin (Astro) to help resist attack of oak bark beetles. The application of the chemical shall be applied to the lower 6 inches of trunk. Treatments shall be repeated for at least two years after completion of the project or if drought prevails for longer periods. <u>All application</u> 	

Table ES-2. Class II Impacts - Significant Impacts That Can Be Mitigated to Less Than Significant Levels		
Impacts	Mitigation Measures	Residual Impacts
	<p><u>of permethrin shall be approved by the County Agricultural Commissioner's Office and, if applicable, by the state Department of Pesticide Regulation to avoid secondary impacts to aquatic species; spraying of oaks along the bank of the drainage shall not be permitted unless it includes best management practices or mitigation measures specifically pre-approved by the County Agricultural Commissioner's Office.</u></p> <ul style="list-style-type: none"> • If determined necessary by the project arborist, supplemental irrigation shall be used to aid trees that incur root loss and/or during hot and dry periods. • Removal of oaks shall be mitigated by planting at a ratio of 10 to 1 with 1-gallon saplings along the drainage channel, or at a ratio of 3 to 1 with 15-gallon oaks in landscaped areas. • The project arborist shall monitor activities on the site throughout the duration of the project. This shall be more frequent during fencing installation, excavation and grading, and less frequent as the project progresses, provided fences remain upright and TPZs are not violated. • All in-channel energy dissipaters shall minimize or void the use of grouting. • Final engineering design of and landscaping within the proposed detention basin and vegetated swale on the southern portion of the site shall account for the location of these two facilities partially 	

Table ES-2. Class II Impacts - Significant Impacts That Can Be Mitigated to Less Than Significant Levels		
Impacts	Mitigation Measures	Residual Impacts
	within the drip lines of oak trees. Final design of these drainage features shall be subject to review by the project arborist to ensure that that their construction minimizes oak tree root damage and changes in soil moisture and drainage which may damage these oaks over the long-term.	
3.7 GEOLOGIC PROCESSES		
GEO-2 The proposed project would expose people or structures to potentially significant (but mitigable) adverse effects as a result of project development on soil that is unstable or that could become unstable as a result of the project, and potentially result in expansion, differential settlement, or collapse (Class II).	MM GEO-2 Soils engineering design recommendations addressing expansive soils and differential settlement in the site-specific geotechnical evaluation report shall be incorporated into the project design in accordance with applicable sections of the California Building Code and County of Santa Barbara Building Code.	After implementation of the identified mitigation measures, impacts would be reduced to less than significant.
3.11 WATER RESOURCES, SUPPLY, AND SERVICE		
WAT-3 The proposed project would result in potentially significant (but mitigable) long-term increases in runoff to site drainages and watersheds due to increase in impervious surfaces, including buildings, aprons, and driveways (Class II).	MM WAT-3 The on-site detention basin shall be designed such that the post-developed peak discharge rate to off-site drainages shall not exceed the pre-developed peak discharge rate for the 2-year through 100-year storm events.	After implementation of the identified mitigation measures, impacts would be reduced to less than significant.

Table ES-3. Class III Impacts – Impacts That Are Adverse But Less Than Significant		
Impacts	Mitigation Measures	Residual Impacts
3.1 AESTHETICS AND VISUAL RESOURCES		
VIS-1 The proposed project would result in adverse, but less than significant impacts to views from East Valley Road (Class III).	No mitigation measures would be required.	Impacts would be less than significant.
VIS-2 The proposed project would result in an adverse, but less than significant impact on views from elevated vistas, including Ortega Ridge Road and nearby foothills (Class III).	No mitigation measures would be required.	Impacts would be less than significant.
3.2 AGRICULTURAL RESOURCES		
AG-1 Construction of the proposed project would result in a less than significant increase in urban-rural agricultural land conflicts (Class III).	No mitigation measures would be required.	Impacts would be less than significant.
3.3 AIR QUALITY		
AQ-1 The proposed project would result in generation of adverse, but less than significant long-term operational emissions or air quality impacts to the inhabitants of the proposed fire station (Class III).	No mitigation measures would be required.	Impacts would be less than significant.
AQ-2 The proposed project would result in adverse, but less than significant short-term construction-related air quality impacts, such as dust from grading and air pollution emissions from construction vehicles and stationary construction equipment (Class III).	No mitigation measures would be required; however, the following standard regulatory conditions would apply: MM AQ-2a The measures listed should be implemented to minimize fugitive dust emissions. These measures represent standard County conditions of approval for a project and would likely be required by the County as part of permit approval process. • During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent	With incorporation of standard regulatory conditions, impacts would be reduced to less than significant.

Table ES-3. Class III Impacts – Impacts That Are Adverse But Less Than Significant		
Impacts	Mitigation Measures	Residual Impacts
	<p>dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.</p> <ul style="list-style-type: none"> • Minimize amount of disturbed area and reduce on site vehicle speeds to 15 miles per hour or less. • If importation, exportation and stockpiling of fill material is involved, soil stockpiled for more than two days should be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site should be tarped from the point of origin. • Gravel pads must be installed at all access points to prevent tracking of mud on to public roads. • After clearing, grading, earth moving or excavation is completed, treat the disturbed area by watering, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur. • The contractor or builder should designate a person or persons to monitor the dust control program and to order increased 	

Table ES-3. Class III Impacts – Impacts That Are Adverse But Less Than Significant		
Impacts	Mitigation Measures	Residual Impacts
	watering, as necessary, to prevent transport of dust offsite. Their duties should include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons should be provided to the Air Pollution Control District prior to land use clearance for map recordation and land use clearance for finish grading for the structure.	
AQ-3 The proposed project would be consistent with the 2010 Clean Air Plan (Class III).	No mitigation measures would be required.	Impacts would be less than significant.
3.4 BIOLOGICAL RESOURCES		
BIO-1 The proposed project would result in adverse, but less than significant impacts from the removal of approximately 2.5 acres of lemon orchard and associated loss of habitat (Class III).	No mitigation measures would be required.	Impacts would be less than significant.
3.5 CULTURAL RESOURCES		
CR-1 Construction of fire station, pavements, buffers, and associated infrastructure would result in less than significant impacts to cultural resources (Class III).	No mitigation measures would be required.	Impacts would be less than significant.
3.7 GEOLOGIC PROCESSES		
GEO-1 The proposed project would expose people or structures to adverse, but less than significant effects from seismicity or seismically induced hazards including earthquakes, seismic shaking, surface rupture landslides, or liquefaction (Class III).	No mitigation measures would be required.	After incorporation of proper engineering measures in accordance with existing regulations, some risk of personal injury or structural damage will remain (GEO-1). These are consistent with the risks seen throughout California and other seismically active areas and are unavoidable.
GEO-3 The proposed project would result in adverse, but less than significant impacts from soil erosion or the loss of topsoil during construction and excavation activities (Class III).	No mitigation measures would be required; however, the following standard regulatory conditions would apply: MM GEO-3 Grading and erosion and	With incorporation of standard regulatory conditions, impacts would be reduced to less than significant.

Table ES-3. Class III Impacts – Impacts That Are Adverse But Less Than Significant		
Impacts	Mitigation Measures	Residual Impacts
	<p>sediment control plans, including the measures listed below, would be required to be designed to minimize erosion. These measures represent standard County conditions of approval for a project and would likely be required by the County as part of permit approval process.</p> <ol style="list-style-type: none"> 1. Except for approved access roads, drives and trails, grading would be prohibited within 50 feet of the top of bank of the intermittent drainage along the western boundary of the project site. The protected areas would be required to be designated with orange construction fencing or other barrier to prevent entry by equipment or personnel. 2. The applicant would be required to limit excavation and grading to the dry season of the year (i.e., April 15 to November 1) unless a Building and Safety-approved erosion and sediment control plan is in place and all measures therein are in effect. All exposed graded surfaces would be required to be reseeded with ground cover vegetation to minimize erosion. 3. Methods such as geotextile fabrics, erosion control blankets, retention basins, drainage diversion structures, siltation basins and spot grading would be required to reduce erosion and siltation into adjacent water bodies or storm drains during grading and construction activities. 4. Any sediment or other materials tracked offsite would be required to be removed the same day as they are tracked using dry 	

Table ES-3. Class III Impacts – Impacts That Are Adverse But Less Than Significant		
Impacts	Mitigation Measures	Residual Impacts
	<p>cleaning methods.</p> <p>5. Storm drain inlets would be required to be protected from sediment-laden waters by the use of inlet protection devices such as gravel bag barriers, filter fabric fences, block and gravel filters, and excavated inlet sediment traps.</p> <p>6. Grading on slopes steeper than 5:1 would be required to be designed to minimize surface water runoff.</p> <p>7. Temporary storage of construction equipment would be limited to a 50 by 50-foot area located along existing paved or dirt road on the property; equipment storage sites shall be located at least 100 feet from any water bodies.</p>	
3.8 LAND USE		
LU-1 The proposed project would introduce a conditionally permitted fire station providing emergency-related services into a semi-rural, residential zone district with predominantly low density estate residential and agricultural land uses (Class III).	No mitigation measures would be required.	Impacts would be less than significant.
3.9 NOISE		
NO-1 Short-term construction activities would generate adverse, but less than significant noise levels for noise-sensitive receptors (Class III).	No mitigation measures would be required.	Impacts would be less than significant.
NO-2 Long-term noise impacts associated with the project would incrementally increase the frequency of very short duration peak nuisance noise occurrences for area residents, but would not result in the exceedance of established County noise thresholds (Class III).	No mitigation measures would be required.	Impacts would be less than significant.

Table ES-3. Class III Impacts – Impacts That Are Adverse But Less Than Significant		
Impacts	Mitigation Measures	Residual Impacts
3.10 TRANSPORTATION AND TRAFFIC		
TT-1 The proposed project would result in adverse, but less than significant impacts associated with short-term construction-related increases in traffic volumes (Class III).	No mitigation measures would be required.	Impacts would be less than significant.
TT-2 The proposed project would result in adverse, but less than significant impacts associated with long-term increases in traffic volumes (Class III).	No mitigation measures would be required.	Impacts would be less than significant.
TT-3 The proposed project would create adverse, but less than significant access impacts at the new East Valley Road/project driveway intersections (Class III).	No mitigation measures would be required.	Impacts would be less than significant.
TT-4 The proposed project would result in less than significant impacts to a Congestion Management Program (CMP) roadway (Class III).	No mitigation measures would be required.	Impacts would be less than significant.
3.11 WATER RESOURCES, SUPPLY, AND SERVICE		
WAT-1 The proposed project would result in adverse, but less than significant, short-term impacts to surface water quality due to potential erosion, runoff, and sedimentation during construction activities (Class III).	No mitigation measures would be required; however, the following standard regulatory conditions would apply: MM WAT-1 Prior to issuance of any construction/grading permit and/or the commencement of any clearing, grading, or excavation, a Notice of Intent (NOI) would be required to be submitted to the State Water Resources Control Board Storm Water Permit Unit. Compliance with the General Permit includes the preparation of a Storm Water Pollution Prevention Plan (SWPPP), which is required to identify potential pollutant sources that may affect the quality of discharges to	With incorporation of standard regulatory conditions, impacts would be reduced to less than significant.

Table ES-3. Class III Impacts – Impacts That Are Adverse But Less Than Significant		
Impacts	Mitigation Measures	Residual Impacts
	storm water, and includes design and placement of Best Management Practices (BMPs) to effectively prohibit the entry of pollutants from the project site into area water bodies during construction. This measure represents a standard County condition of approval for a project and would likely be required by the County as part of permit approval process.	
WAT-2 The proposed project would result in adverse, but less than significant long-term impacts to surface water quality due to polluted runoff during long-term operational activities (Class III).	No mitigation measures would be required; however, the following standard regulatory conditions would apply: MM WAT-2 The applicant would be required to <u>apply for and be consistent with</u> procure a <u>all</u> National Pollution Discharge Elimination System (NPDES) permits <u>that apply, which could include Construction and Municipal General Permits.</u> These permits <u>would be</u> that adheres <u>consistent</u> with all requirements of the federal Clean Water Act.	With incorporation of standard regulatory conditions, impacts would be reduced to less than significant.

Table ES-4. Class IV Impacts – Beneficial and Do Not Require Mitigation		
Impacts	Mitigation Measures	Residual Impacts
3.4 BIOLOGICAL RESOURCES		
BIO-3 The proposed project would result in the protection and improvement of habitats associated with the adjacent intermittent drainage channel (Class IV).	No mitigation measures would be required.	Impacts would be beneficial.
3.6 FIRE PROTECTION		
FP-1 The proposed project would result in a beneficial impact to fire protection service in the eastern Montecito area (Class IV).	No mitigation measures would be required.	Impacts would be beneficial.
3.11 WATER RESOURCES, SUPPLY, AND SERVICE		
WAT-4 The proposed project would result in a reduction of long-term water demand for this 2.55-acre site which may result in beneficial impacts to water supplies as a result of replacing water-intensive agricultural use with low water uses including a fire station and drought-tolerant landscaping (Class IV).	No mitigation measures would be required.	Impacts would be beneficial.

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LIST OF ACRONYMS AND ABBREVIATIONS

AB	Assembly Bill
ADT	average daily trips
AFY	acre-feet per year
APCD	Air Pollution Control District
APN	Assessor's Parcel Number
ATE	Associated Transportation Engineers
BACT	Best Available Control Technology
BMP	Best Management Practice
BOS	Board of Supervisors
B.P.	Before Present
CAA	Clean Air Act
CAAQS	California Ambient Air Quality Standards
CALEMA	California Emergency Management Agency
Cal FIRE	California Department of Forestry and Fire Protection
Caltrans	California Department of Transportation
CAP	Clean Air Plan
CARB	California Air Resources Board
CBC	California Building Code
CC	Certificate of Compliance
CCAA	California Clean Air Act
CCIC	Central Coastal Information Center
CCR	California Code of Regulations
CDFG	California Department of Fish and Game
CEQA	California Environmental Quality Act
CFC	Chlorofluorocarbon
CFR	Code of Federal Regulations
CH ₄	Methane
CMP	Congestion Management Program
CNDDDB	California Natural Diversity Database
CNEL	Community Noise Equivalent Level
CNPS	California Native Plant Society
CO	carbon monoxide
CO ₂	carbon dioxide
CRHR	California Register of Historical Resources
CUP	Conditional Use Permit
CWA	Clean Water Act
cy	cubic yards
dB	decibel
dba	decibels on the "A" weighted frequency scale
DBH	diameter at breast height
DEIR	Draft Environmental Impact Report
DPR	Department of Pesticide Regulation
EIR	Environmental Impact Report
ERME	Environmental Resource Management

ESA	Endangered Species Act
ESH	Environmentally Sensitive Habitat
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FRA	Federal Responsibility Area
ft	feet
GC	Government Code
GHG	greenhouse gas
HCFC	Hydrochlorofluorocarbon
HCM	Highway Capacity Manual
HDM	Highway Design Manual
HSC	Health and Safety Code
IPCC	Intergovernmental Panel on Climate Change
KVL	Key Viewing Location
LAFCO	Local Agency Formation Commission
L _{dn}	Day-Night Average Noise Level
L _{eq}	Equivalent Noise Level
L _{eq} (24h)	Equivalent Noise Level 24 hours
L _{eq} (h)	Equivalent Noise Level one hour
LID	Low Impact Development
LOS	Level of Service
LUDP	Land Use Development Permit
MBAR	Montecito Board of Architectural Review
MCP	Montecito Community Plan
MFPD	Montecito Fire Protection District
MGMO	Montecito Growth Management Ordinance
MLUDC	Montecito Land Use Development Code
mph	miles per hour
MTD	Metropolitan Transit District
MWD	Montecito Water District
NAAQS	National Ambient Air Quality Standards
NAHC	Native American Heritage Commission
NEPA	National Environmental Policy Act
NFPA	National Fire Protection Association
NHPA	National Historic Preservation Act
N ₂ O	Nitrous Oxide
NO ₂	nitrogen dioxide
NOI	Notice of Intent
NOP	Notice of Preparation
NPDES	National Pollutant Discharge Elimination System
NRCS	National Resources Conservation Service
O ₃	ozone
OPR	Office of Planning and Research
P&D	County of Santa Barbara Planning and Development Department
Pb	lead
PM ₁₀	particulate matter equal to or less than 10 microns in diameter

LIST OF ACRONYMS AND ABBREVIATIONS

PM _{2.5}	particulate matter equal to or less than 2.5 microns in diameter
ppm	parts per million
PRT	Parks Recreation & Trails
ROG	Reactive Organic Compound
RSU	Residential Second Unit
RWQCB	Regional Water Quality Control Board
SB	Senate Bill
SBCAG	Santa Barbara County Association of Governments
SBCAPCD	Santa Barbara County Air Pollution Control District
SBFD	City of Santa Barbara Fire Department
SEIR	Supplemental Environmental Impact Report
sf	square feet
SFD	Single family dwelling
SO ₂	sulfur dioxide
SR	State Route
SRA	State Responsibility Area
SRR	Semi-Rural Residential
SWMP	Storm Water Management Program
SWPPP	Storm Water Pollution Prevention Plan
SWRCB	State of California Water Resources Control Board
TDS	Total Dissolved Solids
TPM	tentative parcel map
TPZ	Tree Protection Zone
TRB	Transportation Research Board
UBC	Universal Building Code
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish and Wildlife Service
USGBC	U.S. Green Building Council
USGS	U.S. Geological Survey
µg/m ³	micrograms per cubic meter

1.0 INTRODUCTION

1.1 PROJECT OVERVIEW

This Environmental Impact Report (EIR) evaluates the proposal by the Montecito Fire Protection District (MFPD) to acquire a 2.55-acre site and to construct the new MFPD Fire Station 3 in the unincorporated community of Montecito in the County of Santa Barbara, California. The proposed project would include development of a main fire station building and two support structures on a newly created 2.55-acre parcel. Supporting infrastructure would include construction of paved driveways, parking and circulation space, and connections to potable water and sewer. The project also includes landscape buffers and a habitat restoration area.

The project site is located in eastern Montecito at approximately 2500 East Valley Road, on the north side of East Valley Road, east of Sheffield Drive and Romero Canyon Road, and west of Ortega Ridge Road (Figure 1-1). The project site is a portion of Assessor Parcel Number (APN) 155-070-008 (76.87 acres), which is owned by the Petan Company, represented by Mr. Palmer Jackson. The site is surrounded by agricultural, equestrian, and rural residential uses.

1.2 PROJECT OBJECTIVES

The proposed project includes the following major objectives:

- (1) Improve overall emergency services and response times to fires and emergencies in Montecito, especially in the community's east end.
- (2) Construct a high-quality fire station with modern equipment and facilities, staffed 24 hours per day, 7 days per week by trained personnel, that is architecturally compatible with the neighborhood and consistent with the Montecito Architectural Guidelines.
- (3) Coordinate throughout the design and environmental review process with concerned neighbors and interested organizations to ensure that the station location and design meet community concerns and standards.
- (4) Site the station to minimize and avoid, as possible, adverse environmental impacts.
- (5) Provide an Essential Public Services Building for the community to provide for resources such as shelter, food, and support of emergency equipment during disasters.

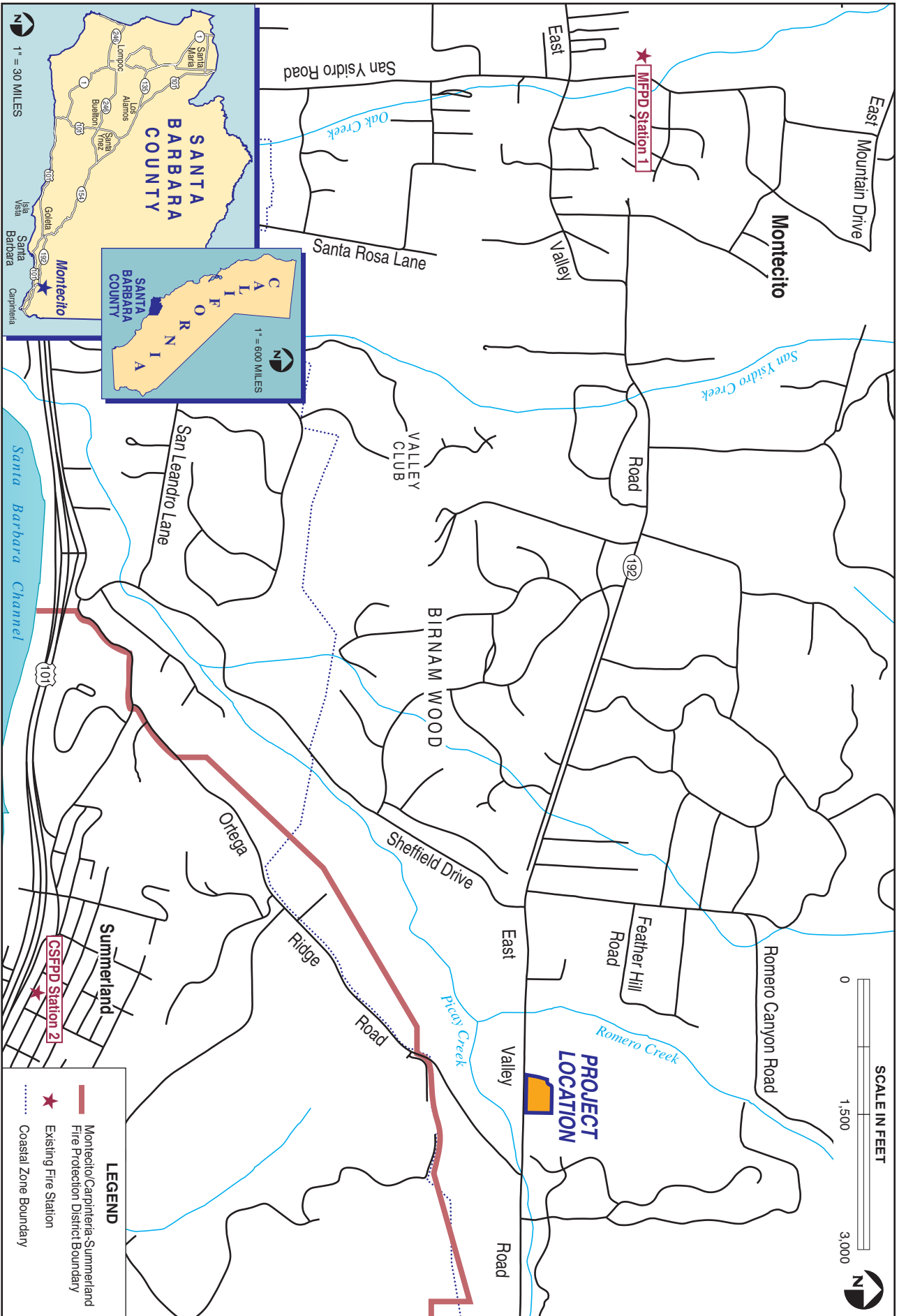


Figure 1-1. Project Location

1.3 PURPOSE AND LEGAL AUTHORITY

This EIR was prepared in accordance with the Guidelines for Implementation of the California Environmental Quality Act of 1970 (CEQA Guidelines) (Title 14, California Code of Regulations 15000 et. seq.), as amended (July 27, 2007). Per Section 21067 of the California Environmental Quality Act (CEQA) and Sections 15367 and 15050 through 15053 of the CEQA Guidelines, the MFPD is the Lead Agency under whose authority this document has been prepared. This EIR is intended to provide information to public agencies, decision-makers, and the public regarding the environmental impacts that would result from implementation of the proposed project. Under the provisions of CEQA, “The purpose of an environmental impact report is to identify the significant effects on the environment of a project, to identify alternatives to the project, and to indicate the manner in which those significant effects can be mitigated or avoided” (Public Resources Code 21002.1(a)).

Consistent with the direction provided under Section 15152 (d) of the State CEQA Guidelines (Tiering), this EIR also tiers off of and builds upon the findings of the County of Santa Barbara’s 1992 Montecito Community Plan EIR and 2010 Montecito Growth Management Plan EIR. In addition, consistent with the direction of Section 15150 of the State CEQA Guidelines (Incorporation by Reference), the Station 3 Site Identification Study is hereby Incorporated by Reference. This study is available for review at the MFPD Station 2 located at 595 San Ysidro Road in Montecito. It is also available on the MFPD website at http://www.montecitofire.com/Station_3_Site_Study.htm.

The environmental review process was established to enable public agencies to evaluate a project in terms of its environmental consequences, to examine and implement methods of eliminating or reducing any potentially adverse impacts, and to consider alternatives to the project. While Section 150201(a) of the CEQA Guidelines requires that major consideration be given to avoiding environmental damage, the Lead Agency and other responsible public agencies must balance adverse environmental effects against other public objectives, including social and economic goals, in determining whether and in what manner a project should be approved.

1.4 PUBLIC REVIEW AND COMMENTS

To define the scope of the EIR, the MFPD provided the public an opportunity to comment on the Initial Study (MFPD 2011) at a meeting on April, 21 2011. Six members of the public attended the scoping meeting, of which five testified. This Initial Study was distributed with the Notice of Preparation (NOP) to Federal, State, County, and City agencies, and local libraries with a comment period that ran from March 29 to April 27, 2011. Notice of the EIR scoping meeting and availability of the Initial Study was published in local newspapers (Santa Barbara News-Press and Montecito Journal), sent to various local agencies, special interest groups, and owners of properties in the vicinity (within approximately 1,000 feet) of the project site. The purpose of the meeting and notifications was to identify public and agency concerns regarding potential impacts of the proposed project. The MFPD received five letters of comment on the NOP (see Appendix C). The Initial Study and the resulting comments helped form the scope of this EIR and initial responses to those comments are included in Appendix C and the issues raised are addressed as appropriate throughout this EIR.

After the circulation of the NOP, the MFPD met several times with the Montecito Land Use Committee to discuss ways in which the project could be made most compatible with the surrounding land uses. The conceptual design for Station 3 was changed in response to these meetings to restrict normal usage of the western driveway to non-emergency vehicles, and change the site layout and building design.

The Draft EIR public comment period ran from December 20, 2011 to February 6, 2012 and a public hearing was held before the MFPD Board of Directors on January 17, 2012 to receive public comments on the Draft EIR. The Recirculated Draft EIR was noticed and made available for public review from February 7 through March 9, 2012, in accordance with CEQA §15087. Notice of the public hearings was published in local newspapers and sent to various local agencies, special interest groups, and owners of properties in the vicinity of the project site. Comments received at the public hearings, as well as written comments received during the public review period, are addressed in Section 7 of the Final EIR and text edits made where applicable.

1.5 PROJECT APPLICANT AND PROJECT DESIGNERS

1 Applicant:

2 Montecito Fire Protection District
 3 c/o Chief Kevin Wallace
 4 595 San Ysidro Road
 5 Santa Barbara, CA 93108

6 Applicant's Agent:

7 Price, Postel & Parma LLP
 8 c/o Mark Manion
 9 200 East Carrillo Street, Suite 400
 10 Santa Barbara, CA 93101

11 Environmental Consultant:

12 AMEC Earth & Environmental, Inc.
 13 c/o Dan Gira
 14 104 W. Anapamu Street, Suite 204A
 15 Santa Barbara, CA 93101

16 Engineer:

17 Penfield and Smith
 18 c/o Steve Wang
 19 111 East Victoria Avenue
 20 Santa Barbara, CA 93101
 21

22 Architects:

23 Leach Mounce Architects
 24 c/o Howard Leach, AIA, CSI
 25 1885 Knoll Drive
 26 Ventura, CA 93003
 27
 28 Thompson Naylor Architects, Inc.
 29 c/o Susette Naylor
 30 900 Philinda Ave.
 31 Santa Barbara, CA 93103

32 1.6 SCOPE OF THE EIR

33 This EIR assesses the potential impact of development of a fire station consisting of three
 34 structures on a 2.55-acre parcel, including associated infrastructure, paving, and creation
 35 of landscape and habitat restoration buffers. The proposed project's potential impacts
 36 were determined through a process mandated by CEQA in which existing conditions are
 37 compared and contrasted with conditions that will exist once the project is implemented.
 38 The significance of each identified impact was determined using the Santa Barbara
 39 County Environmental Thresholds and Guidelines Manual (Santa Barbara County 2008)
 40 and other thresholds assigned to certain resources by local, State, and federal resource
 41 agencies (e.g., California Department of Fish and Game [CDFG], U.S. Army Corps of
 42 Engineers [USACE], and U.S. Fish and Wildlife Service [USFWS]). The following
 43 categories are used for classifying proposed project-related impacts:

- 44 • *Class I:* Significant adverse impacts that cannot be feasibly mitigated or avoided.
 45 If the project is approved, decision-makers are required to adopt a statement of
 46 overriding considerations, pursuant to CEQA Section 21081 and CEQA
 47 Guideline section 15093, which set forth specific economic, legal, social,
 48 technological, or other benefits of the project that outweigh the unavoidable
 49 adverse environmental effects.

- 1 • *Class II*: Significant adverse impacts that can be feasibly mitigated or avoided. If
2 the project is approved, decision-makers are required to make findings pursuant to
3 CEQA section 21081 and CEQA Guideline section 15091 that changes or
4 alterations have been required in, or incorporated into, the project that avoid or
5 substantially lessen the significant environmental effect, or that such changes or
6 alterations are within the responsibility and jurisdiction of another public agency
7 and not the MFPD and that such changes have or can and should be adopted by
8 such other agency, or that specific economic, legal, social, technological, or other
9 considerations make infeasible the mitigation measures or project alternatives
10 identified in the Final EIR.
- 11 • *Class III*: Adverse impacts that are less than significant. These impacts do not
12 require that CEQA findings be made.
- 13 • *Class IV*: Beneficial impacts. A beneficial impact would result in the
14 improvement of an existing physical condition in the environment (no mitigation
15 required).

16 For each adverse impact identified, mitigation measures are presented where feasible to
17 reduce the impacts to acceptable levels. In those instances where mitigation measures
18 cannot reduce adverse impacts to insignificant levels, the impacts are categorized as
19 *Class I* Impacts. The EIR also presents alternatives to the project, including “No
20 Action,” and a qualitative assessment of the impacts that are associated with these
21 alternatives. Finally, cumulative projects are discussed in Section 2.6 of the EIR, with
22 cumulative impacts analyzed in each resource section. Cumulative project analyses
23 represent a comprehensive assessment of potential impacts on resources using a list of
24 past, present, and probable future projects producing related or cumulative impacts.

25 **1.7 AREAS OF KNOWN PUBLIC CONTROVERSY**

26 Based on results of public meetings and responses to the NOP and proposed EIR Scoping
27 Document, the following issues are thought to be of potential concern and may be
28 controversial (each issue is further discussed in the EIR) and include potential:

- 29 • increased traffic and potential traffic hazards on East Valley Road;
- 30 • nuisance noise for vicinity residents;
- 31 • growth-inducing impacts associated with improving public facilities in the area;
32 and
- 33 • economic concerns regarding potential effects on property values.

1 1.8 ORGANIZATION OF THE EIR

2 This EIR is organized into ten sections. Section 1.0, *Introduction*, summarizes the
3 background of the proposed project and explains the environmental review process. A
4 detailed description of the proposed project is provided in Section 2.0, *Project Overview*.
5 In addition, *Cumulative Projects*, describing the impact of the project as it relates to other
6 pending and proposed development in Montecito and area resources are also included at
7 the end of Section 2.0. Existing environmental conditions, specific project impacts,
8 mitigation measures, and residual impacts are detailed in Section 3.0, *Environmental*
9 *Impact Analysis and Mitigation Measures*. Section 4.0, *Consistency with Plans and*
10 *Policies*, summarizes any inconsistencies between the proposed project and applicable
11 County adopted plans and policies. Section 5.0, *Other CEQA Sections*, identifies
12 significant and irreversible, growth-inducing, and unavoidable effects. Section 6.0,
13 *Alternatives*, describes alternatives to the proposed project site and design, and identifies
14 the *Environmentally Superior Alternative*. Comments and responses to comments on the
15 Draft EIR and Recirculated Draft EIR are provided in Section 7.0. The Mitigation and
16 Monitoring Program is presented in Section 8.0. Section 9.0, *List of Preparers*, identifies
17 the EIR project team. Documents and interviews used as a basis of information for
18 preparing the EIR are identified in Section 10.0, *References and Persons or*
19 *Organizations Contacted*. The appendices to the EIR include the NOP, responses to the
20 NOP, and supporting technical studies.

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2.0 PROJECT OVERVIEW

2.1 INTRODUCTION

The applicant (Montecito Fire Protection District [MFPD]) proposes acquisition of property and development of a District fire station (Station 3) on a site of approximately 2.55 acres located near 2500 East Valley Road in Montecito, California. Structures would include a main building containing the apparatus bay, offices and living quarters, and two supporting structures. Infrastructure would include construction of approximately 0.78 acres of non-structural paved surfaces, including two entry/exit driveways to East Valley Road. Because the site slopes to the southwest at approximately a 7 percent grade, the site would require grading to establish level areas for building pads and paved surfaces. This would include approximately 16,500 cubic yards (cy) of cut, with up to 8,000 cy exported via dump truck to a site determined to be acceptable at the time of construction. The project would require approval of a Major Conditional Use Permit and a Parcel Map Waiver, and issuance of a Certificate of Compliance by the County of Santa Barbara.

2.2 PROJECT LOCATION AND OWNERSHIP

The project site is located at 2500 East Valley Road, on the north side of East Valley Road, east of Sheffield Drive and Romero Canyon Road, and west of Ortega Ridge Road (Figure 2-1). The project site is located on a portion of Assessor Parcel Number (APN) 155-070-008 (76.87 acres), which is owned by the Petan Company.

2.3 EXISTING SETTING

2.3.1 Regional and Project Vicinity

The project site is located in the semi-rural eastern end of the community of Montecito, an area generally characterized by some of the larger tracts of undeveloped land remaining in the community. Larger parcels, existing orchards, and extensive tracts of oak woodland and chaparral contribute to the area's semi-rural character, along with the wooded riparian corridors of Romero Creek to the west and Picay Creek to the south and east. Although the site and immediately surrounding parcels are gently sloping, the steep

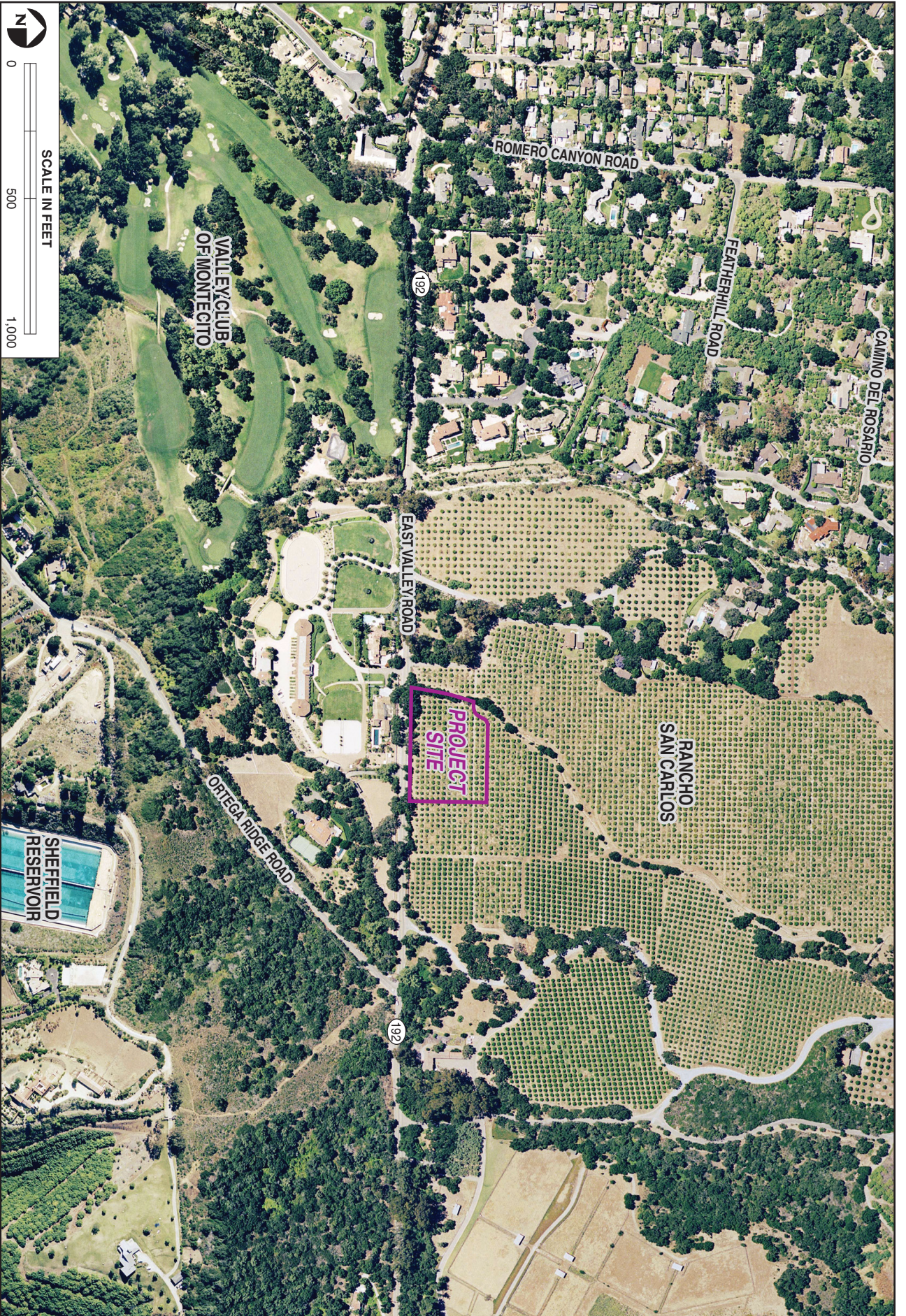
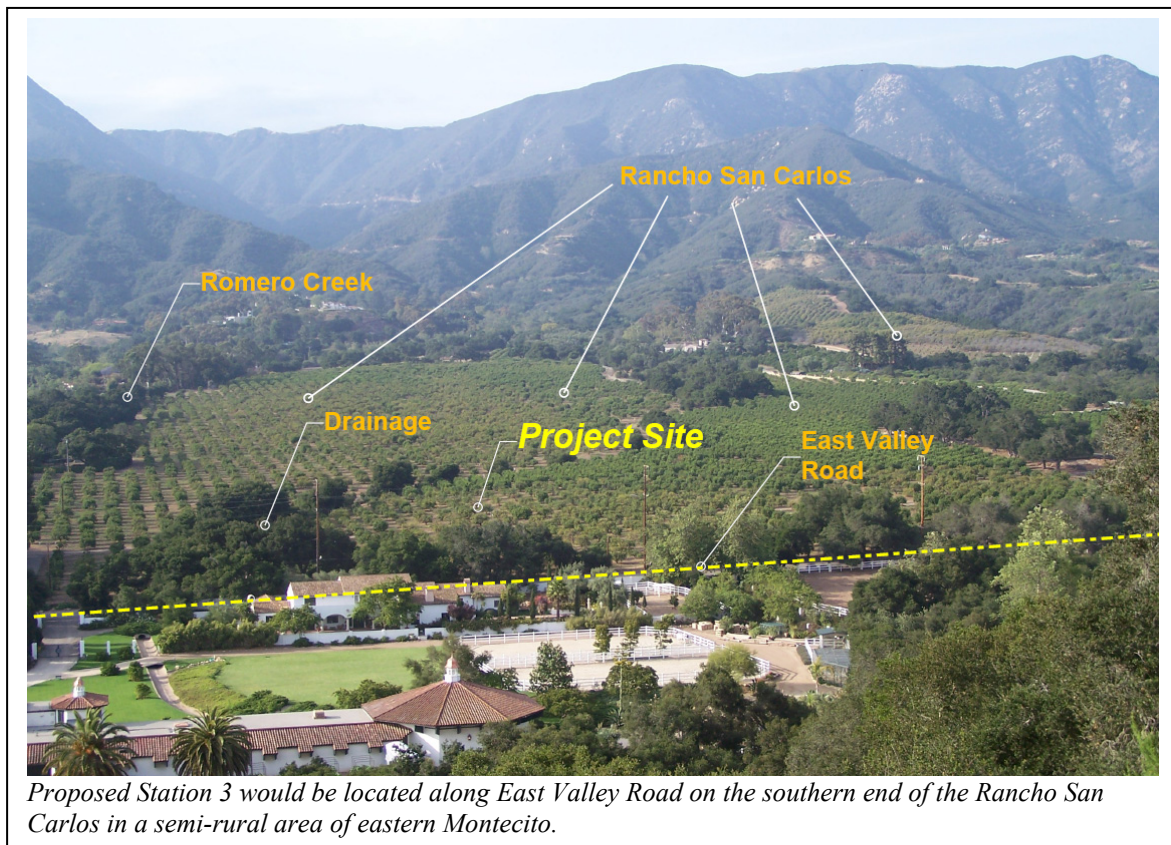


Figure 2-1. Site Boundaries and Vicinity

wooded slopes of Ortega Ridge are located south and southeast of the site and the foothills of the Santa Ynez Mountains begin to rise steeply within approximately ½-mile to the north. The area's semi-rural character is also reflected in the area's land use and zoning designations, which generally allow for parcels ranging from 2 to 20 acres in size.

Surrounding the site to the north, west, and east are parcels currently used for lemon and avocado orchards on the 235-acre Rancho San Carlos. Several residences are located within 1,000 feet to the north of the site on Rancho San Carlos, as well as on the adjacent Featherhill Ranch. South of the site, across East Valley Road are three existing estate residences and a large equestrian facility, including stables, barns and paddocks and an apartment, with one of these residences directly across East Valley Road opposite the site. The Valley Club of Montecito golf course is located approximately 500 feet southwest of the site. Approximately 100 feet west of the site is an undeveloped parcel owned by the Archdiocese of Los Angeles. The nearest residential neighborhood proximate to the site consists of eight estate homes off Stonehouse Lane, approximately 600 feet west of the site. Farther west are homes on smaller lots along Romero Canyon Road and off Orchard Avenue and Tabor Lane.



2.0 PROJECT OVERVIEW

The 2.55-acre project site is currently a part of the 76.87-acre APN 155-070-008, a portion of the larger 235-acre Rancho San Carlos. The majority of this 76.87-acre parcel is cultivated in lemon orchards. However, areas of oak forest or woodlands occur along an intermittent drainage which traverses this parcel from north to south, as well as on the parcel's southeastern corners along the main driveway entrance to Rancho San Carlos. This parcel also supports four or more scattered smaller homes. The Land Use and Zoning Designations for most of this parcel are 2-E-1 (Estate Residential, minimum 2 acre parcel size), while the northern end is designated as 3-E-1 (Estate Residential, minimum 3 acre parcel size).



An oak-lined intermittent drainage abuts the site's western boundary.

The Montecito Community Plan (MCP) identifies State Highway 192, or East Valley Road, as a Circulation Element Primary Road through most of the planning area, but as a Secondary Road west of Sheffield Drive and along the site frontage. This road classification typically fronts residences at medium to lower densities. Traffic volumes on East Valley Road, at approximately 2,600 average daily trips (ADT), are well below the acceptable roadway capacity of 5,530 ADT. East Valley Road is not a designated Scenic Highway, and there is no view corridor overlay associated with the section of the highway fronted by the proposed project.

2.3.2 Project Site

The proposed 2.55-acre site is relatively level, is at an elevation of approximately 325 feet above mean sea level, and slopes gently to the south at approximately 7% (Campbell Geo, Inc. 2011). The proposed new parcel's approximate dimensions would be 420 feet east-west along East Valley Road, 280 feet north-south from East Valley Road to the northern boundary, and 350 feet east-west along the northern boundary. An intermittent drainage forms the site's western



The project site is located along a straight and level stretch of East Valley Road, which affords excellent visibility in both directions.

boundary. This drainage ranges from 4 to 8 feet wide and 2 to 4 feet deep, and generally flows only during and immediately after rainfall events (Rancho San Carlos 2010).

Vegetation on the proposed project site consists primarily of lemon trees (*Citrus limon*), with limited understory as vegetation growth within the orchard is controlled. In addition to lemons, the site contains a total of 46 mature coast live oaks (*Quercus agrifolia*) confined to the site's southern and western boundaries, with oak trees ranging in size from 3 to 44 inches in diameter at breast



Lemon trees currently cover most of the project site.

height (DBH) and up to 35 feet tall (Spiewak 2010). Twelve mature oak trees also line the western side of the drainage which extends for approximately 280 feet along the site's western boundary as well as the site's 420-foot East Valley Road frontage. No existing structures are located on the site.

2.4 PROJECT DESCRIPTION

The proposed project would include the purchase of privately owned property, development of approximately 2.55 acres to accommodate a fire station, and the acquisition of required permits and parcel map changes to allow the development. Approximately 1.07 acres of the 2.55-acre project site would be developed with paved surfaces (buildings or pavements, portions of which would be composed of permeable material). The remaining area would be used as landscape buffer (north and east sides of the parcel) and habitat restoration area (west side of parcel) (Figure 2-2). Structures would include the main station building, a training and hose tower building, and a maintenance building. There are no existing structures on the site, so no building demolition would occur. Two driveways would be constructed off East Valley Road. Site leveling and improvements for building, driveway and parking, and grading outside these areas for drainage/swales and hydro modification retention basins will require approximately 16,500 cy cut and 15,500 cy fill, with this cut and fill balanced on site. Recomposition of the excavated soils would result in the 1,000 cy difference in volume between cut and fill. Proposed project site summaries are provided in Tables 2-1 and 2-2.

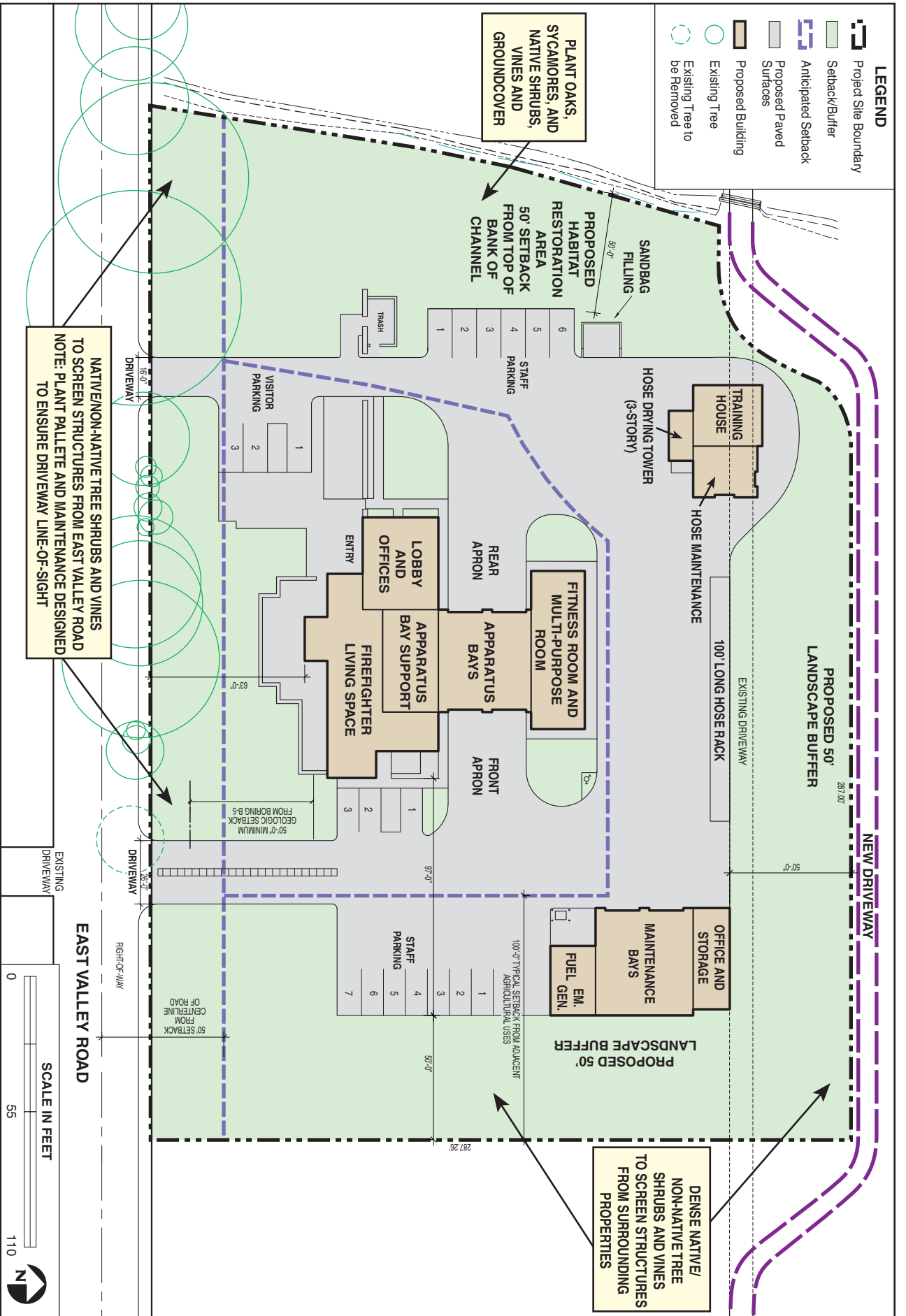


Figure 2-2. Proposed Site Plan

Table 2-1. Summary of Site Information

Site Information	
Site Location	<ul style="list-style-type: none"> • Nearest Major Intersection: Sheffield Drive and East Valley Road, approximately 2,000 feet west of the site • Assessor's Parcel Number: 155-070-008 • Supervisorial District: First District
Community Plan Designation	<ul style="list-style-type: none"> • Montecito Community Plan (MCP), Urban Area, Semi-Rural Residential (SRR-0.5)
Zoning District, Ordinance	<ul style="list-style-type: none"> • 2-E-1 (Estate Residential), 2 acre minimum lot size, Montecito Land Use Development Code
Site Size	<ul style="list-style-type: none"> • +/- 2.55 acres
Present Use & Development	<ul style="list-style-type: none"> • Agriculture (lemon orchard)
Surrounding Uses/Zoning	<ul style="list-style-type: none"> • North: Agriculture (lemon orchard); Residential 2-E-1 • South (across East Valley Road): Residential, 5-E-1 • East: Agriculture (lemon orchard); Residential, 2-E-1 • West: Agriculture (lemon orchard); Residential, 2-E-1
Access	<ul style="list-style-type: none"> • East Valley Road/ State Highway 192
Public Services	<ul style="list-style-type: none"> • Water Supply: Montecito Water District • Sewage: Montecito Sanitary District • Fire: Montecito Fire Protection District • School District: Montecito Union School District (Primary); Santa Barbara School District (Secondary)

Table 2-2. Summary of Proposed Project Features

Structures	<ul style="list-style-type: none"> • <i>Fire Station</i> – 1-story (27'), 7,377 sf • <i>Training and Hose Tower Building</i> – 2-story (27'), 2,301 sf, including attached 3-story (35') Hose Tower • <i>Maintenance Building</i> – 1-story (27'), 2,882 sf, including fuel storage/emergency generator <p><i>Total Structural Square Footage (Gross): 12,560 sf</i></p>
Paved Surfaces	<ul style="list-style-type: none"> • Visitor Parking - 3 spaces (1 handicap accessible), 782 sf composed of permeable material • Firefighter and Other District Personnel Parking – 16 spaces, 3,200 sf composed of permeable material • 30,790 sf of other paved area composed of impervious material <p><i>Total Paved Surfaces: 33,990 sf (0.78 acres)</i></p>
Landscaping and Open Space	<ul style="list-style-type: none"> • Habitat Restoration Area – 15,330 sf on western portion of site • Landscape Buffer Area – 26,110 sf on northern and eastern portions of site • Landscaped area at street frontage – 13,959 sf • Miscellaneous landscaped area within site – 4,929 sf <p><i>Total Landscaped or Restored Area: 60,328 sf (1.38 acres)</i></p>
Site Access	<ul style="list-style-type: none"> • Two driveways off East Valley Road: west side 16' wide, east side 26' wide.

2.4.1 Proposed Facilities

Three main structures would be constructed under the proposed project, with the fire station located in the south-central portion of the site and two support buildings located at the northeastern and northwestern parts of the site. The project would be constructed to United States Green Building Council (USGBC) LEED Silver certification to incorporate energy efficient building design and construction such as passive heating, solar energy use of recycled building materials and water conserving design and water quality protection measures.

2.4.1.1 Fire Station Building

The proposed fire station building would total 7,377-square feet (sf) and include two 27-foot-high drive-through Apparatus Bays to permit sufficient room for fire trucks to safely enter and exit the structure and to permit maneuverability for crews working on the engines. The Apparatus Bays would divide the fire station building into two parts, a northern portion that would include a fitness room, multi-purpose room, and storage, and a southern portion that would include most of the fire station building functions.

Fire suppression support functions would be located immediately south of the Apparatus Bays, and would include dedicated areas for a turn out gear room, an engineering alcove, a support room, storage, a janitor's closet, and a mechanical room. An Administration Area/Public Lobby including a unisex restroom would be located at the public entry of the building. This area would include the lobby, station office, Captain's office, and a fire prevention office. The fire station building would also provide a Firefighter Living Area for four firefighters. The living area would include a dayroom, combined dining room and kitchen, pantry, and laundry room, as well as four firefighter dormitories and restrooms. In emergency situations (e.g., wildfire, earthquake) this building would also be used to shelter evacuees, with the emergency vehicles moved to the site pavements. Other enclosed areas in the fire station building such as the fitness area, meeting rooms, or hallways could also be used to shelter evacuees during emergencies.

2.4.1.2 Training and Hose Tower Building

The 2,301-sf Training and Hose Tower Building located in the site's northwest corner would house a training house, a hose storage/maintenance shop, and other support and storage functions, as well as a three-story hose drying tower. This tower would be used

to hang station hoses to dry as well as occasionally for training purposes. Hoses would be hung on the tower's interior and would not be visible from surrounding properties. An approximately 3-foot-tall, 100-foot-long hose rack would also be located at the northern extent of the developed area.

2.4.1.3 Maintenance Building

The proposed 2,882-sf Maintenance Building would be located in the northeastern corner of the site and would house two apparatus bays for maintaining equipment, an office for the Fire District Mechanic, a partially enclosed area for fuel storage and the emergency generator, and an enclosed maintenance storage space. The emergency generator would be 80 kilowatts (kW) and would be run on diesel fuel stored on-site. The generator would be utilized by the MFPD during emergency situations such as earthquakes or wildfires where power supplies were interrupted to Station 3. Station 3 staff would also test this generator for periods of 15 minutes once a week and 2 hours once a year to ensure operational reliability during emergency events. Diesel fuel would be stored in aboveground storage tanks of up to 1,000 gallons to serve ongoing station fueling needs. This building would house a maximum of 300 gallons of oil, solvent, and hydraulic fluids contained in field packs (i.e., small containers) rather than drums. Waste oil and lubricants would be stored in 55-gallon drums. In the future, pending funding availability, a paramedic rescue vehicle could also be based at Station 3.

The architectural style would be consistent with the majority of other structures in the contiguous Montecito community, with thick plaster walls, deep inset windows and doors, and clay and mortar tile roofs. Project architectural details and building design would be subject to review and approval by the County's Montecito Board of Architectural Review.

2.4.2 Building Heights

The mean ridge height permissible within the 2-E-1 zoning district is 35 feet. The highest ridge of the proposed structures is 35 feet at the peak of the Hose Tower (Figure 2-3). The 2-E-1 zoning district also permits architectural projections and features, such as the fireplace chimney, up to 50 feet in height. The 35-foot tall Hose Tower would be the tallest structure on the site.

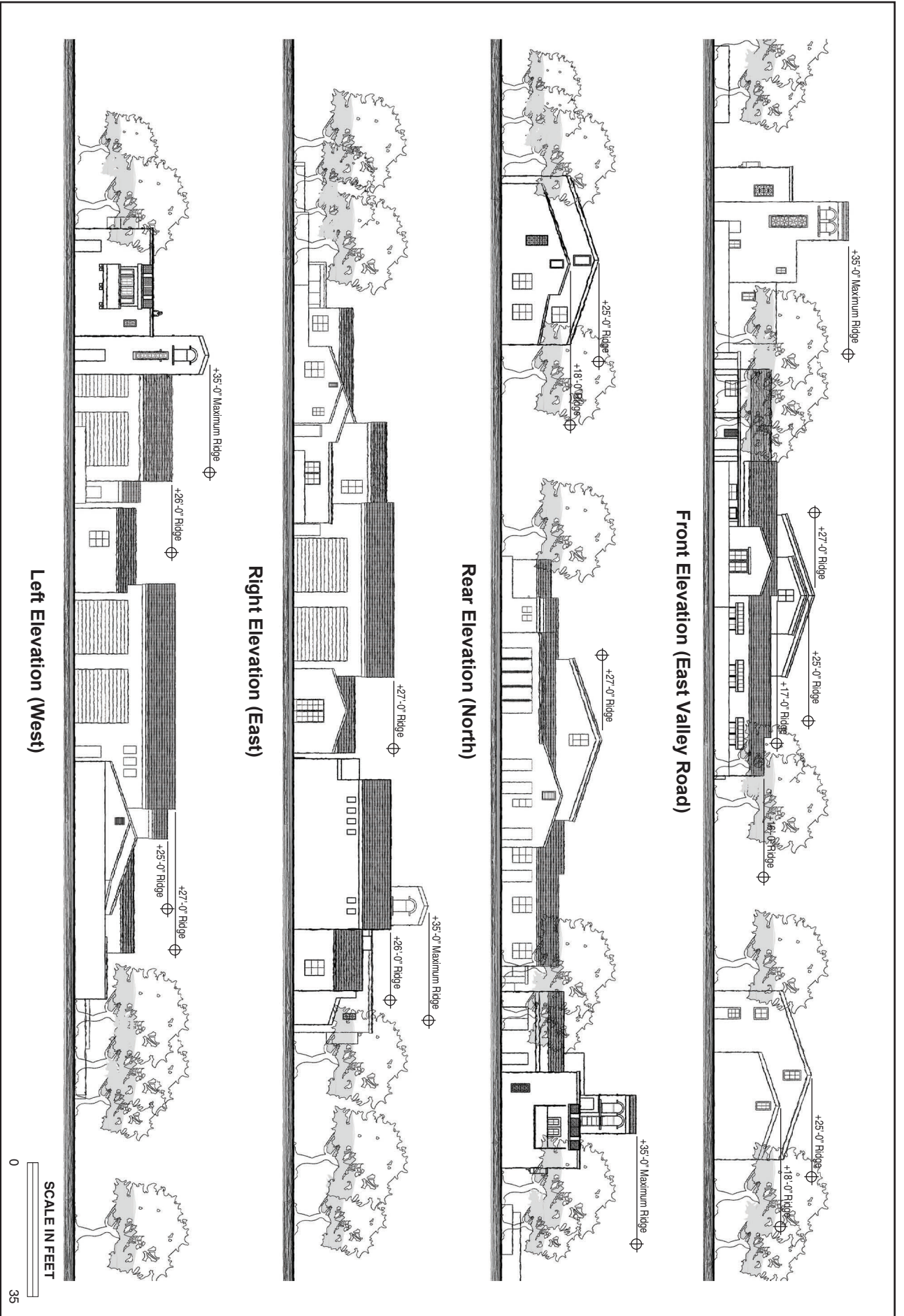


Figure 2-3. Conceptual Station Elevations

2.4.3 Site Access, Circulation and Parking

Vehicular access to the fire station from East Valley Road would be via two newly constructed driveways which would connect to the internal site circulation systems and the front and rear aprons of the main Apparatus Bays as well as to visitor and firefighter parking areas (refer to Figure 2-2). The west driveway would serve visitors and private staff vehicles, and would measure 16 feet across. The east driveway would serve emergency vehicles and MFPD vehicles, and would include entry and exit lanes totaling 26 feet across. Each driveway would have clear sight lines in both directions along East Valley Road. Additional level, paved areas would be provided north of the fire station between the Training and Hose Tower Building and the Maintenance Building. This area would be utilized for training, equipment maintenance, and staging and overflow parking during emergencies.

Three visitor parking spaces would be located immediately adjacent to the western driveway, one of which would meet requirements under the Americans with Disabilities Act. Parking for firefighters and other MFPD personnel would be located along the western and eastern edge of the developed area as well as immediately east of the main fire station, and would include a total of 16 spaces. Other paved spaces within the development area would be used during emergencies for staging and overflow parking.

A narrow unpaved access road serving the existing agricultural operations currently passes through the northern portion of the proposed site, and would be shifted northward by approximately 50 feet to accommodate development.

Development of portions of the project driveways would occur in the Caltrans right-of-way, and construction would require installation of a concrete spandrel or driveway apron supported by arches and cross gutter, and a 12" high by 48" wide reinforced concrete box culvert at each driveway to accommodate drainage under the driveways.

A 10-foot wide easement would be offered for dedication along the entire project's site frontage with East Valley Road to reserve land for the Comprehensive Plan designated Proposed On-Road Trail (Parks, Recreation and Trails Map, PRT-2, Carpinteria-Montecito-Summerland).

2.4.4 Utilities

Utility service to the site would be provided by extension of services such as water, electricity, sewer, natural gas, telephone, and cable from existing nearby connections.

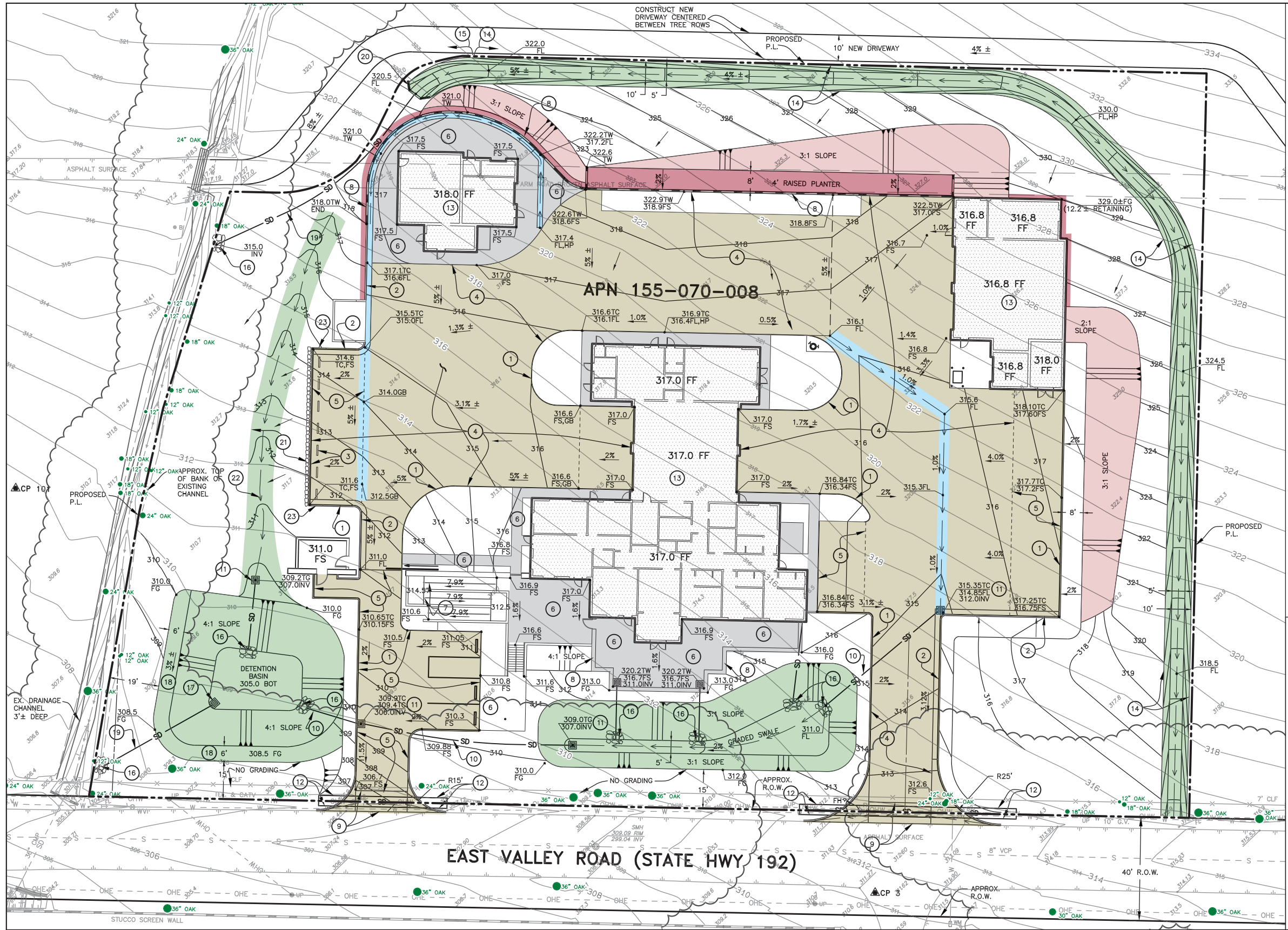
Electricity, cable, and telephone infrastructure is located on poles immediately across from the site along the south side of East Valley Road. Water and sewer lines currently exist in East Valley Road fronting the project site. A fire hydrant would be installed on the site and connected to those water lines. An enclosed area for four 64-gallon solid waste and recycling containers would be provided off of the western access driveway to permit waste hauling truck access away from the planned emergency vehicle driveway.

2.4.5 Grading and Drainage

Total grading to prepare the site for development would include 16,500 cy of cut, with up to 8,000 cy exported via dump truck to a site determined to be acceptable at the time of construction. The remainder would be balanced onsite. Topography along the site's East Valley Road frontage would remain largely unchanged. Grading would typically range from 2-3 feet over the central section of the site, with cuts of generally 3-5 feet deep near the northern site boundary; the most substantial cut would be near the site's northeast corner where approximately 14 feet of soil would be removed to accommodate the maintenance building, which would be backed by a 12-foot-high retaining wall.

The finish floor elevation for the main fire station is proposed at 317 feet, which generally matches the existing ground elevation through the middle of the building. The proposed finish floor elevation for the training and hose tower building is at 318 feet, while the maintenance building would be at 316.8 feet. A 3:1 side slope is proposed on the northern part of the site to transition the proposed grade to existing ground elevation. An approximately 4-foot-high retaining wall and planter box is also proposed along the northern part of the site to sustain the grade difference between the proposed and existing grade.

The drainage design concept for the proposed project would maintain the sheet flow drainage that is prevalent on level areas of the site, collect storm water runoff into a graded vegetated swale for cleaning and treatment, and discharge into the existing drainage courses to the west and south of the site (Figure 2-4). Vegetated swales are also proposed along the eastern and northern perimeter of the site to intercept and transport offsite runoff to the existing asphalt concrete ditch along the north side of East Valley Road and the westerly earth ditch. A drainage swale is proposed south of the fire station building to transport and clean storm runoff from the eastern portion of the developed site. An appropriately sized vegetated storm water detention basin is also proposed on the southwestern portion of the site to detain storm runoff from the western part of the site and to treat that storm runoff prior to discharge into the offsite storm drain system.



CONSTRUCTION NOTES

- 1 CONSTRUCT 6" HIGH CONCRETE CURB.
- 2 CONSTRUCT 6" HIGH CONCRETE CURB AND 24" WIDE CONCRETE GUTTER.
- 3 CONSTRUCT 0" HIGH CONCRETE CURB AND WHEEL STOPS.
- 4 CONSTRUCT 8" THICK PORTLAND CEMENT CONCRETE PAVEMENT WITH #4 REBAR AT 18" O.C., B.W. OVER 6" THICK CLASS 2 AGGREGATE BASE COMPACTED TO MIN. 95% COMPACTION.
- 5 CONSTRUCT PERMEABLE PAVERS.
- 6 CONSTRUCT 4" THICK PORTLAND CEMENT CONCRETE PAVEMENT OVER MIN. 4" THICK CLASS 2 AGGREGATE BASE COMPACTED TO MIN. 95% COMPACTION.
- 7 CONSTRUCT CONCRETE ACCESSIBLE RAMP WITH METAL HANDRAILS.
- 8 CONSTRUCT 4' HIGH RETAINING WALL.
- 9 CONSTRUCT CONCRETE SPANDREL AND CROSS GUTTER.
- 10 CONSTRUCT 12" DIA. STORM DRAIN PIPE.
- 11 CONSTRUCT 24"x24" CONCRETE CATCH BASIN WITH TRAFFIC GRATE ON PAVED AREA WITH STORM WATER CLEANING INSERT ON PAVED AREA.
- 12 CONSTRUCT 12" HIGH BY 48" WIDE REINFORCED CONCRETE BOX CULVERT.
- 13 CONSTRUCT BUILDING PER ARCHITECTURAL PLANS.
- 14 CONSTRUCT 10' WIDE GRADED VEGETATED SWALE WITH 1-1/2:1 SIDE SLOPES AND 5' BOTTOM. CONSTRUCT GRADE STABILIZATION AREA AT 50' ON-CENTER WITH COBBLE ROCKS TO REDUCE VELOCITY OF RUNOFF.
- 15 CONSTRUCT 10' WIDE GRADED VEGETATED SWALE WITH 1-1/2:1 SIDE SLOPES AND 5' BOTTOM. CONSTRUCT GRADE STABILIZATION AREA AT 25' ON-CENTER WITH COBBLE ROCKS TO REDUCE VELOCITY OF RUNOFF.
- 16 CONSTRUCT ROCK RIP-RAP AT END OF DRAINAGE PIPE TO DISSIPATE RUNOFF.
- 17 CONSTRUCT CONCRETE OUTLET CONTROL BASIN.
- 18 CONSTRUCT 6' WIDE BERM ALONG TOP OF DETENTION BASIN.
- 19 CONSTRUCT 18" DIA. STORM DRAIN PIPE.
- 20 CONSTRUCT CONCRETE HEADWALL.
- 21 CONSTRUCT VEGETATED FILTER STRIP WITH PLANTING PER LANDSCAPE PLANS AND APPROXIMATELY 6' WIDE AND 6" DEEP SWALE PER CITY OF SANTA BARBARA STORM WATER BMP MANUAL SECTION 6.6.3, WITH 12" DEEP, 6" WIDE STONE CUTOFF ON THE WEST EDGE OF THE PARKING SPACES.
- 22 CONSTRUCT VEGETATED SWALE.
- 23 CONSTRUCT 5' LONG TRANSITION FROM 6" HIGH CURB TO 0" HIGH CURB.

LEGEND

- Paved Flat Surfaces for Building Pads/Patios
- Paved Gently Sloping Surfaces
- Vegetated Swale or Detention Basin
- Cut Slope
- Retaining Wall or Planter Bed
- Site Surface Water Drainage



SCALE IN FEET



Figure 2-4. Proposed Grading and Drainage Plan

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The vegetated swale on the western part of the site would be approximately 6 feet wide and 6 inches deep, and include a vegetated filter strip planted according to the approved landscape plans. The project structures and pavement would comprise a total of approximately 1.07 acres of impermeable surfaces. Vehicle parking spaces would utilize permeable pavers to increase infiltration and reduce runoff.

2.4.6 Landscaping, Habitat Restoration and Walls

Approximately 1.38 acre or 54% of the 2.55-acre project site would be landscaped or undergo habitat restoration (refer to Figure 2-2 and 2-5). In addition to landscaping immediately surrounding the structures and driveways, the proposed project would include a minimum 50-foot structural setback from the paved edge of East Valley Road and associated road frontage landscaping; a 30 to 50-foot-wide landscape buffer would also be established at the northern and eastern sides of the new parcel. All landscaping would consist of a blend of drought-tolerant and fire-resistive landscaping, and a detailed landscaping and maintenance plan would be developed through consultation with adjacent property owners to maximize visual compatibility. Along the northern portion of the site, a retaining wall and raised planter bed of 4 feet in height would be installed at the base of the cut slope. A low wall of 3 to 5 feet in height would front the firefighter living quarters to shield a patio and increase privacy from East Valley Road.

On the western side of the site, a habitat restoration area would be established within a 50-foot setback from the top of the bank of the ephemeral drainage channel. Habitat restoration would entail planting of typical native vegetation that would be found along such an ephemeral drainage. Trees would consist of the planting of 15-gallon coast live oak trees to mitigate loss of the one mature oak tree to be removed as part of the project, potentially along with native California sycamores (*Plantanus racemosa*). In addition, shrubs would likely include toyon (*Heteromeles arbutifolia*), lemonadeberry (*Rhus integrifolia*), as well as understory species such as hummingbird sage (*Salvia spathacea*), blackberry (*Rubis ursinus*) and California wild rose (*Rosa californica*). The area would also be hydro-seeded with a mix of native herbs and wildflowers.

2.4.7 Station Operation

The proposed fire station building would be occupied and operating 24 hours per day. While a primary goal of construction of Station 3 is to improve service to underserved

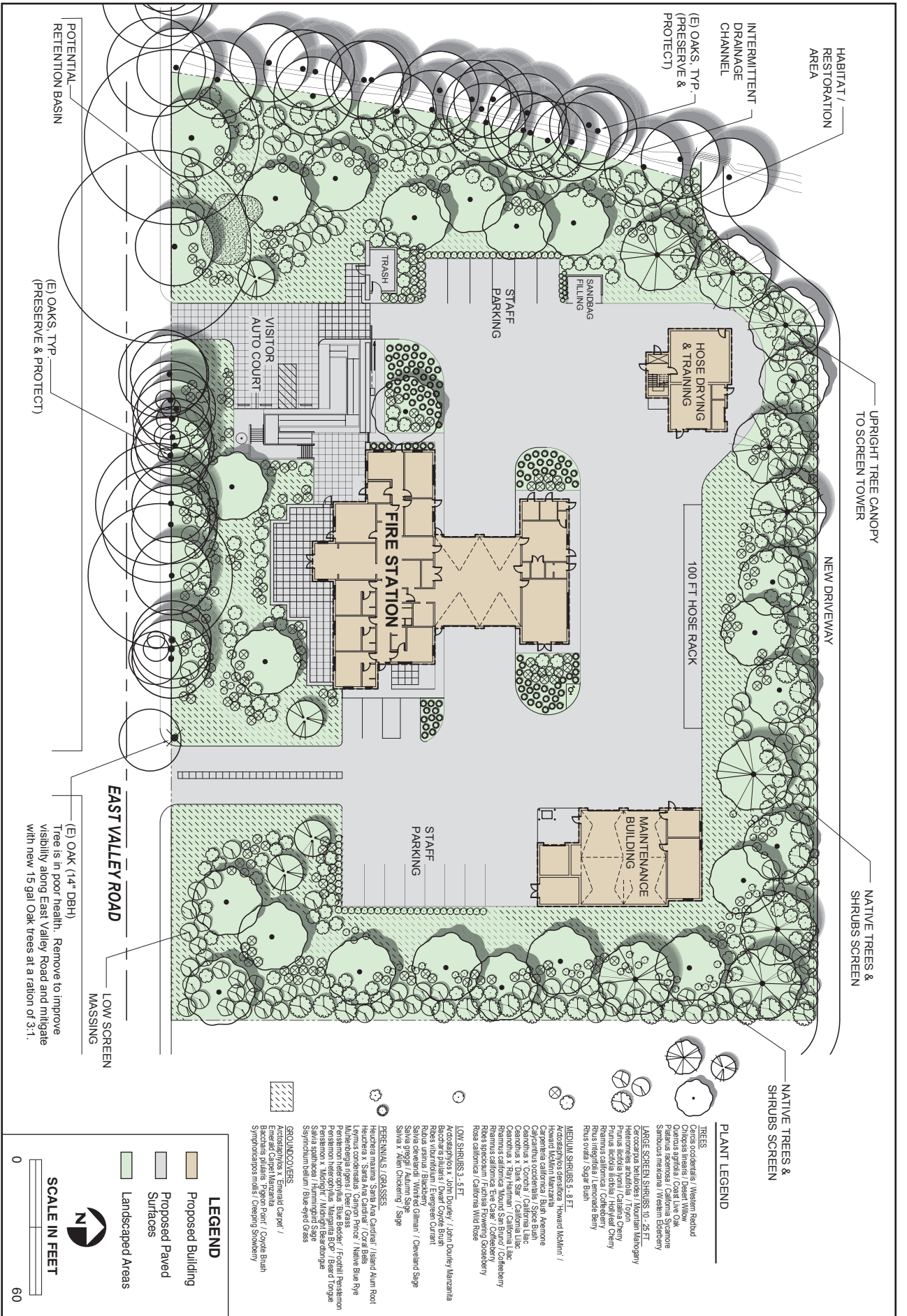


Figure 2-5 Proposed Landscape Plan

areas of eastern Montecito, construction would enhance the overall capabilities of the MFPD to respond to emergencies throughout the community as well as regionally, such as for major wildfire events. Based on existing demands and records for MFPD services, Station 3 personnel and equipment could respond to approximately 400 calls per year, with medical emergencies projected to constitute more than 50% of these calls, and fire and hazardous conditions emergencies involving an estimated 10 to 12% of these calls (AMEC 2008). The remaining calls would be for service (e.g., fire inspections) or result from “good intention” or false alarms where service is requested but not needed (AMEC 2008).

Initial station staffing would consist of a total nine firefighters on a 24-hour/7 day a week basis in rotating shifts of three firefighters each. In addition, one fire prevention officer would work a weekday 8-hour shift at the station. However, as demand for service increases and funding becomes available, an additional firefighter/ paramedic would be added to station staff along with a support paramedic rescue vehicle.

Station personnel would perform ongoing vehicle maintenance at the proposed Support Building. This would consist of oil, lube, and replacement of parts or installation of some equipment. Major maintenance activities, such as an engine, transmission, or pump overhaul would be completed at an off-site, factory-approved shop. A maximum of 300 gallons of oil, solvent, and hydraulics fluids contained in field packs (i.e., small containers) would be stored on-site. Periodic removal of waste oil and lubricants stored in 55-gallon drums would be managed by waste management vendor such as Safety Kleen. Fuel storage would consist of up to 1,000 gallons of diesel in aboveground storage tanks to serve ongoing fueling needs. Ongoing demand for fuel is anticipated to require up to two fuel deliveries (maximum of 400 gallons) to the station each month. In addition, periodic removal of waste oil and lubricants would be managed by Safety Kleen or another waste management vendor.

2.4.8 Construction Equipment and Scheduling

2.4.8.1 Construction Equipment

Construction equipment for the proposed project is expected to include one grader, one tractor/loader/backhoe, and one forklift at the beginning of the project for a period of 2 to 3 months during site and building grading and building foundation preparation. Two cement trucks are expected during the construction of the building foundations and

2.0 PROJECT OVERVIEW

concrete slabs for a period of 3 to 5 days after the site and building preparation work. One grader, one tractor/loader/backhoe, one forklift, one paver, one roller, and two cement trucks are anticipated for the final site work anticipated near the end of construction for about 1 month. Two construction material loading and hauling trucks, one watering truck, and two compressors will be present on-site throughout the project. This is the maximum number and type of construction equipment expected to be on-site at any given time.

2.4.8.2 Workforce and Schedule

The workforce for construction of the proposed project is anticipated to average approximately 15 to 20 workers on-site at any given time over an approximate 12-month construction timeframe.

2.4.8.3 Construction Traffic Estimates

Regular construction-related traffic would consist of construction workers and delivery truck trips. Approximately 15 delivery/hauling truck trips would occur on any given day. In addition to these trips, during the 3-month site grading process, export of grading cut material would require up to 800 dump truck trips to and from the site, assuming a typical capacity of 10 cy per truck, which is the typical capacity of a single “dump box” likely to be employed for hauling on Montecito’s relatively narrow roads. Export activities would peak over a one-month period with up to 30 additional haul truck trips per construction day over this time span. Hauling of construction waste would occur once a week on average. Based on the estimated average construction workforce of 15 to 20 workers, an additional 20 average daily construction trips (round-trip) would also be generated by the proposed project over the construction period.

2.4.8.4 Construction Staging Areas

All staging areas for construction would occur within project site boundaries.

2.5 PROJECT APPROVALS AND PERMITTING

The proposed project would require consideration by the MFPD Board of Directors for final approval authorizing property acquisition and allocation of funding to construct, equip and staff proposed Station 3. Subsequent to this action, the County of Santa Barbara would act as a Responsible Agency. The project design would also be reviewed by the Montecito Board of Architectural Review (MBAR) and be subject to review and

consideration by the Montecito Planning Commission. In addition, provision of water and sewer service would require issuance of can and will serve letters by the Montecito Water and Sanitary Districts.

The proposed project would entail development of approximately 2.55 acres to accommodate a fire station in the 2-E-1, Estate Residential zone district (Figure 2-6).

Although the Montecito Fire Protection District would be the lead agency for this project, project construction would require several actions by the County and the State to permit project construction and recognize creation of a new parcel to accommodate the proposed Fire Station as follows: Approval of a Conditional Use Permit to allow the development of a fire station in the E-1 zone district in accordance with the MLUDC (refer to Section 35.423.030, Table 2-7).

- a Parcel Map Waiver to separate the approximately 2.55 acre project site from an existing 20.69 legal lot (03-CC-037) that is located within 76.87 acre Assessor Parcel Number 155-070-008 (Figure 2-4; refer to Subdivision Map Act Section 66428 and County Subdivision Regulations, Chapter 21, Section 21-4(h));
- a Certificate of Compliance (CC) to maintain the legal status of the remainder parcel (03-CC-037);
- a Government Code Consistency Determination finding that the project is consistent with Comprehensive Plan policies in accordance with GC Section 65402(c);
- a Section 1600 Streambed Alteration Agreement from the California Department of Fish & Game for installation of the energy dissipater and any other necessary drainage features within the drainage along the western side boundary;
- an Encroachment Permit from CalTrans to allow driveway, drainage, and landscape improvements in the State right-of-way as well as short-term construction vehicle access; and,
- review and approval of architectural details and building design by the County's Montecito Board of Architectural Review.

Although the project site would consist of 2.55 acres, the proposed parcel would include approximately 0.20 acres of Caltrans right-of-way, bringing total parcel area to 2.75 gross acres. ~~Additional permits may require an encroachment permit from Caltrans for development of off-site driveway and drainage improvements within the right away of State Highway 192 (East Valley Road).~~ The proposed fire station parcel property lines would extend to the centerline of East Valley Road. Land Use and Building Permits would also be required from the County of Santa Barbara Planning and Development Department.

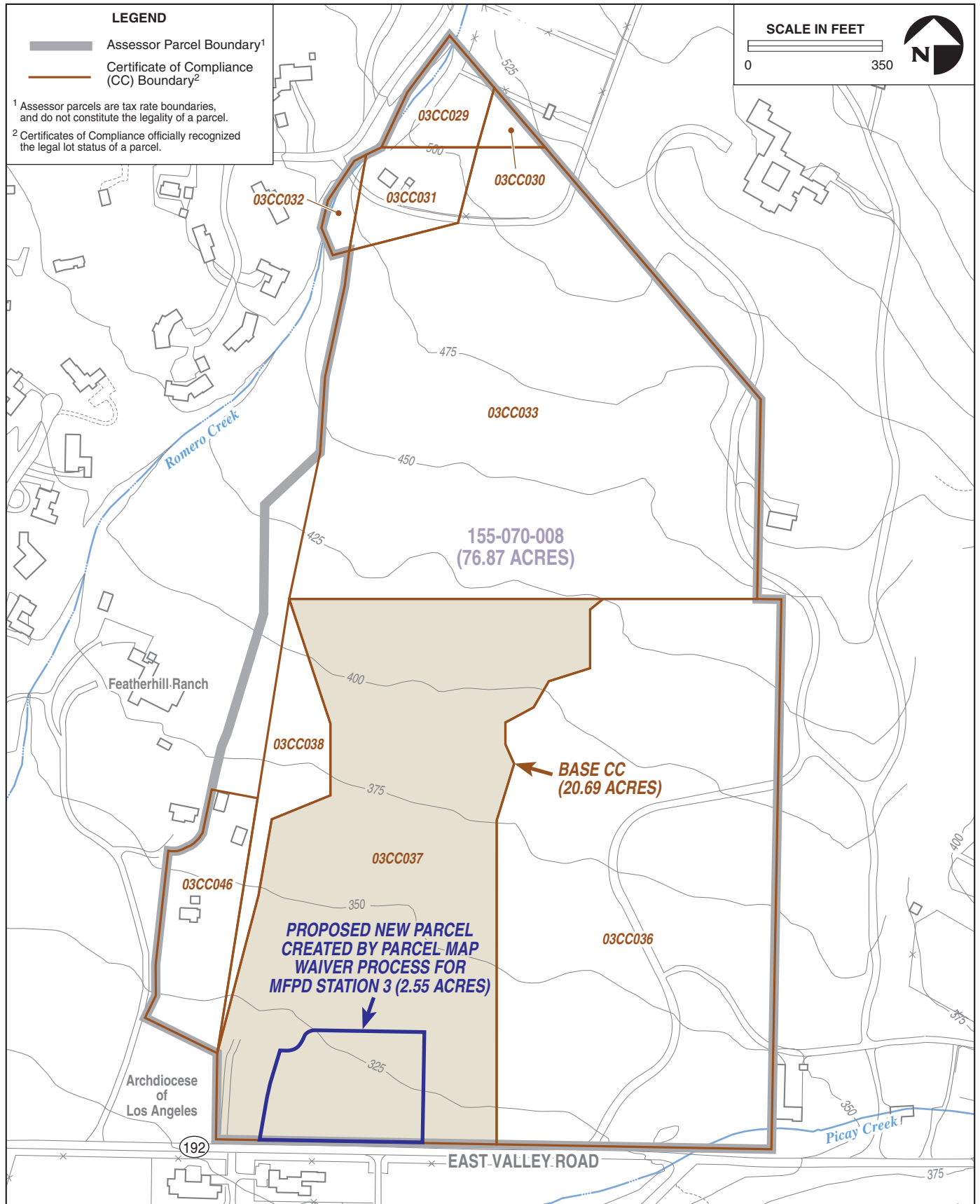


Figure 2-6. Existing and Proposed Parcel Boundaries

2.6 MITIGATION MEASURES INCLUDED IN THE PROPOSED PROJECT

The applicant has proposed a series of mitigation measures to reduce potential adverse project effects, which have been incorporated into the project design. Where the mitigation measure would have more than one beneficial effect, the description of the measure is followed by a listing of the measure's benefits. As part of the County of Santa Barbara's review and consideration of the proposed Conditional Use Permit, mitigation measures included this EIR, including those listed below as part of the Project Description, will be incorporated by the County as appropriate as conditions of project approval with provisions for monitoring and enforcement.

2.6.1 Buffers and Setbacks

- A densely landscaped buffer area of generally 50 feet in width on the northern and eastern sides of the site, separating support buildings and structures from agricultural operations.
 - Would reduce risk to site inhabitants from pesticide drift and other hazards related to vicinity agricultural use
 - Would provide aesthetic screening of structures from surrounding parcels
- A 100-foot buffer (which includes the 30- to 50-foot landscape buffer described above) between agricultural operations and the primary use areas on the site (main fire station and apron areas).
 - Would reduce risk to site inhabitants from pesticide drift and other hazards related to vicinity agricultural use
- A 50-foot habitat restoration buffer from the top of the bank of the drainage along the western side of the site. Restoration would include planting of native oaks and riparian species, and would adhere to a detailed Habitat Restoration Plan to be approved by the County.
 - Would provide aesthetic screening, enhance biological resources, and improve water quality
 - Would reduce risk to site inhabitants from pesticide drift and other hazards related to vicinity agricultural use
- A 50-foot setback of all structures from the edge of East Valley Road.
 - Would provide aesthetic screening of structures from surrounding parcels and from observers on East Valley Road

- A minimum 50-foot setback from the nearest potential location of the Arroyo Parida and Fernald Point Faults and any evidence of fault surface rupture hazard as demonstrated by past onsite geologic testing.

2.6.2 Aesthetics

- Partial undergrounding of the hose tower, in order to maintain a maximum height above ground of 35 feet.
- Exterior building and site lighting will use hooded fixtures to shield and reduce the spread of light.
- Emergency floodlights will be strategically placed in locations on the site that minimize glare and lighting impacts to the adjacent neighbors. Lighting to be used in an emergency situation only.

2.6.3 Noise

- Construction activities for site preparation shall be limited to the hours between 8:00 a.m. and 5:00 p.m., Monday through Friday. No construction shall occur on State holidays (e.g., Thanksgiving, Labor Day). Construction equipment maintenance shall be limited to the same hours. Non-noise generating construction activities such as interior painting are not subject to these restrictions.
- Volume controls shall be installed with the exterior address system.
- Intermittent noise generating activities such as emergency generator testing will be limited to daytime hours on the weekdays for 15-minute durations once a week and for a 1-hour full load test once a year.

2.6.4 Air Quality

Dust generated by construction activities shall be kept to a minimum with a goal of preventing dust generation and retaining any generated dust on the site, by following the dust control measures listed below:

- During clearing, grading, earth moving, excavation, or transportation of cut or fill materials, water trucks or sprinkler systems are to be used to minimize dust generation and to create a crust after each day's activities cease.
- During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to minimize dust generation. At a

minimum, this would include wetting down such areas in the later morning and after work is completed for the day and whenever wind exceeds 15 miles per hour.

- Soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation.
- The proposed emergency generator will be powered by diesel fuel and in order to minimize emissions, the specifications shall be reviewed by the APCD prior to the issuance of a building permit.

2.6.5 Water Quality

- During construction, washing of concrete, paint, or equipment shall occur only in areas where polluted water and materials can be contained for subsequent removal from the site. Washing shall not be allowed near sensitive biological resources. A designated area for washing functions shall be identified.
- Inclusion of water quality protection measures will be incorporated into site design, including use of porous paving in parking areas to minimize runoff and increase infiltration, and treatment of runoff in graded vegetated swales prior to offsite discharge.
- The maintenance bay drainage system shall be designed and maintained to capture all wastewater, leaks, and spills. Drains shall be tied to a sand and oil separator prior to discharging to the sanitary sewer.
- The vehicle/equipment wash area shall be self-contained and designed with a 'rain switch' valve system, allowing storm water to regularly collect/discharge to the storm drain, but switch over to the sanitary sewer during vehicle/equipment washing activities.

2.6.6 Other Mitigations

- Preparation of a construction traffic management plan including:
 - Acquisition of a Caltrans encroachment permit for construction traffic.
 - Preparation of haul truck access and routing plan with designated haul truck route when the receiver site is designated.
 - Acquisition of a County haul permit to the selected receiver site.
 - All trucks hauling export fill would be prohibited from operating during the peak hours (i.e., 7 to 9 am; 4 to 6 pm).
 - All haul trucks transporting excess fill offsite would be required to be tarped or covered.
- Location of driveways will ensure maximum line-of-sight along East Valley Road.
- Retention of all but three of the mature oaks along East Valley Road, and all mature oaks elsewhere within the project site. Trees would only be removed to

2.0 PROJECT OVERVIEW

accommodate the location of the eastern driveway, and to provide adequate line-of-sight for vehicles entering from and exiting to East Valley Road.

- Thirty days prior to the initiation of project activities, a qualified biologist with experience in conducting breeding bird surveys would conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys would continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of project activities. If a protected native bird is found, MFPD would delay all project activities within 300 feet of on and off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31.

Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, would be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. The biological monitor would be present on site during all grubbing and clearing of vegetation to ensure that these activities remain within the project footprint (i.e., outside the demarcated buffer), and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor should send weekly monitoring reports to MFPD during the grubbing and clearing of vegetation, and shall notify MFPD immediately if project activities damage active avian nests.

- A detailed landscaping and maintenance plan would be developed through consultation with adjacent property owners to maximize visual compatibility. The landscaping and maintenance plan shall be designed to maintain line-of sight on East Valley Road.
- Preliminary grading and foundation plans would be subject to review and approval by a registered Geologist (e.g., Campbell Geo, Inc.) to ensure consistency with recommendations of the project Geologic Study and to address any potential seismic safety issues.
- During project construction, a local geotechnical lab (e.g., Pacific Materials) will be retained to perform field observation and testing during grading and foundation work.
- There are no known cultural resources on the project site; however, in the event archeological remains are encountered during grading, work shall be stopped immediately or redirected until a County qualified archeologist and Native American representative are retained by the applicants to evaluate the significance of the find pursuant to Phase 2 investigations of the County Archaeological Guidelines. If remains are found to be significant, they shall be subject to a Phase 3 mitigation program consistent with County Archaeological Guidelines and funded by the applicant.

- Placement of the energy dissipaters in the drainage channel on the property's western side will be set back from the existing culvert under East Valley Road.
- If visual contamination or chemical odors are detected during construction, work would be stopped immediately and the County Fire Department, Hazardous Materials Unit would be contacted prior to resumption of work.
- The MFPD will coordinate with the Agricultural Commissioner's Office and the Ranch Manager for Rancho San Carlos regarding notification of agricultural spraying activities.
- Proposed building design will meet United States Green Building Council (USGBC) LEED Silver Certification Standards to reduce long-term energy use and associated electrical power demand and use of natural gas.
- Montecito Water District and Montecito Sanitary District will be contacted to confirm service availability and adequacy.
- A 10-foot wide easement will be offered for dedication along the entire project's site frontage with East Valley Road to reserve land for the Comprehensive Plan designated Proposed On-Road Trail (Parks, Recreation and Trails Map, PRT-2, Carpinteria-Montecito-Summerland).

2.7 CUMULATIVE PROJECTS

The CEQA Guidelines define cumulative impacts as “two or more individual effects that, when considered together, are considerable or which compound or increase other environmental impacts.” The Guidelines further state that the individual effects can be various changes related to a single project or the change involved in a number of other closely related past, present, and reasonably foreseeable future projects (Section 15355). This EIR examines cumulative effects using a list of past, present, and probable future projects producing related or cumulative impacts, including, if necessary, those projects outside the control of the agency (Section 15130). In addition, where appropriate, this analysis accounts for additional source documents that address regional and local trends and projections (e.g., growth of through traffic on East Valley Road). The combined references provide for a more comprehensive analysis of cumulative effects than what would be captured using only a cumulative projects list.

The analysis of cumulative impacts contained in this EIR includes the impacts of the proposed project plus all other pending or approved projects within the affected area for each resource. The affected environment for most of the resource areas analyzed in this EIR was determined to be limited to the eastern Montecito and western Summerland areas. Table 2-3 contains a list of pending and approved projects within the project vicinity in Montecito. The approximate locations of the projects listed in Table 2-3 are

2.0 PROJECT OVERVIEW

shown in Figure 2-7. The findings of the proposed project's contribution to potential cumulative impacts are summarized in each resource section.

Table 2-3. Pending and Approved Projects in Eastern Montecito

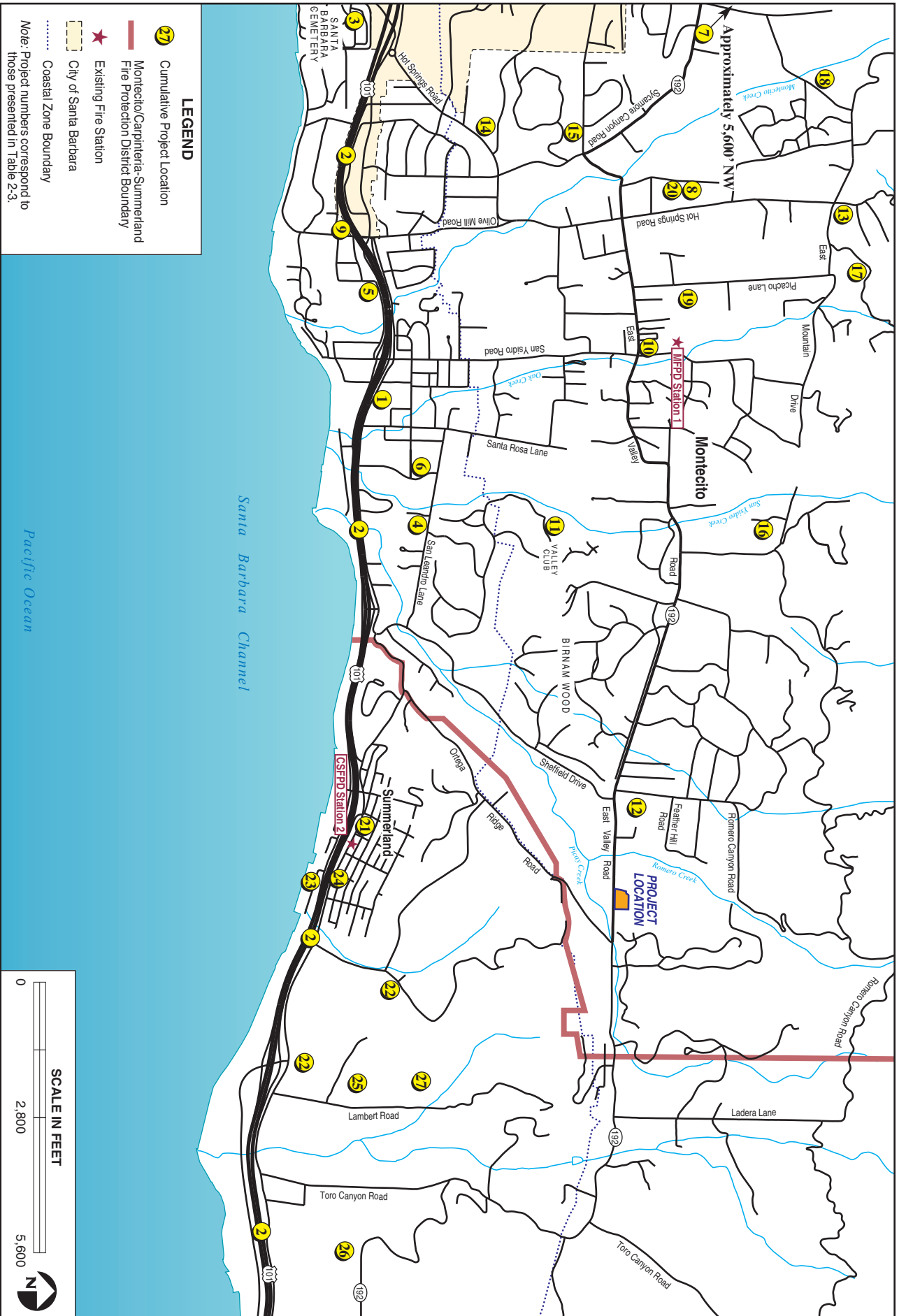
Map Key	Project Name/ Address	Description	Status
1	Miramar Hotel 1555 Jameson Lane	Demolition of existing vacant hotel and construction of a 263,111-gross sf resort (170,575 net sf)	Approved
2	Caltrans U.S. Highway 101 High Occupancy Vehicle Lanes	New lane along U.S. Highway 101, Santa Barbara-Ventura	Phase 1 of 4 construction phases
3	SB Cemetery Mausoleum 901 Channel Drive	1,926-sf mausoleum addition with 161 crypts and 291 niches	In progress
4	Crane School Updated Master Plan 1795 San Leandro Lane	Demolition of 5,645 sf and addition of 39,985 sf with a total campus of 66,060 sf	In progress
5	Danielson Group (TPM 14,686 sf) 1393 Danielson Lane	Lot split of 2 parcels into 4 parcels	Approved. Awaiting Map Clearance
6	Crail Lot Split (TPM 14,758 sf) 175 Tiburon Bay Lane	10-acre parcel split into two 5-acre parcels, 1 existing unit	Approved. Awaiting Map Clearance
7	Loiacono Lot Split 1050 Coyote Road	8.31-acre parcel split into 2 parcels of 5.30 and 3.01 acres	Approved
8	Tolles Lot Line Adjustment 602 Para Grande Lane	Lot Line Adjustment of 1 parcel with 7 lots to create 2 parcels of 0.77 and 1.35 acres	In progress
9	Garner Lot Split 75 Olive Mill Road	Subdivision of a 20,977-sf (gross and net) lot into 2 lots	Approved. Awaiting Map Clearance
10	Gunner Commercial Building 525 San Ysidro Road	18,014-gross sf (14,194-net sf) commercial retail and office	Under construction
11	Bohlinger New SFD/ Accessory Building 311 Ennisbrook Drive	Single family dwelling	Approved (not issued)
12	Decker New SFD/ Guesthouse 680 Stonehouse Lane	Single family dwelling	On appeal at BOS
13	Goerner New SFD 1017 Hot Springs Road	Single family dwelling	In progress
14	Bissell New SFD/ Garage/Cabana 1119 Alston Road	Single family dwelling	Approved (not issued)

Map Key	Project Name/ Address	Description	Status
15	Valle New SFD/Pool/ Cabana/ Accessory 403 Woodley Road	Single family dwelling	In progress
16	Newman Attached RSU & SFD Addition 758 Via Manana	Residential second unit	In progress
17	Larson New SFD/ Guesthouse/Pool 1355 Oak Creek Canyon Road	Single family dwelling	Approved (not issued)
18	Lombard New SFD 819 Ashley Road	Single family dwelling	Approved (not issued)
19	Deansgrange Trust New SFD/Garage/Pond/ Grading 588 Picacho Lane	Single family dwelling	In progress
20	Tolles Residential Development 602 Parra Grande Lane, Santa Barbara	Conversion of an existing 3-unit residential structure to a single family dwelling	In progress
21	Carsey Commercial Mixed Use 2345 Varley Street, Summerland	Demolish existing structures and build new mixed use building including 2,772 sf of retail commercial space; 3,164 sf of subterranean parking; 675 sf of residential space; and separate residential garage	Approved
22	Carpinteria Valley Farms Agricultural Development Plan 120 Montecito Ranch Lane, Summerland and 2800 Via Real, Carpinteria	Development plan for more than 20,000 sf of building and structures	Approved
23	O'neil Coastal Plan Amendment 2552 Wallace Avenue, Summerland	Coastal Plan Amendment to allow residential zoning	In Process
24	Summerland Community Public Safety Center 2450 Lillie Avenue, Summerland	8545 sf of construction for new fire station, meeting room, offices, kitchen, bathrooms, sleeping rooms	In Process
25	Pacifica Institute 249 Lambert Road, Carpinteria	5,635 sf of new campus facilities	Approved
26	Estancia La Serena Equestrian Center 3215 Foothill Road, Carpinteria	5,000 sf for commercial horse training, breeding, and boarding facility for up to 45 horses with site improvements as well as a residential remodel, new guesthouse, pool cabana, swimming pool, and a new private driveway	In Process

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Map Key	Project Name/ Address	Description	Status
27	Holani Farms Horse Boarding Facility 331 Lambert Road, Carpinteria	20,805-sf horse boarding Conditional Use Permit	Approved
28	Valley Club of Montecito 1901 East Valley Road Montecito	41,298 sf golf course and related facilities. 2,149 sf club manager residence and 3,600 sf employee duplex	Approved

Source: County of Santa Barbara 2011. RSU – residential second unit; Sf – square foot/feet; SFD – single family dwelling; TPM – tentative parcel map



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3.0 ENVIRONMENTAL IMPACT ANALYSIS AND MITIGATION MEASURES

To define the scope of the EIR, MFPD provided the public an opportunity to comment on the Initial Study (MFPD 2011) at a scoping meeting on April 21, 2011. Six members of the public attended the scoping meeting, of which five testified. The Initial Study was distributed with the Notice of Preparation (NOP) to Federal, State, County, and City agencies, and local libraries with a comment period that ran from March 29 to April 27, 2011. Notice of the EIR scoping meeting and availability of the Initial Study was published in local newspapers (Santa Barbara News-Press and Montecito Journal), sent to various local agencies, special interest groups, and owners of properties in the vicinity (within approximately 1,000 feet) of the project site. The purpose of the meeting and notifications was to identify public and agency concerns regarding potential impacts of the proposed project. MFPD received five letters of comment on the NOP (see Appendix C).

Through this process, MFPD has determined that the EIR analysis should focus on the following resource areas:

- Aesthetics and Visual Resources
- Agricultural Resources
- Air Quality
- Biological Resources
- Cultural Resources
- Fire Protection
- Geologic Processes
- Land Use
- Noise
- Transportation and Traffic
- Water Resources, Supply and Service

This section of the EIR (Section 3.0) addresses the potentially significant environmental impacts of the proposed project for the resource areas listed above. Each environmental resource area is discussed under the following subsections: *Existing Conditions*, *Regulatory Framework*, *Project Impacts and Mitigation Measures*, *Cumulative Impacts*, and *Residual Impacts*.

For each impact identified in this EIR, a statement of the level of significance of the impact is provided. Impacts are assigned to one of the following categories:

- *No impact* would result when no adverse change in the environment is expected; no mitigation would be required.

- A *beneficial impact* would result when the proposed project would have a positive effect on the natural or human environment and no mitigation would be required (Class IV).
- A *less-than-significant impact* would not cause a substantial change in the environment, although an adverse change in the environment may occur; only compliance with standard regulatory conditions would be required (Class III).
- A *significant (but mitigable) impact* would have a substantial adverse impact on the environment but could be reduced to a less-than-significant level through successful implementation of identified mitigation measures (Class II).
- A *significant unavoidable impact* would cause a substantial adverse effect on the environment, and no feasible mitigation measures would be available to reduce the impact to a less-than-significant level (Class I).

3.1 AESTHETICS AND VISUAL RESOURCES

This section provides an overview of the visual resources in the project vicinity and the eastern Montecito area, with particular attention to those resources present on the project site. In a rural or semi-rural context, the visual resources of an area are often related to the natural character of the area, as well as the developed character of buildings, architectural design, and setbacks from public roads and landscaping. Visual continuity within a region is often desired or anticipated by viewers, and development that is incompatible or inconsistent with the agricultural and/or open character of a rural area can be considered disruptive to the aesthetic character of such regions. This section also addresses the potential for the proposed project to create visual impacts as defined by the California Environmental Quality Act (CEQA) and by applicable Santa Barbara County visual resources policies, guidelines, and Montecito Board of Architectural Review (MBAR) architectural compatibility standards. Visual resource issues identified in the Initial Study (MFPD 2011) were a particular emphasis in the aesthetic and visual resources impact analysis.

3.1.1 Existing Setting

3.1.1.1 Regional Setting

Montecito is a semi-rural community that generally lies between the Pacific Ocean and foothills of the Santa Ynez Mountains. The city of Santa Barbara lies to the west and the unincorporated communities of Summerland and Toro Canyon to the east. Montecito's unique community character encompasses a mix of lower density and larger lot semi-rural development with areas of open space, woodlands, beaches, and steeper foothills regions. The topography of the area varies greatly; however, the majority of Montecito is on gently to moderately sloping hills that rise towards the Santa Ynez Mountain Range (County of Santa Barbara 1992). Numerous open spaces, creek corridors, recreation areas (i.e., equestrian facilities, golf courses), pastures, and orchards are scattered throughout the community, interspersed with lower density and semi-rural development, often consisting of larger, single-family residences and estates.

Development in Montecito primarily consists of typically larger residences and estates located on lots of 1 acre or greater, generally with extensive landscaping. Scattered neighborhoods of smaller lots with older houses add to the residential mix. Residences

tend to be shielded from often narrow winding roadways, by walls and trees and other vegetation that create a forested character in much of the community. The majority of roadways lack sidewalks and traffic and street lights, which contributes to the community's semi-rural character and maintains views of the nighttime sky.

There are no "State Scenic Highways" located in Montecito and none have been identified as eligible for this designation (County of Santa Barbara 1992).

3.1.1.2 Visual Character of the Project Vicinity

The proposed project is located in the inland portion of eastern Montecito along State Highway 192/ East Valley Road between Sheffield Drive on the west and Ortega Ridge Road on the east. To the west of this area lies dozens of residences within the Birnam Wood Golf Club and medium density neighborhoods off Romero Canyon Road. To the west are more rural areas of Toro Canyon. The immediate project vicinity is characterized by larger lots, is



The area immediately south of the project site is developed with two residences of two stories and a large equestrian complex.

generally less developed than other areas in the community, and retains substantial areas of orchards and open space. In addition, large recreational facilities, including Birnam Wood Golf Club and Valley Club Golf Course, provide substantial open space in the area. East Valley Road through Montecito is identified as a Scenic View Corridor by the County (County of Santa Barbara 1992).

Natural Character

Large orchards and undeveloped lands on Rancho San Carlos and Featherhill Ranch contribute to the semi-rural visual character of the project vicinity and provide views through to the Santa Ynez Mountains for travelers on East Valley Road.

East Valley Road in the project vicinity extends from Sheffield Drive east to Ortega Ridge Road and is relatively wooded along much of this reach, with large oaks and other specimen trees and shrubs lining the roadway and property frontages. Residences are generally well setback from the road edge and frequently partially screened from view by hedges, walls, and trees. The western reach of this segment from



Residences at the western end of the project vicinity maintain extensive, mature landscaping that obscure structures from the roadway and create a heavily forested feel.

Sheffield Drive to Romero Creek is lined with dense vegetation associated with residential development to the north that obscure nearly all distant mountain views, and the Valley Club landscaping to the south .

East of Romero Creek and its corridor of riparian trees, views for the roadway become somewhat more expansive due to more widely spaced trees, fewer walls and hedges, and the orchards north of the road on Featherhill and San Carlos Ranches. Although East Valley Road in the vicinity of the project site is generally lined with coast live oaks, views of the Santa Ynez Mountains to the north remain available. These relatively open views to the north are obstructed by the densely vegetated riparian corridor of Picay Creek as East Valley Road approaches near Ortega Ridge Road. To the south of East Valley Road in this reach, scattered estate residences and equestrian uses allow some views through to Ortega Ridge.

Developed Character

There are six residences immediately bordering East Valley Road in the project vicinity: two across from the project site south of East Valley Road and four north of East Valley Road across Romero Creek to the west. These residences consist of four two-story homes and two one-story structures (Table 3.1-1). Views of these structures from East Valley Road are often partially screened by mature vegetation and perimeter walls or fences. Typical residential parcel frontages for these homes average approximately 200 feet, and residences are typically setback approximately 45 feet from East Valley Road.

Table 3.1-1. Scale and Relation to East Valley Road of Residences in the Project Vicinity

Address	Stories	Approx. Setback (ft) ¹	Approx. Frontage (ft) ²
2220 East Valley Road	2	45	190
2222 East Valley Road	1	40	190
West of Stonehouse Drive	1	55	200
East of Stonehouse Drive	2	55	220
2347 East Valley Road	2	40	180
2351 East Valley Road	2	35	300

¹ The approximate setback is from the edge of East Valley Road to primary structures, and does not include perimeter fences, patios, etc.

² The approximate frontage includes the distance that each property fronts East Valley Road, including the residence, and associated perimeter fence, lawns, patios, and landscaped areas.



The two-story residence associated with the equestrian facility located south of the project site has minimal setbacks off East Valley Road.



The two-story residence and equestrian facility located south of the project site on East Valley Road is visible from Ortega Ridge Road.



A two-story residence located west of the project site is setback approximately 50 feet and largely obscured by landscaping from East Valley Road.



A two-story residence located southwest of the project site is visible from the driveway off East Valley Road.

The two residences across East Valley Road south of the project site both support elements of two-story development. Each structure extends for approximately 160 feet along East Valley Road and is partially visible from the roadway. The residence directly across from the proposed project site is particularly visible from the public road due to limited roadside landscaping and the structures white exterior and red tile roof. In addition to these two residences, a large equestrian facility is located south of the site that supports open paddocks bordered by white split rail fences, as well as a one-story stable complex of approximately 370 feet in length which is located 320 feet south of East Valley Road. Coast live oaks spaced along the frontage of these properties provide partial screening of views of existing residences from the road.



A two-story residence associated with the equestrian facility is located south of the project site.

Nighttime Conditions

The semi-rural land uses and few residences that comprise the project vicinity generate very little night lighting. There is only minimal exterior lighting from residences, and views of the nighttime sky are well preserved.

3.1.1.3 Visual Character of the Proposed Project Site

Primary existing public views of the proposed project site are available to travelers along East Valley Road and consist of regularly spaced oaks in the foreground with a backdrop of ordered rows of lemon trees extending north toward the Santa Ynez Mountains. Areas of dense stands of oaks exist along the intermittent drainage channel on the site's western boundary. Mature coast live oaks and clusters of younger oaks are spaced approximately 20 feet apart along the roadway with denser oak canopies beginning at approximately 15 feet or higher above the ground. This permits some degree of openness for views available to travelers on East Valley Road.

3.1.1.4 Existing Views of the Proposed Project Site

Primary views of the proposed project site would be available from travelers using East Valley Road, although intermittent views of the site would also be available from Ortega Ridge Road and distant views from area hiking trails. In the project vicinity, East Valley Road carries approximately 3,900 vehicle trips per day and is an important east-west route for motorists traveling through eastern Montecito. Ortega Ridge Road carries an estimated 1,100 trips per day, is removed from the site and offers only intermitted glimpses of the project vicinity.

Views of the site for eastbound travelers approaching the project site are obscured due to dense stands of oak trees on the Archdiocese property to the west and along the drainage channel on the site's western boundary. Eastbound travelers in vehicles moving along East Valley Road at 35 miles per hour (mph) could view the project site through the existing line of oak trees for approximately 4.5 seconds by looking directly north as they transit the 300-foot length of the site.

For westbound travelers in vehicles proceeding downhill toward the site from Toro Canyon, views are largely obscured by oaks that line the roadway for the majority of this approach. Distant views of the Santa Ynez Mountains are available north across the lemon orchards of Rancho San Carlos; however, views to the northwest (towards the project site) are largely obstructed by tree trunks and foliage. Westbound on East Valley Road at 35 mph, views across the project site occur for approximately 6.5 seconds.¹ It should be noted that while the posted speed is 35 mph, actual speeds of 45 mph or more are typical along this road and would reduce the time of viewer exposure to the site.

East Valley Road is a popular route for cyclists and is used by a limited number of pedestrians. Views across the project site for these users would occur for a greater amount of time than for travelers viewing the site by vehicle. Viewer exposure for cyclists would be moderate due to the relatively limited number of daily viewers. However, these viewers would be in close proximity to the natural landscape and have a greater exposure to existing views. Although the number of pedestrians is limited, they would experience views of the greatest duration. Offsite, Romero Canyon Trail is the

¹ Views across the project site are available from a greater distance to westbound travelers, as compared to eastbound, due to the spacing between oaks that afford views starting from approximately 250 feet prior to reaching the project site.

most heavily used public hiking trail with potential views of the site; however, viewing locations from this trail are generally 1 to 2 miles away and over 1,000 feet in elevation above the site.

3.1.2 Regulatory Setting

3.1.2.1 Applicable County Policies

County Land Use Element Hillside and Watershed Protection Policies: Policy 1 requires minimization of cut and fill operations. Policy 2 requires all development to fit the site topography, be oriented so that grading and other site preparation is kept to an absolute minimum, and that natural features, landforms, and native vegetation be preserved to the maximum extent feasible.

County Land Use Element Visual Resources: Policy 3 requires new structures to be in conformance with the scale and character of the existing community in urban areas.

Montecito Community Plan (MCP): The MCP reinforces the importance of preserving the community's scenic qualities. The MCP contains several policies pertaining to the protection of visual and open space resources, particularly the protection of views of the Santa Ynez Mountain Range and Pacific Ocean. Relevant policies include:

Goal VIS-M-1: Protect the visual importance of the Santa Ynez Mountain Range and Ocean View as having both local and regional significance and protect from development which could adversely affect this quality.

Policy VIS-M-1.1: Development shall be subordinate to the natural open space characteristics of the mountains.

Policy VIS-M-1.2: Grading required for access roads and site development shall be limited in scope so as to protect the viewshed.

Policy VIS-M-1.3: Development of property should minimize impacts to open space views as seen from public roads and viewpoints.

Visual Resource Policy 3: In areas designated as urban on the land use plan maps and in designated rural neighborhoods, new structures shall be in conformance with the scale and character of the existing community. Development, varied circulation patterns, and diverse housing types shall be encouraged.

Visual Resource Policy 4: Signs shall be of size, location, and appearance so as not to detract from scenic areas or views from public roads and other viewing points.

Visual Resource Policy 5: Utilities, including television, shall be placed underground in new developments in accordance with the rules and regulations of the California Public Utilities Commission, except where cost of undergrounding would be so high as to deny service.

Montecito Community Plan EIR: The MCP EIR identified significant and unavoidable adverse impacts to visual resources resulting from buildout of the community. Key issues were identified as impacts to scenic travel corridors from obstruction of views, incompatibility with surrounding uses, intensity of development, removal of vegetation, loss of open space, alteration of natural character, lack of landscaping, or extensive grading.

Montecito Architectural Guidelines and Development Standards: Montecito Architectural Guidelines were developed as mitigation under the MCP EIR, and through these guidelines, the MBAR addresses the visual character of the plan area and visually incompatible structures on a project specific basis. Extensive site preparation and landscaping guidelines are included, as well as residential development Floor Area Ratios (FARs) for interpretation of neighborhood compatibility. Guidelines state that all Educational, Institutional, and Other Public and Quasi-Public Uses should be developed in a manner compatible with the community's residential character.

3.1.3 Environmental Impacts

3.1.3.1 Thresholds for Determining Significance

CEQA Guidelines

Appendix G of the CEQA Guidelines identifies the following four circumstances that can lead to a determination of significant visual impact:

- (1) The project has a substantial adverse effect on a scenic vista.
- (2) The project substantially damages scenic resources, including, but not limited to, trees, rock outcroppings, and historic buildings within a State Scenic highway.
- (3) The project substantially degrades the existing visual character or quality of the site and its surroundings. (This may include loss of major onsite landscape features, or degradation by change of character when placed in the context of the existing surroundings.)
- (4) The project creates a new source of substantial light or glare, which would adversely affect day or nighttime views in the area.

A fifth criterion that potentially identifies significant visual impacts would be:

- (5) The project results in an inconsistency with laws, ordinances, regulations, and standards applicable to the protection of visual resources.

County of Santa Barbara Thresholds of Significance

The County's Thresholds of Significance acknowledge the subjective nature of aesthetic impacts and includes five questions to guide visual impacts analysis, rather than a defined threshold. Affirmative answers to the following guiding questions indicate potentially significant impacts to visual resources.

- 1a. Does the project site have significant visual resources by virtue of surface waters, vegetation, elevation, slope, or other natural or manmade features which are publicly visible?
- 1b. If so, does the proposed project have the potential to degrade or significantly interfere with the public's enjoyment of the site's existing visual resources?
- 2a. Does the project have the potential to impact visual resources of the Coastal Zone or other visually important area (i.e. mountainous area, public park, urban fringe or scenic travel corridor)?

- 2b. If so, does the project have the potential to conflict with the policies set forth in the County's CLUP, the Comprehensive Plan or any applicable community plan to protect the identified views?
3. Does the project have the potential to create significant adverse aesthetic impact through obstruction of public views, incompatibility with surrounding uses, structures, or intensity of development, removal of significant amounts of vegetation, loss of important open space, substantial alteration of natural character, lack of adequate landscaping, or extensive grading visible from public areas?

3.1.3.2 Impact Assessment Methodology

Baseline data collection was initiated with a review of existing project documents and relevant County visual resource protection policies and standards (i.e., MCP, Montecito Land Use and Development Code (MLUDC), Montecito Architectural Guidelines and Development Standards). Following review of available documentation, a field reconnaissance was conducted to identify public views available of the site. Particular attention was paid to areas with public views of the site that would constitute public "Key Viewing Locations" (KVLs). These are primarily located along East Valley Road. During the field study conducted in April 2011 by AMEC, detailed analyses were conducted at five KVLs (Figure 3.1-1). Timed drive-bys were taken to assess the duration of view exposure for vehicle travelers to determine the level of exposure for potential viewers. Views from nearby public trails were also considered to ascertain if changes in views from popular recreation locations could occur. Private views are briefly discussed; however, changes to private views are typically not considered impacts under CEQA.

To evaluate potential visual impacts, this analysis considers both *visual impact susceptibility* and *visual impact severity*. Visual impact susceptibility is the degree to which existing visual resources could be impacted by development of a project. This accounts for *visual quality*, *viewer exposure*, and *viewer sensitivity*. Visual quality relates to the overall impression or appeal of an area. Viewer exposure describes the degree to which viewers are exposed to views of the landscape. Viewer sensitivity considers the level of interest or concern of viewers regarding an area's visual resources.



Figure 3.1-1. KVL Locations Overview

Visual impact severity considers potential negative effect of a proposed project on an area. Key factors considered in determining visual impact severity include the proposed project's *visual contrast* with the natural and developed characteristics of an area, its potential for *visual dominance* over the existing landscape and *view impairment* through either the blocking or substantial alteration of existing views. While assessment of aesthetic and visual impacts is by nature somewhat subjective, use of these criteria provides a context by which to consider such potential impacts.

To support this analysis, a description of the existing landscape was compiled, including consideration of visual quality, potential viewer sensitivity, and site visibility and potential viewer exposure. The evaluation of viewer exposure also included consideration of the potential numbers of viewers and distance and duration of views. These factors helped support both visual impact susceptibility determinations and potential visual impact severity at each KVL. Potentially affected landscapes were photographed using the same focal length as the human eye, and the analysis then considered potential project visual contrast, visual dominance and potential for view impairment.

3.1.3.3 Mitigation Measures Contained in the Proposed Project

The applicant has proposed a series of design measures to reduce potential project visual impacts including:

- Partial undergrounding of the hose tower, in order to maintain a maximum height above ground of 35 feet.
- Exterior building and site lighting will use hooded fixtures to shield and reduce the spread of light.
- Emergency floodlights will be strategically placed in locations on the site that minimize glare and lighting impacts to the adjacent neighbors. Lighting to be used in an emergency situation only.
- A detailed landscaping and maintenance plan would be developed through consultation with adjacent property owners to maximize visual compatibility, including:
 - A densely landscaped buffer of generally 50 feet in width on the northern and eastern sides of the site, providing aesthetic screening of structures from surrounding parcels (refer to Figure 2-2).

- A 50-foot habitat restoration buffer from the top of the bank of the drainage along the western side of the site. Restoration would include planting of native oaks and riparian species, and would adhere to a detailed Habitat Restoration Plan to be approved by the County.
- A 50-foot setback of all structures from the edge of East Valley Road.

3.1.3.4 Impact Analysis

Proposed Project Characteristics

The proposed project would consist of development of three structures that would total 12,560-square feet (sf) all surrounded by landscape buffer areas (refer to Figure 2-2, Section 2.4, Project Description). The closest structure to East Valley Road would be the main fire station building which would be set back at least 60 feet from East Valley Road and fronted by a line of existing oak trees along East Valley Road and a newly installed landscape buffer along this road frontage. A proposed Training and Hose Tower Building on the project site's west end would include a 35-foot high tower used for hose drying and training purposes (Figure 3.1-2). This structure would be set back approximately 205 feet from East Valley Road. A proposed maintenance structure on the project site's east would be located approximately 180 feet from East Valley Road.

The project would consist of primarily single-story structures. However, given the institutional use and needs of a fire station for storage of fire engines and training exercises, some taller elements would be necessary. The roof ridgeline of the proposed structures would be 27 feet located above the two apparatus bays in the main fire station building, 25 feet above the two apparatus bays in the Maintenance Building, and 26 feet above the two-story training house. A 35-foot tall three-story hose drying tower would be attached to the Training and Hose Tower Building located at the rear of the site behind the main fire station building. Two proposed driveways off East Valley Road would provide the most open views into the site through gaps in the line of oaks along East Valley Road. Parking and paving would cover approximately 0.8 acre of the 2.55-acre site.

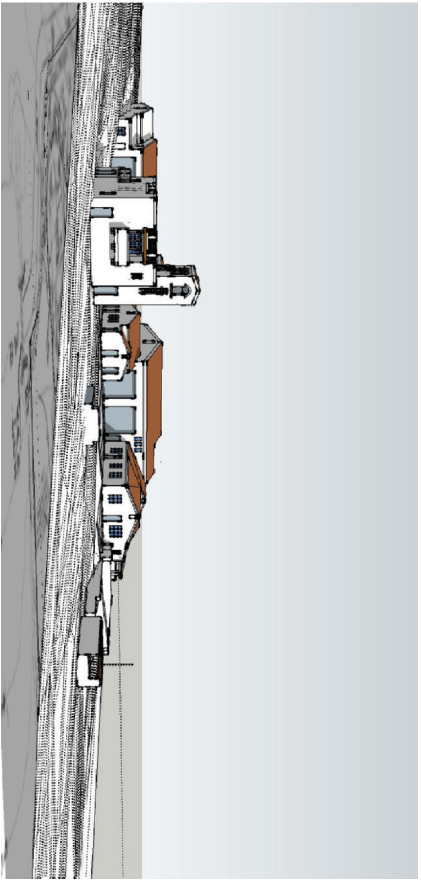
The architectural style would be consistent with other structures in the Montecito community, with thick plaster walls, deep inset windows and doors, and clay and mortar tile roofs. Although the project includes three separate buildings, the orientation and



View of Main Station from Southwest



View of Maintenance Building from Southwest



View of Main Station from Northeast



View of Main Station from Southeast

Figure 3.1-2. Conceptual Station Renderings

massing of the buildings combined with extensive landscaping would minimize the visual bulk of structures from the roadway. Landscaping would consist of an approximately 60-foot-deep buffer along East Valley Road, vegetated with a mix of trees and shrubs. The north, west, and east project boundaries would all have landscape buffers of 30 to 50 feet in width.

Short-Term Construction Impacts

Evaluation of construction impacts focuses on the short-term visual impacts resulting from project construction, the presence of equipment and material storage, as well as alteration of the existing landscape by excavation and earthmoving. In a visual sense, short-duration construction impacts from the proposed project would be obtrusive and out of character with the surrounding natural landscape. The visual changes created by the presence of construction equipment, disruption of site landscape, and unfinished structures would alter the visual character of the site for a 12-month period of time. While this impact would be adverse, it would be short-term, and is thus determined to be less than significant. Further, existing oaks would partially screen construction activities and project landscaping would begin to break up and eventually largely screen the structures from public viewing areas. Should site landscaping and existing oaks be subject to fire-related disturbance, impacts would be short-term and similar to those for construction.

Long-Term Visual Impacts

Long-term project impacts focus on the visual impacts resulting from project operation and the permanent presence of new structures and development. It should be noted that existing views can change over time. For example, trees which currently screen a project site can be burned during wildfire events or die from old age or disease. However, for this proposed project, oak trees typically live for 100 to 200 years or more and, as noted in the arborist report, onsite oaks are generally in good health. Further, oaks are noted for their post-fire regenerative capabilities and are therefore assumed to be part of the long-term landscape character of the area.

Evaluation of Visual Impact Susceptibility

As previously discussed, the *visual impact susceptibility* analysis accounts for the project site's *visual quality*, as well as *viewer exposure* and *viewer sensitivity*. The visual quality

of views from this location is *high* because of the mature oaks and largely unobstructed orchards, and views of the Santa Ynez Mountains to the north. The combination of scenic mature oaks in the foreground, lemon orchards, and Santa Ynez Mountains create a scenic semi-rural or natural ambiance. The MCP reinforces the importance of preserving the community's scenic qualities. Although not a State Scenic Highway, East Valley Road in this area is indentified by the County as a scenic corridor. Because of this, viewer sensitivity is considered *high* as well. However, viewer exposure is *low to moderate* due to very short-duration, limited public views through to the site (e.g., brief glimpses 4.5 seconds or less through vegetation) and the relatively low number of viewers.

Evaluation of Visual Impact Severity by Key Viewing Location

As discussed above, the visual impact severity analysis accounts for the project's visual contrast, potential dominance, and possible impairment of important views. The following analysis discusses potential visual impacts based on KLVs.

KVL A: Eastbound East Valley Road Looking Northeast Toward the Project Site

From KVL A, the site is largely obscured to eastbound travelers approaching the site on



KVL A: Looking northeast from East Valley Road toward the project site; existing oak trees and proposed landscaping would largely obscure views of the project site.

East Valley Road. This KVL represents the easternmost view of the proposed project available while looking northeast and traveling eastbound on East Valley Road. This KVL was selected because it represents the first view of the project site for eastbound travelers not completely obstructed by dense stands of the oaks in the area.

Because the proposed project structures would have very limited visibility, the visual contrast of the project would be almost indiscernible, no views would be blocked or substantially altered, and the project would not dominate this view. Therefore, the *visual impact severity* from this KVA would be *low*.

KVL B: 2347/2351 East Valley Road Driveway Looking Northeast Towards Project Site

This KVL represents a view of the project site looking northeast from the public road at the driveway of 2347 and 2351 East Valley Road, which is a shared entrance for the equestrian facility and residence across from the proposed project site and the residence to the southwest. It was selected to illustrate direct views of the proposed project site that would be experienced briefly by travelers on East Valley Road, residents, and users of the equestrian facility.



KVL B: Looking northeast towards the project site from 2347/2351 East Valley Road; project site is partially visible through existing oak; however, views would be limited by new landscaping.

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The proposed project structures would be partially visible from this KVL through the line of existing oaks; however, the structures would be set back 60 feet or more from the roadway and screened with additional landscaping. The proposed structures would not block any existing mountain views from this KVL; however, the new development would disrupt existing views of the orchards, creating moderate visual contrast and dominance of the proposed project with the surrounding landscape. The proposed project would introduce a new partially visible fire station and support structures into this view that would contrast with surrounding orchards. Therefore, *visual impact severity* would be *moderate*.

KVL C: East Valley Road Immediately South of the Project Site Looking North

This KVL represents a view of the project site looking north from East Valley Road, immediately south of the proposed project site. This KVL was selected because it is the closest view of the project site briefly available to travelers and cyclists along East Valley Road.



KVL C: Looking north from East Valley Road directly south of the project site; brief views would be available to passersby; proposed setbacks and landscaping would soften views of new structures.

The proposed project would contrast with and break up the nearly contiguous orchard and woodlands on the north side of East Valley Road in this area, one of the least developed stretches of East Valley Road in Montecito. However, due to mature oaks in the foreground, the new structures would not substantially block any existing mountain views from this KVL. Construction of project driveways would entail removal of one mature oak, opening up some views of the new structures; however, while contrasting with the immediately surrounding orchards, the proposed project would be visually similar in design, bulk, and character to other area residences and would be setback farther from the road edge than existing residences in the vicinity. In addition, while the proposed structures include taller elements, they would include few of the two-story elements found in four of the six residences visible along this reach of East Valley Road. Therefore, *visual impact severity* would be *moderate*.

KVL D: Westbound East Valley Road Looking Northwest Towards Project Site

Distant views of the project site are limited for westbound travelers on East Valley Road due to visual screening provided by a line of oaks along the roadway. KVL D was selected because it represents a view of the proposed project site available to westbound travelers on East Valley Road through a short gap in the oaks that line the north side of



KVL D: Looking northwest towards the project site; brief views are available to passersby through a 100-foot gap in oak trees; new landscaping would limit views of proposed structures.

3.1 AESTHETICS AND VISUAL RESOURCES

the road. The proposed project would contrast with and somewhat dominate surrounding orchards; however, the proposed 50-foot landscape buffer along the site's east end combined with the backdrop of the oak-lined drainage would lessen this effect. The proposed project would not block any existing mountain views from KVL D due to proposed setbacks. Therefore, visual impact severity would be *moderate*.

KVL E: Ortega Ridge Road Looking North Towards the Project Site

This KVL was selected to provide a view of the project site and general vicinity looking north from Ortega Ridge Road. This elevated vantage would provide brief views of the proposed project through a gap in the oaks which line this road and obstruct views of project site.



KVL E: Ortega Ridge Road looking north towards the project site; distance and proposed landscaping would soften views of new structures

The proposed project would alter views of the existing lemon orchard and oak groves. However, potential visual dominance would be limited in context of views of the large equestrian facilities south of the project site, the distance of the site from KVL E, and proposed landscaping that will surround the structures. While the view would be

changed to include additional structures on the perimeter of an extensive orchard, existing views would not be substantially altered as no scenic elements would be blocked and the visual continuity of the larger rural area would remain. Therefore *visual impact severity* from this location would be *moderate*.

Additional Visual Considerations

Additional visual concerns include the architectural compatibility of the proposed project with other development in eastern Montecito and potential effects of scenic resources such as trees, particularly if the project would have the potential to “substantially degrade the existing visual character or quality of the site and its surroundings” (CEQA Guidelines Appendix G).

Architectural Compatibility

The proposed fire station would consist of 12,560 sf of mostly one-story buildings which would exceed the size of most residences in the vicinity, but would be consistent with the size of structures on the equestrian estate to the south. The overall potential visual effects of this larger facility would be reduced due to existing dense vegetation, greater setbacks from public roads than typical for the area, and proposed substantial landscaping. In addition, total site grading would consist of an estimated 16,500 cubic yards of cut, with up to 8,000 cy of export. This export of soil would lead to slight changes in overall site topography with much of the site being lowered 1 to 2 feet below existing grade, and more limited areas being lowered from 3 to 5 feet below existing grade. Installation of dense project landscaping would help mask these changes in topography.

The proposed project’s single-story construction with taller elements such as the 27-foot-high ridgeline over the main fire station apparatus bays and the 35-foot-high hose tower would be consistent with or lower than the two-story elements of many surrounding structures, including residences adjacent to the site south of East Valley Road and the four tower projections on the large barn south of East Valley Road. Proposed structures would also not exceed the height of existing oaks that border the site. Horizontally, the 107-foot length of the main fire station structure frontage viewed from East Valley Road and the 46-foot length of the Training and Hose Tower Building frontage, set back approximately 205 feet from East Valley Road, would be generally consistent with the

160-foot length of the residences across East Valley Road to the south and substantially less than that the 370-foot length of the large barn. The proposed project would also be architecturally consistent with the Spanish Colonial style of the design of structures in vicinity, including features such as a low perimeter wall facing East Valley Road, tile roof, deep recessed windows and colors consistent with the architectural theme and surrounding residences. Therefore, project design would be generally compatible with surrounding uses and would be subject to further refinement by the MBAR.

Loss of Trees

Project construction would result in removal of three mature oak trees and trimming of a number of oaks along East Valley Road. The loss of mature trees due to project construction requirements would incrementally reduce the number of oaks along East Valley Road and reduce screening of the site. However the large majority of existing oaks along East Valley Road would remain intact and additional oaks and other trees would be planted in project landscape buffers that would more than offset this loss of trees and would provide substantial new visual screening of the proposed structures. Therefore, visual impacts associated with the loss of trees are considered insignificant.

3.1.3.5 Project Impacts and Mitigation Measures

Impact

VIS-1 The proposed project would result in adverse, but less than significant impacts to views from East Valley Road (Class III).

As detailed in the KVL analysis, the proposed project would result in new development in a semi-rural area that would change existing visual continuity and agricultural uses of the site. However, the proposed fire station would be only moderately visible from East Valley Road, with no significant distant views of the project site afforded to either westbound or eastbound travelers on East Valley Road. Views for eastbound travelers would be almost entirely obstructed by oak trees until nearly directly south of the site. Views for westbound travelers would be intermittent, partially obscured by existing trees, and limited by proposed landscaping (refer to KVLs A, C, and D). In general, viewer exposure to the structures would be intermittent and of short duration, occurring for approximately 5 seconds for travelers driving at 35 mph, though slightly longer for cyclists. The proposed structures' limited visibility, location at the margin of agricultural

operations, and screening provided by surrounding oaks and proposed landscaping would substantially reduce potential visual disruption of the area. In addition, proposed changes in site topography of generally 1 to 2 feet lower than existing grades would also be masked by proposed landscaping. This lowering of the site would also have the effect of incrementally reducing building profiles to passers-by on East Valley Road. Although the project would contrast with immediately surrounding orchards it would be visually consistent with regard to size, bulk, height, and design of residences and other structures in the vicinity.

Construction of the proposed project would not obstruct mountain or other scenic views. The project would not result in adverse affects related to glare, as none of the project buildings contain large glass or mirrored facades. In terms of lighting, an increase to nighttime lighting would result from limited exterior lighting; however, such lighting would be consistent with Montecito standards (e.g., hooded) and would not result in a substantial increase in outdoor ambient light. Therefore, changes in views from East Valley Road would be an *adverse, but less than significant impact* (Class III).

Impact

VIS-2 The proposed project would result in an adverse, but less than significant impact on views from elevated vistas, including Ortega Ridge Road and nearby foothills (Class III).

Views from the elevated vantages would not be significantly impacted by the proposed project due to the relative lack of viewpoints of the project site from surrounding public viewing areas such as Ortega Ridge Road and local trails, as well as the relatively small project footprint in relation to the larger setting. Although located within a contiguous semi-rural landscape, the project's proximity to East Valley Road, residences, large equestrian facilities, and the oak-lined drainage channel would lessen the visual disruption of the larger rural landscape character from elevated vantages. In particular, considering the site's proximity to East Valley Road and the visually dominant residences and equestrian facilities that are adjacent to the south of the project site, the visual contrast with and project dominance over the existing landscape would be less than significant. The visual contrast and dominance would be further reduced with the additional landscaping and vegetative screening that would be included with the project. Therefore, changes in views from the elevated vantages would be an *adverse, but less than significant impact* (Class III).

3.1.3.6 Cumulative Impacts

The proposed project would result in the conversion of approximately 2.55 acres of orchard. It should be noted that there are no currently pending major development projects along the East Valley Road or Ortega Ridge corridors and no development is currently proposed for the open spaces on the Rancho San Carlos. Therefore, although Rancho San Carlos is designated for large lot residential uses, no development is pending on the site. Therefore, no substantial cumulative aesthetic impacts would occur related to individual developments along the two major public roads in the immediate project vicinity.

However, at the planning level, as identified in the MCP EIR, future development of open spaces in Montecito, Summerland, and Santa Barbara would result in cumulatively significant changes to the visual character of the region. Wildfires may also continue to affect surrounding views. However, the implementation of the proposed project would not substantially contribute to this potential cumulative impact, as the site would be well-shielded by oak trees and landscaping and would be designed to be visually consistent with existing residential development in the area.

Further, Given that the project would be consistent with MCP and MGMO development guidelines and zoning, the project's contribution to the reduction of farmland and associated rural aesthetics in Santa Barbara County is considered insignificant.

3.1.3.7 Residual Impacts

As no significant impacts to visual resources would occur as a result of the proposed project, no residual impacts would remain after project implementation. Incorporation of proposed mitigation measures such as landscaped buffers and setbacks would further decrease potential for adverse visual changes.

3.2 AGRICULTURAL RESOURCES

The following section evaluates the potential impacts of the MFPD Station 3 Site Acquisition and Construction Project on agricultural resources, including potential loss of prime soils or farmland, increases in urban-rural or agricultural conflicts, and consistency with existing site zoning. It also evaluates the proposed project's consistency with relevant State and County policies and regulations, including agricultural and land use goals, programs, and policies in the Montecito Community Plan (MCP) and the County's Comprehensive Plan, including the County Land Use and Agricultural Elements.

Agricultural resources consist of land with existing or potential agricultural productivity. Important agricultural resources are identified by the State of California's Important Farmland Map as Prime Farmland, Farmland of Statewide or Local Importance, or Unique Farmlands, with soil or other important agricultural production properties such as unique climate zones (California Department of Conservation 2009). The U.S. Department of Agriculture (USDA) Natural Resource Conservation Service (NRCS) *Soil Survey for Santa Barbara County, South Coastal Part*, identifies soil types in the coastal portions of Santa Barbara County, including those which contain superior properties for agricultural production. The NRCS designates such soils with a Soil Capability Class of I or II and such soils are considered "prime" for purposes of agricultural production. The NRCS defines Class I as soils that have slight limitations that restrict their use, and Class II as soils that have moderate limitations that reduce the choice of plants or require moderate conservation practices. Many soils are given a Capability Class of I or II only when irrigated, but otherwise receive a lower rating without irrigation.

3.2.1 Existing Conditions

3.2.1.1 Regional Setting

Agriculture is a key production industry in Santa Barbara County. The County ranks as the 15th largest agricultural producer in the State of California (County of Santa Barbara 2007a). Agriculture continues to be Santa Barbara County's major producing industry with a gross production value of over \$1.24 billion (County of Santa Barbara 2009). Top crops, by value, were comprised of *strawberries* (\$313 million), *broccoli* (\$131 million), *wine grapes* (\$100 million), *head lettuce* (\$88 million), and *cauliflower* (\$46 million). Along the County's South Coast, orchard crops are among the most valuable crop types,

3.2 AGRICULTURAL RESOURCES

particularly lemons and avocados. Through a multiplier effect, County agriculture has an estimated local economic impact in excess of \$2.2 billion (County of Santa Barbara 2007a). A total of approximately 750,000 acres of County land are zoned as agriculture, 555,000 acres of which are in agricultural preserves (County of Santa Barbara 2007b).

3.2.1.2 Local Setting

Montecito is not considered a substantial agricultural region and the majority of historic farmland within the community has been converted to residential and other urban uses; however, areas of active agricultural operations remain, particularly in eastern Montecito. Within Montecito, only 35.3 acres are zoned for agricultural use, although 146.1 acres are currently under agricultural cultivation. The remaining acreage under cultivation consists of parcels that are zoned for residential uses (County of Santa Barbara 2010a). The nearest land outside of Montecito zoned for agriculture and under cultivation is approximately 1.5 miles to the east in the Summerland area, with additional agriculture further east in Toro Canyon and Carpinteria. There are no parcels under Williamson Act contracts in Montecito. The project site and immediately surrounding parcels support historic and ongoing agricultural operations. However, the nearest parcels zoned for agriculture are located approximately 500 feet to the southeast of the project site and are not currently developed in agricultural use.

3.2.1.3 Project Site

The proposed project site currently supports a lemon orchard of approximately 2.5 acres, which is part of a larger 76.87-acre existing parcel (APN 155-070-008). Both this larger parcel and the proposed project site are, operated as part of the larger 237-acre Rancho San Carlos lemon and avocado agricultural operation. Based on review of aerial photographs, Rancho San Carlos currently supports approximately 87



The project site is currently cultivated with lemon trees, part of the larger Rancho San Carlos.

acres of existing developed orchards, primarily lemons and avocados; a one-acre olive orchard is also under cultivation (Figure 3.2-1). In addition to orchards, Rancho San Carlos supports approximately 34 acres of facilities historically occupied by equestrian uses in the southeastern portion of the Ranch, which have been inactive in recent years. Several acres of what appear to be paddocks are also located in the northwestern portion of the Ranch between the main residence and Romero Creek.

Onsite soils are Ballard fine sandy loam occurring on 2 to 9 percent slopes, a moderately well drained soil identified as prime for agricultural purposes (Class II) (United States Department of Agriculture, Natural Resource Conservation Service [NRCS] 1981, 2011; California Department of Conservation 2009). The estimated yield for these soils is 800 field boxes of lemons or 325 boxes of avocados per acre per year; a is near the high end for yields compared to other area soils (NRCS 1981); however, this soil type has moderate potential for root rot to occur and is subject to erosion hazards (NRCS 1981).

Active agricultural operations on the site include water use for irrigation, the intermittent application of fertilizers, pesticides and herbicides, routine cultivation and tree maintenance, harvest of lemons, and the occasional tree replacement. According to Santa Barbara County Agricultural Commissioner's Permit and Use Data, six types of pesticides were applied to the agricultural operation that includes the project site in 2010 (County of Santa Barbara 2010b). Pesticides most commonly used for lemon operations include unclassified petroleum oils, mineral oils, isopropylamine salt glyphosate and potassium salt glyphosate (Round-Up), and chlorpyrifos (Department of Pesticide Regulation [DPR] 2009). High levels of exposure to petroleum and mineral oils have been known to cause rapid respiration, cyanosis, tachycardia, and low-grade fever usually indicative of frank hydrocarbon pneumonitis; however, these symptoms are considered rare. Isopropylamine salt glyphosate, potassium salt ~~glyphosate~~ glyphosate are considered Class III by the EPA, indicating a low level of toxicity and risk to human health. Chlorpyrifos is a neurotoxin, suspected endocrine disruptor, and has been associated with asthma, reproductive and developmental toxicity and acute toxicity, and is classified as Class II by the EPA, indicating it is moderately toxic. Pesticide application and storage on Rancho San Carlos are consistent with the State and County policies and adhere to County Agricultural Commissioner's guidelines for pesticide reporting and use.

Loss of Prime Soils and Conversion of Prime Farmland

The eventual development of the subject 2.55-acre site in urban uses and the associated loss of existing agricultural land has long been anticipated and previously approved under local land use plans and regulations. In 1992, the Santa Barbara County Board of Supervisors approved residential zoning for Rancho San Carlos, acknowledging the associated conversion of agricultural areas in Montecito to urban uses as part of adoption of the Montecito Community Plan (MCP). The MCP EIR (92-EIR-03) found that the zoning and subsequent development of agricultural land for residential use in Montecito would result in significant and unavoidable impacts with no feasible mitigation available. As part of approval of the MCP, the Board of Supervisors adopted accompanying findings and a Statement of Overriding Considerations regarding the loss of prime agricultural land (Appendix K).

Subsequent to the approval of the MCP in 1992, project site's Comprehensive Plan Land Use Designation is Semi-Rural residential (SRR-0.5), with residential zoning of 2-acre minimum parcel size (2-E-1). This land use designation was approved by the County Board of Supervisors in 1995, under amendments to the MCP which specifically addressed amended the MCP to the land use change the land use and zoning and rezone of the nine parcels that comprise Rancho San Carlos and Featherhill Ranches, including the property on which the project site is located.¹ The project site's Comprehensive Plan Land Use Designation was changed to Semi-Rural Residential (SRR-0.5), with residential zoning of 2-acre minimum parcel size (2-E-1). Overall, these County actions increased the development potential of the Rancho San Carlos from approximately 78 to up to 93 units. The County prepared staff reports and findings, as well as an addendum to the 1992 MCP EIR under Section 15162 of the State CEQA Guidelines to address issues and impacts associated with the proposed Comprehensive Plan Amendments and Rezone; these documents again acknowledged the loss of agricultural land cited in the 1992 EIR (refer to Appendix K).

¹ ~~The MCP Environmental Impact Report (EIR) (92 EIR 03) found that the zoning and subsequent development of agricultural land for residential use in Montecito would result in significant and unavoidable impacts with no feasible mitigation available; however, the County prepared an addendum to the EIR to address impacts associated with the proposed Comprehensive Plan Amendments and Rezone, along with accompanying findings and a Statement of Overriding Considerations regarding the loss of prime agricultural land.~~

Although the County, as the agency with land use authority over the proposed Fire Station -3 project site, has previously identified the loss of agricultural land from urban development in Montecito as significant, adopted statements of overriding considerations associated with this impact, and designated the site for urban uses, a brief analysis of agricultural resources is provided to below to further inform the public regarding agricultural issues associated with the proposed project.

The nearest parcels zoned for agriculture are located approximately 500 feet to the southeast of the project site and currently consist of undeveloped oak woodlands on moderate slopes. The proposed project would result in development of approximately 2.55 acres of prime agricultural soils that currently support lemon orchards with an institutional use. This loss of orchard would constitute less than 3 percent of the existing orchards currently in production on the Rancho San Carlos or about 2 percent of the 120 acres of the Ranch historically in agriculturally related uses (i.e., orchards and equestrian facilities). As noted above, the proposed 2.5-acre project site is located within the boundaries of an existing 76.85-acre parcel (APN 155-070-008)², approximately 76 percent (58.4 acres) of which is developed with existing orchards. The loss of 2.5 acres of orchard on the project site would constitute approximately 4 percent of the existing orchards on APN 155-070-008 or 3 percent of the total acreage of agricultural soils on this parcel³.

The County of Santa Barbara utilizes Agricultural Resource Guidelines to assess potential project-related impacts to agricultural resources (refer to Appendix K). These Guidelines consider factors such as parcel size, soils, water availability, land use designation and a range of other issues to help determine if projects would adversely affect significant agricultural resources. These Guidelines are included within the Santa Barbara County Environmental Thresholds and Guidelines Manual (Santa Barbara County, 2008). In order to provide more detail on project effects on agriculture, the potential effects of the project on onsite agricultural resources as well as the agricultural viability of the remainder of APN 155-070-008 were assessed utilizing the County methodology (refer to Appendix K).

² The project site is also located with the boundaries of an existing 20.69-acre Certificate of Compliance (CC; 03CC037), which has been acknowledged by the County as constituting a legal developable parcel; approximately 90% of this CC is currently under cultivation in lemon orchard. The effects of the project on the viability of this CC were also assessed (refer to Appendix K)

³ Areas of APN 155-070-008 not under cultivation generally support oak woodlands.

Based upon a review of these County criteria, the proposed project site has relatively high quality soils, historically available water, is suitable for orchard crops, and has a history of active cultivation. However, the site's very small size, and planned urban land use designation combine with the site's inability to qualify for agricultural preserve due to residential zoning and its relatively small contribution to the site's combined farming operation to reduce its agricultural viability. It should also be noted that the County of Santa Barbara's minimum parcel size for agricultural land use and zoning is five~~5~~ acres, and such five acre zoning is typically focused on super-prime lands within the coastal zone capable of supporting strawberries, nursery crops and other very high value agricultural uses. Orchard lands are generally zoned for minimum sizes of 20 to 40 or more acres. Further, the County has never found ~~to~~the loss of less than five acres of prime soils to be a significant impact and recently identified development of approximately 20 acres of primes soils zoned for agricultural use to be insignificant (Cavaletto Tree Farm Residential Housing Project- 11EIR-00000-00002).

In addition, a review of the remaining 74.3 acres of APN 155-070-008 after the loss of 2.5 acres from the proposed project found that this parcel would continue to be viable for agricultural use under the County's Guidelines, generally due to its large parcel size, prime soils, adequate water availability, and major role as part of the Rancho San Carlos agricultural operation. For similar reasons, the existing 20-acre Certificate of Compliance within which the project site is located was also found to remain viable after loss of the 2.5 acres of the project site. Therefore, project impacts associated with loss of agricultural land and prime agricultural soils would be insignificant. Further, as set forth above, the County already committed the project site to residential use in 1992 and 1995, supported by both the MCP EIR and a CEQA addendum, and adopted the appropriate findings and overriding considerations to support that decision as required under CEQA.

3.2.2 Regulatory Framework

3.2.2.1 State Policies and Requirements

California Department of Conservation. The California Department of Conservation administers both the State Important Farmland Mapping Program and the California Land Conservation Act, or Williamson Act. The Important Farmland Mapping Program compiles information of the State's important farmlands, including tracking farmland proposed for development, and provides this information to state and local government agencies for use in planning and decision-making. The site is currently designated as *Prime Farmland* by the Important Farmland Mapping Program (California Department of Conservation 2009).

The Williamson Act provides for reduced property taxation on agricultural land in exchange for a 10-year, rolling agreement that the land would not be developed or otherwise converted to non-agricultural use. No portion of the project site is presently under a Williamson Act contract and no Williamson Act contracts are in place within Montecito.

3.2.2.2 Applicable County Policies

A number of County of Santa Barbara policy and planning documents contain provisions designed to protect agricultural resources and prime agricultural land. Although the site is not zoned for agricultural use, the County's *Comprehensive Plan*, Agricultural and Land Use Elements are potentially applicable to the project and contain policies that address agricultural resources. Relevant policies are briefly discussed below; however those policies applying to preservation of prime soils no longer directly apply as the County committed the site to residential use in 1995 and adopted the appropriate findings and overriding considerations to support that decision as required under CEQA.

Santa Barbara County Comprehensive Plan. The Santa Barbara County Comprehensive Plan provides a general framework for growth and development in the County. The Plan's Agricultural and Land Use Elements contain various goals and policies which address agricultural resources, including the preservation and expansion of agricultural land use within rural areas of the County. The policies outline the County's priority to preserve and, where feasible, expand and intensify agricultural land uses. Agricultural

operations are encouraged in areas containing both prime and non-prime soils. However, as the County *committed the site to residential use in 1995, policies that address agricultural land preservation are not discussed*. Relevant goals and policies regarding compatibility with surrounding agricultural activities are summarized below.

- *Agricultural Element, Goal I:* Santa Barbara County shall assure and enhance the continuation of agriculture as a major viable production industry in Santa Barbara County. Agriculture shall be encouraged. Where conditions allow (taking into account environmental impacts), expansion and intensification shall be supported
- *Agricultural Element - Policy I.A:* The integrity of agricultural operation shall not be violated by recreational or other non-compatible uses. Imposition of any condition requiring an offer of dedication of a recreational trail or other recreational easement shall be discretionary (determined on a case-by-case basis), and in exercising its discretion, the County shall consider the impact of such an easement upon agricultural production of all lands affected by and adjacent to said trail.
- *Agricultural Element, Policy II.D:* Conversion of highly productive agricultural lands whether urban or rural, shall be discouraged. The County shall support programs which encourage the retention of highly productive agricultural lands.
- —
- *Agricultural Element – Goal III:* Where it is necessary for agricultural lands to be converted to other uses, this use shall not interfere with remaining agricultural operations.

Montecito Community Plan

Policy LUG-M-2.1: Agricultural activities on residential parcels that are consistent with the provisions of the applicable residential zone district shall be supported and encouraged by the County.

3.2.3 Environmental Impacts

3.2.3.1 Thresholds of Significance

CEQA Guidelines. With respect to agricultural resources, applicable sections of Appendix G of the CEQA Guidelines state that a project would normally have a significant impact on the environment if it would:

- Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance to non-agricultural use;
- Conflict with existing zoning for agricultural use, or a Williamson Act contract; and/or
- Involve other changes in the existing environment which, due to their location or nature, could individually or cumulatively result in the conversion of farmland to non-agricultural use.

Santa Barbara County Environmental Thresholds. The *Santa Barbara County Environmental Thresholds and Guidelines Manual* provides guidance on assessing potential impacts to agricultural resources. The manual provides a methodology utilizing a weighted point system to determine agricultural viability of a parcel before and after development. The methodology assigns relative values to particular characteristics of a site's agricultural productivity (e.g., parcel size, soil type, water availability, adjacent land uses, and other factors), weighing the physical environmental setting rather than economic attributes. When the potential for viability is high, a development project should be further evaluated for agricultural impacts.

~~However, analysis of the loss of agricultural soils is not included as the County already committed the project site to residential use in 1995 and adopted the appropriate findings and overriding considerations to support that decision as required under CEQA.~~

3.2.3.2 Impact Assessment Methodology

As previously discussed, analysis of the loss of agricultural soils is not included. Therefore, impacts to agricultural resources were assessed based upon the following criteria:

- An increase in urban-rural conflicts

Where relevant, elements of the project which have the potential to breach a stated goal, policy, or program within established planning policy documents are summarized in this section, along with related physical environmental consequences.

3.2.3.3 Mitigation Measures Contained in the Proposed Project

The applicant has proposed a series of mitigation measures to reduce potential urban-agricultural conflicts with surrounding orchard on residential land, which have been incorporated into the project design. Pesticide drift and other hazards to site inhabitants related to vicinity agricultural use would be minimized by implementing the design measures listed below:

- A densely landscaped buffer area of generally 50 feet in width on the northern and eastern sides of the site, separating support buildings and structures from agricultural operations.
- A 100-foot buffer (which includes the 30- to 50-foot landscape buffer described above) between agricultural operations and the primary use areas on the site (main fire station and residential quarters).
- A 50-foot habitat restoration buffer from the top of the bank of the drainage along the western side of the site.
- The MFPD will coordinate with the Agricultural Commissioner's Office and the Ranch Manager for Rancho San Carlos regarding notification of agricultural spraying activities.

3.2.3.4 Project Impacts and Mitigation Measures

Impact**AG-1 Construction of the proposed project would result in an adverse, but less than significant increase in urban-rural agricultural land conflicts (Class III).**

The proposed project would involve the construction of a new fire station and associated facilities on a new parcel bordered by active agricultural operations currently consisting of lemon orchards. Lemon orchards would immediately border the proposed project to the north and east and from across the intermittent drainage to the west. The proximity of the project to active agriculture could create land use incompatibilities between the proposed development with existing and continuing agricultural uses, such as ongoing use of pesticides or herbicides and noise and dust generation associated with periodic cultivation and harvesting.

In order to reduce these potential incompatibilities, the proposed project includes both building setbacks and use of landscape buffers to provide separation between existing surrounding agricultural operations and the proposed project. Project design includes a 30- to 50-foot densely landscaped buffer area on the project site's north and east boundaries. The proposed fire station would also be well separated from agricultural activities to the west by the existing oak-lined drainage on the site's western boundary and a 50-foot onsite habitat restoration buffer. In addition, the main Fire Station and firefighter residential quarters would be set back more than 100 feet from existing orchards. These measures would reduce the risk of pesticide drift adversely affecting future station personnel and would be consistent with buffers required by the County for other projects adjacent to active agricultural uses on *agriculturally zoned* lands.⁴

⁴ No established Countywide policy currently exists regarding agricultural buffers for *residentially zoned* land. Agricultural buffer requirements for previous development projects have been varied. For example, the Montecito Avocado Ranch provided minimal buffers between new residences and existing orchards. The Legacy Estates Project in Los Alamos required a 70-foot buffer between habitable structures and active row crops, where agricultural practices such as spraying, regular cultivation, and crop harvesting are substantially more intensive than those typically required for a lemon orchard. The 2010 Los Alamos Community Plan Update requires that residential development be set back at least 100 feet from the nearest property line of existing agricultural fields.

3.2 AGRICULTURAL RESOURCES

In addition to these setbacks and buffers included in project design, the application of pesticides and herbicides is strictly regulated and monitored by the County Agricultural Commissioner's Office which is responsible for regulating State and federally restricted pesticides. Farmers are required by law to notify the Commissioner's Office prior to application of any restricted pesticides and adhere to clear standards which govern the use and application of pesticides and herbicides. The majority of pesticides applied to lemon orchards are non-restricted pesticides; however, the Commissioner's Office enforces a "zero-drift" policy regarding the drift of all applied pesticides off the application site and restricts application during periods of higher winds. Existing County regulations combined with project design measures would substantially reduce the risks to human health and safety, and be consistent with County and State standards. Further, the development of this site has been



Potential urban-rural conflicts would be reduced by design measures, including setbacks and buffers.

discussed with the County's Agricultural Commissioner, who indicated that proposed buffers and landscaping appeared generally adequate to address potential urban-rural conflicts including pesticide drift (County of Santa Barbara 2010c). As part of the project, the MFPD will coordinate with the Agricultural Commissioner's Office and the Ranch Manager for Rancho San Carlos regarding notification of agricultural spraying activities.

Urban-rural conflicts such as noise and dust generation associated with periodic cultivation and harvesting can also adversely affect new uses adjacent to active agricultural operations. However, project landscape buffers and setbacks would also reduce such issues to insignificance given the low level of ongoing active cultivation.

Because the proposed project consist of a Fire Station that would be buffered from existing orchards, the proposed project would not create a nuisance, nor require agricultural landowners to alter agricultural operations to meet urban expectations such that the project would be inconsistent with the County's Right to Farm Ordinance (County of Santa Barbara Ordinance 3778, § 1). Agricultural operations would continue

on Rancho San Carlos unimpeded by project development. Additional urban-rural impacts can occur via increased fruit theft, vandalism of crops and property, and trespassing. Because the project would be staffed by responsible public safety personnel and surrounded by landscape buffers, it would not result in increased public access to the larger Rancho San Carlos, and agricultural operations would remain fenced from public access. Additionally, the project site is located in the southwest corner of the Rancho San Carlos and would therefore only be adjacent to agricultural uses on the site's north and east boundaries, which would reduce exposure and interaction with agricultural operations.

Therefore, with proposed incorporation of design measures to buffer agricultural operations from the project site, impacts resulting from urban-rural conflict would be Class III, adverse, but *less than significant*.

3.2.3.5 Cumulative Impacts

Development of the proposed project would result in the direct physical conversion of approximately 2.5 acres of prime soils on Prime Farmland. Overall, the project would add incrementally to the reduction in inventory of prime soils and Prime Farmland in Santa Barbara County. Construction of the proposed project would incrementally contribute to the gradual transition of eastern Montecito from a more rural area with substantial agricultural land uses, to estate residential uses. As previously discussed, the project site, as well as the adjacent parcels that comprise the remainder of Rancho San Carlos and the Featherhill Ranch, have been zoned for residential use, and a Statement of Overriding Considerations was adopted regarding the County's decision to designate prime soils for eventual development. Thus, the loss of agricultural lands associated with eventual development of this site has already been identified and considered by the County. Further, as set forth in Section 3.2.1.3 above (Loss of Prime Soils and Conversion of Prime Farmland), the loss of 2.5 acres of prime soils would be considered insignificant under the County's adopted Guidelines and therefore would not contribute substantially to cumulative impacts.

-Further, the Montecito Growth Management Ordinance (MGMO) EIR found that ongoing development consistent with the MGMO guidelines would not result in a regionally considerable loss of agricultural resources, and impacts to regional agriculture would be insignificant (County of Santa Barbara 2010a). Given that the project would be

consistent with MCP and MGMO development guidelines and zoning, the project's contribution to the reduction of prime soils and Prime Farmland in Santa Barbara County is considered insignificant.

3.2.3.6 Residual Impacts

As no significant impacts to agricultural resources would occur as a result of the proposed project, no residual impacts would remain after project implementation.

3.3 AIR QUALITY

This section describes existing air quality conditions and relevant air quality regulations, assesses potential impacts of the proposed project on air quality, and recommends mitigation measures to reduce impacts to air quality for the proposed MFPD Station 3 Site Acquisition and Construction.

3.3.1 Existing Conditions

Air quality in a given location is determined by the concentration of various pollutants in the atmosphere. National Ambient Air Quality Standards (NAAQS) are established for the criteria pollutants, which include ozone (O₃), carbon monoxide (CO), nitrogen dioxide (NO₂), sulfur dioxide (SO₂), particulate matter equal to or less than 10 microns in diameter (PM₁₀) and 2.5 microns in diameter (PM_{2.5}), and lead (Pb). California has also developed California Ambient Air Quality Standards (CAAQS) for these criteria pollutants, as well as hydrogen sulfide, vinyl chloride, sulfates, and visibility reducing particles. Appendix D shows the NAAQS and CAAQS in detail. Existing conditions for air quality in Santa Barbara County are described in detail in the 2010 Clean Air Plan (CAP) and on the Santa Barbara County Air Pollution Control District (SBCAPCD) website, which are summarized and incorporated herein by reference. Based on information available, it is not expected that baseline conditions have changed significantly since the 2010 CAP was completed.

3.3.1.1 Regional Climate and Meteorology

Montecito's climate can generally be characterized as Mediterranean, with warm dry summers and cooler, mild winters. Approximately 90 percent of the 16 inches of average annual rainfall, occurs between November and April. In the fall, on-shore surface winds decline and the marine layer grows shallow, allowing an occasional weak off-shore flow. Pollutants may accumulate more during this time of year, remaining over the ocean for a few days before being carried back on-shore.

3.3.1.2 Greenhouse Gases and Global Climate Change

Scientific consensus has identified human-related emissions of greenhouse gases (GHGs), primarily in the form of carbon dioxide (CO₂), are a significant contributor to

global climate change (IPCC 2007). GHG are substances that trap heat in the atmosphere and regulate the Earth's temperature. Primary activities associated with GHG emissions include transportation, utilities (e.g., power generation and transport), industry/manufacturing, agriculture, and residential. GHGs are further discussed and analyzed in Section 5.3, *Global Warming*.

3.3.1.3 Regional Air Quality

Air quality within Santa Barbara County is contingent on several factors including the type, amount, and dispersion rates of pollutants being emitted within the region. Major factors affecting pollutant dispersion, as discussed in the previous paragraphs, are wind speed and direction, atmospheric stability, temperature, the presence or absence of inversions, and the topographic and geographic features of the region.

3.3.1.4 Regional Emissions

An attainment designation for air quality standards defines clean air within the County. Both the state and federal government have established standards to protect Californians' health. Santa Barbara County is currently in attainment for all federal air quality standards. The County is in non-attainment for the state 8-hour ozone standard and the state standard for PM₁₀. There is not yet enough data to determine the attainment status for the state or federal standard for PM_{2.5} (SBCAPCD 2009).

3.3.1.5 Existing Emissions in the Vicinity of the Project Site

The primary source of air pollutants in the project vicinity is vehicle emissions. The ambient air quality data in the vicinity of the project area is gathered from Santa Barbara monitoring station approximately 7 miles west of the project area. Maximum values for air pollutants at the monitoring station from 2007 to 2009 are summarized in Table 3.3-1, including the number of exceedances over the state standard.

Table 3.3-1. Ambient Air Quality Data at the Santa Barbara Monitoring Station

	O ₃ , ppm		PM ₁₀ , µg/m ³	CO ppm	NO ₂ , ppm
	Worst 1-Hour	Worst 8-Hour	Worst 24-Hours	Worst 8-Hour	Worst 1-Hour
2007	0.079	0.071	399.60	1.38	0.065
No. of Exceedances (state)	0	1	27	0	0
2008	0.076	0.064	109.00	1.69	0.066
No. of Exceedances (state)	0	0	44	0	0
2009	0.091	0.078	125.90	1.57	0.052
No. of Exceedances (state)	0	1	8	0	0

Notes: ppm = parts per million
 µg/m³ = micrograms per cubic meter
 Source: CARB 2009.

3.3.2 Regulatory Framework

Air quality problems in Santa Barbara County are addressed through the effort of federal, state, local, and regional government agencies. These agencies work together and individually to improve air quality through legislation, regulations, policy making, education, and numerous programs. The individual roles these agencies play in regulating air quality is described below:

- **U.S. Environmental Protection Agency (USEPA)** – enforces the federal (national) standards for atmospheric pollutants.
- **California Air Resources Board (CARB)** – ensures implementation of the California Clean Air Act (CCAA), responds to the federal Clean Air Act (CAA). CARB is responsible for the control of vehicle emission sources, while the local air District is responsible for enforcing standards and regulating stationary sources.
- **Santa Barbara County Air Pollution Control District (SBCAPCD)** – principally responsible for comprehensive air pollution control in the South Central Coast Air Basin. As a responsible agency under CEQA, SBCAPCD reviews and approves environmental documents prepared by other lead agencies or jurisdictions to reduce or avoid impacts to air quality and to ensure that the lead agency's environmental document is adequate to fulfill CEQA requirements. As a concerned agency, the APCD comments on environmental documents and suggests mitigation measures to reduce air quality impacts.
- **Other Local Agencies** – have the authority and responsibility to reduce air pollution through their police power and land use decision-making authority. In

accordance with CEQA requirements and the CEQA review process, local governments assess air quality impacts, required mitigation of potential air quality impacts, and monitor and enforce implementation of such mitigation.

The regulatory framework for air quality within Santa Barbara County combines the responsibility and authority of federal, state, and local agencies to administer and enforce specific air quality standards for the protection of public health. The following legislation serves to protect air quality:

- **California and Federal Clean Air Acts (CAAs)** – The federal CAA designates the USEPA as responsible for improving U.S. air quality. The CAA permits California to establish its own set of standards for maintaining air quality, which must be at least as stringent as federal standards (See Appendix D for federal and state standards).
- **California Legislation on Climate Change:**
 - Assembly Bill (AB) 1493 – requires CARB to define standards for cars and light trucks manufactured after 2009;
 - Executive Order S-3-05 – announced GHG emission reduction targets;
 - AB 32 (Global Warming Solutions Act of 2006) - requires CARB to adopt regulations to evaluate statewide GHG emissions, and then create a program and emission caps to limit statewide emissions to 1990 levels;
 - Executive Order S-01-07 – requires a statewide goal be established to reduce the carbon intensity of the California’s transportation fuels;
 - Senate Bill (SB) 97 – acknowledges that climate change analysis is to occur in conjunction with the CEQA process and that the Office of Planning and Research (OPR) will develop CEQA Guidelines;
 - SB 375 – creates a process whereby local governments and other stakeholders work together within their region to achieve reduction of GHG emissions;
 - Climate Change Scoping Plan – designed to reduce overall carbon emissions in California (CARB 2008d);
 - CARB GHG Emission Inventory – creates GHG emissions limits and requires an emissions inventory for the industries determined to be significant sources of GHG emissions (OPR 2008);
 - OPR Draft CEQA Guidelines – establishes guidelines for the mitigation of GHG emissions or the effects of GHG emissions; and
 - SB 107 – requires investor-owned utilities to increase their total procurement of renewable energy by at least 1 percent of retail sales per year to meet the required 20 percent by 2010.
- **County of Santa Barbara Clean Air Plan (CAP)** – The federal CAA Amendments of 1990 and the CCAA of 1988 mandate the preparation of CAPs that provide an overview of air quality and sources of air pollution, and identifies

pollution-control measures needed to meet federal and state air quality standards. The CAP affects the development of SBCAPCD rules and regulations and other programs, and influences transportation planning and allocation of funds designated for air quality projects.

- **Montecito Community Plan** – The Montecito Community Plan contains the following policies regarding air quality:

Policy AQ-M-1.1: Maintain consistency of all land use planning and development with the Air Quality Attainment Plan and subsequent APCD air quality plans and guidelines.

Policy AQ-M-1.2: The County shall encourage Transportation Management techniques.

Policy AQ-M-1.3: Air pollution emissions from new development and associated construction activities shall be minimized to the maximum extent feasible. These activities shall be consistent with the Air Quality Attainment Plan and Air Pollution Control District guidelines.

Development Standard AQ-M-1.3.1: Future project construction in Montecito shall follow all requirements of the SBAPCD and shall institute Best Available Control Technology (BACT) where necessary to reduce emissions below APCD thresholds.

Development Standard AQ-M-1.3.2: The applicant shall minimize the generation of fugitive dust during construction activities by observing the following:

- a. Minimize the amount of disturbed area;
- b. Utilize water and or dust palliatives; and
- c. Revegetate/stabilize disturbed area as soon as possible.

Policy AQ-M-1.4: The County shall, in its land use decisions, protect and enhance the air quality in Montecito consistent with California Ambient Air Quality Standards and National Ambient Air Quality Standards.

3.3.3 Environmental Impacts

3.3.3.1 Thresholds of Significance

The County's Environmental Thresholds & Guidance Manual and SBCAPCD Rule Book lists screening criteria for determining the significance of operational (long-term) emissions. Criteria relevant to the proposed project includes whether operation of the project would (County of Santa Barbara 2008; SBCAPCD 2011):

3.3 AIR QUALITY

- emit (from all project sources, mobile and stationary) more than the daily trigger (55 pounds per day for NO_x and ROCs and 80 pounds per day for PM₁₀) for offsets for any pollutant;
- emit more than 25 pounds per day of NO_x or ROC from motor vehicle trips only;
- cause or contribute to a violation of an CAAQS or NAAQS (except ozone);
- ~~contribute more than 800 peak hour trips (for CO “hotspot” modeling);~~
- generate significant long-term operational emissions or air quality impacts that would result in health risks to sensitive receptors; and
- be inconsistent with the adopted federal and state air quality plans.

No quantitative thresholds exist for short-term construction emissions. Short-term emissions are considered insignificant by the County Planning and Development Department because construction emissions only comprise approximately six percent of the 1990 County-wide emission inventory for NO_x and the emissions are temporary and short-term in nature (County of Santa Barbara 2008).

The evaluation of climate change impacts in CEQA documents is a recent requirement, and methodologies for conducting such analyses have not been promulgated by state agencies. The County of Santa Barbara has developed Interim Procedures for Evaluating GHG Emissions (June 2010), which provides interim guidance on evaluating GHG emission in CEQA documents for projects. Until such time as County-specific data become available and significance thresholds applicable to GHG emissions are developed and formally adopted, this document provides guidance on the County’s required approach. This approach requires a quantification of emissions, a determination of significance based upon interim determination criteria, application of mitigation and a quantification of mitigation GHG reductions, and a calculation of the residual GHG emissions impact.

GHGs are further discussed and analyzed in Section 3.3.3.3 *Cumulative Impacts* and Section 5.3, *Global Warming*. Despite the absence of statewide adopted analysis procedures or thresholds of significance, CEQA requires that Lead Agencies inform decision-makers and the public about potential significant environmental effects of the proposed project. Therefore, the significance of impacts from GHG emissions for the proposed project is determined by:

- The County's Interim Significance Determination Criteria
- The extent to which the project could help or hinder attainment of the State's goals of reducing GHG emissions to 1990 levels by the year 2020 as stated in AB 32.

3.3.3.2 Impact Assessment Methodology

The air quality analysis follows the guidelines and methodologies recommended in the *CEQA Air Quality and Land Use Handbook: A Community Health Perspective* (CARB 2005). Detailed inventories of proposed construction equipment for the project site were used to calculate emission levels for potential air pollutants. The following specific information was provided: type and quantity of equipment, duration of activities, and total volume of material moved. A typical construction schedule of 8 hours per day and diesel powered construction equipment were assumed for the project. Construction emissions from heavy-duty diesel exhaust and fugitive dust emissions were calculated using the URBEMIS program. Emissions factors for calculating emissions from construction equipment were provided for specific years of activity (i.e., 2013 and 2014) by the California Air Resources Board Off-Road EMFAC7G model which is incorporated into URBEMIS.

The URBEMIS2007, version 9.2.4 computer modeling program, which was developed by the California ARB, was also utilized to calculate vehicular emissions from construction worker commuting and material delivery, off-site hauling of excavation material, and potential impacts to air quality from operational emissions at the project site, based primarily on mobile sources generated by the number and length of vehicle trips to and from the proposed project site.

Recommended URBEMIS2007, version 9.2.4 input values for County-specific standards such as temperature and season were taken from historical weather data. The traffic study prepared for the proposed project (Associated Transportation Engineers [ATE] 2010) was used to determine emission estimates.

3.3.3.3 Mitigation Measures Contained in the Proposed Project

The applicant has proposed a series of mitigation measures to reduce potential adverse construction and operational effects of the project, which have been incorporated into the project design and future operation as listed below:

- During clearing, grading, earth moving, excavation, or transportation of cut or fill materials, water trucks or sprinkler systems are to be used to prevent dust from leaving the site and to create a crust after each day's activities cease. Haul trucks carrying soil export would be required to be tarped or covered.
- During construction, water trucks or sprinkler systems shall be used to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this would include wetting down such areas in the later morning and after work is completed for the day and whenever wind exceeds 15 miles per hour.
- Soil stockpiled for more than two days shall be covered, kept moist, or treated with soil binders to prevent dust generation.
- The proposed emergency generator will be powered by diesel fuel and in order to minimize emissions, the specifications shall be reviewed by the APCD prior to the issuance of a building permit.
- Proposed building design will meet LEED Silver Certification Standards to reduce long term energy use and associated electrical power demand and use of natural gas.

3.3.3.4 Project Impacts and Mitigation Measures

Impact

AQ-1 The proposed project would result in generation of adverse, but less than significant long-term operational emissions or air quality impacts to the inhabitants of the proposed fire station (Class III).

Operation of the proposed project would produce ROC and NO_x emissions from motor vehicle traffic generated by firefighters and associated administrative personnel of the proposed fire station which were determined to be substantially below SBCAPCD thresholds (Table 3.3-2). Further, since operation of the proposed project would create 32 ADT total (ATE 2010), operation of the project would not emit more than 25 pounds per day of an ozone precursor, nor would it contribute enough peak hour trips to create a CO 'hotspot.' Approximately 0.01 pounds of ozone precursor would be produced per

ADT (0.16 pounds total per day). In addition, the ADT associated with the proposed project would not cause or contribute to a violation of any NAAQS or CAAQS. Therefore, long-term emissions from the proposed project would be less than significant. Detailed emissions calculations are included in Appendix D.

Table 3.3-2. Maximum Daily Estimated Long-Term Operational Emissions

Year ¹	Duration	Source	Pollutant (lbs/day)		
			ROC	NO _x	PM ₁₀
2014	Long-term	Area Source	0.13	0.03	0.01
		Operational (Vehicle)	0.16	0.24	0.27
		<u>Operational (Generator)</u>	<u>0.80</u>	<u>15.28</u>	<u>0.68</u>
		Total Long-Term	<u>0.291.09</u>	<u>0.2715.55</u>	<u>0.280.96</u>
SBCAPCD Thresholds			55.00	<u>55.00</u>	80.00
Significant			NO	NO	NO

¹ Summer emissions are displayed, as smog is more likely to form in this season than in the winter.

² Emissions from generator assume operation of an emergency generator for a 24-hour period at full load. Such a situation is not part of regular station operation, but is included as a worst-case scenario.

The 80-kilowatt (kW) emergency generator would be run on diesel fuel. This generator would be utilized by the MFPD during emergency situations such as earthquakes or wildfires where power supplies were interrupted to Station 3. Staff would also test this generator for periods of 15 minutes once a week and 2 hours once a year to ensure operational reliability during emergency events. The SBCAPCD *Prevention of Significant Deterioration (PSD) Best Available Control Technology (BACT) and Modeling Thresholds* (SBCAPCD 2011) were used to determine the significance of emissions associated with the emergency generator since it would be operating on a periodic, short-term basis during emergency situations. Emissions from the emergency generator for a 24-hour emergency conditions period were determined to be below the thresholds as summarized in Table 3.3-3. Therefore, emissions are not expected to contribute to or cause an exceedance of the NAAQS or CAAQS and would be considered less than significant.

The inhabited spaces of the fire station would be located approximately 63 feet from East Valley Road, and about 110 feet from the emergency generator. Based on utilization of a worst case CARB screening, that distance from the generator would result in an

Table 3.3-3. Maximum Daily Estimated Emissions for Emergency Generator

Year ¹	Duration	Source	Pollutant (lbs/day)		
			ROC, SO _x , and NO _x (sum)	CO	PM ₁₀
2014	Short-term/ Temporary (emergency only)	Stationary Source ²	45.14	8.37	2.76
SBCAPCD PSD BACT and Modeling Thresholds ³			120.00	550.00	80.00
Significant			NO	NO	NO

¹ Summer emissions are displayed, as smog is more likely to form in this season than in the winter.

² Stationary Source includes operation of an emergency generator for a 24-hour period at full load once per month.

³ SBCAPCD *Prevention of Significant Deterioration Best Available Control Technology and Modeling Thresholds* were applied since the emergency generator would only operate on a periodic, short-term basis during testing and emergencies; SBCAPCD 2011.

increased cancer risk of less than 1 in one million, well below the CARB threshold of significance of 10 in one million¹. This worst case analysis reflects running the generator for a 24-hour period once per month as opposed to planned operations of 15 minutes monthly and an additional 2 hour test every year. Screening performed for the proposed Project by SBAPCD indicated a residential cancer risk of 4.35 per million, below the SCAPCD threshold of 10 per million (Appendix D). Further, since traffic counts in this area (3,900 ADT) are well below CARB's definitions of high-traffic urban roads (100,000 ADT) and rural roads (50,000 ADT) (CARB 2005; ATE 2010), overall, impacts to the fire station from emissions associated with high traffic roadways would be *adverse, but less than significant* (Class III).

Impact

AQ-2 The proposed project would result in adverse, but less than significant short-term construction-related air quality impacts, such as dust from grading and air pollution emissions from construction vehicles and stationary construction equipment (Class III).

Equipment operation on unpaved roads, cut and fill activities, and entrained dust from earth surfaces exposure to wind would create short-term PM₁₀ emissions. These emissions would be primarily from dust generation; however, operation of diesel equipment would also generate diesel particulate matter, which is considered toxic and carcinogenic by the State of California (CARB 2010). The County does not currently

¹ The cancer risk was determined from the ARB "Hot Spots" stationary diesel engine screening risk assessment tables for a 100 hp generator at 50% load and an urban (worst case) setting. <http://www.arb.ca.gov/ab2588/diesel/diesel.htm>

have any significance thresholds for construction-generated PM₁₀ emissions; however, dust emissions have the potential to be a public nuisance or to add to the non-attainment status for the State PM₁₀ standard. The dust control measures which are proposed to be incorporated into the project description would be consistent with the County's Grading Ordinance requirements. Therefore, when combined with the short-term nature of construction activities, impacts from construction PM₁₀ emissions would be considered *adverse, but less than significant* (Class III).

Diesel particulate matter is listed as a toxic air contaminant by the CARB (with no identified threshold). Diesel exhaust that would be produced by heavy duty construction equipment, as well as diesel haul trucks, would occur within 320 feet of the nearest sensitive receptor; however, emissions would be temporary and short-term in nature. Therefore impacts from diesel particulate matter would be considered *adverse, but less than significant* (Class III).

Combustion emissions from construction activities would primarily be generated by diesel-powered heavy duty equipment and haul trucks, as well as worker commuting and material deliveries (Table 3.3-4). In particular, project site preparation and grading would extend over approximately a 3-month period, with export of excess soil requiring up to 30 haul truck trips per day during peak grading activities. The export of soil and associated haul truck traffic would lead to a slight increase in construction emissions as the majority of emissions would continue to be related to operation of heavy construction equipment on the project site, which typically exhibit relatively high emission rates when compared to trucks and other on-road vehicles. Due to the short-term nature of construction and the County's consideration of construction emissions as an insignificant contribution to regional emissions, impacts from construction emissions would be *adverse, but less than significant* (Class III). However, to further reduce air quality impacts during construction, SBCAPCD-recommended measures will be enforced as conditions of approval for the project.

Table 3.3-4. Maximum Daily Estimated Construction Emissions

Year ¹	Duration	Source	Unmitigated (tons/yr)		Mitigated (lbs/day)
			ROC	NO _x	PM ₁₀
2013	Short-term	Construction (site grading, cut/fill, ground disturbance, building of fire station) ²	0.40	3.07	2.54

3.3 AIR QUALITY

Year ¹	Duration	Source	Unmitigated (tons/yr)		Mitigated (lbs/day)
SBCAPCD Guidelines ^{2,3}			25.00	25.00	80.00
Significant			NO	NO	NO

¹ Summer emissions are displayed, as smog is more likely to form in this season than in the winter.

² Estimated emissions from soil export truck trips included the following assumptions: haul trips per day: 17.39; round trip distance: 20 miles.

²⁻³ Quantitative thresholds of significance are not currently in place for short-term or construction emissions; however, the SBCAPCD uses 25 tons per year for ROC or NO_x as a guideline for determining the significance of construction impacts.

Standard Regulatory Conditions

MM AQ-2a The measures listed should be implemented to minimize fugitive dust emissions. These measures represent standard County conditions of approval for a project and would likely be required by the County as part of permit approval process.

- *During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption.*
- *Minimize amount of disturbed area and reduce on site vehicle speeds to 15 miles per hour or less.*
- *If importation, exportation and stockpiling of fill material is involved, soil stockpiled for more than two days should be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site should be tarped from the point of origin.*
- *Gravel pads must be installed at all access points to prevent tracking of mud on to public roads.*
- *After clearing, grading, earth moving or excavation is completed, treat the disturbed area by watering, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur.*
- *The contractor or builder should designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties should include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons should be*

provided to the Air Pollution Control District prior to land use clearance for map recordation and land use clearance for finish grading for the structure.

Plan Requirements and Timing. Prior to land use clearance or map recordation, the applicant would be required to show all requirements on grading and building plans and as a note on a separate information sheet to be recorded with map. The applicant would be required to adhere to conditions throughout all grading and construction periods.

Monitoring. Lead agency would ensure measures are on project plans and maps to be recorded. Lead Agency staff would ensure compliance onsite. APCD inspectors would respond to nuisance complaints.

MM AQ-2b The measures listed below should be implemented to minimize particulate emissions from diesel exhaust. These measures represent standard County conditions of approval for a project and would likely be required by the County as part of permit approval process.

- *All portable diesel-powered construction equipment should be registered with the state's portable equipment registration program OR should obtain and APCD permit.*
- *Fleet owners fleet owners of mobile construction equipment are subject to the California Air Resources Board Regulation for In-Use Off-road Diesel Vehicles (Title 13, California Code of Regulations Chapter 9, § 2449), the purpose of which is to reduce diesel particulate matter and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles.*
- *All commercial diesel vehicles are subject to Title 13, § 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and truck during loading and unloading should be limited to five minutes; electric auxiliary power units should be used whenever possible.*
- *Diesel construction equipment meeting the California Air Resources Board Tier 1 emission standards for off-road heavy-duty diesel engines should be used. Equipment meeting Tier 2 or higher emission standards should be used to the maximum extent feasible.*
- *Diesel powered equipment should be replaced by electric equipment whenever feasible.*

- *If feasible, diesel construction equipment should be equipped selective catalytic reduction systems, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by EPA or California.*
- *Catalytic converters should be installed on gasoline-powered equipment, if feasible.*
- *All construction equipment should be maintained in tune per the manufacturer's specifications.*
- *The engine size of construction equipment should be the minimum practical size.*
- *The number of construction equipment operating simultaneously should be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time.*
- *Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite.*

Plan Requirements and Timing. The applicant would be required to show measures on grading and building plans and adhere to measures throughout all grading, hauling, and construction activities.

Monitoring. Lead agency would perform periodic site inspections to ensure compliance with approved plans. APCD inspectors would respond to nuisance complaints.

Impact

AQ-3 The proposed project would be consistent with the 2010 Clean Air Plan (Class III).

The 2010 CAP updates the 2007 CAP and provides a long-range emissions estimate for the County that is consistent with regional growth and development plans. This project is consistent with growth projections and other plan elements within the established County Comprehensive Plan and Coastal Land Use Plan, and is therefore considered to be consistent with the 2010 CAP (SBCAPCD 2010). Impacts would be Class III, *less than significant*.

3.3.3.5 Cumulative Impacts

The Environmental Thresholds & Guidelines Manual, the County's Interim Procedures for Evaluating GHG Emissions, and the SBCAPCD's Scope and Content Document requires a proposed project's contribution to cumulative air quality impacts, either regional or localized, to be evaluated based on existing programs and plans, and projects in the area. Short-term, temporary GHG (CO₂ equivalents [CO₂e]) emissions from the proposed project would be generated by preparation and grading activities (e.g., construction equipment, cut/fill operations, worker commuting, and material delivery). Long-term emissions would derive from vehicles trips and area sources (e.g., use of appliances, landscaping, and heating/cooling) associated with the operation of fire station.

URBEMIS2007 version 9.2.4 was used to estimate GHG emissions from construction and operation of the proposed project (Table 3.3-5). GHG emissions are shown before and after implementation of mitigation measures. Detailed emissions calculations are included in Appendix D.

Table 3.3-5. Estimated GHG Emissions (tons/year)

Year	Duration	Project Phase	Unmitigated CO ₂ ^e
2013	Short-term	Construction (site grading, cut/fill, ground disturbance, building of fire station)	398.8
2014	Long-term	Area Source ¹	1.7
		Indirect Emissions (electricity usage) ¹	38.4
		Operational (Vehicle)	25.1
		Point Sources ²	23.0
		Total Long-Term	88.2

¹ Proposed building design will meet USGBC LEED Silver Certification Standards to reduce long-term energy use and associated electrical power demand and use of natural gas.

² Point Sources includes the emissions from the emergency generator.

The proposed project would be well below the County's interim significant determination criteria and would not hinder attainment of California's goals of reducing GHG emissions to 1990 levels by the year 2020, as stated in AB 32. The project, as proposed, would be constructed to United States Green Building Council (USGBC) LEED Silver

certification standards² to incorporate energy efficient building design and construction such as passive heating, solar energy use of recycled building materials and water conserving design and water quality protection measures. This would reduce area source emissions of GHGs. In addition, the project is only anticipated to generate 32 ADT. Therefore, the cumulative impact on global climate change and GHGs would be less than significant and additional mitigation measures to reduce operational vehicle emissions have not been applied.

3.3.3.6 Residual Impacts

The standard best management practices described above which have been incorporated into the project design and incorporated as mitigation measures would minimize the potential for adverse impacts by reducing dust generation during construction. The remaining construction emissions would remain less than significant.

Meeting the standards of LEED Silver certification for energy efficient building design and construction would not eliminate GHG emissions, but it would reduce the potential for adverse long-term cumulative impacts on global climate change. Residual impacts would remain less than significant.

² Although Station 3 would be constructed to LEED Silver certification standards, the MFPD is not proposing to pursue LEED Silver certification at this time.

3.4 BIOLOGICAL RESOURCES

This section describes biological resources in the vicinity of the proposed project including local habitats, communities, and species, and evaluates the potential impacts project implementation may have on these resources. Grading, vegetation removal, construction activities and eventual development of a fire station could have the potential to impact biological resources onsite. In addition to project construction, operational characteristics such as lighting, noise and site runoff from the proposed fire station have the potential to impact biological resources.

This analysis is based on a review of information contained in the Montecito Community Plan (MCP), the California Natural Diversity Database (CNDDDB), the MCP Environmental Impact Report (EIR) (92-EIR-03), and Montecito Growth Management Ordinance (MGMO) EIR (2010). This baseline information has been supplemented by field work completed by AMEC team members regarding onsite and area biological resources, with particular attention to the adjacent oak-lined drainage and the oak trees that line East Valley Road. AMEC team members visited the site on four occasions in 2010 and 2011. The existing condition of these oak trees and possible effects on the trees from the proposed project were reviewed by Mr. Bill Spiewak, a Registered Arborist, during field surveys performed on June 25 and July 19 of 2010.

Potential project-related impacts to biological resources are analyzed and corresponding mitigation measures to avoid or reduce significant impacts as defined by the California Environmental Quality Act (CEQA) are provided.

3.4.1 Existing Conditions

3.4.1.1 Regional Setting

Montecito supports a diversity of habitats in undeveloped areas, including woodlands beaches, and mountains mixed with semi-rural development. The topography of the area varies greatly and includes relatively level areas near the coast; however, the majority of Montecito is on gently to moderately sloping hills that rise towards the steep, rugged southern slopes of the Santa Ynez Mountain Range. Mountain slopes and areas of the lower foothills are vegetated with the chaparral plant community. Chaparral habitats contain a diversity of plant species and provide habitat for a range of wildlife.

Several creeks originating in the Santa Ynez mountains flow through Montecito, including Picay, Hot Spring, Cold Springs, Oak, Buena Vista, Romero, Coyote, and San Ysidro Creeks. The woodlands and forests of riparian corridors support a high diversity and abundance of wildlife, particularly bird species. Large areas of Montecito's chaparral, oak woodlands, and riparian corridors maintain substantial habitat connectivity and value due to a relatively low density and intensity of human occupation (County of Santa Barbara 2010). Low intensity uses that provide habitat in Montecito also include recreation areas (i.e., equestrian facilities, golf courses), pastures, and orchards. Montecito also contains extensive non-native, ornamental flora consisting of exotic trees, shrubs, vines and hedges.

Habitat

Important native habitats in Montecito include oak woodlands, which are particularly extensive in eastern Montecito, as well as along the community's major drainages. Large areas of chaparral are intact in the northern foothill areas of Montecito. Riparian corridors along Coyote, Cold Springs, Hot Springs, San Ysidro, Buena Vista, Picay, and Romero Creeks provide habitat and migration corridors through urbanized areas, connecting the Santa Ynez Mountains and Los Padres National Forest with habitats lower in the foothills (County of Santa Barbara 1992). Designated Environmentally Sensitive Habitats (ESH) are primarily concentrated along creek corridors (County of Santa Barbara 1992).

Much of the community consists of ornamental gardens with a variety of native and non-native plant species. This includes significant areas of "developed" habitats, which are homes and gardens within California sycamore and central/southern coast live oak riparian forest canopy and coast live oak woodland canopy. In addition, non-native species such as eucalyptus provide canopy, understory, and winter flowers that support and attract migrant birds and other species. Eucalyptus groves within Montecito are also known to provide roosts for migrating monarch butterflies. Ornamental plantings do not typically support the diversity of wildlife observed in native habitats.

Within the project vicinity, biological habitats of note include coastal sage scrub, chaparral, and oak woodlands to the southeast of the project site on Ortega Ridge and along the eastern border of Rancho San Carlos, and the riparian corridors of Romero Creek to the west and Picay Creek to the east and south. The CNDDDB indicates that the

Sonoran maiden fern may potentially occur in the northern portion of Rancho San Carlos, approximately 0.5 miles north of the project area; however, this sighting has not been confirmed (California Department of Fish and Game [CDFG] 2010).

Fauna

Montecito's habitats provide resources and corridors that support a diversity of wildlife species. Terrestrial species found in the area include a variety of rodents, bats, coyote, fox, raccoon, bobcat, and deer. Approximately 300 species of birds have been observed in the region. Common bird species include western meadowlark, horned lark, house finch, mourning dove, turkey vulture, Cooper's, red-shouldered and red-tailed hawks, falcons, owls, California quail, Anna's and Costa's hummingbirds, woodpeckers, crows, jays and sparrows. Various species of reptiles and amphibians are present including western fence lizard, gopher snake, common kingsnake, rattlesnake, chorus frog, salamanders and turtles (County of Santa Barbara 1992).

3.4.1.2 Site-specific Setting

Habitat

The project site is located on approximately 2.55 acres in the southwest portion of the larger Rancho San Carlos. The project site consists primarily of actively cultivated lemon trees atop disturbed ground, and lemon orchards surround the site to the north and east. Active agricultural operations have left very limited the understory on the site with weed management practices typical



Due to active agricultural management, understory vegetation in the drainage channel is minimal.

of active orchards, reducing most understory areas on the site to primarily bare ground. The lemon trees and bare understory that comprise the majority of the site likely provide limited roosting and foraging habitat for various bird species; however, particularly given

3.4 BIOLOGICAL RESOURCES

ongoing orchard management and disturbance, this habitat would be considered of marginal quality.

Adjacent to the western boundary of the site is a drainage channel that supports water flows only during and immediately after large rainfall events. The drainage channel is lined with approximately 10 mature coast live oak trees along the project site western boundary, with these oaks forming a dense canopy in areas. Twelve mature oaks also line the western side of the drainage adjacent to the project site. Farther north beyond the project site, the channel supports scattered oak trees as it extends to the northeast, bisecting Rancho San Carlos. Understory vegetation within and adjacent to this intermittent drainage is minimal and consists largely of bare ground. The channel appears to be maintained with similar vegetation management practices as the adjacent



Forty-six coast live oaks occur on the project site concentrated along the East Valley Road frontage and the western drainage channel.

lemon orchard and is therefore largely devoid of understory; however, limited areas of poison oak, blackberries, and non-native species such as German ivy, may occur (AMEC 2011). As such, the project site does not contain natural plant communities considered rare by the CDFG and the existing oak-lined drainage corridor is largely absent the complement of typical native riparian or oak woodland understory species. As such, under existing conditions, the intermittent drainage may not qualify as ESH as defined in the MCP (refer to Section 3.4.2, *Regulatory Framework*).

A total of 46 mature coast live oaks are present on the project site along the western and southern site boundaries adjacent to the intermittent drainage and East Valley Road, respectively. Within the project site there are 10 oak trees in good health along the drainage channel ranging in age and size from approximately 8 inches to more than 24 inches in diameter and generally of 15-30 feet in height. Oaks line along both sides of the drainage channel and form a closed canopy in areas. In addition, there are 36 mature oak trees along East Valley Road within the project site that range in age and size from approximately 6 inches to more than 44 inches in diameter. Immature oak saplings are

also prevalent along the East Valley Road frontage and the western drainage. The larger oaks tend to be somewhat regularly spaced along the roadway, whereas the younger oaks tend to be clustered and less regularly placed. Oaks along the East Valley Road frontage are currently trimmed to protect utility lines.

Fauna

Agricultural areas can provide foraging and migration corridors for terrestrial species, particularly at night when human disturbance is most limited. Wildlife species expected to traverse or inhabit the site include common species such as raccoon, striped skunk, opossum, California ground squirrel, deer, and fox. Bird species that would likely utilize the site for foraging or roosting include those typically found in Montecito (refer to Section 3.4.1.1) (County of Santa Barbara 2010). No Threatened, Endangered, or Special Status species are anticipated to occur on the site. Cooper's hawks are considered vulnerable in California while nesting; however, no known nests have been identified on the site and nesting is considered unlikely due to the proximity and extent of human disturbance and availability of higher quality nesting sites in the vicinity. The CNDDDB indicates that a known Monarch butterfly roost is present in a eucalyptus grove approximately 2,500 feet northeast of the site (CDFG 2010).

3.4.2 Regulatory Framework

3.4.2.1 Federal Regulation

United States Code (USC) § 1531 et seq. (16 USC 1531 et seq.), Title 50 Code of Federal Regulations (CFR) § 17.1 et seq. (50 CFR § 17.1 et seq.). 50 CFR § 17.1 et seq. includes provisions for the protection and management of federally listed Threatened or Endangered plants and animals and their designated critical habitats. Section 7 of the Endangered Species Act (ESA) requires a permit to take Threatened or Endangered species during lawful project activities. The ESA (1973, as amended) provides the legal basis for protection. Section 3 of the ESA defines Threatened and Endangered categories as:

- Endangered – a plant or animal species that is in danger of extinction throughout all or a significant portion of its range.

- Threatened – a plant or animal species that is likely to become an Endangered species within the foreseeable future throughout all or a significant portion of its range.

The U.S. Fish and Wildlife Service (USFWS) is the administering agency charged with managing and enforcing the ESA for terrestrial, avian, and most freshwater aquatic species.

3.4.2.2 State Regulation

The CDFG Code provides specific protection and listing for several types of biological resources. These include:

- Fully protected species
- Streams, rivers, sloughs, and channels
- Significant natural areas
- Designated ecological reserves

Fully Protected Species are listed in § 3511 (Fully Protected birds), § 4700 (Fully Protected mammals), § 5050 (Fully Protected reptiles and amphibians), and § 5515 (Fully Protected fishes). The CDFG Code prohibits the taking of species designated as Fully Protected.

Sections 1600 through 1616 of the CDFG Code regulate impacts to the natural flow, bed, channel and embankments of State waters including lakes and streams. The Code, otherwise known as the Lake and Streambed Alteration Program (Program), is administered by the CDFG. Typical activities that require a Streambed Alteration Agreement include excavation or fill placed within a channel, vegetation clearing, structures for diversion of water, installation of culverts and bridge supports, cofferdams for construction dewatering, and bank reinforcement.

Species may qualify for formal protection under CEQA (State of California 1986). CEQA Section 15380 defines “Rare” and “Endangered” species as follows:

A species of plant or animal is:

“Endangered” when its survival and reproduction in the wild are in immediate jeopardy from one or more causes, including loss of habitat, competition, disease , or other factors; or

“Rare” when either:

Although not presently threatened with extinction, the species is existing in such small numbers throughout all or a significant portion of its range that it may become endangered if its environment worsens; or

The species is likely to become endangered within the foreseeable future throughout all or a significant portion of its range and may be considered “Threatened” as that term is used in the Federal Endangered Species Act.

A species of animal or plant shall be presumed to be Rare or Endangered as it is listed in:

- (1) Sections 670.2 or 670.5, Title 14, California Administrative Code; or
- (2) Title 50, CFR Sections 17.11 or 17.12 pursuant to the Federal Endangered Species Act as Rare, Threatened, or Endangered.

Species may, under certain circumstances, be protected by CEQA statutes, even if they are not registered under Federal or State programs. These include the majority of plants on the California Native Plant Society (CNPS) List 1B as well as others that are identified as Rare, Threatened, or Endangered, regardless of recognition by the USFWS, CDFG, or CNPS. Section 15380 also states that:

A species not included in any listing identified in subsection (c) [federal or state listing] shall nevertheless be considered to be rare or endangered if the species can be shown to meet the criteria in subsection (b) [CEQA definition of ‘rare’ or ‘endangered’].

3.4.2.3 Applicable County Policies

Santa Barbara County Comprehensive Plan, Land Use Element. The County’s Comprehensive Plan Land Use Element includes the following policy that applies to potential development sites with significant native vegetation:

- *Hillside and Watershed Protection Policy 2:* All developments shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited to development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.

Montecito Community Plan. The MCP contains several policies and development standards summarized below that relate to biological habitats, in particular the protection of ESH. The MCP defines significant habitat resources as meeting one of the following criteria to qualify for ESH designation:

- Unique, rare, or fragile communities which should be preserved to strive to ensure their survival in the future;
- Habitats of rare and endangered species habitats that are also protected by State and Federal law;
- Plan communities that are of significant interest because of extensions of ranges, or unusual hybrid, disjunct, and relict species;
- Specialized wildlife habitats which are vital to species survival, e.g., White-tailed Kite habitat, butterfly trees;
- Outstanding representative natural communities that have values ranging from a particularly rich flora and fauna to an unusual diversity of species;
- Areas with outstanding educational values that should be protected for scientific research and educational uses now and in the future;
- Areas that are important because of their high biological productivity, such as wetlands; and,
- Areas that are structurally important in protecting natural landforms and species, e.g., riparian corridors that protect stream banks from erosion and provide shade.

Policy BIO-M-1.2: The following biological resources and habitats shall be identified as environmentally sensitive and shall be protected and preserved to the extent feasible through the ESH overlay: Riparian woodland corridors; Monarch butterfly roosts; sensitive native flora; and, coastal sage scrub.

Policy BIO-M-1.6: Riparian vegetation shall be protected and restoration of degraded riparian areas shall be encouraged

Policy BIO-M-1.8: The minimum buffer strip for development near streams and creek shall be 100 feet in rural areas and 50 feet in urban areas, adjustable on a case-by-case basis.

Policy BIO-M-1.14: Significant biological communities shall not be fragmented into small non-viable pocket areas by development.

Development Standard BIO-M-1.14.1: In rural areas and where major wildlife corridors are present in urban areas, new development shall not interrupt major wildlife travel corridors within the Community Plan Study Area.

Policy BIO-M-1.15: To the maximum extent feasible, specimen trees shall be preserved.

Development Standard BIO-M-1.15.1: All existing specimen trees shall be protected from damage or removal by development to the maximum extent feasible.

Policy BIO-M-1.16: All existing native trees regardless of size that have biological value shall be preserved to the maximum extent feasible.

Development Standard BIO-M-1.16.1: Where native trees of biological value may be impacted by new development, a Tree Protection Plan shall be required.

Policy BIO-M-1.17: Oak trees shall be protected to the maximum extent feasible. Regeneration of oak trees shall be encouraged.

Policy BIO-M-1.19: Oak Woodlands shall be protected as a collective entity, rather than as individual trees, with emphasis on preservation and enhancement.

Policy BIO-M-1.20: Pollution of streams, sloughs, drainage channels, underground water basins, estuaries, the ocean and areas adjacent to such waters shall be minimized.

Policy BIO-M-1.22: The use of native landscaping shall be encouraged, especially in parks and designated open space.

3.4.3 Environmental Impacts

3.4.3.1 Thresholds of Significance

Appendix G of the CEQA Guidelines states that a project is considered to have a significant impact on Biological Resources if it is found to:

- “Conflict with adopted environmental plans and goals of the community where it is located;

- *Substantially affect a rare or endangered species of animal, plant or the habitat of the species;*
- *Interfere substantially with the movement of any resident or migratory fish or wildlife species; and*
- *Substantially diminish habitat for fish, wildlife or plants.”*

Santa Barbara County’s “Environmental Thresholds and Guidelines Manual” (County of Santa Barbara 2008) includes guidelines for the assessment of biological resource impacts. The following thresholds are applicable to this project:

- *Riparian Habitats:* Project impacts may be considered significant due to: direct removal of riparian vegetation; disruption of riparian wildlife habitat, particularly animal dispersal corridors and or understory vegetation; or intrusion within the upland edge of the riparian canopy leading to potential disruption of animal migration, breeding, etc. through increased noise, light and glare, and human or domestic animal intrusion; or construction activity which disrupts critical time periods for fish and other wildlife species.
- *Oak Woodlands and Forests:* Project impacts may be considered significant due to habitat fragmentation, removal of understory, alteration to drainage patterns, disruption of the canopy, removal of a significant number of trees that would cause a break in the canopy, or disruption in animal movement in and through the woodland.
- *Individual Native Trees:* Project impacts may be considered significant due to the loss of 10 percent or more of the trees of biological value on a project site.
- *Other Rare Habitat Types:* The Manual recognizes that not all habitat-types found in Santa Barbara County are addressed by the habitat-specific guidelines. Impacts to other habitat types or species may be considered significant, based on substantial evidence in the record, if they substantially: (1) reduce or eliminate species diversity or abundance; (2) reduce or eliminate the quality of nesting areas; (3) limit reproductive capacity through losses of individuals or habitat; (4) fragment, eliminate, or otherwise disrupt foraging areas and/or access to food sources; (5) limit or fragment range and movement; or (6) interfere with natural processes, such as fire or flooding, upon which the habitat depends.

3.4.3.2 Impact Methodology

Impacts to biological resources were evaluated in terms of the project’s effects on vegetation, wildlife habitat, and individual species occurrences. Impacts can result from conversion or loss of native habitat and incidental mortality of wildlife species during site

grading and development, habitat fragmentation, and operational use. Impacts were considered short-term if limited to the construction phase of the proposed project. Long-term impacts were those with permanent effects or that carry into the operational phase of the project.

3.4.3.3 Mitigation Measures Contained in the Proposed Project

The applicant has proposed a series of mitigation measures to reduce potential adverse project effects, which have been incorporated into the project design. Impacts to biological resources shall be kept to a minimum by following the measures listed below:

- A 50-foot habitat restoration buffer from the top of the bank of the drainage channel along the western side of the site. Restoration would include planting of native oaks and riparian species, and would adhere to a detailed Habitat Restoration Plan to be approved by the County.
- Replanting of native oaks removed by the project within project landscaped areas along with additional native species.
- Exterior building and site lighting will use hooded fixtures to shield and reduce the spread of light.
- Retention of all but three of the mature oaks along East Valley Road, and all mature oaks elsewhere within the project site. Trees would only be removed for construction of the eastern driveway and for safety reasons, to provide adequate line-of-sight for vehicles entering from and exiting to East Valley Road.
- During construction, washing of concrete, paint, or equipment shall occur only in areas where polluted water and materials can be contained for subsequent removal from the site. Washing shall not be allowed near sensitive biological resources. A designated area for washing functions shall be identified.
- Water quality protection measures will be incorporated into site design, including use of porous paving in parking areas to reduce runoff and increase infiltration, and treatment of runoff in a graded vegetated swale prior to offsite discharge.
- Thirty days prior to the initiation of project activities, a qualified biologist with experience in conducting breeding bird surveys would conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys would continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of project activities. If a protected native bird is found, MFPD would delay all project activities within 300 feet of on and

off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31.

Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, would be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. The biological monitor would be present on site during all grubbing and clearing of vegetation to ensure that these activities remain within the project footprint (i.e., outside the demarcated buffer), and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor should send weekly monitoring reports to MFPD during the grubbing and clearing of vegetation, and shall notify MFPD immediately if project activities damage active avian nests.

3.4.3.4 Project Impacts and Mitigation Measures

Botanical Resources

Impact

BIO-1 The proposed project would result in adverse, but less than significant impacts from the removal of approximately 2.5 acres of lemon orchard and associated loss of habitat (Class III).

The project would result in the conversion of approximately 2.55 acres containing approximately 206 lemon trees to the proposed fire station, additional buildings, associated paved surfaces, and landscaped areas. The loss of existing lemon trees on the project site would remove limited roosting and foraging habitat for native or migratory bird and bat species; however, given existing human disturbance associated with ongoing cultivation, the habitat is considered of marginal value. The project site is located in the southwestern margin of the approximately 237-acre Rancho San Carlos. Rancho San Carlos extends north into the Santa Ynez foothills towards Romero Canyon and project development would not fragment this contiguous rural, unlit area and associated habitat values. Further, project development includes approximately 1 acre of landscaping to include native species, particularly coast live oaks and native understory. Given the limited habitat value provided by orchard operations on the site, the loss of 2.55 acres of lemon orchard is considered Class III, *adverse but less than significant*.

Impact

BIO-2 The proposed project would result in potentially significant (but mitigable) adverse affects to coast live oaks as a result of project grading, detention basin development and other construction activities causing damage to existing oaks, the removal of three mature oaks, as well as routine trimming of oaks fronting East Valley Road (Class II).

An Oak Tree Assessment (Appendix E) was prepared for the project site in July 2010 to assess the condition of and potential impacts to oak trees from proposed construction (Spiewak 2010). The project site includes 46 mature coast live oak trees concentrated linearly along the western drainage channel and East Valley Road, and both direct and indirect impacts to and disturbance of oak trees would occur associated with project development. The project has been designed to limit potential impacts to oaks to the greatest extent feasible; however, development of project driveways along East Valley Road would require the removal of one mature oak that is the smallest specimen tree on the site. Project design would include planting of numerous oaks within the landscape buffer and habitat restoration areas.

The three oak trees that would be removed under project development have trunk diameters of between 6 and 14 inches, and are relatively young and small compared to other oaks occurring along the East Valley Road frontage. The removal of three mature oaks would constitute a loss of approximately 6 percent of mature oak trees on the project site and would therefore not exceed County Thresholds which consider project impacts significant if the loss of 10 percent or more were to occur. Further, project design includes the replanting of oaks throughout landscaped areas and recommended mitigation measure MM BIO-2 would require development and implementation of a Tree Protection and Replacement Plan to mitigate oak tree removal as recommended in the Oak Tree Assessment and in accordance with County of Santa Barbara standard conditions (County of Santa Barbara 2007). Oaks would be required to be replaced at a 10 to 1 ratio if 1-gallon trees were planted along the drainage channel, or a 3 to 1 ratio if 15-gallon trees were planted within the proposed landscaped areas. This Plan would potentially include the application of permethrin to the bases of oak trees to repel oak bark beetles. Because permethrin is toxic to aquatic invertebrates, application of permethrin would be used only under conditions approved by the County Agricultural Commissioner's Office, typically during droughts and summer season.

In addition, site grading and construction has the potential to impact a number of the remaining oaks to be preserved onsite through inadvertent damage to trunks, branches, and root zones during operation of heavy equipment, trenching, and other construction activities. Site rough grading would potentially intrude into the drip line of the oak trees along the drainage channel and East Valley Road. In addition, construction of a proposed 10-foot-wide drainage swale in the site's northwestern corner and rip-rap rock energy dissipater at this structure's terminus in the existing drainage channel could directly impact the root zones of oak trees in this area. Further, excavation of a 4,000+/- square foot detention basin, and placement of the associated 18" diameter storm drain and in-channel energy dissipater in the site's southwest corner would partially underlie the drip lines of several oak trees, potentially leading to damage to the root zones of these trees. Similarly, excavation of a second detention basin/ bioswale along the site's East Valley Road frontage could also impact root zones of oak trees in this area. Finally, potential changes in soil moisture within the drip lines of oaks trees surrounding this detention basin and vegetated swale may create additional long-term health impacts to multiple oak trees. However, the western swale would be located largely outside the drip lines of existing oak trees, and the detention basin would contain water only during storm events and for 2-3 hours after peak flow storm events. The basins would be expected to be entirely dry during most of the Spring, Summer and Fall seasons.

Construction of the proposed driveways would also result in encroachment to the drip lines of three mature oaks that are in the Caltrans right-of-way, although this is not anticipated to result in impacts to the health of these trees. In order to maintain adequate visibility from driveway entries and exits, trimming of oaks that front East Valley Road would occur. All oaks would be protected and maintained according to measures included in mitigation measure MM BIO-2, and would continue to provide roosting, forage, and nesting habitat.

With implementation of measures included in MM BIO-2, the impact is considered Class II, *potentially significant but feasibly mitigated*.

Mitigation Measures

MM BIO-2 The applicant shall implement a Tree Protection and Replacement Plan, including the following tree protection measures to address potential adverse effects on oak trees:

- *A pre-construction meeting should be held with contractors, prior to commencement of work, to discuss tree protection measures.*
- *Chain link or other acceptable fencing shall be installed, to establish tree protection zones (TPZs) at the outside edge of the drip lines or work areas (if drip lines are encroached upon). Fences must be maintained in upright positions throughout the duration of the project. Tree protection fencing shall also remain upright during landscape installation. Oaks in the drainage channel shall be protected with fencing at the buffer zone and at the edge of the road where it bisects the row of trees.*
- *The TPZs shall be void of all activities, including parking vehicles, operation of equipment, storage of materials and dumping (including temporary spoils from excavation).*
- *All excavation and grading near trees shall be monitored by the project arborist with particular attention to construction of the drainage swale in the site's northwestern corner and of the vegetated swale and detention basin on the southern portion of the site.*
- *Excavation within the drip lines but outside of the TPZs shall be done by hand where reasonable. Any roots encountered that are 6 inches and greater shall be cleanly cut.*
- *Tree pruning, where limbs may conflict with equipment and proposed structures, shall be done prior to excavation and grading.*
- *Pruning shall be performed or supervised by a qualified Certified Arborist. The project arborist shall review the goals with workers prior to commencement of any tree pruning. Tree workers shall be knowledgeable of American National Standards Institute (ANSI) A-300 Pruning Standards and ISA Best Management Practices for Tree Pruning.*
- *Results of the soil analysis shall be reviewed and soil shall be treated if necessary, or additional diagnostic protocol shall be performed on stressed trees and treated accordingly.*
- *Trees that are impacted from root damage (even minimally) shall be sprayed in the early spring and late summer with permethrin (Astro) to help resist attack of oak bark beetles. The application of the chemical shall be applied to the lower 6 inches of trunk. Treatments shall be repeated for at least two years after completion of the project or if drought prevails for longer periods. All application of permethrin shall be approved by the County Agricultural Commissioner's Office and, if applicable, by the state Department of Pesticide Regulation to*

avoid secondary impacts to aquatic species; spraying of oaks along the bank of the drainage shall not be permitted unless it includes best management practices or mitigation measures specifically pre-approved by the County Agricultural Commissioner's Office.

- *If determined necessary by the project arborist, supplemental irrigation shall be used to aid trees that incur root loss and/or during hot and dry periods.*
- *Removal of oaks shall be mitigated by planting at a ratio of 10 to 1 with 1-gallon saplings along the drainage channel, or at a ratio of 3 to 1 with 15-gallon oaks in landscaped areas.*
- *The project arborist shall monitor activities on the site throughout the duration of the project. This shall be more frequent during fencing installation, excavation and grading, and less frequent as the project progresses, provided fences remain upright and TPZs are not violated.*
- *All in-channel energy dissipaters shall minimize or void the use of grouting.*
- *Final engineering design of and landscaping within the proposed detention basin and vegetated swale on the southern portion of the site shall account for the location of these two facilities partially within the drip lines of oak trees. Final design of these drainage features shall be subject to review by the project arborist to ensure that their construction minimizes oak tree root damage and changes in soil moisture and drainage which may damage these oaks over the long-term.*

Plan Requirements and Timing. Tree protection measures shall be implemented during pre-construction, project construction, and upon completion of project development, as indicated above. Additional site-specific and plan-specific tree protection measures and landscaping plans shall be submitted and approved, as necessary, prior to issuance of the Development Permit for the project.

Monitoring. County of Santa Barbara Planning and a registered arborist shall review reports and plans. A County-approved arborist and Permit Compliance shall ensure compliance with plans, as required above.

Impact**BIO-3 The proposed project would result in the protection and improvement of habitats associated with the adjacent intermittent drainage channel (Class IV).**

While the drainage channel and associated oak trees along the western boundary of the project site are not designated as ESH, and do not appear to qualify for ESH designation due to lack of habitat continuity with adjacent habitats and the lack of any understory, the project would include measures to protect and improve the potential habitat value provided by the drainage. Project design would preserve all native trees associated with the drainage and would include a minimum 50-foot habitat restoration buffer from the drainage channel to proposed facilities. Additionally, a Habitat Restoration Plan would be implemented. Any non-native naturalized vegetation associated with the drainage on the western portion of the site would be removed during proposed habitat restoration efforts; however, such habitat is minimal and restoration activities over the long-term would benefit soil stabilization and drainage control, and would result in an increase in biological value and function within the drainage channel. Further, outdoor lighting on proposed facilities would be hooded to shield and reduce the spread of light. The 50-foot buffer surrounding the site would also limit noise impacts associated with project operation. Therefore, proposed restoration would substantially enhance the habitat qualities of the drainage channel, resulting in a Class IV, *beneficial impact*.

3.4.3.5 Cumulative Impacts

The proposed project would result in the net loss of 1.5 acres of low value lemon orchard habitat and one mature oak tree. This loss would be offset by habitat restoration along the drainage channel and the planting of native species throughout proposed landscaped areas. Since the project would not significantly impact biological resources onsite, it would not have a cumulatively considerable effect on the County's biological resources.

3.4.3.6 Residual Impacts

Impacts BIO-1 would be Class III, *adverse, but less than significant* and would not require mitigation. Implementation of mitigation measure MM BIO-2, would reduce Impacts BIO-2 to *adverse, but less than significant* levels. As no significant impacts to

3.4 BIOLOGICAL RESOURCES

biological resources would occur as a result of the proposed project, no residual impacts would remain after project implementation.

3.5 CULTURAL RESOURCES

This section describes existing known cultural resource sites in the vicinity and on the subject site. This section also examines the potential impact of the proposed project on cultural resources and discusses measures to avoid or reduce potential adverse impacts. This section was developed using information from the Montecito Community Plan, a Phase I Cultural Resources Investigation for the project site (Appendix F), and consultation with County staff.

Cultural resources represent and document the activities, accomplishments, and traditions of past and present cultures and link current and former inhabitants of an area. Archaeological resources include areas where prehistoric or historic activity measurably altered the earth, and include physical remains (e.g., arrowheads, bottles, or dietary refuse), environmental indicators such as pollen or other plant remains, and the soils or sediments in which they are deposited. Architectural resources include standing buildings, districts, bridges, and other structures of historic or aesthetic significance.

3.5.1 Existing Conditions

3.5.1.1 Prehistoric Setting

The local prehistoric chronology is divided into four major periods – Paleoindian, Early Period, Middle Period, and Late Period. It is generally accepted that humans entered the New World during the latter part of the Wisconsin glaciation between 40,000 and 20,000 years before present (B.P.). The earliest unquestioned evidence of human occupation in southern Santa Barbara County is dated to between 10,000 to 8,000 B.P. (Erlandson and Colten 1991). Paleoindian groups during this time likely focused on hunting Pleistocene megafauna, including mammoth and bison, and included plants and smaller animals as part of their diet as well.

Post-Pleistocene changes in climate and environment are reflected in the local archaeological record by approximately 8,000 B.P., the beginning of the Early Period, as defined by Chester King (1981, 1979, 1974). The diagnostic feature of this period is the mano and metate milling stones, which were used to grind hard seeds such as sage for consumption.

The Middle Period (3,350 to 800 B.P.) is characterized by larger and more permanent settlements, related to a generally wetter environment. Materials from Middle Period sites reflect a greater reliance on marine resources and include marine shells, fish

remains, and fishhooks and development of the plank canoe made ocean fishing and trade with the Channel Islands safer and more efficient (Arnold 1987). A major shift in vegetable food exploitation occurred, as the mano and metate milling stones were replaced by stone mortars and pestles. This indicates a transition from seed gathering to oak tree acorn gathering and processing.

The Late Period (approximately A.D. 1150 to 1800) was a time of increased social and economic complexity. Increases in the number of permanent and semi-permanent villages clustered along the Santa Barbara Channel and on the Channel Islands in the archaeological record indicate a substantial increase in population. Intensification of terrestrial as well as marine use of resources occurred. Acorns continued to be processed, and land mammals were hunted with the bow and arrow, rather than exclusively by spear as in previous periods. The protohistoric culture of the Chumash was terminated by the arrival of a Spanish expedition led by Gaspar de Portola in 1769. Chumash culture changed dramatically with the establishment of the Missions of Santa Barbara, Santa Ynez, and La Purísima.

3.5.1.2 Historical Setting

The historic occupation of the project vicinity can be divided into three settlement periods: the Mission Period (A.D. 1769 – 1830), the Rancho Period (ca. A.D. 1830 - 1865), and the American Period (ca. A.D. 1865 – 1915). Construction of Mission Santa Barbara in 1786, Mission la Purísima Concepción in 1787, and Mission Santa Ynez in 1804, altered both the physical and cultural landscape of the region. The missions were the center of Spanish influence in the region and affected native patterns of settlement, culture, trade, industry, and agriculture. Following the secularization of the Missions by the Mexican Government in 1821, California became part of the Republic of Mexico.

Secularization of lands and a focus on cattle raising marked the Rancho Period, where large land grants of Mission lands were ceded to wealthy, prominent Spanish families. Native Americans continued to work as laborers on ranchos during this period. With California statehood in 1850 and the advent of the American Period, farming and more intensive land uses steadily replaced cattle stock raising. Cattle ranching was substantially curtailed by a prolonged drought in the 1860s. Since statehood, major forces of regional change during the last 150 years have been railroads, maritime shipping, agribusiness concerns, the oil industry, and the college institutions.

3.5.1.3 Site Characterization

Records Searches and Field Studies

An archaeological records search of the project site was conducted at the Central Coastal Information Center (CCIC) as part of a Phase I Cultural Resources Survey in March 2010 (MFPD 2010) (Appendix F). The records search included a review of all cultural resource investigations and recorded prehistoric and historic archaeological sites located within the project site and a 0.5-mile radius.

The records search indicated that no previous cultural resource investigations have been completed within project area; however, 12 investigations have been completed within a 0.5 mile radius of the project site. The records search identified no recorded archaeological resources within the project area, but one prehistoric site and five historic sites exist within a 0.5-mile radius (Table 3.5-1). The six cultural resource sites are summarized in Table 3.5-1, below. The prehistoric site, CA-SBA-15, appears to be a temporary habitation site located adjacent to a permanent fresh water source. The historic sites are all related to 20th century drainage infrastructure and public works improvements. One historic culvert, CA-SBA-3789, is located within 1,000 feet of the project location.

Table 3.5-1. Recorded Archeological Sites within 0.5 Mile of the Project Site

Trinomial	Component	Description
SBA-15	Prehistoric	Groundstone and lithic scatter
SBA-3788	Historic	Historic bridge
SBA-3789	Historic	Unnamed drainage culvert
SBA-3790	Historic	Historic culvert
SBA-3791	Historic	Unnamed drainage culvert
SBA-3792	Historic	Unnamed drainage culvert

An intensive archaeological surface survey of the project area including the Caltrans right-of-way was conducted in June 2010. Methods for the survey were developed in accordance with requirements of the *County of Santa Barbara Regulations Governing Archaeological and Historical Projects Undertaken in Conformance with the California Environmental Quality Act (CEQA) and Related Laws: Cultural Resource Guidelines* (revised January 1993). All ground surfaces within the project area were inspected in 5-meter (15-foot) parallel north-south transects, roughly following the rows of lemon trees

within the property. Ground surface visibility throughout the project area was excellent (between 90-100 percent). No evidence of prehistoric or historic archaeological resources was identified as a result of the intensive archaeological survey. As ground surface visibility was excellent throughout the project area, the negative survey results for cultural resources are considered highly reliable. As no known cultural resource sites occur within project boundaries, and no surface indication of historic or prehistoric resources was encountered, no shovel test pits were included in the Phase I survey. It is important to note that the systematic survey methods were much more intensive than the 15-meter (45-foot) transect intervals required by the Santa Barbara County Cultural Resource Guidelines (MFPD 2010).

3.5.2 Regulatory Setting

Several state preservation laws guide actions that concern cultural resources. These include CEQA (Public Resources Code 21000 et seq.), Public Health and Safety Code (HSC), and Public Resources Code. At the local level, the County of Santa Barbara and the Montecito Community Plan require protection of archaeological and historical resources to the greatest extent feasible. All of the following regulations apply to the proposed project.

3.5.2.1 Federal Policies and Regulations

The proposed project does not include any federal lands. No federal permits or authorizations are required for its implementation, and federal funds will not be used. Therefore, the proposed project is not subject to the National Historic Preservation Act (NHPA) and no federal laws or regulations governing cultural resources apply.

3.5.2.2 State Policies and Regulations

CEQA. Section 15064.5(a)(3) of the CEQA Guidelines (as amended) states that a resource shall be considered by the lead agency to be “historically significant” if the resource meets the criteria for listing on the California Register of Historical Resources (CRHR) (Pub. Res. Code §§5024.1, Title 14 CCR, Section 4852). Criteria of eligibility for the CRHR include the following:

- (1) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage;
- (2) Is associated with the lives of persons important in our past;

- (3) Embodies the distinctive characteristics of a type, period, region, or method of construction, or represents the work of an important creative individual, or possesses high artistic values; or
- (4) Has yielded, or may be likely to yield, information important in prehistory or history.

Cultural resources meeting one or more of these criteria are defined as “historical resources” under CEQA. Resources included in a local register of historical resources (pursuant to Section 5020.1(k) of the Public Resources Code), or identified as significant in an historical resources survey (meeting the criteria in Section 5024.1(g) of the Public Resources Code), also are considered “historical resources” for the purposes of CEQA.

Codes Governing Human Remains. The disposition of human remains is governed by Section 7050.5 of the California HSC and Sections 5097.94 and 5097.98 of the Public Resources Code, and falls within the jurisdiction of the Native American Heritage Commission (NAHC). If human remains are discovered, the County Coroner must be notified immediately and there should be no further disturbance to the site where the remains were found. If the remains are determined by the coroner to be Native American, the coroner is responsible for contacting the NAHC within 24 hours. The NAHC, pursuant to Section 5097.98, will immediately notify those persons it believes to be most likely descended from the deceased Native Americans so they can inspect the burial site and make recommendations for treatment or disposal.

3.5.2.3 Local Polices and Regulations

County of Santa Barbara Cultural Resource Guidelines. According to the Santa Barbara County Historic Preservation Ordinance, in order for a resource to be eligible for designation as a County Landmark or Place of Historic Merit, it must meet the designation criteria defined in Section 18A-3 of the Santa Barbara County Municipal Code under consideration by the Historic Landmarks Advisory Commission and the Board of Supervisors. The Commission has bylaws which provide additional guidance on eligibility for establishing landmarks and places of historic merit (Ord. No. 4425, § 1).

Montecito Community Plan. Policy goals of the Montecito Community Plan are intended to 1) preserve and protect properties and structures with historic importance in the Montecito community to the maximum extent feasible, and to 2) preserve and protect those cultural resources deemed of special significance to the maximum extent feasible without interfering with the rights of the property owners (Section F; CR-M-1, 2). Appropriate preservation and restoration measures would be determined and

implemented for properties 50 years of age or older if it is found to be significant (refer to CR-M-2.1.1).

3.5.3 Environmental Impacts

3.5.3.1 Thresholds for Determining Significance

If a project may cause a substantial adverse change in the characteristics of a resource that convey its significance or justify its eligibility for inclusion in the CRHR or a local register, either through demolition, destruction, relocation, alteration, or other means, then the project is judged to have a significant effect on the environment (CEQA Guidelines, §15064.5(b)). Direct impacts may occur by:

- (1) Physically damaging, destroying, or altering all or part of the resource;
- (2) Altering characteristics of the surrounding environment that contribute to the resource's significance;
- (3) Neglecting the resource to the extent that it deteriorates or is destroyed. Indirect impacts primarily result from the effects of project-induced population growth. Such growth can result in increased construction as well as increased recreational activities that can disturb or destroy cultural resources; or
- (4) The incidental discovery of cultural resources without proper notification.

Direct impacts can be assessed by identifying the types and locations of proposed development, determining the exact locations of cultural resources within the project area, assessing the significance of the resources that may be affected, and determining the appropriate mitigation.

Indirect impacts primarily result from the effects of project-induced population growth. Removal, demolition, or alteration of cultural resources can destroy the historic fabric of an archaeological site, structure, or historic district. Due to their nature, indirect impacts are much harder to assess and quantify.

CEQA provides guidelines for mitigating impacts to historical resources in Section 15126.4. For architectural resources, maintenance, repair, stabilization, restoration, preservation, conservation, or reconstruction in a manner consistent with the Secretary of the Interior's Standards and Guidelines (Weeks and Grimmer 1995) generally will constitute mitigation of impacts to a less-than-significant level. Avoidance is the preferred manner of mitigating impacts to significant archaeological resources.

3.5.3.2 Impact Assessment Methodology

For cultural resources, impact assessment is based on a comparison of known resource locations with the placement of ground disturbing project activities that have the potential to remove, relocate, damage, or destroy the physical evidence of past cultural activities. If such ground disturbance overlaps recorded site locations, then a direct impact may occur. Historical buildings and structures may be directly impacted if the nearby setting and context is modified substantially, even if the building or structure itself is not physically affected. Indirect impacts may occur if activities occur near, but not directly on, known cultural resources.

3.5.3.3 Mitigation Measures Contained in the Proposed Project

The applicant has proposed a series of mitigation measures to reduce potential adverse project effects, which have been incorporated into the project design. Potential impacts to cultural resources shall be kept to a minimum by following the measure listed below:

- There are no known cultural resources on the project site; however, in the event archeological remains are encountered during grading, work shall be stopped immediately or redirected until a County qualified archeologist and Native American representative are retained by the applicants to evaluate the significance of the find pursuant to Phase 2 investigations of the County Archaeological Guidelines. If remains are found to be significant, they shall be subject to a Phase 3 mitigation program consistent with County Archaeological Guidelines and funded by the applicant.

3.5.3.4 Project Impacts and Mitigation Measures

Impact

CR-1 Construction of fire station, pavements, buffers, and associated infrastructure would result in adverse, but less than significant impacts to cultural resources (Class III).

Based on the excellent ground surface visibility and intensive survey strategy, and the absence of any prehistoric or significant historic archaeological deposits as summarized in the Phase I Cultural Resources Survey, the potential for the proposed project to encounter unknown but potentially significant subsurface prehistoric remains (intact and not subject to previous ground disturbance) is considered unlikely. As the project site is located on fairly level topography and is not within the influence of a major drainage or alluvial fan hillside, it is very unlikely that the existing project area surface soils are a

function of alluvium associated with flooding runoff over the past several thousand years that would otherwise have the potential to bury unknown prehistoric site living surfaces.

Therefore, project impacts on prehistoric and historic archaeological resources are considered to be less than significant. Any potential impacts to historic drainages would be avoided by ensuring that required energy dissipaters are set back from the existing culvert. In the highly unlikely event that potentially important cultural resources are identified during construction, artifacts and particularly features, if identified, could be capable of indicating when prehistoric use of the area occurred. Contemporary Chumash individuals generally consider all prehistoric artifacts and food remains (e.g., shellfish, animal bone) to be important heritage resources. Any isolated human remains would be protected by Public Resource Code 5098.98 and are considered important heritage resources by the contemporary Native American community. The proposed project would implement procedures to follow in the event that prehistoric or historic resources are discovered during project construction. This would ensure that the unlikely potential for impacts to unknown cultural resources during proposed project construction activities would remain Class III, *adverse, but less than significant*.

3.5.3.5 Cumulative Impacts

As no cultural resources are known to exist on the project site, the project would not contribute to regional loss of cultural resources. Therefore, no cumulative impact to cultural resources would occur.

3.5.3.6 Residual Impacts

As no significant impacts to cultural resources would occur as a result of the proposed project, no residual impacts would remain after project implementation.

3.6 FIRE PROTECTION

The following section describes fire protection resources and issues for the existing conditions of the subject site and vicinity; and evaluates impacts of the proposed project on these resources. Fire protection resources include the entities tasked with combating fires, infrastructure that assists those entities, and site conditions that contribute to or diminish the danger of fire. Fire protection issues in the eastern Montecito consist of high fire hazards related to wildfires and the distance of existing residences from fire stations, as well as their length of emergency response times.

3.6.1 Existing Conditions

3.6.1.1 Regional Fire Danger

History in the Santa Barbara area has shown that a major wildland fire occurs approximately every 3.5 years, on average (Table 3.6-1). As a result of weather conditions, plant types, and past fire management policies, the Santa Ynez Mountains and surrounding area have a very high risk of fire.

Table 3.6-1. Historic Fires in the Santa Ynez Mountains and Surrounding Area

Date	Name of Fire	Acres Burned	Structures Burned	Fatalities
1964	Coyote Fire	67,000	106 homes	1 person
1966	Wellman Fire ¹	97,120	None	None
1971	Romero Canyon Fire	14,500	4 homes	4 persons
1977	Sycamore Canyon Fire	805	195 homes	None
1977	Hondo Canyon Fire	10,000	None	None
1979	Eagle Canyon Fire	4,530	5 homes	None
1990	Painted Cave Fire	4,900	440 homes, 28 apartments, 30 other structures	1 person
1993	Marre Fire ¹	43,864	None	None
2002	Sudden Fire	7,160	None	None
2004	Gaviota Fire	7,440	1 home, 3 other structures	None
2007	Zaca Fire ¹	240,207	1 other structure	None
2008	Gap Fire	9,443	4 other structures	None
2008	Tea Fire	1,940	210 homes	None
2009	Jesusita Fire	8,733	80 homes, 80 other structures	None

¹These fires remained on the northern side of the Santa Ynez Mountains and did not directly threaten the South Coast. Source: CAL FIRE 2011.

The native chaparral plant community that covers the slopes has various chemical, physical, and physiological characteristics that tend to make it flammable. Some chaparral species even require a “fire cue” such as intense heat, smoke or charring of bark before germination can occur, or have reproductive systems that allow for fast germination after fire.

Weather is the single most important component affecting wildfire. In particular, specific weather events known as “sundowner” winds can occur that drastically alter normally temperate Santa Barbara coastal plain climate to create catastrophic wildfire conditions. These winds bring very warm, dry air onto the coastal plain and can reach gale force levels. Many of the most destructive conflagrations that have occurred in the Santa Barbara region, including the Painted Cave fire of June 1990, which was among the more devastating fires in California history (losses in public and private buildings totaled almost \$250 million), have occurred during one of these wind episodes (Blier 1998).

Inadequate or unreliable water supply, inadequate ingress and egress, inadequate structural safeguards, and inadequate vegetation management are the factors that lead to major fire losses in areas adjacent to wildlands. The cumulative effect of unprotected development in these areas leads to large property losses and potential loss of life. The inability for residents to shelter in place in their homes can create an evacuation and fire department access problem in these areas.

3.6.1.2 Fire Danger in the Project Vicinity

Montecito is a semi-rural, heavily-wooded community with extensive estate development along the urban-wildland interface with the front country of the Santa Ynez Mountains, creating substantial exposure to wildland fires originating within the Los Padres National Forest. Although Montecito has some densely populated portions, extensive areas of the community consist of estates scattered among mature oak woodlands and groves of non-native trees. Many homes, particularly in the foothills and the eastern areas of the community, are located on or in close proximity to steep hillsides vegetated with dense stands of native chaparral known to be susceptible to wildland fires.

The project site is located within a State Responsibility Area (SRA) Very High Fire Hazard Severity Zone (County of Santa Barbara 2009). Additionally, Very High Fire Hazard Areas surround the site, particularly to the north, west, and in the surrounding

Santa Ynez foothills. The project site is located in an area of eastern Montecito that currently lacks a MFPD-standard five-minute response time. Due to inadequacies in response-time coverage, the MFPD passed and adopted Resolution 2004-10 which made the identification of a parcel that could accommodate a new station the district's highest priority.

3.6.1.3 Fire Protection Services

Montecito Fire Protection District (MFPD). Fire protection services for the project vicinity are provided by the MFPD. The District is bound on the west by City of Santa Barbara limits, on the east by the Carpinteria-Summerland Fire Protection District (CSFPD), on the north by the Los Padres



MFPD Station 1

National Forest, and on the south by the Pacific Ocean. The District is served by two stations: Station 1, located at 595 San Ysidro Road, provides an emergency response of one Engine Company with at least three personnel, one Rescue Company with two personnel, and a Battalion Chief in a separate Command Vehicle; Station 2 provides an emergency response of one Engine Company with at least three personnel. This provides the MFPD with a total of two Engine Companies, one Rescue Company, and a Battalion Chief responding to each significant call. Depending on the staffing of the Engine Companies, between nine and eleven total personnel are currently available to respond to each significant call (MFPD 2008). The District responds to approximately 1,200 calls for service each year in the categories of Medical Emergency/ Rescue; Fire; Hazardous Conditions; Service; Good Intent; and False Alarm.

The MFPD also has Automatic Mutual Aid Agreements with the City of Santa Barbara Fire Department (SBFD), the CSFPD, the Santa Barbara County Fire Protection District, and the U.S. Forest Service. These agreements provide a response that supplements the district's response capabilities described above. The most utilized agreements are with the SBFD and the CSFPD (MFPD 2008).

3.6.1.4 Response Times

The MFPD Station 3 Site Identification Study (August 2008) identified four zones in Montecito with measurable response and deployment patterns (Figure 3.6-1). Zone I generally includes the area east of the Santa Barbara City limits to the existing Station 2 on Sycamore Canyon Road. Zone II generally includes the area east of Station 2 to Station 1. Zone III includes the area east of Station 1 to approximately Romero Canyon Road. Zone IV includes the area east of Romero Canyon Road to the MFPD boundary.

Of the four zones, Zone II has the highest level of service with regard to deployment and emergency response. This is because Zone II is located between the two MFPD stations and response time analysis shows that all of the district's equipment will arrive, on average at any location in Zone II, within the 5-minute response time. Additionally, response time data indicate that a Mutual Aid engine will arrive, on average, within 6 to 10 minutes. This more than meets NFPA Standard 1710 with regard to response time and number of personnel.

Zones I and III are similar in that the first engine from their respective MFPD stations will arrive on average within the 5-minute response time. All remaining MFPD and Mutual Aid equipment will arrive, on average, in less than 9 minutes. Zone IV is determined to be outside the MFPD 5-minute response time. Within 9 minutes, on average, all MFPD equipment would arrive along with Mutual Aid from CSFPD, if available.



Portions of eastern Montecito lie outside of the MFPD's 5-minute response time area.

Additionally, there are other areas of the MFPD depicted in the Response Time Map that are also not located within a 5-minute response time area. These areas are typically much more rural in nature than the rest of the District and contain lower population and structure densities. Areas such as Gibraltar Road and other properties off Mountain Drive and Bella Vista Drive cannot be provided the same standard of response as the rest

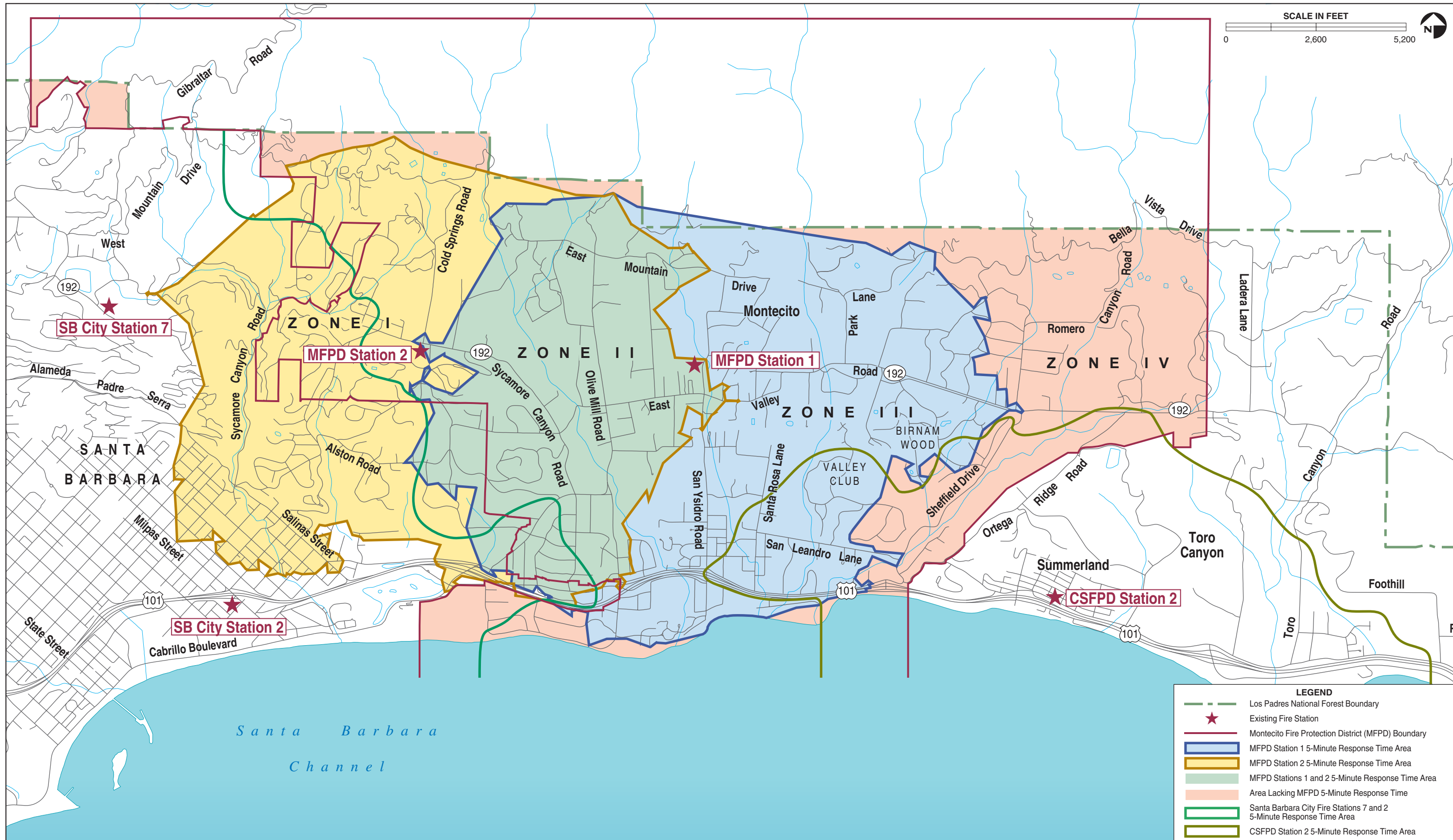


Figure 3.6-1: Existing 5-Minute Response Time Service

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of the District due to their rural locations. Some areas along the coast near Fernald Point Lane and Butterfly Beach are also located outside of 5-minute response time areas due to obstacles in the road network that slow response times such as U.S. Highway 101. The project site is located in the underserved area in the eastern end of the district referred to as Zone IV (MFPD 2008).

3.6.2 Regulatory Setting

3.6.2.1 Federal and State Authorities and Administering Agencies

Los Padres National Forest Los Padres National Forest is part of a larger group of agency cooperators that combine and share resources to accomplish wildfire suppression and management on National Forest Service lands and lands managed by Forest Service partners (U.S. Forest Service 2008). They have a mutual aid agreement with the Santa Barbara County Fire Department for wildland fire protection services during the high fire hazard season (County of Santa Barbara 1992). Los Padres National Forest Resources are stationed at Pine Canyon, New Cuyama, Figueroa, San Marcos, Santa Ynez Airport Station, Los Prietos, Foothill (at Santa Barbara Airport), Rincon, Gibraltar Road/Santa Barbara City Station 7 (U.S. Forest Service 2011).

State Board of Forestry. The State Board of Forestry designates fire protection responsibility areas for federal, state, and local agencies. Federal agencies such as the U.S. Forest Service have responsibility to provide wildland resource fire protection on all Federal Responsibility Area (FRA) lands, including Forest Service land within the Montecito Community Plan Area. To more efficiently provide protection over a more contiguous land base, federal agencies trade protection areas with the California Department of Forestry and Fire Protection (CAL FIRE). The resulting lands are called State Direct Protection Areas or Federal Direct Protection Areas.

California Department of Forestry and Fire Protection (CAL FIRE). CAL FIRE has legal responsibility to provide wildland resource fire protection on all SRA lands, including the financial responsibility for preventing and suppressing fires. Within Santa Barbara County, the Santa Barbara County Fire Department is a contract county for CAL FIRE, and under contract, provides wildland resource fire protection and prevention efforts on SRA land (excluding structures). The project site is within an SRA; therefore, CDF

serves as one of many secondary wildland responders, along with USFS, under the California Firefighting Assistance Agreement.

National Fire Protection Association (NFPA) 1710, Standard for the Organization and Deployment of Fire Suppression Operations, Emergency Medical Operations, and Special Operations to the Public by Career Fire Departments. The NFPA has developed criteria for fire department response time standards applicable to the project site within a semi-rural community. NFPA 1710 is a voluntary set of operating standards for professional fire protection services which includes a 5-minute emergency response time standard comprised of 1 minute of turnout time¹ and 4 minutes of travel time (NFPA 2001).

3.6.2.2 Local Authorities and Administering Agencies

Santa Barbara County Comprehensive Plan – Seismic and Safety Element. The Santa Barbara County Comprehensive Plan, Seismic and Safety Element establishes policies to protect the community from natural and manmade hazards, including fire hazards (County of Santa Barbara 2010).

Montecito Community Plan. The Montecito Community Plan, provides goals and policies that address fire facilities and hazards. Goals F-M-1 and -2 include ensuring that adequate fire protection services are available in High Fire Hazard Areas prior to permitting new development and reducing fire hazards throughout the community. Specifically, the Montecito Community Plan states that “. . . if development in the eastern portion of [Montecito] was to continue at higher levels, the [MFPD] might have the need for a new fire station in the eastern area” (County of Santa Barbara 1992).

Montecito Fire Protection District Goals. The MFPD is organized for the purpose of saving the lives of anyone who may be in danger due to fire, smoke, gases, etc.; to extinguish fires with the least possible damage to property from fire or water; to prevent fires by fire prevention ordinances; and to perform such other acts for public safety as may arise in event of disaster or other emergency (MFPD 2008). The MFPD strives to meet all accepted standards applicable to its delivery of Fire and Rescue services to the community.

¹ Turnout time refers to the time required for emergency service personnel to ‘suit up’ and exit the station.

Montecito Growth Management Ordinance (MGMO). The intent of the MGMO is to pace growth within the Montecito Community Planning Area in a manner that balances development with available resources. MGMO Service and Resource Constraints, Finding 2.3.7 recognizes that a substantial portion of the Montecito Planning Area lies outside the 5-minute response time for fire protection and restricts growth by implementing a point allocation system based on criteria including a maximum 3-mile distance to the nearest fire station and a 5-minute response time.

3.6.3 Environmental Impacts

3.6.3.1 Thresholds for Determining Significance

Santa Barbara County does not have a specific threshold of significance for fire protection, but Montecito Fire Department standards and other County standards and regulations would apply to the development. Impacts to fire protection services would be significant if the proposed project would:

- Not meet development standards presented in the adopted Montecito Fire Protection Plan.
- Significantly increase the population in an area insufficiently served by fire protection services.
- Expose people or structures to a significant risk of loss, injury or death involving wildland fires, including where wildlands area adjacent to urbanized areas or where residences are intermixed with wildlands.
- Significantly increase the flammable fuel load on the property, including vegetation, flammable liquids or gases.

The following Montecito Fire Department standards are applied in evaluating impacts associated with the proposed development:

- The MFPD has chosen to use 5-minute the emergency response time standard set by the NFPA in NFPA 1710.

3.6.3.2 Impact Assessment Methodology

The effects of constructing a fire station in an area of elevated fire danger and currently substandard response times were considered. Data provided in the MFPD Station 3 Site Identification Study (2008) for current and projected population, number of underserved homes, resources, and emergency response capabilities was assessed for adequate emergency response time service, based on NFPA and MFPD standards.

3.6.3.3 Project Impacts and Mitigation Measures

Impact

FP-1 The proposed project would result in a beneficial impact to fire protection service in the eastern Montecito area (Class IV).

With the addition of a staffed third fire station, the MFPD would experience a higher level of emergency response service throughout the District. Overall, the MFPD would have additional resources on duty to respond to multiple calls and to provide a more powerful response to both local emergency calls and major incidents when they occur. In addition, Station 3 would also provide an Essential Public Services Building for the community to provide resources such as shelter, food, and support of emergency equipment during disasters. Further, both the aforementioned Zones III and IV would benefit from decreased response times. Zone III would benefit from overlapping response service from Stations 1 and 3, similar to current conditions in Zone II. Most importantly, approximately 385 existing residential units currently located in the underserved Zone IV of the MFPD would receive service which meets the MFPD's standards. Zone IV has the potential to increase to a total of approximately 1,119 residential units with development permitted under existing zoning (for up to 175 primary residences and with the theoretical addition of up to 559 residential second units/guest houses). The addition of Station 3 would ensure that a large majority of current and future residences in the underserved Zone IV are served by a 5-minute response time. This would consequently result in Zones I through IV meeting the MFPD's goal of compliance with the NFPA Response Time Standard (MFPD 2008).

The proposed project is designed to address current inadequacies in MFPD response coverage. The project would allow for increased staff and fire protection equipment required for the MFPD to reduce areas that currently lack a 5-minute response time in

Montecito. Therefore, the project would have a *beneficial* (Class IV) impact on fire protection.

3.6.3.4 Cumulative Impacts

Since the project would function to reduce significant fire hazards, it would have a cumulatively beneficial effect on fire safety within the County.

3.6.3.5 Residual Impacts

Because no significant impacts would occur, mitigation is not required and no residual impacts would result.

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3.7 GEOLOGIC PROCESSES

The geologic resources of an area consist of all soil and bedrock materials. For the purpose of this section, the terms soil and rock refer to unconsolidated and consolidated earth materials, respectively, regardless of depth. Geologic resources can include mineral deposits, important landforms, and tectonic features. These resources can present hazards or obstacles to new development, and may also have scientific, economic, and recreational value. In the case of the proposed Station 3 Site Acquisition and Construction Project, tectonic features, particularly local and regional faults are a potentially important Geologic Processes issue.

A site-specific geotechnical evaluation was conducted for the proposed project site (Campbell Geo 2011, Appendix G) and provides much of the information for this section.

3.7.1 Existing Conditions

3.7.1.1 Regional Geologic Setting

The project site is located in a geologically complex and seismically active region. This region is within the Transverse Ranges Geomorphic Province, a generally mountainous region that extends some 310 miles in an east-west direction which is in contrast to the prevailing northwesterly structural grain of California. These ranges, stretching from Point Arguello on the west to the Pinto and Eagle Mountains in eastern California, are in aggregate only 10 to 63 miles wide in a north-south direction (Dibblee 1966). The point Arguello and Santa Ynez faults are generally considered the boundary between the Transverse Ranges Province and the Coast Ranges Province to the north. Santa Barbara County is situated southwest of the San Andreas Fault, a major dislocation of the earth's crust that extends roughly 750 miles from the east side of the Salton Sea to its offshore intersection with the Mendocino Fracture near Eureka, California. The Santa Ynez Mountains and northern Channel Islands form the westernmost part of the Transverse Ranges and are actively rising as a result of the oblique plate collision process associated with the San Andreas Fault.

Regional Faulting, Seismicity, and Earthquakes

The project site is located in a seismically active area, though the level of seismicity is not unusual for Southern California. No major fault zones cross the project site (Campbell Geo-2011), but potentially active and active faults in the vicinity of the project site include:

- the Mission Ridge/Arroyo Parida/More Ranch Fault (MRIAP Fault), which is less than 1 mile from the site (Figure 3.7-1); and
- the southwest trending Fernald Point Fault that splays off the Arroyo Parida.

The nearest active fault mapped in accordance with Alquist-Priolo Earthquake Fault Zoning Act is the Red Mountain Fault in the Pitas Point Quadrangle in Ventura County. The fault surface expression shown on the State of California Special Studies Zone Map (1991) is located more than 10 miles east of the project site, but the map does not show the trace of the fault offshore where the fault trends to the west towards the Santa Barbara area. Computer modeling the closest subsurface portion of the Red Mountain Fault is estimated to be 4.2 miles offshore from the project site (Campbell Geo 2011).

Other investigators (Namson and Davis 1990) have stated the opinion that the region is underlain by a large ‘blind thrust’ fault and fold structure. Although this blind thrust fault does not break the ground surface, it may have larger seismic shaking potential than the faults considered existing by the California Geologic Survey, according to studies by these investigators.

Between 1800 and 1999, 15 earthquakes of greater than magnitude 5.0 occurred in the immediate Santa Barbara area. The largest historical quakes occurred in 1812 (three events with estimated magnitudes of 7.1, 7.5, and 6.8) and 1925 (magnitude 6.8). The epicenter of the 1812 quakes is still uncertain.

3.7.1.2 Site Geologic Setting

The proposed project site is located on an alluvial fan formed by the erosion and deposition of detritus from Romero Canyon and the south face of the Santa Ynez Mountains, located approximately 0.5 miles north of the site.

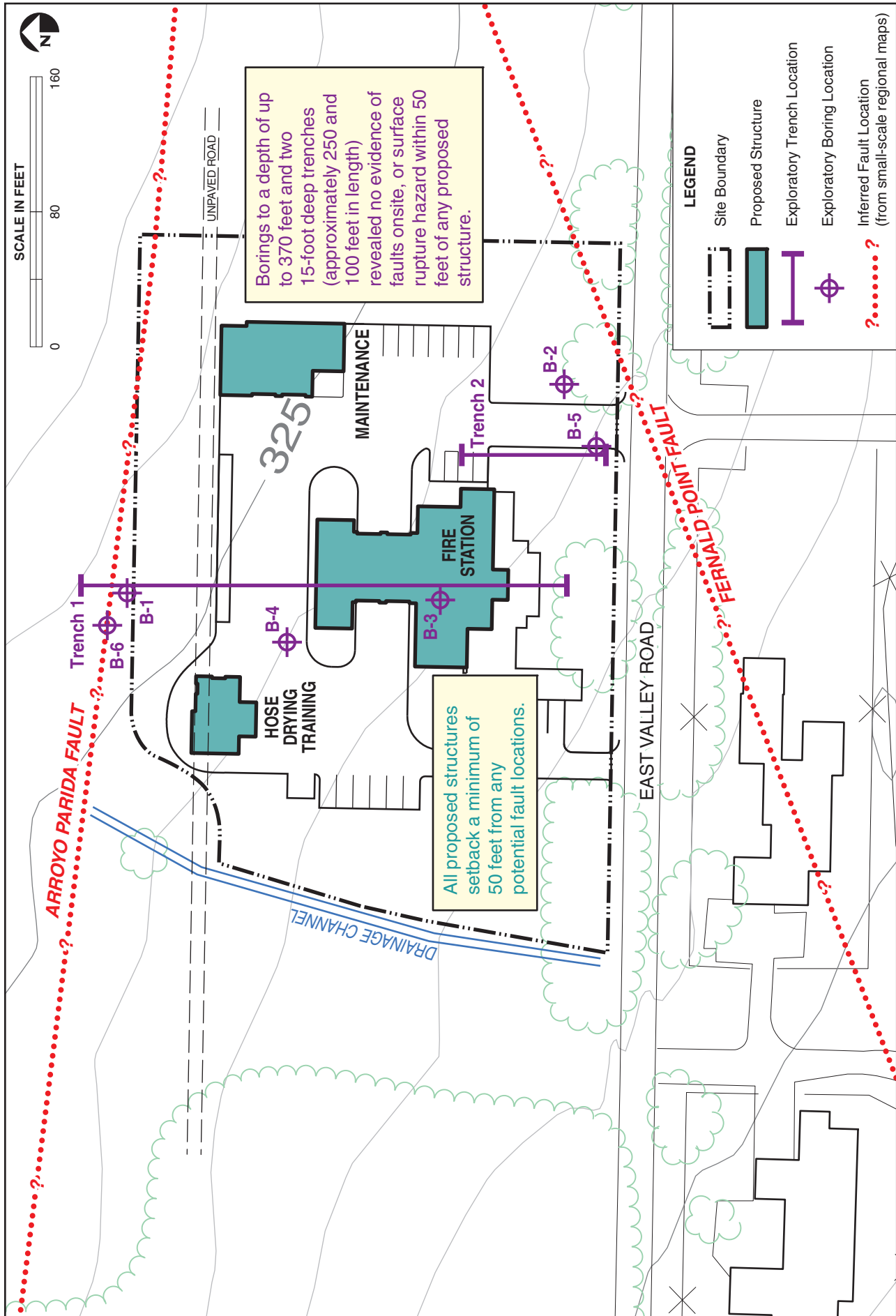


Figure 3.7-1 Potentially Active and Active Faults in the Vicinity of the Project Site

The geologic formations encountered in boreholes or exposed on the site are, from oldest to youngest, the Casitas formation (Qca), older, intermediate alluvial or fanglomerate deposits (Qia), and Artificial Fill (Qat).

3.7.1.3 Site Topography

The proposed building footprint is on flat to gently sloping ground. Based on the County of Santa Barbara Flood Control Department topographic map (Sheet 19, July 1990), the site elevation varies from approximately 330 feet to 305 feet above sea level. The surface grade slopes to the southwest at approximately 7 percent. Runoff of surface water at the site is to the south and west, by sheet flow to East Valley Road. A drainage ditch that is less than 5 feet deep is located on the western boundary of the proposed site.

3.7.1.4 Site Soils

The underlying soil association at the site consists of Ballard fine sandy loam occurring on 2 to 9 percent slopes. The soil in the area is characterized by moderately well drained fine sandy loams. The USDA indicates that this soil is favorable for building site development and would not pose a geotechnical limitation to project construction (US Department of Agriculture [USDA] 1981).

3.7.1.5 Site Geologic Hazards

Surface Rupture

Surface rupture involves the displacement and cracking of the ground surface along a fault trace. Surface ruptures are visible instances of horizontal or vertical displacement, or a combination of the two, typically confined to a narrow zone along the fault. Surface rupture is more likely to occur in conjunction with active fault segments where earthquakes are large, or where the location of the movement (earthquake hypocenter) is shallow. No evidence of surface rupture has been observed on the project site.

Expansive Soils

Expansive soils tend to swell with seasonal increases in soil moisture and shrink during the dry season as soil moisture decreases. The geotechnical evaluation for the proposed project site found that the near surface soils had a low expansion potential (Campbell Geo 2011).

Liquefaction

Liquefaction is a form of earthquake-induced ground failure that occurs primarily in relatively shallow, loose, granular, water-saturated soils. The potential for liquefaction at the site is considered low due to the absence of shallow groundwater and dense nature of the sandy soils (Campbell Geo 2011).

Landslides and Slope Instability

The stability of slopes is affected by a number of factors including rock and soil type, amount of water present, and amount of vegetation present. The US Geological Survey has identified this area to have a "low landslide potential" (Bezore and Wills 1999).

Radon Gas

Radon is an odorless and colorless radioactive gas produced by the natural decay of minerals found in many types of earth materials. The California State Geological Survey's Radon Zone Map for Santa Barbara County indicates a low potential for excessive indoor radon levels in the general vicinity of the project site (CDMG 2000).

3.7.2 Regulatory Setting

3.7.2.1 Federal Regulations

Federal Soil Conservation Law (16 USGS 590a). By Congressional policy, this law provides permanently for the control and prevention of soil erosion by preventative measures, including but not limited to engineering operations, methods of cultivation, growing of vegetation, and changes in land use.

Clean Water Act Section 402 (National Pollutant Discharge Elimination System [NPDES] Program). This act mandates that certain types of construction activity comply with the requirements of the USEPA's NPDES program. Under State Water Resources Control Board (SWRCB) enforcement, the Central Coast Regional Water Quality Control Board (RWQCB) implements the NPDES program in Santa Barbara County. The program requires a General Construction Activities Permit, including implementation of established Best Management Practices (BMPs) for management of stormwater, erosion control, and/or siltation. More information regarding this regulation is provided in Section 3.11, *Water Resources, Supply, and Service*.

3.7.2.2 State Policies and Regulations

Alquist-Priolo Earthquake Fault Zoning Act (1972). The purpose of this act is to regulate types of development near active faults to mitigate the hazard of surface rupture. Under this act, the State Geologist is required to delineate earthquake fault zones along known active faults in California. The State Mining & Geology Board is tasked with establishing regulations regarding development near known active faults. Under current California Code of Regulations Section 3603(a), the minimum setback from an active fault as generally applied is 50 feet. The relevant text states:

No structure for human occupancy, identified as a project under Section 2621.6 of the Act, shall be permitted to be placed across the trace of an active fault. Furthermore, as the area within fifty (50) feet of such active faults shall be presumed to be underlain by active branches of that fault unless proven otherwise by an appropriate geologic investigation and report prepared as specified in Section 3603(d) of this subchapter, no such structures shall be permitted in this area.

California Building Code (CBC) (2010). The State of California provides a minimum standard for building design through the CBC, which is based on the Universal Building Code but has been modified to account for California's unique geologic conditions. The CBC is selectively adopted by local jurisdictions, based on local conditions. Chapter 16 of the CBC contains specific requirements for seismic safety. Chapter 18 of the CBC regulates excavation, foundations, and retaining walls. Chapter 33 of the CBC contains specific requirements pertaining to site demolition, excavation, and construction to protect people and property from hazards associated with excavation cave-ins and falling debris or construction materials. Appendix J of the CBC regulates grading activities,

including drainage and erosion control. Under definitions in the most current California Building Code, the project is considered to be an essential services facility, with the same occupancy category as hospitals, law enforcement facilities, airport control towers, etc. (CBC Table 1604A.5). Engineering geologic reports are required by CBC Section 1803A.6. Specific hazards, including seismic/fault-related hazards, are required to be evaluated.

3.7.2.3 Local Policies and Standards

Santa Barbara County Comprehensive Plan - Seismic Safety and Safety Element. The County's Seismic Safety and Safety Element includes goals and policies intended to protect the community from risks associated with the effects of seismic hazards and other known geologic hazards. Policies include minimizing the potential effects of geologic, soil, and seismic hazards through the development review process and preparation of preliminary soils and geological reports, if necessary (County of Santa Barbara 2010).

Montecito Community Plan (MCP) Policies and Development Standards. The MCP consists of goals, policies, and standards specific to the Montecito Planning Area. These policies are used in place of those in the County Comprehensive Plan for development occurring in Montecito. Relevant policies from this plan are listed below:

Policy GEO-M-1.1: Mountainous watershed areas shall be protected to the maximum extent feasible from development which would interfere with their watershed function and would intensity fire and flood danger.

Policy GEO-M-1.2: Grading from future ministerial and discretionary projects in Montecito shall be minimized to the extent feasible in order to prevent unsightly scars in the natural topography due to the grading, and to minimize the potential for earth slippage, erosion, and other safety risks.

Policy GEO-M-1.4: Construction within fifty feet of Historically Active and Active Fault traces shall be avoided. The County shall require special engineering features to minimize potential structural damage from fault rupture for any structure which cannot avoid faults.

Policy GEO-M-1.5: Development standards shall be required to decrease the potential for soils or slope hazards.

3.7.3 Environmental Impacts

3.7.3.1 Thresholds for Determining Significance

Thresholds of significance are taken from the *County of Santa Barbara Environmental Thresholds and County Guidelines Manual*, adopted by the Board of Supervisors in 1993 and most recently revised in 2008 (County of Santa Barbara 2008). According to the manual, a geologic impact would be considered significant if:

- The project site or any part of the project is located on land having substantial geologic constraints, as determined by the County. Areas constrained by geology include those located near active or potentially active faults and property underlain by rock types associated with compressible/collapsible soils or susceptible to landslides or severe erosion. "Special Problem" areas designated by the Board of Supervisors have been established based on geologic constraints, flood hazards and other physical limitations to development;
- The project results in potentially hazardous geologic conditions such as the construction of cut slopes exceeding a grade of 1.5 horizontal to 1 vertical;
- The project proposes construction of a cut slope over 15 feet in height as measured from the lowest finished grade; or
- The project is located on slopes exceeding 20 percent grade.

3.7.3.2 Impact Assessment Methodology

The impact assessment methodology used in this analysis consisted of evaluating two types of impacts: (1) impacts to the proposed project resulting from local and regional geologic conditions (e.g., fault rupture, seismic shaking, liquefaction, landslides, expansive soils); and (2) potential impacts to local and regional geologic conditions resulting from the proposed project (e.g., soil erosion or loss of top soil). To accomplish this, existing conditions, including the configuration of the project site, current operations, and present geologic environment, were established based on site-specific information obtained from several sources, as described in Section 3.7.1. Significance criteria were then developed and used to evaluate potential impacts.

3.7.3.3 Mitigation Measures Contained in the Proposed Project

The applicant has proposed a series of mitigation measures to reduce potential adverse construction and operational effects of the project, which have been incorporated into the project design and future operation as listed below:

- A minimum 50-foot setback from the nearest *potential* or inferred location of the Arroyo Parida and Fernald Point Faults as derived from regional maps.
- Preliminary grading and foundation plans would be subject to review and approval by a registered Geologist (e.g., Campbell Geo, Inc.) to ensure consistency with recommendations of the project Geologic Study and to address any potential seismic safety issues.
- During project construction, a local geotechnical lab (e.g., Pacific Materials) will be retained to perform field observation and testing during grading and foundation work.

3.7.3.4 Project Impacts and Mitigation Measures

Impact

GEO-1 The proposed project would expose people or structures to adverse, but less than significant effects from seismicity or seismically induced hazards including earthquakes, seismic shaking, surface rupture landslides, or liquefaction (Class III).

The mapped locations of the Fernald Point and Arroyo Parida Faults are more than 50 feet horizontally from the project site, based on regional geologic work conducted by Dibblee (1986), Hoover (1979), and Gurrola (2006). However, the 2009 USGS map shows queried, inferred or uncertain locations for both the Fernald Point and Arroyo Parida Faults in close proximity to the site. In order to investigate the potential for occurrence of onsite faults, the MFPD commissioned extensive geologic testing which included review of existing maps, literature and local well records as well as two forms of onsite testing including borings to a depth of up to 370 feet and excavation of two 15-foot deep trenches across the site of approximately 250 and 100 feet in length (refer to Figure 3.7-1 and Appendix G). This testing and follow-up laboratory work revealed no evidence of faults onsite (Campbell Geo, Inc., 2011).

State of California regulations and policies (CCR Title 14 and State Mining and Geology Board policy) state that "the area within 50 feet of such active faults shall be presumed to be underlain by active branches of that fault unless proven otherwise." The results of onsite geologic testing were utilized to locate proposed structures a minimum of 50 feet from any potential fault locations and thus avoid potential for surface rupture hazards.

The project site is located in a seismically active region of Southern California. The levels of ground acceleration that might result from a moderate-to-large earthquake on local and regional faults have the potential to cause severe damage to buildings and infrastructure. Such impacts are common throughout California and nothing can be done to absolutely ensure that structures do not fail during significant seismic events. Through the incorporation of proper engineering measures in accordance with existing regulations, impacts would be *Class III, adverse, but less than significant*

Impact

GEO-2 The proposed project would expose people or structures to potentially significant (but mitigable) adverse effects as a result of project development on soil that is unstable or that could become unstable as a result of the project, and potentially result in expansion, differential settlement, or collapse (Class II).

The potential for project development to occur on unstable soils and result in significant subsidence, landslides, liquefaction, or differential settlement at the project site was determined to be low (Campbell Geo 2011). Nonetheless, the site-specific geotechnical evaluation included recommendations that address differential settlement, including a program of over-excavation, scarification, moisture conditioning, and compaction of the upper soils in the building and surface improvement areas.

Therefore, impacts related to development on expansive soils and soils subject to differential settlement are considered to be potentially significant; however, impacts would be reduced through the implementation of recommendations outlined in the site-specific geotechnical evaluation report. Therefore, this impact would be considered *Class II, potentially significant but feasibly mitigated*.

Mitigation Measures

MM GEO-2 Soils engineering design recommendations addressing expansive soils and differential settlement in the site-specific geotechnical evaluation report shall be incorporated into the project design in accordance with applicable sections of the California Building Code and County of Santa Barbara Building Code.

Plan Requirements and Timing. Recommendations from the geotechnical evaluation shall be incorporated into grading and foundation designs as appropriate. Additional site-specific and plan-specific geological and/or soils engineering reports shall be submitted and approved, as necessary, prior to issuance of the Development Permit for the project.

Monitoring. Santa Barbara County's Building and Safety Division and Public Works Department shall review reports and plans. Permit Compliance shall ensure compliance with plans. Grading inspectors shall monitor technical aspects of the grading activities.

Impact

GEO-3 The proposed project would result in adverse, but less than significant impacts from soil erosion or the loss of topsoil during construction and excavation activities (Class III).

Because the site slopes to the southwest at approximately a 7 percent grade, development of Station 3 would require grading to establish level areas for building pads and paved surfaces. Grading would include the excavation of approximately 16,500 cubic feet of soil and rock, with export of up to 8,000 cy. to a site determined to be acceptable at the time of construction. Grading for site development is expected to expose existing undocumented fill, and underlying alluvium. Therefore, during construction, undocumented fill and the underlying alluvium would temporarily be exposed and subject to erosion. Excavation would be localized to the proposed project site, providing a natural containment of soils. Thus, any potential erosion would be contained within the project site and not affect surrounding areas. Because more than 1 acre of land would be disturbed during the construction phase, the project would require a NPDES storm water

permit. Compliance with permit conditions would require implementation of erosion control BMPs. In addition, the receiver site for fill would be an acceptable site with any required permissions and associated BMPs in place. Therefore, the potential for significant erosion hazards during the construction phase is considered to be low. Additional information on storm water permit requirements and erosion control measures is included in Section 3.11, *Water Resources, Supplies, and Service*.

Following construction, the disturbed soils would be developed or would contain landscaping with very little exposed soil. Therefore, future operations would have a low potential for soil erosion hazards. Based on the relatively short period of time that soils would be susceptible to erosion, and because implementation of standard erosion control measures would be enforced as conditions of approval for proposed construction activities (see *MM GEO-3* below), impacts associated with erosion are considered to be Class III, *adverse, but less than significant*.

Standard Regulatory Conditions

The proposed project would adhere to the following standard regulatory requirements as part of the permit approval process, which would ensure that impacts would be less than significant.

MM GEO-3 Grading and erosion and sediment control plans, including the measures listed below, would be required to be designed to minimize erosion. These measures represent standard County conditions of approval for a project and would likely be required by the County as part of permit approval process.

- 1. Except for approved access roads, drives and trails, grading would be prohibited within 50 feet of the top of bank of the intermittent drainage along the western boundary of the project site. The protected areas would be required to be designated with orange construction fencing or other barrier to prevent entry by equipment or personnel.*
- 2. The applicant would be required to limit excavation and grading to the dry season of the year (i.e., April 15 to November 1) unless a Building and Safety-approved erosion and sediment control plan is in place and all measures therein are in effect. All exposed graded surfaces would be required to be reseeded with ground cover vegetation to minimize erosion.*

3. *Methods such as geotextile fabrics, erosion control blankets, retention basins, drainage diversion structures, siltation basins and spot grading would be required to reduce erosion and siltation into adjacent water bodies or storm drains during grading and construction activities.*
4. *Any sediment or other materials tracked offsite would be required to be removed the same day as they are tracked using dry cleaning methods.*
5. *Storm drain inlets would be required to be protected from sediment-laden waters by the use of inlet protection devices such as gravel bag barriers, filter fabric fences, block and gravel filters, and excavated inlet sediment traps.*
6. *Grading on slopes steeper than 5:1 would be required to be designed to minimize surface water runoff.*
7. *Temporary storage of construction equipment would be limited to a 50 by 50-foot area located along existing paved or dirt road on the property; equipment storage sites shall be located at least 100 feet from any water bodies.*

Plan Requirements and Timing. Grading and erosion and sediment control plan(s) would be required to be submitted for review and approval by County P&D prior to issuance of a Development Permit for the project. The plan(s) would be required to be designed to address erosion and sediment control during all phases of development of the site.

The requirements to limit grading to the dry season or to implement an erosion and sediment control plan, and to revegetate exposed graded surfaces would be required to be noted on all grading and building plans.

The applicant would be required to notify Permit Compliance prior to commencement of grading.

Erosion and sediment control measures would be required to be in place throughout grading and development of the site until all disturbed areas are permanently stabilized.

Graded surfaces would be required to be reseeded within four weeks of grading completion, with the exception of surfaces graded for the

placement of structures. These surfaces would be required to be reseeded if construction of structures does not commence within four weeks of grading completion.

Components of the grading plan would be required to be implemented prior to final inspection.

Monitoring. Permit Compliance would photo-document revegetation and ensure compliance with plan(s). Grading inspectors would monitor technical aspects of the grading activities. County P&D would site inspect during grading to monitor dust generation and four weeks after grading to verify reseeded and to verify the construction has commenced in areas graded for placement of structures.

3.7.3.5 Cumulative Impacts

Mitigation measures associated with the proposed project would avoid or minimize individual significant impacts. For these reasons, the project's contribution to the cumulative impact of erosion and sedimentation would be less than significant.

3.7.3.6 Residual Impacts

After incorporation of proper engineering measures in accordance with existing regulations, some risk of personal injury or structural damage will remain (GEO-1). These are consistent with the risks seen throughout California and other seismically active areas and are unavoidable.

With the incorporation of specified mitigations, the risk of damage from expansive soils would be reduced to less than significant (GEO-2).

With the incorporation of standard erosion control requirements, the risk of erosion or loss of topsoil would be considered less than significant (GEO-3).

3.8 LAND USE

This section provides information on the existing and planned uses of the project site, and existing land uses in the project vicinity. It also summarizes the land use policies and regulations applicable to the project site and assesses land use impacts of the proposed project. Land use in the community is governed by Santa Barbara County's comprehensive Plan, particularly the Montecito Community Plan (MCP), as well as the Montecito Land Use Development Code (MLUDC).

3.8.1 Existing Conditions

3.8.1.1 Project Vicinity

The 2.55-acre project site is located at 2500 East Valley Road, on the north side of the road, east of Sheffield Drive and Romero Canyon Road, and west of Ortega Ridge Road. The project site is located in the semi-rural eastern end of the community of Montecito, an area generally characterized by larger residential estate uses, major private recreation facilities such as the Valley Club of Montecito, and some of the larger tracts of undeveloped land remaining within the community. The area's semi-rural character is also reflected in land use and zoning designations, which generally allow for parcels ranging from 2 to 10 acres in size (Figure 3.8-1).

Several residences are located within 1,000 feet to the north of the site on Rancho San Carlos, as well as on the adjacent Featherhill Ranch. Approximately 100 feet west of the site is an undeveloped parcel owned by the Archdiocese of Los Angeles. The nearest residential neighborhood proximate to the site consists of eight estate homes off Stonehouse Lane, located across Romero Creek, approximately 600 feet west of the site. Farther west are homes on smaller lots along Romero Canyon Road and off Orchard Avenue and Tabor Lane. The Valley Club of Montecito golf course is located approximately 500 feet southwest of the site.

South of the site, across East Valley Road are three existing estate residences and a large equestrian facility, including stables, barns and paddocks, and an apartment, with one of these residences directly across East Valley Road opposite the site. Land uses within the vicinity are designated within the MCP as Semi-Rural Residential (SRR) with allowable densities generally ranging from one unit per 2 or 3 acres on the project site and adjacent

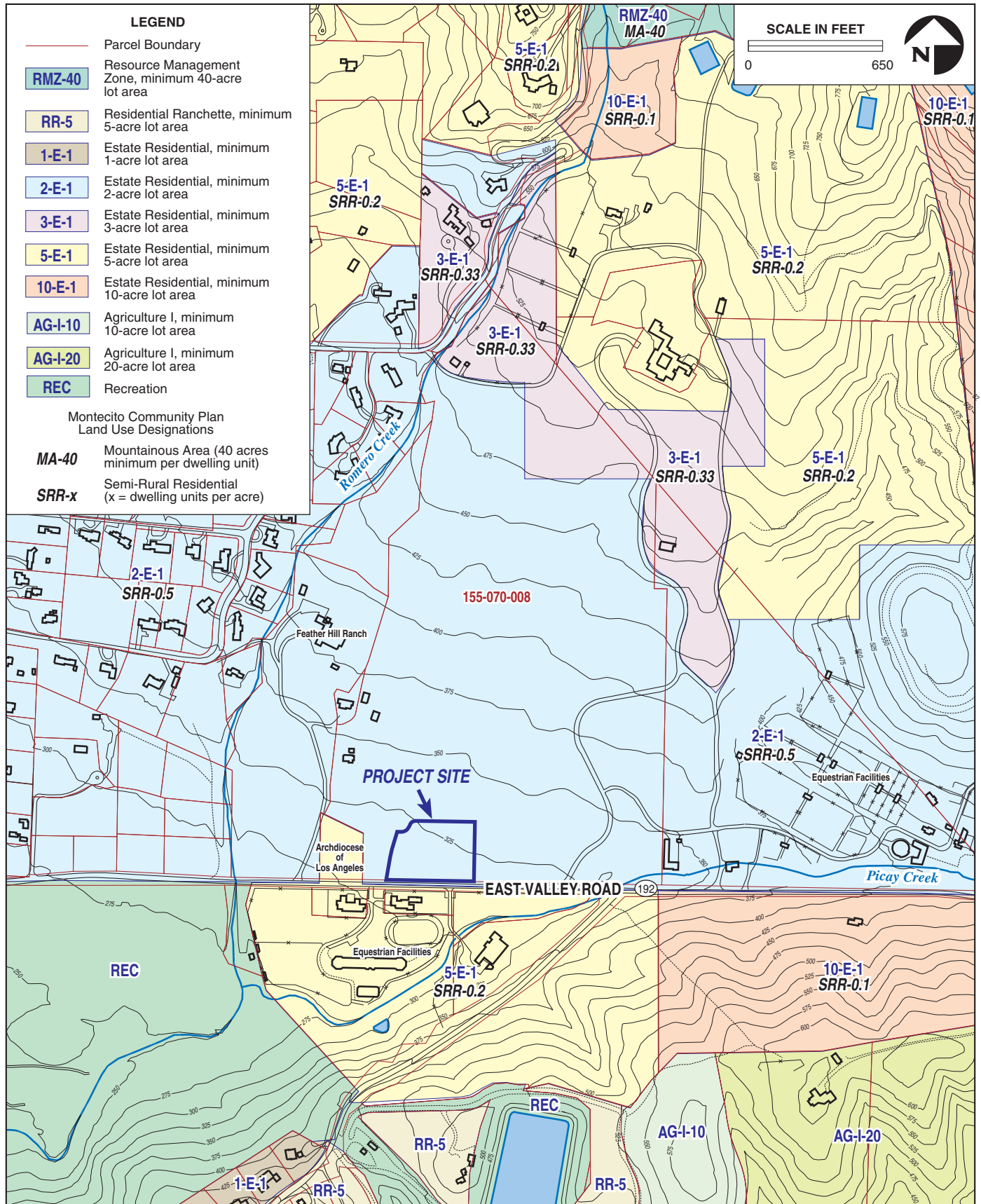


Figure 3.8-1. Land Use and Zoning in the Vicinity of the Project Site

areas north of East Valley Road (SRR- 0.33; SRR 0.5), to one unit per 5 or 10 acres south of East Valley Road (SRR-0.1 to SRR-0.2), with corresponding Estate Residential zoning of 2, 3, 5, and 10 acre minimum parcel sizes (2-E-1, 3-E-1, 5-E-1 and 10-E-1) in accordance with MLUDC. Farther to the south lie areas of 20 acre agricultural land use and zoning on the north slopes of Ortega Ridge and Recreational land uses and zoning on the Valley Club property.

3.8.1.2 Project Site

The project site is currently a part of the 235-acre Rancho San Carlos, and is bound by this larger holding to the west, north, and east, with land use consisting primarily of lemon and avocado orchards, a number of existing scattered residences, and large, currently unutilized equestrian facilities. As part of the MCP update in 1992 and subsequent General Plan amendments, Rancho San Carlos was designated SRR with corresponding Estate Residential zoning for 2, 3, and 5 acre minimum parcel sizes (2-E-1; 3-E-1, and 5-E-1), in accordance with the MLUDC. .

3.8.2 Proposed Land Uses

The proposed project would entail development of approximately 2.55 acres to accommodate a fire station in the 2-E-1, Estate Residential zone district. Although the Montecito Fire protection District (MFPD) would be the lead agency for this project, project construction would require several actions by the County to permit project construction and recognize creation of a new parcel to accommodate the proposed fire station as follows:

- approval of a Conditional Use Permit to allow the development of a fire station in the E-1 zone district in accordance with the MLUDC (refer to Section 35.423.030, Table 2-7).
- a Parcel Map Waiver to separate the approximately 2.55-acre project site from an existing 20.69-acre legal lot (03-CC-037) that is located within 76.87-acre Assessors Parcel Number 155-070-008 (refer to Subdivision Map Act Section 66428 and County Subdivision Regulations, Chapter 21, Section 21-4(h));
- a Certificate of Compliance (CC) to maintain the legal status of the remainder parcel (03-CC-037);
- land use, building and grading permits; and

- a Government Code Consistency Determination finding that the project is consistent with Comprehensive Plan policies in accordance with GC Section 65402(c).

Of the 2.55-acre site, approximately 1.07 acres would be developed with paved surfaces (buildings or pavements, portions of which would be composed of permeable material), with the remaining area used as landscape buffer (north and east sides of the parcel) and habitat restoration area (west side of parcel). Structures would include the main station building, a training and hose tower building, and a maintenance building. There are no existing structures on the site, so no building demolition would occur. Two driveways would be constructed off East Valley Road. Site leveling and improvements for building, driveway and parking and grading outside these areas for drainage swales and a hydro-modification retention basin the project would require approximately 16,500 cy cut and 15,500 cy fill, balanced on site. A 10-foot wide easement would be offered for dedication along the entire project's site frontage with East Valley Road to reserve land for the Comprehensive Plan designated Proposed On-Road Trail (Parks, Recreation and Trails Map, PRT-2, Carpinteria-Montecito-Summerland).

3.8.3 Regulatory Framework

This section presents applicable land use policies and regulations, including the State Government Code, the County Comprehensive Plan elements, the MCP, MGMO, and the *Montecito Architectural Guidelines and Development Standards* (Montecito Design Guidelines). A detailed policy analysis is presented in Section 4.0, *Consistency with Plans and Policies*.

3.8.3.1 State Policies and Requirements

State Government Code. The State of California Government Code, Title 7, Division 1 – *Planning and Zoning* includes planning and land use statutes that govern the physical development of land statewide. Section 65402(c) requires that a local agency that acquires and/or constructs a public building or structure in a county that has an adopted general plan must submit the proposed project to the county and report upon the project's conformity with the adopted general plan. The proposed project includes a determination of general plan consistency as summarized in Section 4.0, *Consistency with Plans and Policies*.

The State of California Government Code, Title 7, Division 2 – *Subdivisions* includes provisions for a waiver to Parcel Map requirements. Section 66428 provides for a waiver of a parcel map for land conveyed to a governmental agency, public entity, or a public utility. The proposed project parcel of approximately 2.55 acres would be conveyed to MFPD from 03-CC-037, a 20.69-acre legal parcel created in 2003, and part of APN 155-070-008, from its current private ownership. The proposed parcel is eligible to receive a waiver from the County of the Parcel Map requirements given the public entity status of the MFPD. An accompanying CC request would ensure that the remainder parcel maintains its legal lot status.

3.8.3.2 Applicable County Policies

Santa Barbara County Comprehensive Plan. A number of County policy and planning documents address land use and development. The guiding element that defines the blueprint for physical development is the Land Use Element. Other State-mandated elements include the: Coastal Land Use Plan, Circulation, Conservation, Noise, Open Space, Scenic Highways, Housing, Seismic Safety, and Safety Elements. In addition, aside from area plans, the County of Santa Barbara has elective elements that carry the same weight, and also require internal consistency between all adopted elements. These include the: Agricultural, Environmental Resource Management (ERME), Scenic Highway, Hazardous Waste, and Energy Elements. The County's *Comprehensive Plan* provides general goals, policies, and programs which are applicable to the proposed project.

Montecito Community Plan (MCP) and Implementing Programs. Community plans are also part of the County Comprehensive Plan and establish the goals, policies, objectives, actions and development standards relating to the physical development of land within a geographically-based region composed of set neighborhoods and districts with a commonly-shared sense of place. The MCP provides this framework for development and includes the project site. Additionally, the MGMO implements the rate of growth established in the MCP, and the Montecito Design Guidelines recommend standards to assure that project designs are harmonious with the goals and objectives of the MCP to preserve the semi-rural character of Montecito.

Public facilities and services such as the proposed fire station project are not subject to the MGMO, as such public services typically improve required and available public

services. Commercial and residential development is subject to the MGMO in order to promote a well-paced rate of community growth.

Montecito Architectural Guidelines and Development Standards. While the Montecito Design Guidelines do not apply specific design standards (e.g., floor-to-area ratios, setbacks, etc.) to institutional, public and quasi-public uses, the proposed project would be required to adhere to the general guideline of ensuring neighborhood compatibility (County of Santa Barbara 1995).

Montecito Land Use Development Code (MLUDC). The MLUDC regulates zoning in the Montecito Community Planning area. The proposed project parcel, the underlying legal lot (CC-03-037), and assessor parcel (APN 155-070-008) are zoned 2-E-1 under the MLUDC. Under Section 35.423.030, Table 2-7, conditionally permitted uses include public safety facilities, which may include paramedic services associated with a fire station, and accessory structures and uses customarily incidental to the primary use (Sec. 35.423.030.E). The project would be processed in compliance with Sec. 35.472.060, Conditional Use Permits and Sec. 35.472.070, Design Review, which requires Montecito Board of Architectural Review (MBAR) approval.

Santa Barbara County Code, Chapter 21, County of Santa Barbara Subdivision Regulations. The *County of Santa Barbara Subdivision Regulations* 21.4(h) provides an exemption to the regulations for divisions of land conveyed to a governmental agency, public entity, or a public utility, consistent with the State Government Code, Title 7, Division 2, *Subdivision* provisions.

3.8.4 Environmental Impacts

3.8.4.1 Thresholds of Significance

CEQA Guidelines

The Santa Barbara County *Environmental Thresholds and Guidelines Manual* does not contain specific thresholds for land use impacts. With respect to land use, Appendix G of the CEQA Guidelines states that a project would normally have a significant impact on the environment if it would:

- (a) Physically divide an established community;
- (b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect;
- (c) Induce substantial population growth in an area, either directly or indirectly; or,
- (d) Conflict with any applicable habitat conservation plan or natural community conservation plan.

3.8.4.2 Impact Assessment Methodology

The proposed project would not physically divide an established community or conflict with any conservation plans; therefore, thresholds (a) and (d) do not apply. Potential conflicts with plans and policies associated with threshold (b) are addressed in Section 4.0, *Consistency with Plans and Policies*. Where such conflicts closely correspond with physical environmental impacts, they may be identified as potentially significant impacts and discussed in each individual resource section of this EIR. With regard to threshold (c), impacts were assessed based upon the project's potential to induce growth in nearby areas (refer to Section 5.2, *Growth-Inducing Impacts* for additional analysis).

3.8.4.3 Mitigation Measures Included in the Proposed Project

The applicant has proposed a series of mitigation measures to reduce potential adverse effects of the project, which have been incorporated into the project design and future operation as listed below:

- A densely landscaped buffer of generally 50 feet in width on the northern and eastern sides of the site, separating support buildings and structures from agricultural operations.
- A 100-foot buffer (which includes the 30- to 50-foot landscape buffer described above) between agricultural operations and the primary use areas on the site (main fire station and apron areas).
- A 50-foot habitat restoration buffer from the top of the bank of the drainage along the western side of the site. Restoration would include planting of native oaks

and riparian species, and would adhere to a detailed Habitat Restoration Plan to be approved by the County.

- A 50-foot setback of all structures from the edge of East Valley Road.
- Partial undergrounding of the hose tower, in order to maintain a maximum height above ground of 35 feet.
- Exterior building and site lighting will use hooded fixtures to shield and reduce the spread of light.
- Emergency floodlights will be strategically placed in locations on the site that minimize glare and lighting impacts to the adjacent neighbors. Lighting to be used in an emergency situation only.
- Construction activities for site preparation shall be limited to the hours between 8:00 a.m. and 5:00 p.m., Monday through Friday. No construction shall occur on State holidays (e.g., Thanksgiving, Labor Day). Construction equipment maintenance shall be limited to the same hours. Non-noise generating construction activities such as interior painting are not subject to these restrictions.
- Volume controls shall be installed with the exterior address system.
- Intermittent noise generating activities such as emergency generator testing will be limited to daytime hours on the weekdays for 15-minute durations once a week and for a 1-hour full load test once a year.
- Retention of all but three of the mature oaks along East Valley Road, and all mature oaks elsewhere within the project site. Trees would only be removed to allow for construction of the eastern driveway and for safety reasons, to provide adequate line-of-sight for vehicles entering from and exiting to East Valley Road.

3.8.4.4 Project Impacts and Mitigation Measures

Impact

LU-1 The proposed project would introduce a conditionally permitted fire station providing emergency-related services into a semi-rural, residential zone district with predominantly low density estate residential and agricultural land uses (Class III).

The proposed project would introduce an institutional use into a residential area. Institutional uses such as schools, churches, retreat centers, or other destinations such as Casa Dorinda or Lotus Land or retirement homes with skilled nursing facilities such as Casa de Maria are all conditionally permitted in residential zones. In order to reduce or eliminate any potential incompatibilities between the proposed fire station and surrounding uses, the proposed project includes multiple design features and proposed mitigation measures, including use of landscape buffers of 30 to 60 feet around the project perimeter, use of dense landscape screening, inclusion of agricultural buffers, oak tree protection and replacement measures, riparian restoration along the site's western boundary, use of hooded lighting fixtures to reduce the spread of night lighting, and noise restrictions to avoid individual significant impacts. For these reasons, the project's contribution to the impacts of neighborhood compatibility and community character would be Class III, *adverse, but less than significant*.

3.8.4.5 Cumulative Impacts

Since the project would not create significant neighborhood compatibility and community character land use impacts, it would not have a cumulatively considerable effect upon land use. As previously discussed in Section 3.2, *Agricultural Resources*, the project site and the adjacent parcels that comprise the remainder of Rancho San Carlos and the Featherhill Ranch have been zoned for residential use, and a Statement of Overriding Considerations was adopted regarding the County's decision to designate prime soils for eventual development. Further, the MGMO EIR found that ongoing development consistent with the MGMO guidelines would not result in a regionally considerable loss of agricultural resources, and impacts to regional agriculture would be insignificant (County of Santa Barbara 2010). Given that the project would be consistent with MCP and MGMO development guidelines and zoning, the project's contribution to the reduction of prime soils and Prime Farmland in Santa Barbara County is considered insignificant.

3.8.4.6 Residual Impacts

As no significant impacts to land use would occur as a result of the proposed project, no residual impacts would remain after project implementation.

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3.9 NOISE

This section addresses the noise impacts associated with construction and operation of the proposed project. Noise is generally defined as unhealthful sound levels or unwanted sound that substantially interferes with normal activities or otherwise diminishes the quality of the environment. Noise is usually measured as sound level on a logarithmic decibel (dB) scale. Long-term exposure to higher noise levels (i.e., continuous, involuntary exposure for many hours per day over a long period of time) may affect human health through sleep deprivation, nervous conditions, etc. Relevant scientific literature indicates that prolonged exposure to elevated sound levels could increase the risk of certain health conditions, including hypertension and other cardiovascular conditions. Therefore, in the context of an analysis of potential noise impacts, significant noise impacts are primarily associated with the potential for constant exposure to higher noise levels, such as high interior noise levels during sleeping hours. Exposure to ongoing high noise levels in exterior living areas would typically involve shorter exposure times, and higher noise levels may not represent a significant environmental impact. In addition, residences are typically insulated and typical construction from the 1970s can reduce interior noise levels substantially.

Noise typically has three properties which are described and measured: *magnitude*, *frequency* and *duration*. The magnitude of variations in air pressure associated with a sound wave results in the quality commonly referred to as “loudness.” This property is typically measured in the dB scale. Frequency refers to the number of times per second the object producing the sound vibrates, or oscillates. Duration refers to the length of time for any given noise exposure.

Since environmental noise at any location is usually fluctuating from quiet one moment to loud the next, it is necessary to describe a noise level over time. The most common approach to describe varying noise levels is to define the Equivalent Noise Level (L_{eq}) for a specified period of time. The L_{eq} is a single value that represents the total sound energy of a time-varying noise. L_{eq} is defined as the continuous steady-state noise level that would have the same total acoustical energy as the real fluctuating noise measured during the same time duration. Although L_{eq} can be measured or computed for any duration, it is typically specified for one hour ($L_{eq}[h]$) or 24 hours ($L_{eq}[24h]$). L_{eq} values and the other noise metrics described below are expressed as decibels on the “A” weighted frequency scale (dBA). The A-weighted frequency filter de-emphasizes the very low and

very high frequency components of sound in a manner similar to the frequency response of human hearing.

Noise within California communities is evaluated in terms of the Community Noise Equivalent Level (CNEL) metric. CNEL is the same as a 24-hour L_{eq} except that 5 dBA is added to levels measured during the evening hours (7:00 p.m. to 10:00 p.m.) and 10 dBA to levels measured during the nighttime hours (10:00 p.m. to 7:00 a.m.). These penalties account for the increased community noise sensitivity during the evening and nighttime. A similar scale is the Day-Night Average Noise Level (L_{dn}), which includes a penalty of 10 dBA for the nighttime period only. Results of CNEL and L_{dn} generally agree to within 1 dBA. Most California noise ordinances specify levels using the CNEL metric, while most Federal laws use the L_{eq} metric.

Different sources and types of noise can affect communities in different ways. Ambient noise refers to background noise. It is the composite of noise from all sources which impact a given location and represents the normally existing noise environment at a particular place. Ambient noise levels are measured using weighted noise measurement systems, such as CNEL. Nuisance noise refers to sounds that are intentionally created, but are of relatively short duration.

Table 3.9-1 identifies noise levels associated with some common indoor and outdoor activities and settings. The table also indicates the subjective human judgments of noise levels, specifically the perception of noise levels doubling or being halved. For reference purposes, a baseline noise level of 70 dB is described as moderately loud. Humans perceive an increase of 10 dB as a doubling of loudness, while an increase of 30 dB corresponds with an eight-fold increase in perceived loudness.

Table 3.9-1. Sound Levels of Typical Noise Sources and Noise Environments

Noise Source (at a given distance)	A-Weighted Sound Level Scale (dBA)
Commercial Jet Takeoff (200 ft)	120
Pile Driver (50 ft)	110
Emergency Vehicle Siren (100 ft)	100
Power Lawn Mower (3 ft)	
Motorcycle (25 ft)	90
Prop. Plane Flyover (1,000 ft)	

Noise Source (at a given distance)	A-Weighted Sound Level Scale (dBA)
Garbage Disposal (3 ft)	80
Passenger Car, 65 mph (25 ft)	70
Vacuum Cleaner (3 ft)	
Normal Conversation (5 ft)	60
Air Conditioning Unit (100 ft)	
Light Traffic (100 ft)	50

Source: Branch et al. 1970.

3.9.1 Existing Conditions

The principal contributor to the ambient noise environment at the project site is East Valley Road (State Route 192). East Valley Road is a two lane east-west primary arterial road, which carries approximately 2,600 average daily trips (ADT) in the project vicinity (ATE 2010). This level of traffic is thought to generate noise levels of approximately 64 dBA 50 feet (ft) from the road centerline (Santa Barbara County 1992; 2010). Other noise sources in the area include yard or golf course maintenance activities, distant noise from passing trains, construction activities, and other typical noise sources found in a lower density residential community. Occasional emergency vehicle traffic along East Valley Road associated with existing MFPD stations in Montecito also contribute to existing noise in this area of the community. East Valley Road currently serves as a primary emergency vehicle access route to eastern Montecito neighborhoods from MFPD Stations 1 and 2. The MFPD responds to approximately 1,200 emergency calls per year, a portion of which use the East Valley Road corridor. However, the current numbers of responses to emergencies which utilize East Valley Road in the project vicinity is unknown.

3.9.2 Regulatory Framework

3.9.2.1 State Regulations

State of California's Guidelines for the Preparation and Content of Noise Element of the General Plan (1987). These guidelines reference land use compatibility standards for community noise environments as developed by the California Department of Health Services, Office of Noise Control. Sound levels up to 60 L_{dn} or CNEL are determined to

be normally acceptable for low density, single-family, duplex, and mobile home residential land uses. Sound levels up to 70 L_{dn} or CNEL are considered conditionally acceptable (where new construction or development should be undertaken only after a detailed analysis of the noise reduction requirements is made and needed noise insulation features are included in the design).

3.9.2.2 Local Regulations

The Santa Barbara County Comprehensive Plan Noise Element (1986). The County's Noise Element provides a thorough background discussion of noise and its effects on human health and quality of life. The Noise Element is a mandatory component of the General Plan that includes general community noise guidelines developed by the State Department of Health. The Noise Element also contains specific planning guidelines for noise relating to land use compatibility. This information was reviewed and updated in 1993 when the County adopted its Environmental Thresholds and Guidelines.

The Santa Barbara County Environmental Thresholds and Guidelines Manual (2008). This manual provides significance thresholds for noise impacts. In general, a project would have a significant impact if it results in long-term exposure of noise-sensitive receptors to exterior noise levels greater than 65 CNEL. A significant impact may also occur when ambient noise levels affecting sensitive receptors increase substantially but remain less than 65 CNEL, as determined on a case-by-case basis. CNEL is a weighted measurement for a given location and significant long-term impacts are established as an average measurement over a 24-hour period.

Noise associated with construction activity generally has a potentially significant effect on noise-sensitive receptors located within 1,600 ft of a proposed project, including residential development. This is based on the assumption that average peak construction noise levels of 95 dBA measured at 50 ft from the source would require a distance of 1,600 ft to be reduced to levels below 65 dBA. A decrease of about 6 dB occurs with every doubling of distance from a stationary noise source. Construction within 1,600 ft of sensitive receptors is limited to weekdays between the hours of 8 a.m. and 5 p.m. and noise attenuation barriers and muffling of grading equipment may also be required (County of Santa Barbara 2008).

Montecito Community Plan (MCP) (1992). The MCP establishes policies and development standards which guide development projects within the community of Montecito. Under the MCP, noise-sensitive land uses, such as residential facilities and other uses defined in the Noise Element are protected from significant noise impacts. It recommends that all site preparation and associated exterior construction activities should take place between 7:00 a.m. and 4:30 p.m. on weekdays only. Also, sound shielding and sufficient noise attenuation in the design of construction projects are required, where necessary, to avoid significant noise impacts to noise sensitive land uses.

3.9.3 Environmental Impacts

3.9.3.1 Thresholds for Determining Significance

Thresholds of significance are defined by the *County of Santa Barbara Environmental Thresholds and County Guidelines Manual* (County of Santa Barbara 2008). Sound levels for the proposed project must also comply with relevant noise policies, standards, and ordinances. Thresholds are intended to be used with flexibility, on a case-by-case basis, but would generally consider an impact significant if:

- a proposed development generates noise levels in excess of 65 dBA CNEL and affects sensitive receptors;
- outdoor living areas of noise sensitive uses are subject to noise levels in excess of 65 dBA CNEL, or if interior noise levels cannot be reduced to 45 dBA CNEL or less;
- ambient noise levels would increase substantially for noise-sensitive receptors in adjoining areas; or
- noise from grading and construction is proposed within 1,600 feet of sensitive receptors. To mitigate this impact, construction within 1,600 feet of sensitive receptors shall be limited to weekdays between 8:00 a.m. and 5:00 p.m. Noise attenuation barriers and muffling of grading equipment may also be required. Construction equipment generating noise levels above 95 dBA may require additional mitigation.

In addition, according to CEQA standards, a project is considered to have a potentially significant adverse impact if it would:

- Result in exposure to or generation of excessive groundborne vibration or groundborne noise levels;
- Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project; or
- Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project.

3.9.3.2 Impact Assessment Methodology

Anticipated construction sound levels were assumed based on standard construction vehicle requirements, distance between sensitive receptors and construction activities, and proposed daytime operational levels. Standard noise generation levels for typical construction equipment were used to estimate construction sound levels, taking into consideration applicable noise-control measures that have been incorporated into the proposed project design. Impacts were assessed based on County thresholds defined for construction projects within 1,600 ft of sensitive receptors, as private residences do occur within this distance.

Long-term impacts associated with anticipated operations at the proposed fire station were estimated for the existing and future noise environment. Currently the MFPD receives 1,200 calls per year; the proposed fire station is anticipated to take an average of 400 calls per year, which would result in an average of 1.1 emergency responses per day; however, as noted in Section 3.9.1 above, this project increase represents a worst-case scenario as East Valley Road already serves as an emergency vehicle access route to eastern Montecito.

Since emergency vehicle siren use may be necessary for some responses, impacts for a periodic mobile noise source were evaluated. A decrease of about 3 dB occurs with every doubling of distance from a mobile noise source (County of Santa Barbara 2008). Impacts were assessed based on potential changes to ambient noise levels and potential nuisance noise, especially exposure for residences and noise-sensitive receptors to exterior noise levels greater than 65 CNEL.

3.9.3.3 Mitigation Measures Contained in the Proposed Project

The applicant has proposed a series of mitigation measures to reduce potential adverse project effects, which have been incorporated into the project design.

- Construction activities for site preparation shall be limited to the hours between 8:00 a.m. and 5:00 p.m., Monday through Friday. No construction shall occur on State holidays (e.g., Thanksgiving, Labor Day). Construction equipment maintenance shall be limited to the same hours. Non-noise generating construction activities such as interior painting are not subject to these restrictions.
- Volume controls shall be installed with the exterior address system.
- Intermittent noise generating activities such as emergency generator testing will be limited to daytime hours on weekdays for 15-minute durations once a week and for a 2-hour full load test once a year.

3.9.3.4 Project Impacts

Impact

NO-1 Short-term construction activities would generate adverse, but less than significant noise levels for noise-sensitive receptors (Class III).

The grading and site preparation phase of the project would generate the highest construction sound levels due to the operation of heavy equipment. Peak sound levels associated with heavy equipment typically range between 75 and 95 dBA at 50 ft from the source (USEPA 1971). Typical major sources of noise during the project's grading and earthwork period and their estimated sound levels at 50 ft are: excavators (85 to 95 dBA), tractors (75 to 95 dBA), loaders (75 to 85 dBA), compactors (75 dBA), trucks (75 to 95 dBA), and backhoes (75 to 95 dBA) (USEPA 1971). While construction would occur during normal workday hours, not all construction equipment would be operated simultaneously. Peak sound levels associated with construction equipment would occur sporadically throughout the work day.

The County's Thresholds and Guidelines Manual addresses construction noise and identifies typical restrictions to help reduce this potential impact. These Guidelines generally consider construction noise impacts to be potentially significant to any

residence or sensitive receiver located within 1,600 ft (Santa Barbara County 2008). Since residential land uses occur within a distance of at least 200 ft, the highest anticipated peak construction-related noise levels at the project site would be reduced to levels near 83 dBA near current residences (a decrease of about 6 dB occurs with every doubling of distance from a stationary noise source). However, per established County guidelines, construction for this project would be limited to weekdays between the hours of 8:00 a.m. to 5:00 p.m. only. Therefore, this impact would be considered *adverse, but less than significant* (Class III).

Impact

NO-2 Long-term noise impacts associated with the project would incrementally increase the frequency of very short duration peak nuisance noise occurrences for area residents, but would not result in the exceedance of established County noise thresholds (Class III).

The potential adverse effect of noise associated with the use of emergency vehicle sirens on the quality of life of nearby residents is often a concern in development of new fire stations. Part of these concerns is related to the perception that fire stations would typically respond to many emergencies with multiple emergency vehicles leaving the site daily. The other is that emergency sirens are intentionally loud and that such loud noise could disrupt quiet residential neighborhoods. These concerns are reflected in Montecito where at least two neighboring property owners of the proposed project site have expressed concerns over the effects of noise during the EIR Notice of Preparation (NOP) review process (see Appendix C, *NOP Comments and Responses*). The daily ongoing and emergency operation noise characteristics of the proposed MFPD Station 3 are discussed more fully below.

While the proposed station would be occupied and operated on a 24-hour/7-day a week schedule, the majority of routine operations at the proposed fire station would occur within the typically defined daytime hours (7:00 a.m. to 7:00 p.m.). Volume controls would be installed with the proposed exterior address system, and the exterior address system would be programmed to shut down between the hours of 7:00 p.m. and 8:00 a.m. except in the case of emergency. Intermittent noise from emergency generator testing would be limited to daytime hours on the weekdays for 15-minute durations once a week and for a 2-hour full load test once a year. The routine daily operations of the proposed new fire station would not substantially increase ambient noise levels in the area or

expose nearby residents or sensitive noise-receptors to exterior noise levels in excess of adopted County standards (i.e., greater than 65 CNEL). With regard to noise from sirens and emergency vehicle use, responding to emergency calls is an integral part of the operations anticipated at the proposed fire station. State law requires that certain response times for emergency vehicles be upheld, so emergency siren usage cannot be restricted under particular emergency circumstances. As stated, the proposed fire station is anticipated to respond to an average of 400 emergency calls per year, which would result in an average of 1.1 emergency responses per day. This estimate of the *frequency* of siren use does not account for existing use of East Valley Road by MFPD emergency vehicles which involves ongoing use of the road by emergency vehicles from existing Stations 1 and 2. In addition, the potential exists for multiple emergency calls to occur in one day or for several days to pass without an emergency response.

Residents or other sensitive-noise receptors in the immediate vicinity of the proposed fire station would experience periodic exposure to sirens. In terms of the *magnitude* of noise exposure, a typical siren emits approximately 100 dB at 100 ft (refer to Table 3.9-1 for comparisons of different noise levels). Since a decrease of about 3 dB occurs with every doubling of distance from a mobile noise source (County of Santa Barbara 2008), the three residences within approximately 400 ft of proposed Station 3 would experience peak short-duration *exterior* noise levels in the 95 to 100 dB range an average of once per day (refer to Figure 3.9-1). It should be noted that typical older construction practices from the 1970s would reduce typical short duration *interior* noise exposure to 75 to 80 dB, while more recently constructed or remodeled homes would further reduce interior noise effects.

Because emergency vehicle response is by nature rapid, the *duration* of exposure to these peak noise levels in the 95 to 100 dB range is estimated to last for a maximum of 10 seconds as emergency vehicles pause at the driveway exit, engage the siren and turn onto East Valley Road and accelerate rapidly away from Station 3. Thus, residents of existing nearby homes would be exposed to very short-duration high noise levels for approximately 10 seconds an average of once per day. Further, the typical practice for emergency vehicle use at the MFPD is to use sirens to break traffic at intersections or warn drivers of the emergency vehicle approach when traffic is congested. Responses to nighttime emergency calls, when nuisance noise is most noticeable, routinely occur

Estimated average of 1-2 emergency vehicles/day.
 Emergency vehicles turn on siren when exiting Station 3 driveway.

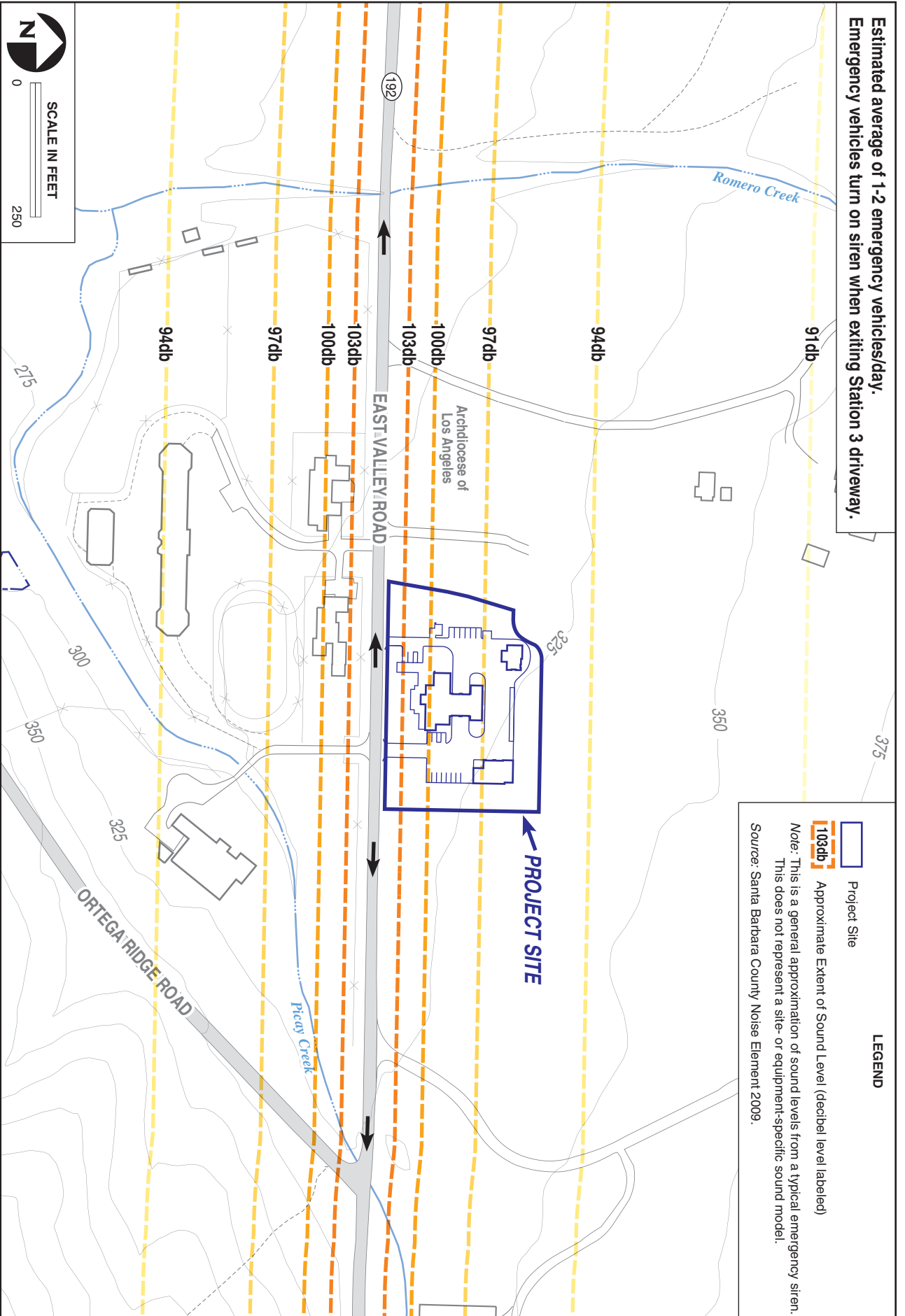


Figure 3.9-1. Projected Short Duration (10 seconds) Peak Noise from Emergency Vehicles

without the use of sirens. It should be noted that other homes and residents along East Valley Road and other routes used for emergency access would also be exposed to such noise levels, although the *magnitude* and *frequency* of this exposure would vary by distance from the road and proximity to Station 3. The *duration* of such exposure would likely be less than the projected 10 seconds for homes near proposed Station 3 as the emergency vehicles would generally be assumed to be passing at full speed, with no time required for turning out of the driveway or accelerating.

As discussed in Section 3.9, a key focus of analysis with regard to noise is the potential for long-term exposure to higher noise levels (i.e., continuous, involuntary exposure for many hours per day over a long period of time) that may adversely affect human health. Because of this emphasis, adopted Federal, State and County regulations and standards typically focus on increases in long-term exposure to ongoing average noise levels rather than infrequent short-duration peak effects (refer to Section to 3.9.2). Under these adopted standards, the increase of an average of one emergency vehicle trip per day would not be considered a significant impact because:

- Average long-term noise levels in the neighborhood would not substantially change and the CNEL for the vicinity would not exceed 65 dBA, the accepted level for exterior noise in adopted County standards as a result of emergency vehicle and siren use at the proposed station;
- The low *frequency* of siren use (an average of once per day) would not constitute a significant change in the existing noise environment;
- The relatively short *duration* of the noise events (i.e., generally less than 10 seconds) would not substantially alter the existing noise environment; and
- The *magnitude* of noise, while briefly very high in exterior living areas, would be substantially reduced in interior living areas through existing construction.

Therefore, noise impacts to residents and other sensitive receptors resulting from the station's long-term operation and response to emergencies would be *adverse, but less than significant* (Class III).

3.9.3.5 Cumulative Impacts

The proposed project would include the development of approximately 2.55 acres to accommodate a new fire station. Overall, the project would introduce some changes to ambient noise levels in the project vicinity, mostly during construction phases of the proposed project. While construction phases of this project may coincide with other projects planned in the vicinity, the noise-control measures that have been incorporated into the proposed project design discussed above in Section 3.9.3.3 would guide development of the proposed project and would ensure that standards defined by the County and discussed in the MCP are maintained. Additionally, long-term noise impacts in the project vicinity would be of low frequency and short duration in nature; therefore, anticipated long-term noise impacts would be unlikely to contribute to the cumulative effects of other pending and ongoing projects. Given that all anticipated short- and long-term noise impacts would comply with noise thresholds by the County and the MCP, the project's effects on the cumulative noise environment in the project vicinity is considered insignificant.

3.9.3.6 Residual Impacts

As no significant noise impacts would occur as a result of the proposed project, no residual impacts would remain after project implementation.

3.10 TRANSPORTATION AND TRAFFIC

This section describes existing known transportation and traffic issues in the project vicinity, particularly along East Valley Road fronting the subject site. Potential project impacts and the resulting adequacy of roadway, intersection, pedestrian, bicycle, and public transit facilities are identified. Cumulative impacts are also addressed in Section 3.10.3.4.

This section was developed using information from the Montecito Community Plan (MCP), the Final Supplemental Environmental Impact Report (SEIR) for the extension of the Montecito Growth Management Ordinance (MGMO) (County of Santa Barbara 2010), and the Traffic Impact and Sight-Distance analyses (Appendix I) prepared by Associated Transportation Engineers (ATE) for the proposed project (ATE 2009; 2010). These studies contain detailed analyses of local and project-related traffic and circulation issues, including existing and future traffic conditions, cumulative impacts, an analysis of site access and visibility, and an analysis of consistency with the Santa Barbara County Association of Governments (SBCAG) Congestion Management Program (CMP). Information regarding regional and cumulative conditions was also obtained from the Final SEIR for the extension of the MGMO. ATE personnel also visited the project site to observe traffic operations, speeds, and line-of-sight at the project driveway locations.

3.10.1 Existing Conditions

3.10.1.1 Surrounding Roadway Network

The circulation system serving the project site is comprised of regional highways, arterial streets, and collector roads (Figure 3.10-1). Access to the project site would be from East Valley Road. The roadways in the project vicinity are briefly described below.

East Valley Road

East Valley Road (State Route [SR] 192) is a two-lane State Highway that runs east-west through the Montecito area, providing an alternative east-west route to U.S. Highway 101 between the City of Santa Barbara and the communities of Summerland/Carpinteria. In Montecito, each lane of East Valley Road is 11 feet wide with no more than a 2-foot paved shoulder in most places. This roadway is under the jurisdiction of and designed and maintained by the California Department of Transportation (Caltrans). The posted speed limit along East Valley Road fronting the project site is 35 miles per hour (mph), but speeds are typically nearer 45 mph (ATE 2010). Parking is not generally permitted on

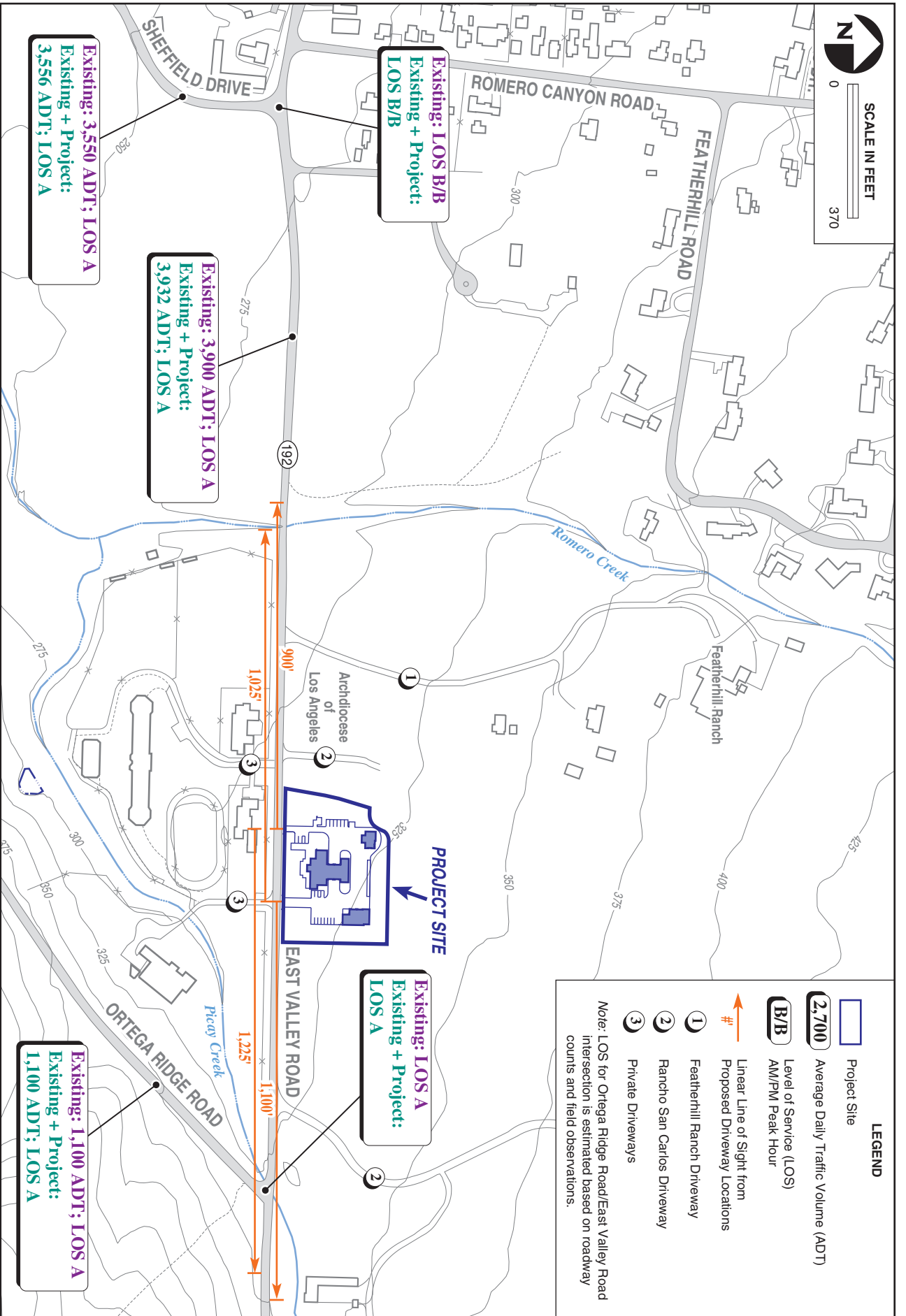


Figure 3.10-1. Existing and Proposed Traffic Conditions in the Vicinity of the Project Site

the shoulders of East Valley Road, but some limited roadside parking is present to the south of the project site. East Valley Road is designated by the County of Santa Barbara as a Primary 3 with a Design Capacity of 15,700 Average Daily Trips (ADT) and an Acceptable Capacity of 10,990 ADT; this road currently carries approximately 3,900 ADT and operates at Level of Service (LOS) A.

Three homes and an equestrian complex are located south of East Valley Road generally across from the project site. Access to these homes and the equestrian facility is provided by three primary driveways and a secondary equestrian access driveway. One of these driveways is located directly across from the project site and the remaining three are located approximately 50 to 300 feet west of the site. Two additional driveways and one agricultural access road on the north side of East Valley Road provide access to the Featherhill and San Carlos ranches and are located approximately 50 and 300 feet west of the site and 450 feet east of the site, respectively (refer to Figure 3.10-1).

Sheffield Drive

Sheffield Drive is a two-lane County road that extends in a north-south direction between East Valley Road and U.S. Highway 101. The travel lanes are 11 feet wide with a shoulder of 2 feet or less. It is divided by double yellow centerline median striping and has a speed limit of 35 mph. Sheffield Drive is classified as a Secondary 3 with a Design Capacity of 7,900 ADT and Acceptable Capacity of 5,530 ADT; this road currently carries 3,550 ADT and operates at LOS A.

Ortega Ridge Road

Ortega Ridge Road is a two-lane local north-south road that extends for approximately 1 mile from Ortega Hill Road to East Valley Road. It is an unclassified road in the MCP, so it has no designated Design Capacity or Acceptable Capacity. This road currently carries 1,100 ADT and operates at LOS A (County of Santa Barbara 2010).

East Valley Road/Sheffield Drive Intersection

This intersection is controlled by a stop sign on the Sheffield Drive approach. The intersection operates at LOS B during the A.M. and P.M. peak hour periods (Santa Barbara County 2010). This intersection is located approximately 2,000 feet west of the project site. The intersection of Romero Canyon Road with East Valley Road is located approximately 185 feet farther to the west, creating an offset intersection which can complicate turning movements.

East Valley Road/ Romero Canyon Road Intersection

This intersection is controlled by a stop sign on the southbound Romero Canyon Road approach; Romero Canyon Road terminates at East Valley Road. This intersection is located approximately 2,185 feet west of the project site. The intersection is estimated to operate at LOS A during the A.M. and P.M. peak hour periods. The intersection of southbound Sheffield Road with East Valley Road is located approximately 185 feet to the east, creating an offset intersection which can complicate turning movements.

East Valley Road/ Ortega Ridge Road Intersection

This intersection is controlled by a stop sign on the Ortega Ridge Road approach. The intersection is estimated to operate at LOS A during the A.M. and P.M. peak hour periods. This intersection is located approximately 650 feet east of the project site.

3.10.1.2 Transit, Bicycle, and Pedestrian Facilities

The Santa Barbara Metropolitan Transit District (MTD) provides bus service along East Valley Road and Sheffield Drive with Route 14 (MTD 2011). The nearest stop is at the East Valley Road/Sheffield Drive intersection. No bus traffic occurs past the project site.

There are no existing designated bikeways in the project vicinity. While not a designated bikeway, East Valley Road receives a moderate level of bicycle traffic. Bicycling hazards in the project vicinity include right-of-way encroachments (mailboxes, utility poles, vegetation, or other impediments), windy and narrow roads, lack of shoulders, and sudden width changes, particularly along East Valley Road. Sheffield Drive is proposed in the MCP as a Class III Bikeway from North Jameson Lane to East Valley Road, but there are no plans at this time to formally designate it as such.

No sidewalks are present in the proposed project area, and the MCP discourages concrete sidewalks. However, an on-road shoulder trail is proposed along East Valley Road as shown in the County of Santa Barbara's Parks, Recreation, & Trails (PRT) maps for the Montecito area.

3.10.1.3 Levels of Service

The MCP road classifications system is the Circulation Element for the community, providing guidance on acceptable standards for operation of roadways and intersections in Montecito. These road classifications use a LOS grading system to evaluate traffic operations for roadways and intersections. Service levels range from LOS A indicating

free flow operations to LOS F indicating congested operations. Roadway LOS is calculated based on the roadway classification and corresponding design and acceptable capacity established by the MCP.

The roadway classification system is divided into two main designations, Primary and Secondary roadways. Each of these designations is further subdivided into three subclasses dependent on roadway size, function, and surrounding uses. The Montecito roadways classification is comprised of a select number of Primary and Secondary roadways, and several of the smaller roads in Montecito remain unclassified.

Design capacity is identified in the MCP and is defined as the maximum daily traffic volume that a given roadway can accommodate. Design capacity usually equates to LOS E/F. Acceptable capacity for a given roadway is expressed as a percent of the design capacity based on the LOS threshold to reflect the specific roadway conditions in the study area (such as narrow pavement, roadway grade, slopes, presence of curves, sight distance, and prevalence of driveways and intersections or other access points that produce substantial turning movement conflicts in the study area, or prevalence of on-street parking).

The Transportation Research Board (TRB) *Highway Capacity Manual* (HCM) (2000) is the standard used for evaluating all types of LOS (e.g., signalized, unsignalized, freeway intersections). Santa Barbara County, as stated in the MCP, has established LOS B as the minimum acceptable LOS for street segment operations in the Montecito plan area (including the project site frontage), with a few exceptions including East Valley Road from Buena Vista to Sheffield Drive (west of the project site), where LOS C is considered acceptable. Because East Valley Road (SR 192) is under Caltrans jurisdiction, the acceptable LOS for intersections is set by Caltrans and is currently LOS D.

LOS was calculated for the A.M. and P.M. peak hour for the nearby portions of East Valley Road and Sheffield Drive using HCM methodology. Measured against the County's LOS standards, East Valley Road and Sheffield Road near the proposed project driveways are acceptable and currently operate at LOS A during the A.M. and P.M. peak hours.

3.10.2 Regulatory Setting

3.10.2.1 California Department of Transportation

The Caltrans *Highway Design Manual* (HDM) provides standards for roadway design and use (Caltrans 2010). The following topic and chapter is applicable to the proposed project:

Chapter 400, Topic 405 – Intersection Design Standards. At design speeds of 50 mph, which is the 85th percentile speed along East Valley Road (ATE 2010), the sight distance standard for stopping is 550 feet (Table 405.1A). This is applicable to Public Road Intersections, a designation chosen over the Private Driveway category in an effort to be conservative with regards to sight distance.

Caltrans Encroachment Policies. Encroachment Permit Application Guide, January 2009 which applies to SR 192 (East Valley Road): Requires activity that may encroach onto the State's property to obtain an encroachment permit, including for:

- *Advertising Displays, holiday decorations, banners, or signs.*
- *Frontage improvements: sidewalk, curb and gutter, mailbox, fencing, driveways, new road intersections, drainage facilities and erosion control.*
- *Landscaping, planting, or modifying vegetation.*
- *Miscellaneous activities: mowing, grading, excavations.*
- *Utility installations.*

3.10.2.2 Montecito Community Plan Policies and Development Standards

The MCP Circulation Element policies govern transportation planning and analysis in the Montecito Planning Area. Relevant policies from this plan are listed below:

Policy CIRC-M-1.6: The minimally acceptable LOS on roadway segments and intersections in the Montecito Planning Area is "B." Exceptions to this are:

Roadways:

- East Valley Road/Buena Vista to Sheffield - LOS C is acceptable
- Sycamore Canyon Road - LOS C is acceptable
- Hot Springs Road/Sycamore Canyon to Coast Village - LOS D is acceptable
- Olive Mill Road/Coast Village to Channel Drive - LOS C is acceptable
- San Ysidro Road/East Valley Road to North Jameson - LOS C is acceptable
- San Ysidro Road/North to South Jameson - LOS D is acceptable

Intersections:

- Hot Springs Road/East Valley Road - LOS C is acceptable

Policy CIRC-M-1.4: The County shall strive to permit reasonable development of parcels within the community of Montecito based upon the policies and land use designations adopted in this Community Plan, while maintaining safe roadways and intersections that operate at acceptable levels.

Policy CIRC-M-3.2: Land uses and densities shall reflect the desire of the community to maintain minor local roads (i.e., roads not classified in the Circulation Element) below acceptable capacities and LOS for designated roads.

Policy CIRC-M-3.3: If at any time, a traffic count accepted by the County Public Works Department determines that a local road (i.e., a road not designated on the Circulation Element) has an ADT count which exceeds 5,530 ADT, a review of land use densities and intersecting roadways of the surrounding area shall be conducted for possible inconsistencies with Circulation and Land Use goals and policies. (If appropriate, a road classification may be assigned to such a road after review and approval by the Board of Supervisors).

Policy CIRC-M-3.6: It is the intent of the community to preserve and maintain mature landscaping within the road rights-of-way to the extent that it does not interfere significantly with motorized and non-motorized transportation safety.

Policy CIRC-M-3.9: The County Public Works Department shall not grant new encroachment permits allowing the installation of structures, fences, walls, landscaping, etc. where the placement of such structures, fences, walls, landscaping, etc. would preclude safe pedestrian access and/or adequate site distance in the public right-of-way.

Policy CIRC-M-3.10: New Major Conditional Use Permits shall be required to demonstrate that the proposed use would not potentially result in traffic levels higher than those anticipated for that parcel by the Community Plan and its associated environmental documents. If higher traffic levels could potentially result from the proposed Major Conditional Use Permit, in order to approve the project, a finding must be made that:

- (1) The increase in traffic is not large enough to cause the affected roadways and/or intersections to exceed their designated acceptable capacity levels at build-out of the Community Plan, or
- (2) Road improvements included as part of the project description are consistent with the community plan and are adequate to fully offset the identified potential increase in traffic.

3.10.3 Environmental Impacts

3.10.3.1 Thresholds for Determining Significance

Significance thresholds for determining transportation and traffic impacts were identified using the MCP, Santa Barbara County's Environmental Thresholds of Significance, and the CEQA Guidelines. Because of project size and low traffic volumes, applicable thresholds are related more to safety and access rather than congestion.

According to relevant County thresholds, a significant traffic impact would occur when:

- Project access to a major road or arterial road would require a driveway that would create an unsafe situation or require a new traffic signal or major revisions to an existing traffic signal.
- Project adds traffic to a roadway that has design features (e.g., narrow width, roadside ditches, sharp curves, poor sight distance, inadequate pavement structure) or receives use which would be incompatible with substantial increases in traffic (e.g., rural roads with use by farm equipment, livestock, horseback riding, or residential roads with heavy pedestrian or recreational use, etc.) that will become potential safety problems with the addition of project or cumulative traffic.
- Exceedance of the roadway's designated Circulation Element Capacity may indicate the potential for the occurrence of the above impacts.

Because East Valley Road is a CMP roadway, the following threshold also applies:

- A significant traffic impact on a CMP network occurs if project-added traffic results in a decrease of two levels of service for any roadway or intersection operating at LOS A or B.

Based on the MCP:

- A significant traffic impact occurs on a roadway segment when the future-with-project daily volume exceeds the acceptable capacity or when a roadway does not meet the minimum LOS threshold.

3.10.3.2 Impact Assessment Methodology

The roadways and intersections included in the Traffic Impact Analysis were identified jointly by AMEC and ATE based on the project's potential to impact streets and roadways in the project area. The impacts of the proposed project related to traffic were evaluated by modeling trip generation, trip distribution, and trip assignment. Trip generation estimates the amount of project-added roadway traffic, which is then distributed for travel to and from the project site to specific street segments and intersections. Conditions were evaluated during the weekday A.M. and P.M. peak hour period. The results of this analysis and subsequent LOS calculations were compared to existing traffic data flow to determine impacts.

The proposed project would generate a total of 32 ADT, 11 A.M. peak hour trips, and 3 P.M. peak hour trips. These trip generation estimates were developed by ATE based on operational information provided by the MFPD since there are no published trip generation studies for fire stations. Trip generation calculations are provided in the *Trip Generation Worksheet* in Appendix I. The Traffic Impact Analysis conforms to standards in County of Santa Barbara guidelines.

3.10.3.3 Mitigation Measures Included in the Proposed Project

The applicant has proposed a series of mitigation measures that could reduce potential adverse effects of the project on transportation and traffic, which have been incorporated into the project design and future operation as listed below:

- Location of driveways will ensure maximum line-of-sight along East Valley Road.
- Retention of all but three of the mature oaks along East Valley Road, and all mature oaks elsewhere within the project site. Trees would only be removed for construction of the eastern driveway and for safety reasons, to provide adequate line-of-sight for vehicles entering from and exiting to East Valley Road.
- A detailed landscaping and maintenance plan would be developed through consultation with adjacent property owners to maximize visual compatibility. The landscaping and maintenance plan shall be designed to maintain line-of sight on East Valley Road.
- Preparation of a construction traffic management plan including:
 - Acquisition of a Caltrans encroachment permit for construction traffic.
 - Preparation of haul truck access and routing plan with designated haul truck route when the receiver site is designated.

- Acquisition of a County haul permit to the selected receiver site.
- All trucks hauling export fill would be prohibited from operating during the peak hours (i.e., 7 to 9 am; 4 to 6 pm).
- All haul trucks transporting excess fill offsite would be required to be tarped or covered.

3.10.3.4 Project Impacts

Impact

TT-1 The proposed project would result in adverse, but less than significant impacts associated with short-term construction-related increases in traffic volumes (Class III).

Over the course of the approximately 12-month construction period, the applicant has estimated that approximately 20 workers per day would use East Valley Road and the project driveways to access the site, with two workers per privately owned vehicle, generating an additional average of 20 ADT. Approximately 15 daily delivery and/or haul trucks would add up to 45 ADT; therefore, total construction trips would be equal to 65 ADT during the peak construction periods over the estimated 12 month construction window. Delivery and haul trucks are expected to consist of smaller trucks, but would include occasional larger trucks, such as tractor trailers or cement trucks that would deliver construction equipment, structure steel and concrete. Up to 800 haul truck trips would also be required over the course of 3 months for export of the 8,000 cy of excavated soils not being re-used on site to a site determined to be acceptable at the time of construction. This would correspond to up to 30 additional daily round trips during the peak month of grading when the majority of soil export would occur. These haul trucks would be restricted by the provisions of the proposed construction management plan, including avoidance of peak hour traffic periods and any provisions deemed necessary by the County to assure safe entry and egress to the site. If fill were required to be transported out of the project vicinity, haul trucks would utilize East Valley Road and Sheffield Drive, and the maximum of 30 daily trips added to these roads would represent less than 1 percent of their daily traffic. Any receiver site for this fill would be required to be pre-approved and have adopted Best Management Practices to address issues with acceptance of such fill, including safe operation of haul trucks.

This addition of construction-related project traffic would result in short-term, less than significant impacts to LOS at the East Valley Road/project driveway intersections, which is forecast to operate at LOS B during the A.M. and P.M. peak hours under existing plus

construction traffic conditions. Similarly, the addition of up to 65 ADT to East Valley Road in the project vicinity would not result in a degradation of existing East Valley Road operations. Roadway operations would remain within County and Caltrans standards and no adverse impacts are anticipated due to the short-term nature of construction. Short-term construction traffic would not cause any congestion-related impacts. Therefore, impacts would be *adverse but less than significant* (Class III).

Impact

TT-2 The proposed project would result in adverse, but less than significant impacts associated with long-term increases in traffic volumes (Class III).

The proposed project's 32 new ADT, and 11 A.M. and 3 P.M. peak hour trips would not substantially increase area traffic volumes in relationship to existing flows on East Valley Road or Sheffield Drive (Table 3.10-1). LOS for the study-area was calculated assuming existing traffic conditions plus project traffic using methodology outlined in the HCM (refer to Appendix I). Turning movement volumes are not projected to increase substantially in relation to existing capacity at the intersection of the project driveway and East Valley Road and no other impacts to area intersections are anticipated due to low project traffic volumes. East Valley Road and Sheffield Drive would continue to operate at LOS A, the intersection of East Valley Road and Ortega Ridge Road would continue to operate at LOS A, and the intersections of East Valley Road with Sheffield Drive and Romero Canyon Roads would continue to operate at LOS B with project-added traffic (refer to Appendix I). The proposed project would not substantially increase demand for transit, pedestrian or bicycle facilities. The small number of turning movements at the site entrance would not result in a significant increase in risk to bicyclists or pedestrians utilizing the East Valley Road shoulder or proposed on-road shoulder trail. Conflicts between emergency vehicles and bicyclists/pedestrians during turning movements would be minimal as the bicyclists/pedestrians would be alerted by the vehicles' sirens. Impacts would be *adverse, but less than significant* (Class III).

Table 3.10-1. Existing and Existing + Project Roadway Operations on East Valley Road and Sheffield Drive

Roadway Segment	Existing ADT/LOS	Project Added Traffic	Existing + Project ADT/LOS ¹	Significant Impact?
East Valley Road	3,900 ADT/ LOS A	32 ADT	3,932 ADT/ LOS A	No
Sheffield Drive	3,550 ADT/ LOS A	6 ADT	3,556 ADT/	No

			LOS A	
Ortega Ridge Road	1,100 ADT/ LOS A	0 ADT	1,100 ADT/ LOS A	No

¹ Assumes 100% of project traffic will use East Valley Road, 20% will use Sheffield Drive, and 0% will use Ortega Ridge Road.

Source: ATE 2010 (see Appendix I).

Impact

TT-3 The proposed project would create adverse, but less than significant access impacts at the new East Valley Road/project driveway intersections (Class III).

A field review found that while existing line-of-sight from the location of the proposed Station 3 driveways along East Valley Road is generally excellent, with the sight distance looking to the east on East Valley Road limited by a vertical curve on the road and the sight distance looking to the west limited by a horizontal curve at the bridge that crosses Romero Creek (Caltrans Bridge #51-110). In addition, there are utility poles and oak trees located along the north side of East Valley Road that would partially obstruct the view of approaching vehicles to the east and west of drivers exiting the site at both of the proposed driveways. However, with relocation of the utility poles, removal of three mature oaks for driveway construction and additional trimming of the trees, these potential obstructions to line of could be addressed. The following text reviews the sight distance analysis completed for each driveway.

Eastern Driveway. Traffic using the eastern driveway would primarily include emergency vehicles and other MFPD vehicles. The sight distance looking to the east from this proposed driveway location is currently obstructed by a utility pole and oak trees. The utility pole would be relocated during project construction. The oak trees along the fence line just east of the driveway would be trimmed during project construction. Farther to the east, past the existing fire hydrant that is located just east of the proposed driveway, the oak trees that line the road would be trimmed up from ground level so that drivers can see under the canopies. The overhanging limbs would be trimmed (and the trimming maintained) to provide adequate sight distance. With these changes, there would be approximately 1,100 feet of sight distance looking east to the vertical curve on East Valley Road, which is double the 550 feet required by the Caltrans standards.¹

¹ Caltrans standards are based on a design speed of 40 mph for East Valley Road with a resulting lower sight distance standard; however, in order to maximize safety, the EIR analysis and supporting technical

The sight distance looking to the west from the proposed eastern driveway is limited by overhanging limbs of three oak trees just to the west. The overhanging limbs would be trimmed (and the trimming maintained) to provide adequate sight distance. Assuming these changes, there would be approximately 1,025 feet of sight distance looking west to the horizontal curve on East Valley Road at the bridge, which nearly doubles the 550 feet required by the Caltrans standards. Therefore, impacts to traffic on East Valley Road from vehicles entering or exiting the eastern driveway would be *less than significant (Class III)*.

Western Driveway. Traffic at the western driveway would primarily include fire station employees and visitors as well as MFPD vehicles; emergency vehicles could use this driveway as well if necessary during emergency operations (e.g., wildfire). The sight distance looking to the east is obstructed by a utility pole, which the site plan shows would be relocated, as well as oak trees. There is a small grouping of scrub oaks (less than 1-foot diameter) along the fence line just east of the utility pole that would be removed or trimmed. Farther to the east, the oak trees that line the road would be trimmed up from ground level (and the trimming maintained) so that drivers can see under the canopies. Assuming these changes, there would be approximately 1,225 feet of sight distance looking east to the vertical curve on East Valley Road, which more than doubles the 550 feet required by the Caltrans standards.

The sight distance looking to the west from the proposed western driveway location is currently limited by the overhanging limbs of the oak trees that line the road. The overhanging limbs would be trimmed (and the trimming maintained) to provide adequate sight distance. The project as proposed includes a landscaping and maintenance plan designed to maintain line-of-sight on East Valley Road. Assuming these changes, there would be approximately 900 feet of sight distance looking west to the horizontal curve on East Valley Road at the bridge, which substantially exceeds the 550 feet required by the Caltrans standards. Therefore, impacts to traffic on East Valley Road from vehicles entering or exiting the western driveway would be *less than significant (Class III)*.

Impact

TT-4 The proposed project would result in less than significant impacts to a Congestion Management Program (CMP) roadway (Class III).

studies measured actual speeds and used the 85th percentile speed of vehicles traveling on the road (which is 49 MPH for westbound traffic and 47 MPH for eastbound traffic).

SBCAG has developed a set of traffic impact thresholds to assess the impacts of land use decisions made by local jurisdictions on regional transportation facilities located within the CMP roadway system. According to the CMP Land Use Analysis Program, projects that generate less than 500 ADT and less than 50 peak hour trips are considered to be consistent with the CMP. The proposed project would generate 32 ADT, 11 A.M. peak hour trips, and 3 P.M. peak hour trips. Therefore, the proposed project would have a *less than significant impact* (Class III) to CMP facilities in the area.

3.10.3.5 Cumulative Impacts

Roadway Impacts

According to the analysis in the MGMO SEIR, Sheffield Drive is forecast to carry 6,480 ADT and operate at LOS D in Year 2030. The proposed project would add 6 ADT to the roadway, which equates to a net increase of 1/10th of 1%. Thus, the project would not generate cumulative impacts based on County thresholds.

Also according to the MGMO SEIR, East Valley Road is forecast to carry 5,210 ADT and operate at LOS A in Year 2030. The proposed project would add 32 ADT to the roadway and the roadway would operate at LOS A under Cumulative + Project conditions. Thus, the project would not generate cumulative impacts based on County thresholds.

Intersection Impacts

The intersection of East Valley Road and Sheffield Drive is forecasted in the MGMO SEIR to operate at LOS B in the Year 2030, as shown in Table 3.10-2. The proposed project would add 11 trips to the intersection during the A.M. peak hour and 3 trips during the P.M. peak hour.

Table 3.10-2. Cumulative and Cumulative + Project LOS at the Intersections of East Valley Road/Sheffield Drive and East Valley Road/Ortega Ridge Road

Peak Hour	Cumulative LOS	Cumulative + Project LOS	Project-Added Trips ¹	Significant Impact?
East Valley Road/Sheffield Drive				
A.M.	B	B	11	No
P.M.	B	B	3	No
East Valley Road/Ortega Ridge Road ²				
A.M.	A	A	0	No

P.M.	A	A	0	No
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¹ These project-added trips represent ADT, which occur over the entire day (i.e., not just during the peak hours).

² Estimated by ATE based on professional experience and historic traffic counts.

Source: ATE 2010 (see Appendix I).

The project would not change LOS under cumulative conditions during peak hours. Therefore, the project would not generate cumulative impacts to the intersection of East Valley Road and Sheffield Drive or East Valley Road and Ortega Ridge Road based on County thresholds.

3.10.3.6 Residual Impacts

The proposed project would not substantially impact vehicular traffic along the roadways in the project vicinity. No mitigation measures would be required and residual impacts to transportation and traffic due to the proposed project would be less than significant.

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3.11 WATER RESOURCES, SUPPLY, AND SERVICE

Water resources within the project area include surface water and groundwater. The physical, chemical, and biological characteristics of these water sources are key to their suitability for a particular purpose or use, such as for drinking water, for recreation, or to support a healthy ecosystem. Water supply and service include the entitlements and forecasted future water supplies (e.g., groundwater, surface water, State Water Project, etc.) associated with a project area and region.

3.11.1 Existing Conditions

3.11.1.1 Regional and Vicinity Hydrologic Setting

According to the Central Coast (Region 3) Regional Water Quality Control Board (RWQCB), the project site is located within the South Coast Hydrologic Unit, which generally includes the area south of the Santa Ynez Mountains between Carpinteria and Point Arguello.

Watershed

Romero Creek: Romero Creek is a major stream located approximately 600 feet west of the project site. Romero Creek originates in the foothills of the Santa Ynez Mountains and drains a 3,301-acre watershed capable of producing flows of 4,900 cubic feet per second during a 100-year storm event. In its upper reaches, the creek channel is incised with steep banks along many sections. Riparian vegetation is a mix of native sycamore, willow, alder, bays, and non-native landscape specimens, nasturtium, ironweed, and watercress. The lower watershed typically carries water year round. Riffles and step pools are common along this length. Large cobbles and boulders along the creek are populated with islands of young willow sprouts (Santa Barbara County Flood Control and Water Conservation District 2010).

Picay Creek: Picay Creek, located to the south of the project site, is a small tributary to Romero Creek that runs along a bridle trail and under several small road crossings. Picay Creek originates in the Santa Ynez Mountains and drains a 626-acre watershed capable of producing 1,400 cubic feet per second during a 100-year storm event. Overhanging willows are common along the narrow riparian corridor. The substrate is rocky with

small pools throughout most of the project reach. It typically flows throughout the wet season and dries up during the summer months (Santa Barbara County Flood Control and Water Conservation District 2010).

Precipitation

The average precipitation in the South Coast Hydrologic Unit is nearly 18 inches per year (Santa Barbara County Water Resources Division 2009). Annual rainfall in the Santa Barbara coastal area is highly variable and includes periods of intense rainfall and flooding punctuated by extended droughts. Rainfall has averaged 20.3 inches over a 85-year period at rain gauge Station #325 at the Montecito Water District.

3.11.1.2 Regional Groundwater Conditions

The Montecito Groundwater Basin encompasses about 6.7 square miles between the Santa Ynez Mountains and the Pacific Ocean. The Montecito Groundwater Basin is separated from the Carpinteria Groundwater Basin to the east by faults and bedrock and from the Santa Barbara Groundwater Basin to the west by an administrative boundary. The basin has been divided into three storage units on the basis of east-west trending faults that act as barriers to groundwater movement. The project site is located within the northern unit, which is bounded on the south by the Arroyo Parida Fault.

Water quality in the basin generally is suitable for agricultural and domestic use. Some wells near fault zones or coastal areas yield groundwater with elevated levels of total dissolved solids (TDS) and other constituents. Studies indicate that seawater intrusion is not a significant problem in the basin (Santa Barbara County Water Resources Division 2009).

Available storage within the Montecito Groundwater Basin is estimated to be 7,700 acre-feet (Santa Barbara County Water Resources Division 2009). Groundwater from this basin supplies private residences and a small amount of agriculture within Montecito. In 1992, the County Thresholds Manual identified the Montecito Groundwater Basin as in a state of overdraft by approximately 473 AFY. However, it is not considered to be overdrafted by MWD, and has a safe yield of 1,650 AFY (MWD 2005). Typical withdrawals from the basin total a maximum of 1,450 AFY (450 AFY from MWD wells and 1,000 AFY from private wells) (MWD 2005).

3.11.1.3 Regional Water Supply

According to MWD (2005), the average annual long-term water supply available in the Montecito area is approximately 7,380 AFY, including groundwater and the available surface water sources. This figure includes 2,906 AFY from the Cachuma Project, 1,569 AFY from Jameson Lake, 375 AFY from Doulton Tunnel infiltration, 2,280 AFY of State Water and the typical pumping from the groundwater basin of 250 AFY. However, additional analysis conducted by the MWD (2007) indicated that the maximum long-term water supply without creating dry-year shortfalls is 6,280 AFY (accounting for diversions to City of Santa Barbara and 4% loss from pipe leakage).

Water demand in the Montecito area was estimated at approximately 6,544 AFY in 2007 (MWD 2007). However, extrapolating the historic rate of increase in demand resulted in estimates of demand in the year 2030 as high as 9,000 AFY (MWD 2007). Increasing demand, coupled with reduced deliveries from the State Water Project, resulted in a shortfall of approximately 600 AFY in 2007. As a result, the MWD passed an emergency ordinance restricting the water allocated to new development or redevelopment (refer to Section 3.11.2.3 Local Regulations).

3.11.1.4 Project Site Groundwater Conditions

Borings conducted for geotechnical investigation in November 2010 (Campbell Geo 2011) discovered groundwater at 53 feet depth in one boring. Other borings on the site found groundwater at greater depths or none at all.

3.11.1.5 Project Site Surface Water Conditions

Drainage within the project site consists of sheet flow to the south and west into an unnamed intermittent drainage between 4 and 8 feet wide and 2 and 4 feet deep to the west of the site and a drainage channel that runs within the Caltrans right-of-way along the north side of East Valley Road. Drainage beneath East Valley Road is accommodated by a culvert of approximately 36 inches. The intermittent drainage and its banks are generally clear of understory vegetation; overstory vegetation consists of coast live oaks. This drainage is known to flow only during or immediately after rainfall events and is not documented to have overtopped its banks (Sam Frye, Manager; Rancho San Carlos)

3.11.1.6 Project Site Flood Hazard

The County of Santa Barbara's 100-year Flood Hazard Overlay data indicate that the project site is outside of any flood hazard areas. The Flood Insurance Rate Map (FIRM) published by the Federal Emergency Management Administration (FEMA) shows the site to be in "zone x," with less than a 0.2% annual chance of flooding (map number 06083C1411F, effective September 30, 2005 and posted on the FEMA website, February, 2010). The flood plains of Romero Canyon Creek to the west and Picay Creek to the south are far removed from the site.

3.11.1.7 Project Site Water Use

The project site supports over 2 acres of existing lemon orchards and has been under cultivation for 80 or more years. Although not metered separately, existing water use for irrigation of onsite orchards is estimated at approximately 3 AFY based on an average annual water demand for lemon orchards of 1.5 AFY (County of Santa Barbara 2008). The exact mix of water delivered to this site is unknown as Rancho San Carlos water is supplied by a mix of supplies from the ~~Montecito Water District (MWD)~~, onsite wells, and stream diversions. MWD water use specific to the project site is not available because each meter serves a mix of parcels and annual use of MWD water varies annually based on the amounts available from stream diversions, natural rainfall, and well sources (MWD 2012).

3.11.2 Regulatory Setting

3.11.2.1 Federal Regulations

Federal Clean Water Act (CWA), 33 USC 1251 et seq. (1977). This law is the primary law regulating water pollution. Relevant sections include:

- Section 208, requiring that states develop programs to identify and control non-point sources of pollution, including runoff.
- Section 303, requiring states to establish and enforce water quality standards to protect and enhance beneficial uses of water for such purposes as recreation and fisheries.

- Section 304(a)(1), requiring the administrator of the USEPA to develop and publish water quality criteria that reflect the latest scientific knowledge regarding the effects of pollutants in any body of water.
- Section 313(a), requiring that federal agencies observe state and local water quality regulations.
- Section 405 of the Water Quality Act of 1987 added to Section 402(p) to the CWA. Pursuant to Section 402(p)(4) of the CWA, the USEPA is required to promulgate regulations for National Pollutant Discharge Elimination System (NPDES) permit applications for storm water discharges.

3.11.2.2 State Regulations

Regional Water Quality Control Board (RWQCB) Basin Plan. The Central Coast (Region 3) RWQCB has jurisdiction over coastal drainage within Santa Barbara County, including groundwater resources of the South Coast Hydrologic Unit. In accordance with the California Water Code, the RWQCB developed a Water Quality Control Plan (1994) (Basin Plan) designed to preserve and enhance water quality and protect the beneficial uses of all regional waters. Water quality objectives for the Central Coastal Basin satisfy state and federal requirements established to protect waters for beneficial uses and are consistent with existing statewide plans and policies. The Basin Plan undergoes periodic updates, including a recent revision strengthening criteria for onsite wastewater treatment (Resolution No. R3-2008-0005).

There are no hydrologic features within the project site. Of those in the project vicinity, only Romero Creek is identified in the RWQCB's Basin Plan as having specific beneficial uses. It is assigned the following default designations:

- *Municipal and Domestic Water Supply*
- *Groundwater Recharge*
- *Water Contact Recreation*
- *Non-Water Contact Recreation*
- *Wildlife Habitat*
- *Warm Freshwater Habitat*
- *Estuarine Habitat*
- *Freshwater Replenishment*
- *Commercial and Sport Fishing*

In addition to standards set for the designations above, the Basin Plan states:

“Wherever the existing quality of water is better than the quality of water established herein as objectives, such existing quality shall be maintained unless otherwise provided by the provisions of the State Water Resources Control Board Resolution

No. 68-16, 'Statement of Policy with Respect to Maintaining High Quality of Waters in California,' including any revisions thereto.'

The State of California Water Resources Control Board (SWRCB). The SWRCB has adopted a statewide construction general permit that applies to storm water and non-storm water discharges from construction activities. This general permit, which is implemented and enforced in the Santa Barbara area by the Central Coast RWQCB, requires all owners of land where construction activity occurs to:

- eliminate or reduce non-storm water discharges to storm water systems and other waters of the U.S.,
- develop and implement a Storm Water Pollution Prevention Plan emphasizing storm water Best Management Practices (BMPs), and
- perform inspections of storm water pollution prevention measures to assess their effectiveness.

In addition, SWRCB regulations mandate a “non-degradation policy” for state waters, especially those of high quality.

Porter-Cologne Water Quality Control Act (1969). This act mandates that waters of the state shall be protected such that activities that may affect waters of the state shall be regulated to attain the highest quality.

3.11.2.3 Local Regulations

Santa Barbara County Comprehensive Plan. The County Comprehensive Plan’s overarching policy regarding protection of water quality applies to both construction and post-construction and states that degradation of groundwater quality basins, nearby streams, or wetlands shall not result from site development.

Montecito Community Plan (MCP). The MCP contains goals and policies to address community flooding and drainage issues, including:

- *Policy FD-M-2.1:* Development shall be designed to minimize the threat of on-site and downstream flood potential and to allow recharge of the groundwater basin to the maximum extent feasible.

- *Policy FD-M-4.5:* The County shall strive to ensure through public and private projects that adequate drainage is provided to minimize existing community-wide flooding and drainage problems.

The MCP also contains goals and policies to address water supply issues, including:

- *Policy WAT-M-1.1:* When planning for future water supply, the County shall encourage reasonable, practical, reliable, efficient, and environmentally sound water policies.
- *Development Standard WAT-M-1.2.1:* Landscape plans, where required for development, shall include drip irrigation systems and/ or other water saving irrigation systems.
- *Policy WAT-M-1.5:* When supplemental alternative water sources become available, a buffer of 10 percent between supply and demand should be maintained in reserve for periods of drought condition.

Montecito Water District Emergency Limitation on Water Distribution to Land Within the District (Ordinance No. 89). For lands within the Montecito Water District, establishes that all subdivision projects or any project resulting in a change of land use that requires permitting from the County of Santa Barbara or City of Santa Barbara to obtain a Certificate of Water Availability from the District. The District General Manager will issue a Certificate of Water Availability if he finds that service can be made available to the property, that the project requiring the Certificate will include the installation of state-of-the-art water-saving technologies, and that estimated water usage for the project is within a reasonable range of the Maximum Available Quantity as determined under the Ordinance. Every property subject to this Ordinance measuring one acre or more shall receive a maximum of one acre-foot of water per year, or a base allotment of average amount of water actually delivered to the property per year and per month during the three-year fiscal period 2003/04 - 2005/06, whichever is greater. If it is determined that the Base Allotment does not accurately reflect the typical existing water usage associated with a parcel, a proxy Base Allotment greater than the Base Allotment can be granted. When a Certificate of Water Availability is required because land is proposed for subdivision, the Maximum Available Quantity shall be either the Base Allotment for the entire property divided proportionally among the new parcels or, for each new parcel, one acre foot per year or pro rata portion thereof, as applicable

County Grading, Erosion, and Sediment Control Ordinance (Ordinance No. 4477). The County Grading Ordinance, Chapter 14 of County Code, provides minimum standards and procedures necessary to protect and preserve life, limb, health, property and public welfare. This chapter also addresses the County's compliance with NPDES Phase II storm water regulations for construction activities. The code requires that a non-discretionary Grading Permit be obtained for projects that disturb 50 cubic yards (cy) or more of material. An Erosion and Sediment Control Plan must be submitted and approved as part of the permit conditions.

County Storm Water Management Program. As required under the federal NPDES Phase II regulations, the SWRCB adopted a general permit for the discharge of storm water for new development from small municipal separate storm sewer systems (MS4s, WQ Order No. 2003-005-DWQ) to provide permit coverage for smaller municipalities, including the County of Santa Barbara. The General Permit requires the County to develop and implement a Storm Water Management Program (SWMP). The County's SWMP is composed of six elements, or minimum control measures, that are expected to reduce pollutants discharged into receiving water bodies when implemented together. These elements are:

- Public Education and Outreach
- Public Participation/Involvement
- Illicit Discharge Detection and Elimination
- Construction Site Runoff
- Post-construction Runoff Control
- Pollution Prevention/ Good Housekeeping

The County has developed BMPs for both construction site runoff and post-construction runoff control that are applicable to new development projects. However, additional BMPs may be necessary to meet the RWQCB requirements on any specific project.

3.11.3 Environmental Impacts

3.11.3.1 Thresholds for Determining Significance

Thresholds of significance for impacts to water resources, supply, and service are taken from the *Santa Barbara County Environmental Thresholds and Guidelines Manual*:

For the proposed project, a significant impact to water resources is presumed to occur if a project:

- Is located within an urbanized area of the county and the project construction or redevelopment individually or as a part of a larger common plan of development or sale would disturb one (1) or more acres of land;
- Increases the amount of impervious surfaces on a site by 25% or more;
- Results in channelization or relocation of a natural drainage channel;
- Results in removal or reduction of riparian vegetation or other vegetation (excluding non-native vegetation removed for restoration projects) from the buffer zone of any streams, creeks or wetlands;
- Discharges pollutants that exceed the water quality standards set forth in the applicable NPDES permit, the Regional Water Quality Control Board's (RWQCB) Basin Plan or otherwise impairs the beneficial uses¹ of a receiving water body;
- Results in a discharge of pollutants into an "impaired" water body that has been designated as such by the SWRCB or the RWQCB under Section 303 (d) of the Federal Water Pollution Prevention and Control Act (i.e., Clean Water Act); or
- Results in a discharge of pollutants of concern to a receiving water body, as identified by the RWQCB.

An impact to water services or supply would occur if the project would:

- Exceed established threshold values which have been set for each overdrafted groundwater basin;
- Substantially reduce the amount of water otherwise available for public water supplies;
- Result in a net increase in pumpage from a well would that would substantially affect production or quality from a nearby well.

Additional thresholds of significance for water resources are taken from the CEQA Guidelines Appendix G, and identify significant impacts if the proposed project would:

¹ Refer to Section 3.11.2.2 for beneficial uses designated for Romero Creek.

- Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other flood hazard delineation map;
- Place within a 100-year flood hazard area structures which would impede or redirect flood flows;
- Expose people or structures to a significant risk of loss, injury, or death involving flooding, including flooding as a result of the failure of a levee or dam;
- Expose people or structures to a significant risk of tsunami, seiche or mudflow.

Thresholds from the CEQA Guidelines Appendix G also identify significant impacts to water supply or service if the proposed project would:

- Have insufficient water supplies available to serve the project from existing entitlements and resources, requiring new or expanded entitlements.

3.11.3.2 Impact Assessment Methodology

The impact assessment methodology used in this analysis consisted of evaluating three types of impacts: 1) degradation of surface water or groundwater quality resulting from construction of the proposed project (e.g., construction materials or urban pollutants, such as oil, grease, and heavy metals) and long-term impacts due to the development (e.g. hydromodification and watershed health); 2) potential impacts to the proposed project resulting from exposure to an existing flood hazard; and 3) potential impacts to potable water supply due to project construction or operational demand. To accomplish this, published data sources were reviewed and regulatory personnel familiar with site conditions were consulted.

3.11.3.3 Mitigation Measures Contained in the Proposed Project

The applicant has proposed a series of mitigation measures to reduce potential adverse construction and operational effects of the project, which have been incorporated into the project design and future operation as listed below:

- A 50-foot habitat restoration buffer from the top of the bank of the drainage along the western side of the site. Restoration would include planting of native oaks

and riparian species, and would adhere to a detailed Habitat Restoration Plan to be approved by the County.

- During construction, washing of concrete, paint, or equipment shall occur only in areas where polluted water and materials can be contained for subsequent removal from the site. Washing shall not be allowed near sensitive biological resources. A designated area for washing functions shall be identified.
- Incorporation of water quality protection measures into site design, including use of porous paving in parking areas to minimize runoff and increase infiltration, and treatment of runoff in a vegetated swale or detention basin prior to offsite discharge.
- The maintenance bay drainage system shall be designed and maintained to capture all wastewater, leaks, and spills. Drains shall be tied to a sand and oil separator prior to discharging to the sanitary sewer.
- The vehicle/equipment wash area shall be self-contained and designed with a 'rain switch' valve system, allowing storm water to regularly collect/discharge to the storm drain, but switch over to the sanitary sewer during vehicle/equipment washing activities.

3.11.3.4 Project Impacts and Mitigation Measures

Impact

WAT-1 The proposed project would result in adverse, but less than significant, short-term impacts to surface water quality due to potential erosion, runoff, and sedimentation during construction activities (Class III).

The proposed project would involve excavation and grading of an estimated 16,500 cy of cut and 8,500 cy of fill in order to provide level building pads and internal circulation. Up to 8,000 cy of cut would be exported via haul trucks to a site determined to be acceptable at the time of construction. This grading could temporarily create an increase in soil erosion and sediment transport into surrounding surface water bodies due to runoff waters moving over exposed areas and entering the drainages to the west and south of the site. Such soil erosion could result in the creation of onsite rills and gully systems, clog existing drainage channels, degrade offsite surface water quality, and damage downstream aquatic habitats. Soil movement would occur in exposed graded or excavated areas, as well as unprotected drainage culverts or basins. This surface runoff may also contain eroded construction material and oil, grease, or spilled fuel from

construction equipment that could potentially degrade surface water quality. To reduce surface water and groundwater quality impacts during construction activities, all pertinent regulatory requirements would be adhered to and required erosion control and sediment management practices put into effect at the project site. Such potential impacts would be reduced to an adverse, but less than significant level through imposition of erosion and sedimentation control BMPs such as avoiding grading during rainy season, installation of sediment basins, use of straw bales or bundles, and other measures that would be included in a Storm Water Pollution Prevention Plan (SWPPP) required by the RWQCB and enforced as part of the County's Grading Permit. Potential for erosion and sedimentation at the receiver site for exported soils would be reduced to an acceptable level as the site would need to be determined to be acceptable to receive such export and have all required permissions and associated BMPs in place prior to export of soil. In addition to the sediment control measures included in Section 3.7, *Geologic Processes*, these practices would include site-specific measures to reduce the occurrence of soil movement during precipitation events and minimize sediment and polluted runoff from entering nearby tributaries and water bodies, per the SWRCB NPDES General Permit. Therefore, due to the short-term nature of construction and implementation of required standard water quality measures (see *MM WAT-1* below), impacts during construction would be considered *adverse, but less than significant* (Class III).

Standard Regulatory Conditions

The proposed project would adhere to the following standard regulatory requirements as part of the permit approval process, which would ensure that impacts would be less than significant.

MM WAT-1 Prior to issuance of any construction/grading permit and/or the commencement of any clearing, grading, or excavation, a Notice of Intent (NOI) would be required to be submitted to the State Water Resources Control Board Storm Water Permit Unit. Compliance with the General Permit includes the preparation of a Storm Water Pollution Prevention Plan (SWPPP), which is required to identify potential pollutant sources that may affect the quality of discharges to storm water, and includes design and placement of Best Management Practices (BMPs) to effectively prohibit the entry of pollutants from the project site into area water bodies during construction. This measure represents a standard County

condition of approval for a project and would likely be required by the County as part of permit approval process.

Plan Requirements and Timing. Prior to construction, the applicant would be required to submit a NOI to the State Water Resources Control Board. The applicant would be required to provide a copy of the RWQCB’s NOI acceptance letter and the required SWPPP to the County for review and approval. BMPs described in the SWPPP would be required to be shown on plans prior to issuance of the Development Permit.

The applicant would be required to notify the County prior to commencement of grading. Erosion and sediment control measures would be required to be maintained for the duration of the grading period and development of the project until graded areas have been permanently stabilized by structures, long-term erosion control measures or landscaping. The County would conduct periodic “tailgate” meetings about site maintenance and water quality issues.

Monitoring. The County and other agencies, as appropriate, would inspect the site during construction, particularly during the rainy season (between November 1 and April 15), for compliance with the SWPPP. Grading inspectors would monitor technical aspects of grading activities, and ensure enforcement of County requirements consistent with the Grading Ordinance. County staff would inspect the site for all requirements prior to final inspection. Upon strict adherence to requirements set forth in the RWQCB-approved SWPPP, including site monitoring routines, additional downstream water quality sampling and testing would not be necessary.

Impact

WAT-2 The proposed project would result in adverse, but less than significant long-term impacts to surface water quality due to polluted runoff during long-term operational activities (Class III).

Operation of the proposed station would involve the use of fuel and oil/grease that would result from onsite vehicle and equipment maintenance and washing of emergency vehicles, and fertilizers, pesticides, and “household” cleaners and chemicals associated with overall landscape and building maintenance. However, the proposed fire station would be subject to federal, state, and local regulations pertaining to storage and use of

any hazardous materials/waste, including obtaining appropriate permits, training, and agency inspections. These regulations would require implementation of standard good housekeeping measures, BMPs, and site maintenance and security precautions. In addition, compliance with standard NPDES ~~Industrial~~ Permit requirements would include development of a Storm Water Pollution Prevention Plan (SWPPP), implementation of BMPs, and discharge monitoring (see *MM WAT-2* below). Further, the proposed project has been designed to include water quality engineering controls, such as a vehicle/equipment wash area ‘rain switch’ valve system to allow discharge switch over from the storm drain to the sanitary sewer during vehicle/equipment washing activities, a maintenance bay drainage system tied to a sand and oil separator prior to discharging to the sanitary sewer, and vegetated swales that would allow for uptake of storm water runoff along with the uptake of potential surface water pollutants. The southerly vegetated swale is designed to be 105 feet long at no great than two percent slope, which would meet County Standard Conditions for Project Plan Approval- Water Quality BMPs. An approximately 130-foot long vegetated swale in the western portion of the site would also channel and filter flows towards the detention basin. The detention basin outlet structure would include a fossil filter to further clarify water runoff in compliance with County standards. -Therefore, potential long-term water quality impacts would be considered *less than significant* (Class III).

Standard Regulatory Conditions

The proposed project would adhere to the following standard regulatory requirements as part of the permit approval process, which would ensure that impacts would be less than significant.

MM WAT-2 The applicant would be required to ~~procure~~ apply for and be consistent with ~~a~~ all National Pollution Discharge Elimination System (NPDES) permits that apply, which could include Construction and Municipal General Permits. ~~that~~ These permits would be consistent with all requirements of the federal Clean Water Act.

Plan Requirements and Timing. Prior to construction, the applicant would be required to submit a NOI to the State Water Resources Control Board. The applicant would be required to provide a copy of the

RWQCB's NOI acceptance letter and the required SWPPP to the County for review and approval.

Monitoring. Upon strict adherence to requirements set forth in the RWQCB-approved SWPPP, including site monitoring routines, additional downstream water quality sampling and testing would not be necessary.

Impact

WAT-3 The proposed project would result in potentially significant (but mitigable) long-term increases in runoff to site drainages and watersheds due to increase in impervious surfaces, including buildings, aprons, and driveways (Class II).

The project site currently has limited or no impervious surfaces, with the exception of very small areas of degraded asphalt along an orchard access road. Project construction would result in installation of approximately 1.07 acres of impervious surfaces on the project site, including driveways, parking areas, patios, and the roofs of proposed structures, thereby increasing runoff volumes and rates. These impervious surfaces would result in incrementally diminished watershed infiltration. Incremental increases in peak flows to adjacent drainages could also cause increased erosion within the channels, and flows to the roadside drainage ditch along East Valley Road could contribute to exceedance of capacity. Because the circulation pavements within the fire station must withstand heavy fire engines, water trucks, and other heavy equipment on a regular basis, permeable paving is not feasible for much of the site. However, consistent with Santa Barbara County's Low Impact Development (LID) policy, the project would incorporate 0.07 acres of permeable paving surfaces in parking areas and would direct most of the site's runoff to vegetated swales and a detention basin located in the southwest portion of the project site. Analysis of the proposed storm water detention basin and swale show no peak runoff increase for the post-development condition from the pre-development condition for all storm events (2, 5, 10, 25, 50, and 100 years) (Appendix L). With incorporation of mitigation measure *MM WAT-3* requiring site drainage to include a detention basin to reduce peak flows, along with design review of the drainage plan by County Planning and Development (P&D) and Flood Control, impacts to increased runoff would be reduced to *Class II, significant but feasibly mitigated*.

Mitigation Measures

MM WAT-3 The on-site detention basin shall be designed such that the post-developed peak discharge rate to off-site drainages shall not exceed the pre-developed peak discharge rate for the 2-year through 100-year storm events.

Plan Requirements and Timing. Drainage plan shall be submitted to County P&D and Flood Control for review and approval prior to approval of Conditional Use Permit.

Monitoring. County P&D shall site inspect during grading.

Impact

WAT-4 The proposed project would result in a reduction of long-term water demand for this 2.55-acre site which may result in beneficial impacts to water supplies as a result of replacing water-intensive agricultural use with low water uses including a fire station and drought-tolerant landscaping (Class IV).

As discussed above, Montecito faces challenges with regards to provision of water supplies adequate to meet long-term demand, with water demand in the community exceeding reliable supplies in 2007 by an estimated 600 AFY (MWD 2008). However, because of comparatively high existing water use onsite, the proposed project is anticipated to reduce long-term water use onsite.

Based on water use factors in the Thresholds Manual for Environmental Review of Water Resources in Santa Barbara County (Santa Barbara County 2008), total water use for the project would be 1.39 AFY (Table 3.11-1). However, because the existing water consumption for the estimated 2.0+ acres of lemon orchard (3.00 AFY) would be discontinued, the net water consumption for the project would be negative; i.e., less water would be consumed under the proposed project than under existing conditions. Therefore, the proposed project would have a *beneficial impact (Class IV)* on water supplies in the region.

Table 3.11-1. Proposed Project Water Demand

				Potable Water Demand (AFY)
	Demand Source	Demand Factor	Multiplier	
<i>Project Use</i>	Structures – Firefighters ¹	0.0737 AFY/ person	4	0.29
	Structures – Admin. ²	0.10 AFY/ 1,000 sf	1,222 sf	0.12
	Landscaping ³	1 AFY/ acre	0.43 acres	0.43
	Topping off of Trucks ⁴	150 gallons/ fill	52 fills per year	0.024
	Hose Training ⁵	8,000 gallons/ year	N/A	0.025
	Miscellaneous ⁶	N/A	N/A	0.50
Total Project Use				1.39
<i>Historic Use</i>	Lemon Orchards	1.5 AFY/acre	2.0 acres ⁷	3.00
Net Water Consumption for Project				-1.61

¹ Uses residential factors from Table 8a of County Groundwater Thresholds Manual, assumes 4 persons living at station.

² Uses factors for “General Office” from the Santa Barbara area in Table 8a of County Groundwater Thresholds Manual.

³ Assumes landscaping would be entirely composed of drought-tolerant plants and trees.

⁴ Assumes trucks would be partially filled on site only once per week, at other times would be filled from hydrants off-site. This is consistent with activities at the other MFPD stations.

⁵ Assumes hose training between January and June each year, consistent with training at other MFPD stations. Annual water usage for hose training estimated by MFPD.

⁶ Estimate; includes washing of equipment and other incidental use.

⁷ Area estimated from measurement of geo-referenced aerial photograph.

3.11.3.5 Cumulative Impacts

The cumulative hydrology and water quality setting includes existing, pending, and reasonably foreseeable future land uses within: 1) the watersheds identified for the proposed project area; and 2) the South Coast Hydrologic Unit. The South Coast Hydrologic Unit is delimited in the Basin Plan and generally includes the area south of the Santa Ynez Mountains between Carpinteria and Point Arguello. Cumulative hydrology and water quality impacts, similar to direct impacts, result from increased impervious surface runoff, accelerated erosion, and pollutant loading generally associated with urban and agricultural development. Most of the proposed project’s contribution to cumulative hydrology and water quality impacts would occur during the construction phase. Similar to the proposed project, all other pending projects would also be subject to site-specific requirements for storm water management during construction and post-construction. Other pending projects would also undergo the same drainage design review by the County. Incorporation of storm water management design features into the

landscaping and construction of the other pending projects would reduce impacts to water quality. Mitigation measure *MM WAT-3* and standard conditions of permit approval would reduce the project's incremental contribution to this cumulatively significant impact within the South Coast Hydrologic Unit to less than significant.

3.11.3.6 Residual Impacts

After the implementation of the identified mitigation measures, impacts would be reduced to less than significant.

3.12 EFFECTS FOUND NOT TO BE SIGNIFICANT

CEQA Guidelines state that the EIR shall contain a statement briefly indicating the reasons that various potentially significant effects of a project were determined not to be significant and were therefore not discussed in detail in the EIR (Section 15128). After standard regulatory conditions are applied, several resource areas were found to be below a level of significance, as identified in the Initial Study. Some of these issues have been reassessed in this EIR, and further analysis resulted in mitigation measures provided as appropriate. Results of the environmental analyses are either presented in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, or discussed below.

3.12.1 Energy

The Initial Study did not identify any significant impacts to energy resources and none are anticipated. The project consists of three structures totaling approximately 12,560 square feet, which are proposed to be developed to USGBC LEED Silver certification standards, and would therefore incorporate energy efficient design and technologies. Further, in light of the enormous scope of the California electricity grid and natural gas delivery system and the relatively small size of the project, the additional demand represented by this project could be considered incremental but not significant. The project would not require the development or extension of any new sources of energy to serve its energy needs. In summary, the project would have a negligible effect on regional energy needs. No adverse impacts would result.

3.12.2 Hazardous Materials

The Initial Study did not identify any significant impacts associated with hazardous materials and none are anticipated. The project site is currently and has historically been occupied primarily by a lemon orchard and no structures or hazardous material storage occurs on the site. According to a Phase I Environmental Site Assessment completed for the project site (Appendix H), no significant releases of hazardous chemicals or petroleum products on the project site have been observed or reported (MFPD 2010). Further, if visual contamination or chemical odors were detected during construction, work would be stopped immediately and the County Fire Department, Hazardous Materials Unit would be contacted prior to resumption of work.

The proposed project would involve the use and storage of hazardous materials/waste (i.e., oil, solvent, and hydraulics fluids, diesel fuel, and gasoline) associated with operations on the project site, as described in Section 2.4.7 of the *Project Description*. However, the proposed fire station would be subject to federal, state, and local regulations pertaining to hazardous materials/waste including obtaining appropriate permits, training, and agency inspections. In addition, these regulations would require implementation of standard good housekeeping measures, BMPs, and site maintenance and security precautions, reducing potential impacts related to future use, handling, storage, or routine transportation of hazardous materials/waste to less than significant.

Potential impacts associated with past and current of pesticides and fertilizers at the project site are discussed in Section 3.2, *Agricultural Resources*.

3.12.3 Public Facilities

The Initial Study did not identify any significant impacts to public facilities and none are anticipated. The proposed new fire station would not have a significant impact on existing police protection or health care services, and existing service levels would be sufficient to serve the proposed project. The project would not generate the number of students (approximately 20) that would require an additional classroom. The proposed project would not generate solid waste in excess of County thresholds (196 tons per year, and construction waste would not exceed 350 tons). The project would not cause the need for new or altered sewer system facilities as it is already in the service district, and the District is presumed to have the capacity to serve the minimal needs of the proposed project. However, the Montecito Sanitary District has stated that it would need to upgrade infrastructure to accommodate any additional residential development that might be induced by the presence of a fire station in this area (Montecito Sanitary District 2012). As part of the proposed project, the Montecito Water District and Montecito Sanitary District would be contacted to confirm service availability and adequacy. The proposed project would not require construction of new storm water drainage or water quality control facilities or expansion of existing facilities as surface runoff from the site would be accommodated with a vegetated swale and detention basin that would provide infiltration and uptake of excess runoff. Therefore, the proposed project would result in less than significant impacts to public facilities.

The potential growth inducing effects in the vicinity of the proposed project are further discussed in Section 5.2, *Growth-Inducing Impacts*.

3.12.4 Recreation

The Initial Study did not identify any significant impacts to recreation and none are anticipated. No established recreational uses are located on or adjacent to the proposed project site. The proposed project would not affect the quality or quantity of existing recreational opportunities, including biking, equestrian, and hiking trails, either in the project vicinity or county-wide. As part of the proposed project, a 10-foot wide easement would be offered for dedication along the entire project's site frontage with East Valley Road to reserve land for the Comprehensive Plan-designated Proposed On-Road Trail (Parks, Recreation and Trails Map, PRT-2, Carpinteria-Montecito-Summerland); therefore, impacts would be less than significant.

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4.0 CONSISTENCY WITH PLANS AND POLICIES

The following discussion of County policies and preliminary determinations regarding the consistency of the proposed project with these policies is presented for informational purposes. Section 15125 (d) of the State CEQA Guidelines requires that an EIR “shall discuss any inconsistencies between the proposed project and applicable general plans and regional plans. Such regional plans include, but are not limited to, the applicable air quality attainment or maintenance plan...and regional land use plans for the protection of the coastal zone, Lake Tahoe Basin, San Francisco Bay, and Santa Monica Mountains.” In this case, the adopted plans most relevant to the proposed project are *Santa Barbara County’s Comprehensive Plan*, including the policies of the *Montecito Community Plan*. Where appropriate, analysis of the *Montecito Land Use Development Code* (MLUDC), the *Montecito Architectural Guidelines and Development Standards* (Montecito Design Guidelines), and a brief summary of the *Montecito Growth Management Ordinance* (MGMO) are also included.

Although the Montecito Fire Protection District (MFPD) is the lead agency, as a responsible agency, the Montecito Planning Commission (Commission) has initial responsibility for determining if the proposed project is consistent with the County’s adopted plans and policies. Decisions by the Commission are subject to appeal to the Santa Barbara County Board of Supervisors. Because the County is the final decision-maker, this analysis is focused on the subset of the County’s adopted plans and policies with which the proposed project may be potentially inconsistent. Where such inconsistencies are identified, to the extent feasible, the EIR identifies mitigation measures or alternatives to improve project consistency with these policies. County decision-makers will make the final decision regarding consistency.

Table 4-1. Consistency with Santa Barbara County Comprehensive Plan Policies and Other Regulations

Policy Requirement	Discussion
AESTHETICS/VISUAL RESOURCES	
<p><i>Montecito Community Plan (MCP) Goal VIS-M-1:</i> Protect the Visual importance of the Santa Ynez Mountain Range and Ocean View as having both local and Regional Significance and protect from development which could adversely affect this quality.</p> <p><i>MPC Policy VIS-M-1.1:</i> Development shall be subordinate to the natural open space characteristics of the mountains.</p> <p><i>MCP Policy VIS-M-1.3:</i> Development of property should minimize impacts to open space views as seen from public roads and viewpoints.</p> <p><i>Land Use Element, Visual Resource Policy 3:</i> In areas designated as urban on the land use plan maps and in designated rural neighborhoods, new structure shall be in conformance with the scale and character of the existing community. Development, varied circulation patterns, and diverse housing types shall be encouraged.</p>	<p>Consistent: Construction of the proposed project would not obstruct mountain or other scenic views from public roadways and viewpoints. The proposed structures’ setbacks, limited visibility, location at the margin of agricultural operations, and screening provided by surrounding oaks and proposed landscaping substantially reduce potential visual disruption of the area. Although the project would contrast with immediately surrounding orchards it would be visually consistent with regard to size, bulk, height, and design of residences and other structures in the vicinity within the 2-E-1, Estate Residential zone district.</p>
<p><i>MCP Policy VIS-M-1.2:</i> Grading required for access roads and site development shall be limited in scope so as to protect the viewshed.</p> <p><i>Land Use Element, Hillside and Watershed Protection Policy (HWPP) 1:</i> Plans for development shall minimize cut and fill operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.</p>	<p>Consistent: The proposed project is located on a gently sloped site. Although export of 8,000 cy of cut is proposed, this would be the minimum necessary excavation and export of fill to allow the proposed development given the need to create level building pads, parking and internal circulation., in compliance with the County’s Grading Ordinance.</p>
<p><i>Land Use Element, HWPP 2:</i> All developments shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited to development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.</p>	<p>Consistent: Land coverage onsite has been previously disturbed given the current primary use of the site as a lemon orchard. Several mature oaks exist onsite along East Valley Road. With the exception of the removal of one mature oak, other oaks would remain intact. Additional oaks and other trees would be planted with landscape buffers to provide visual screening and would soften views of the structures.</p>

<p><i>Land Use Element, Visual Resource Policy 4:</i> Signs shall be of size, location, and appearance so as not to detract from scenic areas or views from public roads and other viewing points.</p>	<p>Consistent: All signage would comply with Chapter 35.438 - Sign Standards of the MLUDC and would be reviewed by the MBAR to ensure project consistency with this policy.</p>
<p><i>Land Use Element, Visual Resource Policy 5:</i> Utilities, including television, shall be placed underground in new developments in accordance with the rules and regulations of the California Public Utilities Commission, except where cost of undergrounding would be so high as to deny service.</p>	<p>Consistent: Utility lines for the proposed development would be underground. Thus, the proposed project would be consistent with this policy.</p>
<p>AGRICULTURAL RESOURCES</p>	
<p><i>Agricultural Element, Goal I:</i> Santa Barbara County shall assure and enhance the continuation of agriculture as a major viable production industry in Santa Barbara County. Agriculture shall be encouraged. Where conditions allow (taking into account environmental impacts), expansion and intensification shall be supported.</p>	<p>Consistent: Policies applying to preservation of prime soils no longer directly apply as the County committed the site to residential use in 1995 and adopted the appropriate findings and overriding considerations to support that decision as required under CEQA. <u>In addition to previous County actions on this issue., the development of approximately 2.5 acres of prime agricultural land would constitute an insignificant impact to agricultural resources and would therefore be potentially consistent with adopted County policies for protection of agricultural resources (Refer to Section 3.2.1.3 and Appendix K).</u></p>
<p><i>Agricultural Element, Policy I.A:</i> The integrity of agricultural operations shall not be violated by recreational or other non-compatible uses.</p>	<p>The applicant has proposed a series of mitigation measures to reduce potential urban-agricultural conflicts with surrounding orchard on residential land, which have been incorporated into the project design. The measures would ensure policy consistency. Pesticide drift and other hazards to site inhabitants related to vicinity agricultural use would be minimized by implementing the design measures listed below:</p>
<p><u><i>Agricultural Element, Policy I.E:</i> The quality and availability of water, air, and soil resources shall be protected through provisions including but not limited to, the stability of Urban/Rural Boundary Lines, maintenance of buffer areas around agricultural areas, and the promotion of agricultural practices.</u></p>	<ul style="list-style-type: none"> • A densely landscaped buffer of generally 50 feet in width on the northern and eastern sides of the site, separating support buildings and structures from agricultural operations. • A 100-foot buffer (which includes a landscape buffer of generally 50 feet in width described above) between agricultural operations and the primary use areas on the site (main fire station and residential quarters). • A 50-foot habitat restoration buffer from the top of the bank of the drainage along the western side of the site. • The MFPD will coordinate with the Agricultural Commissioner’s Office and the Ranch Manager for Rancho San Carlos regarding notification of
<p><u><i>Agricultural Element, Policy II.A:</i> Santa Barbara County shall require measures designed for the prevention of flooding and silting from urbanization, especially as such damage related to approved development.</u></p>	
<p><i>Agricultural Element, Policy II.D:</i> Conversion of highly productive agricultural lands whether urban or rural, shall be discouraged. The County shall support programs which encourage the retention of highly productive agricultural lands.</p>	
<p><i>Agricultural Element, Goal III:</i> Where it is necessary for agricultural lands to be converted to other uses, this use shall not interfere with remaining agricultural operations.</p>	

4.0 CONSISTENCY WITH PLANS AND POLICIES

<p><i>MCP Policy LUG-M-2.1:</i> Agricultural activities on residential parcels that are consistent with the provisions of the applicable residential zone district shall be supported and encouraged by the County.</p>	<p>agricultural spraying activities.</p>
<p>AIR QUALITY</p>	
<p><i>Santa Barbara County Clean Air Plan (CAP):</i> The federal Clean Air Act Amendments of 1988 and 1990 mandate the preparation of CAPs that provide an overview of air quality and sources of air pollution, and identify pollution-control measures needed to meet federal and state air quality standards. The CAP affects the development of regulations and programs within the Santa Barbara County Air Pollution Control District (APCD). Since the County is classified as “moderate” non-attainment for the state 1-hour ozone standard, it must track and meet transportation performance standards. The updated 2007 CAP provided a long-range emissions estimate for the County that was consistent with regional growth and development plans.</p>	<p>Consistent: The proposed project is consistent with growth projections and other plan elements within the established County Comprehensive Plan, and is therefore potentially consistent with the 2007 CAP.</p>
<p><i>MCP Policy AQ-M-1.1:</i> Maintain consistency of all land use planning and development with the Air Quality Attainment Plan and subsequent APCD air quality plans and guidelines.</p>	<p>Consistent: The CAP is responsible for the development of rules and regulations to help the County implement pollution-control measures needed to meet clean-air standards. Consistency with the 2007 CAP would also, therefore, make the proposed project consistent with the Air Quality Attainment Plan for the County.</p>
<p><i>MCP Policy AQ-M-1.3:</i> Air pollution emissions from new development and associated construction activities shall be minimized to the maximum extent feasible. These activities shall be consistent with the Air Quality Attainment Plan and Air Pollution Control District guidelines.</p> <p><i>MCP Development Standard AQ-M-1.3.1:</i> Future project construction in Montecito shall follow all requirements of the APCD and shall institute Best Available Control Technology (BACT) where necessary to reduce emissions below APCD thresholds.</p> <p><i>MCP Development Standard AQ-M-1.3.2:</i> The applicant shall minimize the generation of fugitive dust during construction activities by observing the following: minimize the amount of disturbed area; utilize water and or dust palliatives; and revegetate/stabilize disturbed area as soon as possible.</p>	<p>Consistent: The proposed project would not result in generation of significant long-term operational emissions or air quality impacts to the inhabitants of the proposed fire station. The project would comply with required standard conditions including use of BACT and Best Management Practices (BMP) to ensure that emissions are below the APCD thresholds and fugitive dust during construction is minimized.</p>

BIOLOGICAL RESOURCES	
<p><i>MCP Policy BIO-M-1.2:</i> The following biological resources and habitats shall be identified as environmentally sensitive and shall be protected and preserved to the extent feasible through the ESH overlay: Riparian woodland corridors; Monarch butterfly roosts; sensitive native flora; and, coastal sage scrub.</p> <p><i>MCP Policy BIO-M-1.6:</i> Riparian vegetation shall be protected and restoration of degraded riparian areas shall be encouraged.</p> <p><i>MCP Policy BIO-M-1.8:</i> The minimum buffer strip for development near streams and creek shall be 100 feet in rural areas and 50 feet in urban areas, adjustable on a case-by-case basis.</p>	<p>Consistent: While the drainage channel and associated oak trees along the western boundary of the project site are not designated as ESH, and do not appear to qualify for ESH designation due to lack of habitat continuity with adjacent habitats and the lack of any understory, the project would include measures to protect and improve the potential habitat value provided by the drainage. Project design would preserve all native trees associated with the drainage and would include a minimum 50-foot habitat restoration buffer from the drainage channel to proposed facilities. Additionally, a Habitat Restoration Plan would be implemented. Any non-native naturalized vegetation associated with the drainage on the western portion of the site would be removed during proposed habitat restoration efforts; however, such habitat is minimal and restoration activities over the long-term would benefit soil stabilization and drainage control, and would result in an increase in biological value and function within the drainage channel. The proposed restoration would substantially enhance the habitat qualities of the drainage channel, resulting beneficial impacts and ensuring policy consistency.</p>
<p><i>MCP Policy BIO-M-1.14:</i> Significant biological communities shall not be fragmented into small non-viable pocket areas by development.</p> <p><i>MCP Development Standard BIO-M-1.14.1:</i> In rural areas and where major wildlife corridors are present in urban areas, new development shall not interrupt major wildlife travel corridors within the Community Plan Study Area.</p>	<p>Consistent: The project would result in the conversion of approximately 2.55 acres containing approximately 206 lemon trees. Loss of existing lemon trees on the project site would remove limited roosting and foraging habitat for native or migratory bird and bat species; however, given existing human disturbance associated with ongoing cultivation, the habitat is considered of marginal value. Additionally, the project site is located in the southwestern margin of the approximately 237-acre Rancho San Carlos. Rancho San Carlos extends north into the Santa Ynez foothills towards Romero Canyon and project development would not fragment this contiguous rural, unlit area and associated habitat values. Project development includes approximately 1 acre of landscaping to include native species, particularly coast live oaks and native understory. Given the limited habitat value provided by orchard operations on the site and the proposed restoration and landscaping to include native species, the project meets the intent of the applicable biological resource policies.</p>

MCP Policy BIO-M-1.15: To the maximum extent feasible, specimen trees shall be preserved.

MCP Development Standard BIO-M-1.15.1: All existing specimen trees shall be protected from damage or removal by development to the maximum extent feasible.

MCP Policy BIO-M-1.16: All existing native trees regardless of size that have biological value shall be preserved to the maximum extent feasible.

MCP Development Standard BIO-M-1.16.1: Where native trees of biological value may be impacted by new development, a Tree Protection Plan shall be required.

MCP Policy BIO-M-1.17: Oak trees shall be protected to the maximum extent feasible. Regeneration of oak trees shall be encouraged.

MCP Policy BIO-M-1.19: Oak Woodlands shall be protected as a collective entity, rather than as individual trees, with emphasis on preservation and enhancement.

Land Use Element, HWPP 2: All developments shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited to development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.

Potentially Consistent: An Oak Tree Assessment was prepared for the project site to assess the condition of and potential impacts to oak trees from proposed construction. The project site includes 46 coast live oak trees concentrated linearly along the western drainage channel and East Valley Road. The project has been designed to limit potential impacts to oaks to the greatest extent feasible; however, development of project driveways along East Valley Road would require the removal of three mature oaks, with two of 6-8 inches in diameter and one of 14 inches in diameter, among the smallest specimen trees on the site. In addition, site grading and construction of drainage facilities could also impact oaks. Project design would include planting of numerous oaks within the landscape buffer and habitat restoration areas. In addition, mitigation measure MM BIO-2 requiring implementation of a Tree Protection and Replacement Plan would reduce impacts to oak trees to less than significant, consistent with tree protection policies and standards.

Potentially Consistent: Site grading and development would generally preserve existing native vegetation. Where grading and development would impact native vegetation, the application of mitigation measures to require a Tree Protection and Replacement Plan (MM BIO-2) would make this project potentially consistent with this policy.

CULTURAL RESOURCES	
<p><i>MCP Development Standard CR-M-2.1.1:</i> Prior to the issuance of a Land Use or Coastal Development Permit, Resource Management Department (RMD) shall determine whether the project site is located either in a known archaeological site or in an area with potential archaeological resources... In the event that the site is located in an area which is likely to contain archaeological resources and there has not yet been a Phase I survey of the property, the applicant shall fund preparation of a Phase I survey to be prepared by an RMD-qualified archaeologist... All recommendations of an archaeological report analysis including completion of additional archaeological analysis and/or project redesign shall be implemented or incorporated into the proposed development prior to issuance of a Land Use or Coastal Development Permit.</p>	<p>Consistent: A Phase I Cultural Resources Survey performed for the project site determined that the potential to encounter unknown but potentially significant subsurface prehistoric remains is considered unlikely. Further, the proposed project includes implementation of procedures to follow in the event that prehistoric or historic resources are discovered during project construction (i.e., work would be stopped immediately or redirected until a County qualified archeologist and Native American representative are retained by the applicants to evaluate the significance of the find pursuant to Phase 2 investigations of the County Archaeological Guidelines). Therefore, the proposed project is consistent with this policy.</p>
FIRE PROTECTION	
<p><i>MCP Goals F-M-1 and -2</i> include ensuring that adequate fire protection services are available in High Fire Hazard Areas prior to permitting new development and reducing fire hazards throughout the community. "... if development in the eastern portion of [Montecito] was to continue at higher levels, the [MFPD] might have the need for a new fire station in the eastern area.</p> <p><i>Land Use Element, Land Use Development Policy (LUDP) 4:</i> Prior to the issuance of a development permit, the County shall make the finding... that adequate public or private services... are available to serve the proposed development.</p> <p><u><i>Agricultural Element, Policy IV.B:</i> Because of fire-risk reduction or soil instability, the use of certain slopes for agricultural production may be preferable to leaving the land in its natural state, or allowing non-agricultural development provided that adverse effects are minimized.</u></p>	<p>Consistent: The proposed project goal is to enhance the adequacy and availability of fire protection services for current and future residences residing in the eastern region of the Montecito Community Planning Area, providing an emergency response time addresses and significantly improves the current deficient response rate of 5 minutes. This would consequently result in Zones I through IV meeting the MFPD's goal of compliance with the NFPA Response Time Standard (MFPD 2008) and represents a public benefit with respect to health, safety, and welfare.</p>

GEOLOGIC PROCESSES	
<p><i>MCP Policy GEO-M-1.1:</i> Mountainous watershed areas shall be protected to the maximum extent feasible from development which would interfere with their watershed function and would intensify fire and flood danger.</p> <p><i>MCP Policy GEO-M-1.2:</i> Grading from future ministerial and discretionary projects in Montecito shall be minimized to the extent feasible in order to prevent unsightly scars in the natural topography due to the grading, and to minimize the potential for earth slippage, erosion, and other safety risks.</p> <p><i>Land Use Element, HWPP 1:</i> Plans for development shall minimize cut and fill operations. Plans requiring excessive cutting and filling may be denied if it is determined that the development could be carried out with less alteration of the natural terrain.</p> <p><i>Land Use Element, HWPP 2:</i> All developments shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited to development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.</p>	<p>Consistent: The proposed project is located on a gently sloping site with overall average grade of 7%. Site preparation would include approximately 16,000 cubic yards of cut and 8,000 cy of export, which is the minimum necessary to establish level building pads and paved areas for equipment maneuvering and maintenance. Excavation of undocumented fill and re-compaction of soils within the development area would be performed in compliance with the County’s Grading Ordinance.</p>
<p><i>MCP Policy GEO-M-1.4:</i> Construction within fifty feet of Historically Active and Active Fault traces shall be avoided. The County shall require special engineering features to minimize potential structural damage from fault rupture for any structure which cannot avoid faults.</p>	<p>Consistent: The mapped locations of the Fernald Point and Arroyo Parida Faults are more than 50 feet horizontally from proposed structures on the project site. The 2009 USGS map shows queried (or uncertain) fault locations through or near the site. In order to investigate the potential for occurrence of onsite faults, the MFPD commissioned extensive geologic testing. This testing and follow-up laboratory work revealed no evidence of faults onsite. The results of onsite geologic testing were utilized to locate proposed structures a minimum of 50 feet from any potential fault locations. With incorporation of engineering measures and design standards required by existing regulations, such as the Uniform Building Code, the project would be consistent with applicable geologic processes policies.</p>

<p><i>MCP Policy GEO-M-1.5:</i> Development standards shall be required to decrease the potential for soils or slope hazards.</p>	<p>Potentially Consistent: The potential for project development to occur on unstable soils and result in significant subsidence, landslides, liquefaction, or differential settlement at the project site was determined to be low. Mitigation measure MM GEO-2 requiring implementation of soils engineering design recommendations in the project-specific geotechnical evaluation report would further reduce potential impacts to less than significant. Therefore, the proposed project would maintain consistency with this policy.</p>
<p>LAND USE</p>	
<p><i>MCP Goal LU-M-1:</i> In order to protect the semi-rural quality of life, encourage excellence in architectural and landscape design. Promote area-wide and neighborhood compatibility. Protect residential privacy, public views, and to the maximum extent feasible, private views of the mountains and ocean.</p> <p><i>MCP Goal LU-M-2:</i> Preserve roads as important aesthetic elements that help to define the semi-rural character of the community. Strive to ensure that all development along roads is designed in a manner that does not impinge upon the character of the roadway.</p> <p><i>MCP Policy LU-M-2.1:</i> New structures shall be designed, sited, graded, and landscaped in a manner which minimizes their visibility from public roads.</p> <p><i>MCP Policy LU-M-2.1:</i> Lighting of structures, roads and properties shall be minimized to protect privacy, and to maintain the semi-rural, residential character of the community.</p> <p><i>MCP Goal LUED-M-1:</i> Provide for educational and institutional uses that are harmonious and compatible with the character and fabric of the existing residential community.</p>	<p>Consistent: The proposed project would introduce an institutional use into a residential area. Institutional uses such as schools, churches, retreat centers, or other destinations such as retirement homes with skilled nursing facilities are conditionally permitted in residential zones. In order to reduce or eliminate any potential incompatibilities between the proposed fire station and surrounding uses, the proposed project includes multiple design features and proposed mitigation measures, including use of landscape buffers around the project perimeter, use of dense landscape screening, inclusion of agricultural buffers, oak tree protection and replacement measures, riparian restoration along the site’s western boundary, use of hooded lighting fixtures to reduce the spread of night lighting, and noise restrictions to avoid individual significant impacts. The project has been designed to comply with the compatibility guidelines of the Montecito Design Guidelines and would require MBAR approval, ensuring compliance with land use compatibility policy intent.</p>

<p><i>MCP Policy LUED-M-1.1 and Montecito Design Guidelines Sec. V.C.3.a.:</i> All education, institutional, and other public & quasi-public uses shall be developed and operated in a manner compatible with the community’s residential character.</p> <p><i>MCP Goal LUG-M-1:</i> Comprehensively plan for, and maintain, an ultimate community buildout that is based on the conservation of limited resources. Infrastructure and services planning shall respect the need to preserve the community’s existing quality of life and community character and shall be scaled to accommodate growth provided within the context of the adopted land use maps and this Plan.</p> <p><i>MCP Policy LUG-M-1.1:</i> The County shall recognize that the Montecito Planning Area is a community nearing its full buildout potential, and shall require that development respect its small town, semi-rural character.</p>	
NOISE	
<p><i>Noise Element, Recommended Policy 1:</i> In the planning of land-use, 65 dB Day-Night Average Sound Level should be regarded as the maximum exterior noise exposure compatible with noise-sensitive uses unless noise mitigation features are included in project designs.</p>	<p>Consistent: All long-term exterior noise exposure levels of surrounding residences as well as fire district staff group living quarters would be less than 65 Day-Night Average Sound Level; therefore, the project would be potentially consistent with this policy.</p>
PUBLIC FACILITIES	
<p><i>Land Use Element, LUDP 4:</i> Prior to the issuance of a development permit, the County shall make the finding...that adequate public or private services...are available to serve the proposed development.</p> <p><i>Land Use Element, LUDP 5:</i> Within designated urban areas, new development other than that for agricultural purposes shall be serviced by the appropriate public sewer and water district or an existing mutual water company, if such service is available.</p>	<p>Consistent: The proposed project would not have a significant impact on existing police protection, health care services, or schools, and existing service levels would be sufficient to serve the proposed project. The proposed project would not generate solid waste in excess of County thresholds or cause the need for new or altered sewer system facilities as it is already in the service district, and the District is presumed to have the capacity to serve the minimal needs of the proposed project. As part of the proposed project, the Montecito Water District and Montecito Sanitary District would be contacted to confirm service availability and adequacy. Therefore, the project would be consistent with these policies.</p>

RECREATION	
<p><i>Parks, Recreation, and Trails Map for Carpinteria-Summerland-Montecito (PR-T 2):</i> Easements for trails shall be required as a condition of project approval for that portion of the Proposed On-Road trail traversing the site’s frontage along East Valley Road.</p>	<p>Consistent: As part of the proposed project, a 10-foot wide easement would be offered for dedication along the entire project’s site frontage with East Valley Road to reserve land for the Comprehensive Plan designated Proposed On-Road Trail (Parks, Recreation and Trails Map, PRT-2, Carpinteria-Montecito-Summerland). This offer of dedication maintains consistency with the Comprehensive Plan recreational planning goals and policies.</p>
TRANSPORTATION AND TRAFFIC	
<p><i>MCP Policy CIRC-M-1.6:</i> The minimally acceptable Level of Service (LOS) on roadway segments and intersections in the Montecito Planning Area is "B." Exceptions to this are:</p> <p>Roadways: East Valley Rd/Buena Vista to Sheffield - LOS C is acceptable and Hot Springs & East Valley - LOS C is acceptable.</p> <p><i>MCP Policy CIRC-M-1.4:</i> The County shall strive to permit reasonable development of parcels within the community of Montecito based upon the policies and land use designations adopted in this Community Plan, while maintaining safe roadways and intersections that operate at acceptable levels.</p> <p><i>MCP Policy CIRC-M-3.10:</i> New Major Conditional Use Permits shall be required to demonstrate that the proposed use would not potentially result in traffic levels higher than those anticipated for that parcel by the Community Plan and its associated environmental documents. If higher traffic levels could potentially result from the proposed Major Conditional Use Permit, in order to approve the project, a finding must be made that: the increase in traffic is not large enough to cause the affected roadways and/or intersections to exceed their designated acceptable capacity levels at build-out of the Community Plan, or road improvements included as part of the project description are consistent with the community plan and are adequate to fully offset the identified potential increase in traffic.</p>	<p>Consistent: The proposed project’s 32 new ADT, and 11 A.M. and 3 P.M. peak hour trips would not substantially increase area traffic volumes in relationship to existing flows on East Valley Road or Sheffield Drive. Turning movement volumes are not projected to increase substantially in relation to existing capacity at the intersection of the project driveway and East Valley Road and no other impacts to area intersections are anticipated due to low project traffic volumes. East Valley Road and Sheffield Drive would continue to operate at LOS A, the intersection of East Valley Road and Ortega Ridge Road would continue to operate at LOS A, and the intersections of East Valley Road with Sheffield Drive and Romero Canyon Roads would continue to operate at LOS B with project-added traffic. The proposed project would be consistent with County policies.</p>

<p><i>MCP Policy CIRC-M-3.6:</i> It is the intent of the community to preserve and maintain mature landscaping within the road rights-of-way to the extent that it does not interfere significantly with motorized and non-motorized transportation safety.</p> <p><i>MCP Policy CIRC-M-3.9:</i> The County Public Works Department shall not grant new encroachment permits allowing the installation of structures, fences, walls, landscaping, etc. where the placement of such structures, fences, walls, landscaping, etc. would preclude safe pedestrian access and/or adequate site distance in the public right-of-way.</p>	<p>Consistent: The proposed project would not substantially increase demand for transit, pedestrian or bicycle facilities. The small number of turning movements at the site entrance would not result in a significant increase in risk to bicyclists or pedestrians utilizing the East Valley Road shoulder or proposed on-road shoulder trail. Conflicts between emergency vehicles and bicyclists/pedestrians during turning movements would be especially minimal as the bicyclists/pedestrians would be alerted by the vehicles' sirens. In order to reduce or eliminate any potential impacts associated with transportation safety, the proposed project includes multiple design features to ensure maximum line-of-sight along East Valley Road, including strategic location of driveways, tree removal, and landscape maintenance. Therefore, the project has been designed to comply with transportation safety policies.</p>
<p><i>Caltrans Highway Design Manual (HDM), Chapter 400, Topic 405 – Intersection Design Standards:</i> At design speeds of 50 mph, which is the 85th percentile speed along East Valley Road (ATE 2010), the sight distance standard for stopping is 550 feet (Table 405.1A). This is applicable to Public Road Intersections, a designation chosen over the Private Driveway category in an effort to be conservative with regards to sight distance.</p>	<p>Consistent: The sight distance looking to the west from the western driveway is limited by the overhanging limbs of the oak trees that line the road. The overhanging limbs would be trimmed (and the trimming maintained) to provide adequate sight distance. The project as proposed includes a landscaping and maintenance plan designed to maintain line-of-sight on East Valley Road. Assuming these changes, there would be 900 feet of sight distance looking west to the horizontal curve on East Valley Road at the bridge, and there would be approximately 1,225 feet of sight distance looking east to the vertical curve on East Valley Road. Site distance in both directions substantially exceeds the 550 feet required by the Caltrans standards and maintains consistency with this standard.</p>

WATER RESOURCES, SUPPLY, AND SERVICE

Land Use Element, HWPP 2: All developments shall be designed to fit the site topography, soils, geology, hydrology, and any other existing conditions and be oriented so that grading and other site preparation is kept to an absolute minimum. Natural features, landforms, and native vegetation, such as trees, shall be preserved to the maximum extent feasible. Areas of the site which are not suited to development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.

Land Use Element, HWPP 4: Sediment basins (including debris basins, desilting basins, or silt traps) shall be installed on the project site in conjunction with the initial grading operations and maintained through the development process to remove sediment from runoff waters. All sediment shall be retained on site unless removed to an appropriate dumping location.

Land Use Element, HWPP 5: Temporary vegetation, seeding, mulching, or other suitable stabilization method shall be used to protect soils subject to erosion that have been disturbed during grading or development. All cut and fill slopes shall be stabilized immediately with planting of native grasses and shrubs, appropriate nonnative plants, or with accepted landscaping practices.

Land Use Element, HWPP 7: Degradation of the water quality of groundwater basins, nearby streams, or wetlands shall not result from development of the site. Pollutants, such as chemicals, fuels, lubricants, raw sewage, and other harmful waste, shall not be discharged into or alongside coastal streams or wetlands either during or after construction.

Consistent: The proposed project would be subject to erosion and sedimentation control Best Management Practices (BMPs) during construction, such as avoiding grading during rainy season, installation of sediment basins, use of straw bales or bundles, and other measures that would be included in a Storm Water Pollution Prevention Plan (SWPPP) required by the RWQCB and enforced as part of the County's Grading Permit. Site-specific measures would reduce the occurrence of soil movement during precipitation events and minimize sediment and polluted runoff from entering nearby tributaries and water bodies.

Once operational, the proposed project would comply with regulations requiring, compliance with standard NPDES Industrial Permit requirements, including development of a long-term SWPPP, BMPs, and discharge monitoring. Further, the proposed project has been designed to include water quality engineering controls, such as landscape and habitat restoration buffer areas around the project perimeter, a designated, contained, vehicle/equipment wash area away from sensitive biological resources, a wash area 'rain switch' valve system to allow discharge switch over from the storm drain to the sanitary sewer during vehicle/equipment washing activities, a maintenance bay drainage system tied to a sand and oil separator prior to discharging to the sanitary sewer, and vegetated swales that would allow for uptake of storm water runoff along with the uptake of potential surface water pollutants. Therefore, the proposed project would be consistent with applicable erosion and water quality policies.

Land Use Element, HWWP 6: Provisions shall be made to conduct surface water to storm drains or suitable watercourses to prevent erosion. Drainage devices shall be designed to accommodate increased runoff resulting from modified soil and surface conditions as result of development. Water runoff shall be retained onsite whenever possible to facilitate groundwater recharge.

MCP Policy FD-M-2.1: Development shall be designed to minimize the threat of on-site and downstream flood potential and to allow recharge of the groundwater basin to the maximum extent feasible.

MCP Policy FD-M-4.5: The County shall strive to ensure through public and private projects that adequate drainage is provided to minimize existing community-wide flooding and drainage problems.

MCP Policy WAT-M-1.1: When planning for future water supply, the County shall encourage reasonable, practical, reliable, efficient, and environmentally sound water policies.

MCP Development Standard WAT-M-1.2.1: Landscape plans, where required for development, shall include drip irrigation systems and/ or other water saving irrigation systems.

MCP Policy WAT-M-1.5: When supplemental alternative water sources become available, a buffer of 10 percent between supply and demand should be maintained in reserve for periods of drought condition.

Potentially Consistent: The proposed project would increase impervious surfaces at the project site which would increase runoff. However, consistent with Santa Barbara County's Low Impact Development (LID) policy, the project would incorporate 0.07 acres of permeable paving surfaces in parking areas and would direct most of the site's runoff to vegetated swales at the south of the project site. Further, incorporation of mitigation measure MM WAT-3 requiring a detention basin to reduce peak flows, along with design review of the drainage plan by County Planning and Development (P&D) and Flood Control, would reduce impacts to increased runoff to less than significant. Therefore, the proposed project would be consistent with these policies.

Consistent: The proposed project would result in a reduction of long-term water demand as a result of replacing water-intensive agricultural use with low water uses including a fire station and drought-tolerant landscaping. Therefore, the proposed project would be consistent with water supply policies.

5.0 OTHER CEQA SECTIONS

5.1 IRREVERSIBLE ENVIRONMENTAL IMPACTS

CEQA Guidelines, Section 15126.2(c) requires that irretrievable commitments of resources be evaluated to assure that such current consumption is justified. This includes use of non-renewable resources, the commitment of future generations to similar uses, and irreversible damage which can result from environmental accidents associated with the project.

Construction of new buildings and paved surfaces would involve consumption of building materials and energy, some of which are non-renewable or locally limited natural resources (e.g., fossil fuels and wood). Non-renewable resources utilized for the proposed project could no longer be utilized for other purposes. Consumption of building materials and energy is associated with any development in the region, and these commitments of resources are not unique or unusual to the proposed project. The proposed project would represent an incremental commitment to long-term use of non-renewable resources, particularly fuel for increased automobile use and oil, coal, and natural gas for power generation. In addition, as discussed in Section 3.3, *Air Quality*, use of each of these forms of non-renewable energy would contribute to the generation of GHGs with an incremental contribution to global climate change. Thus while project energy demand and use of non-renewable sources itself would not be significant, the project would also incrementally contribute to resultant secondary impacts to other resources, such as air quality.

Implementation of the proposed project would irreversibly commit 2.5 acres of Prime Soils to development of the fire station and associated paved surfaces. The proposed project would commit future generations to similar uses. The irretrievable commitment of this site for these uses is considered justified given that this site has been zoned as residential by the County, the County approved overriding considerations for that zoning, and the proposed project is a high priority public benefit project.

The proposed project would not be expected to result in environmental accidents that have the potential to cause irreversible damage to the natural or human environment.

5.2 GROWTH-INDUCING IMPACTS

Section 15126.2(d) of the CEQA Guidelines requires a discussion of how the proposed project could foster economic or population growth, or the construction of additional housing, either directly or indirectly, in the surrounding environment. Included in this are projects that would “remove obstacles to population growth.” CEQA Guidelines also state that growth in any area should not be assumed to be necessarily beneficial, detrimental, or of little significance to the environment.

The proposed project could result in growth-inducing impacts due to the improvement of fire service in eastern Montecito. The Montecito Community Plan (MCP) cites the potential need for a new fire station in eastern Montecito if development continued in that area. As discussed in Section 3.10, *Land Use*, emergency response times in many parts of eastern Montecito are in excess of MFPD and National Fire Protection Association (NFPA) guidelines of a 5-minute response time. The MGMO stipulates that properties outside this 5-minute response time area be awarded lower scores during development review. It is assumed that this reduction in review score could potentially limit development in eastern Montecito, albeit incrementally. By providing a new fire station in eastern Montecito, this potential limit to development would be eliminated.

In particular, although no development is currently planned or proposed for the Rancho San Carlos and Featherhill Ranch properties which surround the proposed location of Station 3, construction of a fire station would remove one potential barrier to development of up to 97 new homes on these ranches as permitted under the zoning and land use designations set forth in the MCP. While other regulatory barriers such as the Montecito Growth Management Ordinance (MGMO), provision of adequate public sewer and water service, or the presence of sensitive biological resources could limit or pace eventual growth or development on these ranches, construction of a fire station would incrementally ease future development in the project vicinity.

The proposed project could also result in a potential increase of (10) ten new employees for the MFPD. This increase would be associated with three shifts of three fire fighters per shift and potentially one paramedic working at Station 3. Based upon average household size of approximately 2.4 residents per household, these new employees could generate an increase in population of up to 24 new residents to the South Coast. However, it is currently unknown whether these new emergency personnel would come

from the existing labor pool or in-migrate from another community and increase demand for housing. Anecdotal evidence for recent emergency personnel hires in the area has consisted of employees either already living the community or living in a neighboring community from which they can commute (i.e., Ventura) (MFPD 2011).

In terms of potential increases in housing demand associated with these new employees, demand for housing could increase by as many as 10 new units. Although the County has historically tacked the link between employment growth and housing demand, no current housing demand estimates exists for the link between non-residential development such as Station 3 with increases in housing demand for unincorporated areas of the County of Santa Barbara. Projects such as the proposed fire station, with highly-trained and skilled emergency service workers, have been identified by the County to incrementally contribute to increased demand for housing, particularly affordable housing (Santa Barbara County 2010). However, given a South Coast population in excess of 200,000 residents with over 10,000 in Montecito, a total population increase of up to 24 new residents potentially associated with construction of Station 3 would not be considered as significantly growth inducing. Further, the MFPD has set aside three rental units to help accommodate such additional housing needs. For these reasons, the project's contribution to employment growth and related growth inducement would be less than significant.

5.3 GLOBAL WARMING

Recent state legislation and opinions by the California Attorney General have indicated that CEQA evaluations are to include an assessment of a proposed project's potential to contribute to global climate change (also known as "global warming") impacts. The evaluation of climate change impacts in CEQA documents is a new requirement, and methodologies for conducting such analyses have not been defined at a state or local level. Despite the absence of adopted analysis procedures or thresholds of significance, CEQA requires that Lead Agencies inform decision-makers and the public about potential significant environmental effects of the proposed project.

Global climate change can be measured by changes in wind patterns, storms, precipitation, and temperature. Scientific consensus has identified that human-related emission of greenhouse gases (GHGs) above natural levels is a significant contributor to global climate change. GHGs are substances that trap heat in the atmosphere and

regulate the Earth's temperature, and include water vapor, carbon dioxide (CO₂), methane (CH₄), nitrous oxide (N₂O), ground level ozone, and fluorinated gases, including: chlorofluorocarbons (CFCs), hydrochlorofluorocarbons (HCFCs), and Halons.

Primary activities associated with GHG emissions include transportation, utilities (e.g., power generation and transport), industry/manufacturing, agriculture, and residential. End-use sector sources of GHG emissions in California are as follows: transportation (40.7 percent), electricity generation (22.2 percent), industry (20.5 percent), agriculture and forestry (8.3 percent), and other (8.3 percent) (California Energy Commission 2005). The main sources of increased concentrations of GHGs due to human activity include the combustion of fossil fuels and deforestation (CO₂); livestock and rice paddy farming, land use and wetland depletions, and landfill emissions (CH₄); refrigeration systems and fire suppression systems use and manufacturing (CFCs); and agricultural activities, including the use of fertilizers.

Climate change could potentially affect other resource areas, including hydrologic, economic, and biologic resources. Projected impacts to the region caused by climate change include: decreases in the water quality of surface water bodies, groundwater, and coastal waters; rising sea levels; increased flooding and fire events; declines in aquatic ecosystem health; lowered profitability for water-intensive crops; changes in species and habitat distribution; and impacts to fisheries (California Regional Assessment Group 2002). Construction of a fire station would incrementally improve the community's ability to respond to climate change and related impacts such as wildfires and floods.

As discussed in Section 3.3, *Air Quality*, long-term operation of the proposed project would result in the generation of GHG emissions from vehicle trips and area sources (e.g., use of appliances, landscaping, and heating/cooling) associated with the operation of the fire station. Under the proposed project, operational vehicular and area sources would generate approximately 88.2 tons/year of CO₂ emissions. The generation of GHGs would be relatively minor and the proposed project would incrementally contribute to the challenge of meeting the State's attainment goals of reducing GHG emissions to 1990 levels by the year 2020 as stated in Assembly Bill (AB) 32. Mitigation measures described in Section 3.3 *Air Quality* would further reduce GHG emissions and ensure that project-level impacts are less than significant. In combination with existing GHG emissions, direct emissions from the proposed project would

incrementally add to cumulative GHG emissions. Recent State legislation pertaining to climate change is summarized in Section 3.3 *Air Quality*.

5.4 ECONOMIC AND SOCIAL EFFECTS

Section 15131 (a-c) of the CEQA Guidelines sets forth standards for the assessment of economic or social effects in an EIR and mandates that “economic or social effects of a project shall not be treated as significant effects on the environment.” However, because public concerns have been raised over the potential impacts of a new fire station on property values, in the interest of full disclosure, this EIR provides a brief discussion of issues related to property values. Consistent with the guidance provided in CEQA Section 15131, the following discussion briefly summarizes potential economic issues.

It is widely recognized that certain types of land uses may adversely impact property values and a considerable body of literature exists regarding possible effects of locally undesirable land uses on property values. Such land uses typically include nuclear power plants, hazardous waste facilities, landfills, airports and major industrial facilities. Economic analyses of such effects employ “hedonic” assessment of potential effects of these land uses based on factors including proximity, visibility, and area of potential effects from noise or emissions, and provide for detailed mathematical models to assess potential changes or declines in property values associated with such uses. However, it should be noted that none of the studies or literature reviewed as part of the research for preparation of this EIR identify fire stations as one of these land uses.

In order to determine possible effects of Station 3 on surrounding property values, AMEC staff conducted an initial review of available literature on this issue. Subsequent to AMEC’s initial review, AMEC contracted with Phillips Fractor Gorman, a well-known real estate economics and finance research firm to conduct a more detailed literature search and preliminary analysis. This report concluded that “A broad investigation of academic literature revealed that fire station presence in a neighborhood typically adds to the value of that neighborhood rather than detracting from it” Information from this research is included in Appendix J. Relevant information sources from the initial review included:

- Office of Planning and Research- State Clearinghouse: The state repository for all environmental documents prepared in the state contained no references for

- analysis of the economic effects of fire stations. Three EIRs have been prepared for fire station construction within the state over the last decade; although property value issues were raised as items of concern in at least one EIR, none of these documents analyzed economic effects of station construction.
- CEQAnet Online Document Repository: No relevant documents were available on this website.
 - American Planning Association: A review of all available online studies and publications available did not locate any studies of the effects of fire stations on property values.
 - Urban Lands Institute Document Archives: The Urban Lands Institute is a nationally recognized organization that studies urban planning issues. This organization's document archives contained no relevant documents that addressed the economic effects of fire stations.
 - Google Search: A Google search was performed for links related to economic and property value impacts related to new fire stations. Anecdotal discussions of potential impacts of fire stations on property values exist, including appraisers chat rooms (Appraisers Forum 2009). In addition, a review of public documents indicated that possible effects of fire stations on property values are often raised by neighbors of such projects.

One economic analysis for the impacts of fire a station was located (Portland Development Commission 2004). Conducted in an urban area of Portland, this analysis found that a fire station would have a beneficial effect on property values and noted the following:

“Introduction of a new, full-block development incorporating a fire station that is operated twenty-four hours, seven days per week, Fire Department administrative offices, a museum, and a learning center, as well as offices or housing, and street-level retail can only serve as a stabilizing factor for the study area overall, and the immediately surrounding buildings and businesses in particular. The Blagen Block to the south of the site has been redeveloped for some years and is not close to full occupancy. The Fleischer Building to the west is in much the same situation. Attracting tenants to the area is not considered an easy sell, due to the character of the neighborhood discussed previously; therefore, the addition of a fire station that can serve as a catalyst for neighborhood improvement is seen as particularly positive for existing businesses.

As noted in the case studies for Charlotte, North Carolina and Austin Texas, fire stations in mixed-use areas can prove beneficial for commercial and residential uses alike. Their impact can be particularly positive where the design of the fire station is open and encourages interaction with the surrounding community. The presence of a fire station diminishes concerns about safety and increases the perception of overall protection, thus reducing concerns about risk within the area. As noted earlier, the perception of risk directly impacts both personal and

professional investment in a property or area, and hence directly impacts rental levels and property values.

In each and every case we investigated, a fire station is viewed as a valuable member of its community; property values have continued to increase even with the infrequent inconvenience of sirens or large trucks – the benefit of having the facility close by outweighing any of the acknowledged negatives. Further, in each instance we found fire fighters are integral participants in community activities and considered welcome neighbors.”

Because this study took place in an urban context and the fire station was part of a larger mixed-use redevelopment effort, it may not be directly applicable to construction of a new fire station in the semi-rural context of Montecito.

A summary appraiser’s report was also prepared for the Rancho San Carlos property to assess potential economic impacts of locating Station 3 (Appendix J). The report includes a review and comparison of listed asking prices and actual sales prices as well as inquiries of both listing agents and buyers regarding any concerns about proximity to a fire station. The qualitative evidence from that report is that the proximity to fire stations had no impact on property values.

Potential effects of a new fire station on property values would appear to center on the project’s potential visual compatibility with the community and changes or increases in noise levels. As discussed elsewhere in this EIR (refer to Section 3.1, *Aesthetics*), the design of Station 3 would include substantial landscaping and new buildings would be well setback from East Valley Road. Project design and architecture would be largely consistent visually with surrounding residential uses. Based on this analysis, it does not appear that project design and aesthetic characteristics would have demonstrable negative effects on the neighborhood.

Potential changes in noise levels may also be of concern. As discussed in Section 3.9 *Noise*, Station 3 is projected to have an average of 1.1 emergency responses per day. Exterior/ outdoor siren noise levels during the average of 1.1 responses per day would be in the range of 95 to 100 decibels affecting surrounding residences for 10 seconds. Interior noise levels would be substantially lower. These noise levels would not exceed any adopted local ordinances or thresholds, but would create very short-duration noise impacts. Based on a review of existing literature, it is unclear if such low frequency short-duration nuisance noise would have a demonstrable effect on property values.

However, existing studies indicate that such low frequency short-duration noise becomes part of the accepted environment for surrounding residents.

Finally, it should also be noted that in high fire hazard areas such as Montecito, construction of a new fire station may also have beneficial effects on property values due to enhanced protection provided to area homes. A new fire station may also reduce or stabilize insurance rates in the area, potentially lower cost for area homeowners (ISO Property 1996).

5.5 UNAVOIDABLE SIGNIFICANT ENVIRONMENTAL EFFECTS

CEQA Guidelines, Section 15126.2(b) requires a description of any significant impacts resulting from implementation of a project, including impacts that cannot be mitigated to below a level of significance. The proposed project was evaluated with respect to specific resource areas to determine whether implementation would result in significant adverse impacts. A detailed discussion of each of the impacts can be found in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*.

Specific significance thresholds were defined for each potential impact associated with each resource area. Based on the environmental impact assessment presented in Section 3.0, *Environmental Impact Analysis and Mitigation Measures*, of this EIR, the proposed project's impacts to biological resources, geologic processes, and water resources would be potentially significant. Mitigation measures were developed that would reduce all impacts to less than significant levels. Therefore, the MFPD will not be required to adopt a Statement of Overriding Considerations for the proposed project.

6.0 ALTERNATIVES

6.1 INTRODUCTION

The CEQA Guidelines state that an “EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives” (Section 15126.6).

The CEQA Guidelines state that “the range of alternatives required in an EIR is governed by a rule of reason” that requires the EIR to set forth only those alternatives necessary to permit a reasoned choice. The alternatives shall be limited to ones that would avoid or substantially lessen any of the significant effects of the project. Of those alternatives, the EIR need examine in detail only the ones that the Lead Agency determines could feasibly attain most of the basic objectives of the project (Section 15126.6).

In defining feasibility of alternatives, the CEQA Guidelines state that “among the factors that may be taken into account when addressing the feasibility of alternatives are site suitability, economic viability, availability of infrastructure, general plan consistency, other plans or regulatory limitations, jurisdictional boundaries, and whether the proponent can reasonably acquire, control or otherwise have access to the alternative site” (Section 15126.6).

The alternatives must adequately represent the spectrum of environmental concerns in order to permit a reasonable choice of alternatives. The EIR must provide the rationale for selecting or defining the alternatives, including identifying any alternatives that were considered by the Lead Agency but rejected as infeasible during the scoping process. These alternatives must be prepared at a sufficient level of detail to permit their consideration for adoption by MFPD. When considered with the information contained in the body of this EIR, the analysis contained in these alternatives must adequately characterize the potential associated impacts. However, depending upon the degree of design changes associated with any given alternative, an additional administrative level of environmental review may be required to refine mitigation measures and assess detailed changes in the project description associated with the adoption of one of these alternatives.

The alternatives analysis for this EIR is presented in four major parts. The first section describes the objectives of the MFPD Station 3 Site Acquisition and Construction. The second section summarizes the potentially *significant unavoidable* short- and long-term impacts of the project from information presented in Section 3.0. The third section discusses potential impacts under the project alternatives. The final section concludes with the selection of an environmentally superior alternative, based on the project configuration with the fewest significant impacts while meeting the greatest number of project objectives.

6.2 PROJECT OBJECTIVES

The proposed project includes the following major objectives:

- (1) Improve overall emergency services and response times to fires and emergencies in Montecito, especially in the community's east end.
- (2) Construct a high-quality fire station with modern equipment and facilities, staffed 24 hours per day, 7 days per week by trained personnel, that is architecturally compatible with nearby residences.
- (3) Coordinate throughout the design and environmental review process with concerned neighbors and interested organizations to ensure that the station location and design meet community concerns and standards.
- (4) Site the station to minimize and avoid, as possible, adverse environmental impacts.
- (5) Provide an Essential Public Services Building for the community to provide for resources such as shelter, food, and support of emergency equipment during disasters.

6.3 SUMMARY OF POTENTIALLY SIGNIFICANT UNAVOIDABLE PROJECT IMPACTS

The proposed project would have no potentially significant unavoidable (i.e., unmitigable) impacts.

6.4 ALTERNATIVES ANALYSIS

This section discusses alternatives to the proposed project, including alternatives which were considered and discarded. Each of these considers the ability of a particular alternative to substantially reduce or eliminate the project's significant environmental

impacts while still meeting basic project objectives. The EIR also includes a No-Project Alternative and an analysis of possible alternative sites (named as they were in the Site Identification Study [MFPD 2008]). Alternative sites that were considered for the proposed Station 3 are presented in Table 6-1. These sites were again screened for consideration as potential locations for Station 3 as discussed further below.

Table 6-1. Sites Considered for Further Screening and Analysis

Site	Site Name/ Ownership	Parcel Number	Parcel Size (acres)	Key Constraints	Suitability for Further Analysis
A	Palmer Jackson East/ Palmer G Jackson Trust	155-070- 008	76.9	<ul style="list-style-type: none"> Scattered mature oak trees Prime farmland Minor tributary drainage High speeds on adjacent arterial 	<p>Yes</p> <ul style="list-style-type: none"> Adjacent to arterial Limited constraints Includes proposed project site.
B	Roman Catholic Archdiocese of Bishop (Los Angeles/San Diego)	155-070- 009	1.4	<ul style="list-style-type: none"> Recorded historic Catholic cemetery Small size may not meet MFPD needs High speeds on adjacent arterial Existing mature oak trees Prime farmland 	<p>Yes</p> <ul style="list-style-type: none"> Adjacent to arterial
C	Palmer Jackson West/ Palmer G Jackson Trust	155-070- 012	17.6	<ul style="list-style-type: none"> Adjacent to Romero Creek 100-year floodplain, ESH, and riparian woodland Limited line-of-sight due to Romero Creek bridge High speeds on adjacent arterial Prime farmland 	<p>Yes</p> <ul style="list-style-type: none"> Adjacent to arterial Large parcel size
D	Kimball-Griffith #1/ Kimball- Griffith LP	005-030- 007	29.2	<ul style="list-style-type: none"> Steep slopes and erosion potential Grading and site preparation costs Located on eastern edge of study area Existing oak woodland High speeds on adjacent arterial 	<p>Yes</p> <ul style="list-style-type: none"> Adjacent to arterial Large parcel size
E	Kimball- Griffith #2/ Kimball- Griffith LP	005-030- 003	16.3	<ul style="list-style-type: none"> Steep slopes and erosion potential Grading and site preparation costs Located on eastern edge of study area ESH, oak woodland, and coastal sage scrub High speeds on adjacent arterial 	<p>No</p> <ul style="list-style-type: none"> Lacks direct arterial access Steep slopes Mapped ESH High site development costs

Table 6-1. Sites Considered for Further Screening and Analysis

Site	Site Name/ Ownership	Parcel Number	Parcel Size (acres)	Key Constraints	Suitability for Further Analysis
F	Feather Hill	155-050-014	1.0	<ul style="list-style-type: none"> • Many vicinity driveways are “back out only” • Poor line-of-sight • Both roads are narrow 	<p>No</p> <ul style="list-style-type: none"> • Not adjacent to arterial • Surrounded by residences • Small parcel
G	Stonehouse/680 Stonehouse Lane, LLC	155-060-030	2.0	<ul style="list-style-type: none"> • Proximity to existing residences • Traffic safety and vehicle access on small private lane • Scattered oak trees • Owner unwilling to sell 	<p>No</p> <ul style="list-style-type: none"> • Not adjacent to arterial • Surrounded by residences
H	Birnam Wood/ Birnam Wood Golf Club	007-480-032	2.2	<ul style="list-style-type: none"> • Potential flooding hazards • Existing residence and maintenance facilities • Riparian woodland • Specimen oak trees • Proximity to existing residences • High site development costs 	<p>Yes</p> <ul style="list-style-type: none"> • Best response time of all sites • Adjacent to arterial
I	Upper Sheffield	007-480-016	0.62	<ul style="list-style-type: none"> • Poor line-of-sight • Insufficient parcel size • Mature oak trees • Unnamed creek • One existing residence • Proximity to existing residences 	<p>No</p> <ul style="list-style-type: none"> • Very small parcel • Expensive drainage improvements required • Demolition of residence
J	Klein/Theodore M Klein	007-250-012	14.5	<ul style="list-style-type: none"> • Proximity to ESH • Mature oak trees • Limited frontage with Sheffield Drive • Moderate slopes • Southern edge of study area 	<p>No</p> <ul style="list-style-type: none"> • Undesirable response time • Line-of-sight issues • Turning radius issues
K	Montecito Valley Ranch/Coffin Family Trust	005-060-028 005-060-027	5.3 12.5	<ul style="list-style-type: none"> • Steep slopes/limited developable area • Potentially unstable soils • Proximity to Picay Creek 100-year floodplain, ESH, and oak and riparian woodland • Need for bridge across Picay Creek • Potentially high development costs 	<p>No</p> <ul style="list-style-type: none"> • High development costs • Need to go through intersection to get to arterial • Unsuitable site configuration
L	Pines Trust	005-020-044	14.6	<ul style="list-style-type: none"> • Adjacent to Romero Creek 100-year floodplain, ESH, and riparian woodland • Limited line-of-sight 	<p>Yes</p> <ul style="list-style-type: none"> • Adjacent to arterial • Line-of-sight can be improved

Table 6-1. Sites Considered for Further Screening and Analysis

Site	Site Name/ Ownership	Parcel Number	Parcel Size (acres)	Key Constraints	Suitability for Further Analysis
				<ul style="list-style-type: none"> • Close proximity to existing residence 	
M	Sinser-de Dominic	005-020-051	1.78	<ul style="list-style-type: none"> • Small parcel size • Owner unwilling to sell • Proximity to Picay Creek 100-year floodplain, ESH, and oak and riparian woodland • Riparian woodland • Specimen oak trees 	<p style="text-align: center;">No</p> <ul style="list-style-type: none"> • Small parcel and unsuitable configuration • Expensive drainage improvements required
N	Valley Club	005-020-050	84.55	<ul style="list-style-type: none"> • Limited line-of-sight • Existing portions of golf course would be significantly altered • Proximity to Romero Creek 100-year floodplain, ESH, and riparian woodland • Mature native oaks and Monterey Cypress trees would likely be removed or relocated • Owner unwilling to sell 	<p style="text-align: center;">Yes</p> <ul style="list-style-type: none"> • Adjacent to arterial • Two potential developable locations

ESH – Environmentally Sensitive Habitat
Refer to Figure 6-1 for site locations.

6.4.1 Alternatives Considered but Discarded

As discussed above, Section 15126.6(c) of the CEQA Guidelines requires that an EIR disclose alternatives that were considered and discarded and provide a brief explanation as to why such alternatives were not fully considered in the EIR. In particular, as required by the CEQA Guidelines, the selection of alternatives included a screening process to determine which alternatives could reduce significant effects but also feasibly meet project objectives. The following alternatives were considered but eliminated from further analysis by MFPD due to infeasibility or inconsistency with primary project objectives.

6.4.1.1 Alternative Uses

Several alternative uses could potentially occur under the zoning of the project site (Residential, minimum parcel size 2 acres [2-E-1]). However, review of such alternative uses would not be consistent with the applicant's primary objective of development of a

fire station in eastern Montecito. In addition, a number of these alternative uses would have the potential to increase environmental impacts beyond those anticipated for the proposed project and would therefore be inconsistent with the primary purpose of the alternatives analysis under CEQA, which is to reduce adverse environmental effects. As a result, alternative uses have been dropped from consideration.

6.4.1.2 Alternative Site Configuration

Under this alternative, proposed Station 3 would be constructed at a location on Rancho San Carlos farther set back from East Valley Road, on what is commonly referred to as a “flag lot.” The goal of this flag lot alternative would be to minimize visibility of the new station from East Valley Road and potentially remove sources of noise, light, and glare from existing residences south of the existing project site. This new configuration would incrementally increase response time due to increased driveway length, in conflict with a primary project objective. In addition, a flag lot would not decrease siren noise to residences south of East Valley Road as emergency vehicle sirens would be engaged only at the intersection of the Station 3 driveway with East Valley Road. While a flag lot could incrementally decrease the effects of noise, light, and glare from Station 3 to residences to the south, such reconfiguration would not reduce any potentially significant impacts. Further, while a flag lot would reduce project visibility from East Valley Road, the 60-foot structural setback included in the proposed project design, combined with extensive landscaping and the project’s residential character and single-story design already minimizes visual resource concerns and impacts. Finally, reconfiguration of Station 3 into a flag lot would increase impacts to agricultural resources, until such time as Rancho San Carlos is developed, due to increased loss of prime soils and disruption of ongoing farming associated with locating the fire station and extended driveway in the middle of existing orchards. A flag lot could also increase urban-rural conflicts associated with cultivation and pesticide use as the station would be surrounded on all sides by active agriculture. Therefore, an alternate site configuration using a flag lot was not considered further as an alternative to the proposed project.

6.4.1.3 Alternative Building Scale or Site Design

Under this alternative, the proposed structures associated with Station 3 would be reconfigured or reduced in scale in order to improve visual compatibility with the



Figure 6-1. Potential Sites for Station 3 – Montecito Fire Protection District

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community. This would involve decreasing the total amount of development of the proposed fire station and incrementally increasing the setbacks of structures from East Valley Road. Reductions in building scale and increased setbacks would incrementally reduce changes in the existing visual character of the area associated with construction of the proposed project. However, the proposed site plan already includes a landscape buffer and structural setback of approximately 60 feet along East Valley Road. This setback is larger than those of typical residences located along East Valley Road in the vicinity, which generally include average setbacks of approximately 45 feet (refer to Section 3.1, *Aesthetics*, Table 3.1-1). In addition, proposed project construction would consist of primarily single-story buildings with limited taller elements such as the apparatus bays and hose tower, while four of the six residences that front East Valley Road in the vicinity are of two-story or partial two-story construction. Because of these factors and due to very limited views of the project from surrounding public viewing locations, the EIR does not identify any significant aesthetic impacts associated with project construction. Further, the current design of Station 3 reflects a key MFPD objective to both enhance service in eastern Montecito and provide support facilities for enhanced fire protection services for the community. Therefore, because reductions in building scale or site design would not avoid or substantially reduce project impacts and would interfere with project objectives, this was not considered further as an alternative to the proposed project.

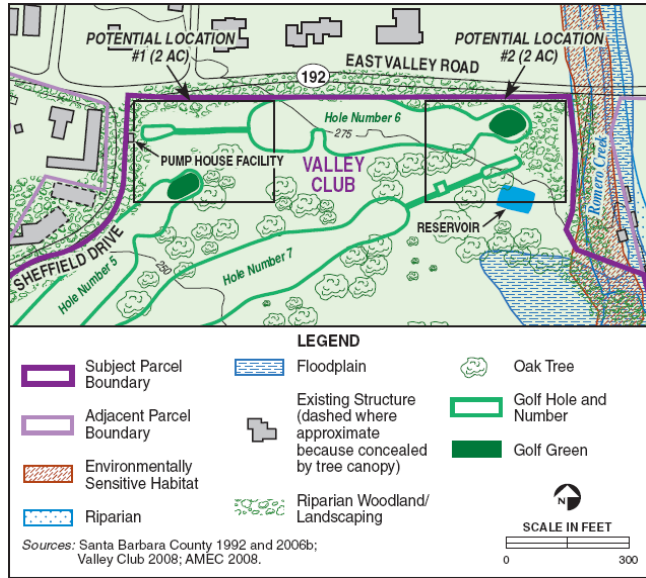
6.4.2 Alternative Locations Determined to Be Unsuitable Upon Further Evaluation

Of the potential alternative fire station sites listed in Table 6-1, seven were carried forward for further screening to determine the ability of these sites to reduce or avoid project impacts while meeting all or most project objectives. Of those seven, three were determined to create similar or substantially more severe impacts than those associated with the proposed project, one of which would also not meet response time objectives as briefly discussed below.

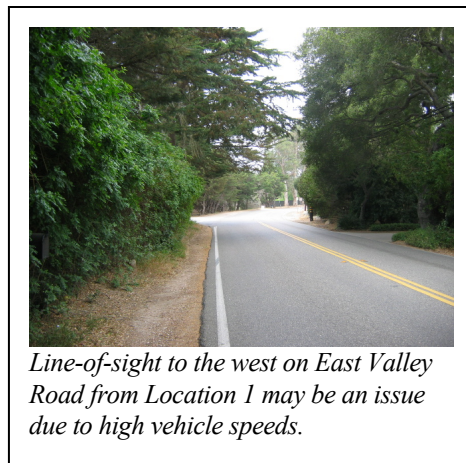
Valley Club Site

Under this alternative, Station 3 would be constructed at one of two possible sites on the Valley Club Golf Course, each of 2 acres located along East Valley Road. Location 1 at the southeast corner of the intersection of East Valley Road and Sheffield Drive would

provide ideal response times due to its location. Location 2 at the east end of the Valley Club’s property immediately adjacent to Romero Creek would require an additional 15 seconds to respond to service calls on upper Bella Vista Drive, but would also provide excellent response times (MFPD 2008). Access for either location would be off East Valley Road¹. Construction of Station 3 at either of the two potential Valley Club locations would potentially create the following impacts:



Transportation and Traffic. Access to either location within this site would be off of East Valley Road. The roadway in this area is lined with dense hedges and mature Monterey Cypress trees. Similarly to the proposed project, access to either site may require removal of mature specimen trees, trimming of other trees and clearing of dense hedges in order to provide clear lines of sight for emergency vehicles exiting the site. Available line-of-sight for emergency vehicle access would vary depending on the final station driveway location. It is estimated that line-of-sight from Location 1 would be more than 500 feet to the east and approximately 275 feet to the west along East Valley Road. Line-of-sight from Location 2 is estimated to be approximately 375 feet to the east due to the Romero Creek Bridge and approximately 425 feet to the west. Line-of-sight from both locations would be adequate based on the posted speed limit of 35 miles per hour (mph) (Caltrans 2010). Although meeting minimum Caltrans standards, available line-of-sight from potential driveways at either location would be substantially less than that available at the proposed project site. Further, actual traffic speeds on East Valley Road can exceed 50



¹ Although Location 1 has frontage on both East Valley Road and Sheffield Drive, access from Sheffield Drive would be problematic due to the proximity to the intersection and poor line-of-sight to the south.

mph, indicating that line-of-sight to the west from Location 1 and to the east from Location 2 may be inadequate, which could create potential traffic safety impacts for use of these sites that are substantially more severe than for the proposed project site.

Biological Resources. The Valley Club is a heavily wooded site with trees lining all road frontages and golf course fairways. Approximately 22 coast live oak trees and 34 mature Monterey Cypress trees are scattered throughout Locations 1 and 2. Many of the oak trees are large specimens with trunk diameters ranging from 24 to 48 inches (MFPD 2008). Construction of two 16- to 26-foot-wide driveways, three buildings, and approximately 0.8 acre of paved parking and apron space could cause damage to or removal of a number of specimen Monterey cypress and oak trees and could create potentially significant impacts to biological and aesthetic resources. Depending upon the degree of tree removal required, this could conflict with Montecito Community Plan (MCP) and Santa Barbara County Comprehensive Plan biological resource protection policies. In addition, Location 2 within this site would be immediately adjacent to the riparian corridor of Romero Creek, which could create the potential for impact to this Environmentally Sensitive Habitat (ESH) area.

Cultural Resources. The Valley Club has the potential to be considered a historic resource because it is almost 80 years old, is largely in its original configuration, and was designed by Dr. Alister MacKenzie, a renowned golf course architect. Although not currently listed as a landmark or place of historical significance by the County of Santa Barbara, the site's age, largely intact features, international recognition, and design by a noted figure in golfing history, indicate a high potential for this site to be identified as an important historical resource. Under Section 15064.5(3), disruption or disturbance to such historic resources may be considered a potentially significant impact. Construction of Station 3 at either Location 1 or 2 on this site would require realignment or reconfiguration of greens and tees associated with two holes, with unknown potential for further redesign in other parts of the golf course. Such reconstruction could impact the historic value of the golf course and could create potentially significant impacts to historic resources which would be substantially more severe than those associated with construction at the proposed project site.

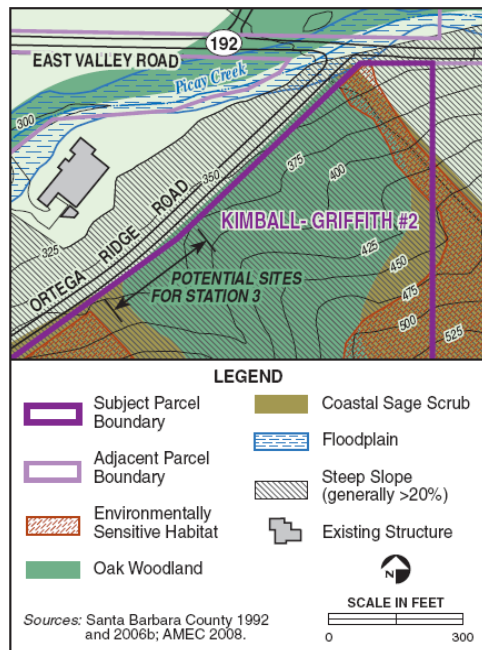
Public Facilities. Both potential locations are traversed by the South Coast Conduit, a major water delivery pipeline for the South Coast of Santa Barbara County. Construction of Station 3 at either location has the potential to disrupt or damage this pipeline and may require special engineering efforts to either protect or relocate this pipeline, as well as

negotiations with the pipeline operator to permit such actions. Thus, construction of Station 3 at either potential Valley Club location may create potentially significant effects to public facilities.

Summary. Construction of Station 3 at either potential Valley Club location would have the potential to create impacts that are substantially more severe than those associated with the proposed project. The current use of this site appears to be integral to the continued operation and preservation of this potentially historic golf course. Construction of Station 3 would require major redesign of the golf course, would severely disrupt golf course operation and has the potential to affect its historic character. In addition, access off East Valley Road from either site would not provide optimal line-of-sight for emergency vehicle access and may create potentially significant safety impacts due to high speeds and somewhat limited line-of-sight at these locations. Further, construction of Station 3 at these locations would require removal of or cause damage to an unknown number of specimen Monterey cypress and coast live oak trees. Finally, Station 3 construction may require costly improvements or engineering solutions related to relocation or protection of the South Coast Conduit that traverses the site. For these reasons, this alternative was eliminated from further consideration.

Kimball Griffith #2 Site

Under this potential alternative, Station 3 would be constructed on a 2 or more-acre portion of this 20-acre parcel. This potential site is located on relatively steep slopes on the east side of Ortega Ridge Road, approximately 0.70 miles east of Sheffield Drive and Romero Canyon Road. This site is currently undeveloped and is characterized by dense oak woodland containing mature coast live oak trees interspersed with coastal sage scrub and areas of chaparral. Slopes onsite generally exceed 20 percent, and two small tributary canyons drain this hillside northwest into Picay Creek. Under this alternative, construction of Station 3 at this site would require extensive



grading to provide level pads for building locations, level apron areas, and driveways. Based on the existing Station 3 site plan, construction of Station 3 would require creation of approximately 1.5 acres of level building pads and paved areas on this steep site.

Fire engines would be required to stop at the intersection of Ortega Ridge Road and East Valley Road before continuing east or west in order to access a major arterial route, increasing response times. Still, this site's location would meet adopted standards to provide service to the majority of the area currently lacking 5-minute response time service, but its location away from the center of the study area is not ideal.

Transportation and Traffic. Ortega Ridge Road is a narrow local roadway which connects eastern Montecito with Summerland and carries approximately 1,100 daily trips near this site (County of Santa Barbara 2010). The site would have an acceptable line-of-sight of more than 500 feet along Ortega Ridge Road in both directions; however, the relatively narrow width of Ortega Ridge Road (21 feet) may require added on-site improvements (e.g., a wider driveway than would otherwise be required for turnout) to facilitate engine access and turning movements. Fire engines would be required to stop at the intersection of Ortega Ridge Road and East Valley Road before proceeding east or west. This two-lane arterial has relatively low traffic volumes and minimal congestion (County of Santa Barbara 2010). Line-of-sight at this intersection is approximately 350 feet to the west due to a slight curve, and approximately 500 feet to the east. Line-of-sight at this intersection would be adequate based on the posted speed limit of 35 mph (Caltrans 2010). However, traffic speeds on East Valley Road can exceed 50 mph. Such high speeds could expose emergency vehicles making turns onto East Valley Road to potential traffic safety hazards. In addition, this more remote location at the edge of the MFPD's service area would incrementally increase response times to portions of the community.

Geologic Hazards. This site is characterized by steep slopes generally in excess of 20 percent and erosion-prone soils. Onsite soils consist of Todos-Lodo Complex (TdF2) with 30 to 50 percent slopes (County of Santa Barbara 2006). Todos-Lodo Complex is identified as having severe constraints for construction, including low strength, severe shrink-swell potential, and a variety of erosion hazards (USDA 1981). Construction of Station 3 at this site would require extensive grading to provide level pads for building locations, level apron areas, and driveways. Based on the existing Station 3 site plan, construction of Station 3 would require creation of approximately 1.5 acres of level building pads and paved areas on this steep site. Grading to create these level pads

would create potentially significant impacts associated with erosion and potential for downstream sedimentation as well as potential for failure of fill slopes. These constraints are substantially more severe than those present at the project site and would require costly engineering measures to create safe and usable level areas and implementation of measures to mitigate these geological hazards. Construction on steep slopes and associated grading may also be potentially in conflict with the County's Comprehensive Plan Hillside and Watershed Protection Policies.

Biological Resources. Coast live oak woodland interspersed with chaparral and coastal sage scrub characterize the vegetation of this potential site. Mapped ESH exists in the southern areas of this site surrounding the potential Station 3 location. However, AMEC's review of the site indicates that oak trees and other intact native habitats are prevalent throughout the site, which may qualify the site for consideration for designation as ESH. Construction of Station 3 on this site would require grading and clearing of 2 acres or more of vegetation as well a clearing or thinning of an addition 1 to 2 acres of vegetation to provide fire safety. Grading and clearing of 2 to 4 acres of oak, chaparral and coastal sage scrub habitats and removal of or damage to an unknown number of oak trees could create potentially significant impacts to biological resources. Hillside grading and related potential for erosion and sedimentation could also impact offsite biological resources such aquatic habitats within downstream portions of Picay Creek. Such impacts would be substantially more severe than those anticipated to occur with construction of Station 3 at the currently proposed project site. Because of these potential impacts, construction of Station 3 at this site may also raise potential conflicts with Santa Barbara County Comprehensive Plan and MCP habitat and oak protection policy issues.

Aesthetics. Under this alternative, construction of Station 3 on this site would require grading and clearing of 2 to 4 acres or more of scenic native vegetation as well as substantial hillside grading. The site is currently visible from a number of public roads, including segments of Romero Canyon and East Valley Roads as well as Ortega Ridge Road. Hillside grading and clearing of oak, chaparral and coastal sage scrub habitats and removal of or damage to an unknown number of oak trees could create potentially significant impacts to community aesthetics through hillside scarring and substantial changes to the existing undisturbed character of this hillside.

Summary. Construction of Station 3 at this site would require substantial grading and vegetation clearing with associated impacts to erosion, native habitats, and aesthetics.

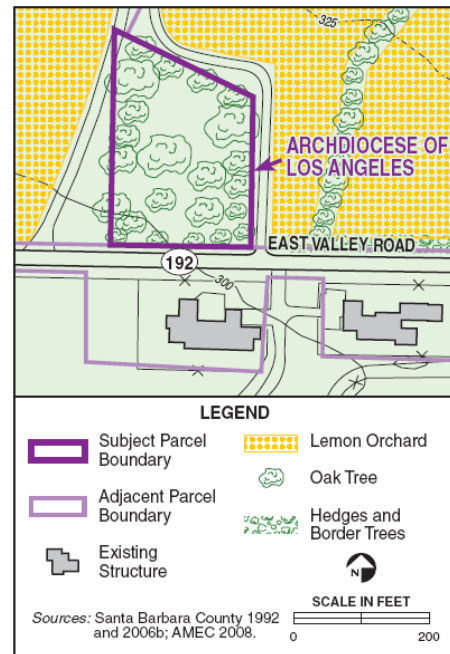
The site's location off a main arterial would increase response times and present potential turning movement hazards for emergency vehicle. Because of the greater impacts of developing this site and increases in response times when compared to the proposed project site, this site was dropped from further consideration.

Archdiocese Site

This site is located on the north (mountain) side of East Valley Road east of Sheffield Drive and Romero Canyon Road and west of Ortega Ridge Road. It can be accessed from an existing driveway on an adjacent parcel off East Valley Road. The site is generally level, slopes gently to the south, and is bordered by lemon orchards. The site is currently vacant, but contains a recorded historic Catholic cemetery. Onsite soils are considered prime farmland and support many coast live oak and other trees.

This site's 1.4-acre size is 0.1 acre less than the recommended minimum of 1.5 acres needed for Station 3, and substantially smaller than the 2.55-acre project site. This relatively small size would reduce flexibility of station placement on the property with regard to building location, driveway alignment, tree protection, equipment storage, buffers from agricultural operations, etc. In addition, under this alternative, construction of Station 3 on this site could potentially require removal of or damage to many of the onsite specimen trees.

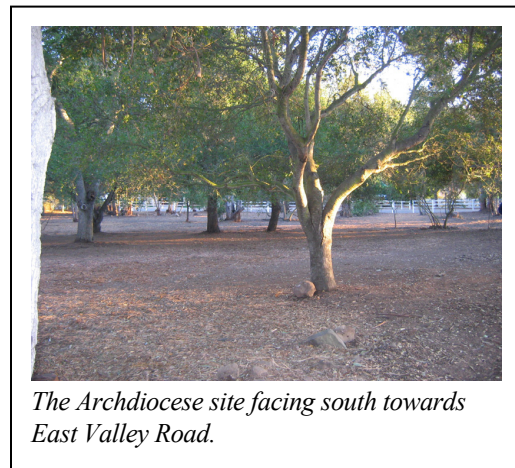
Transportation and Traffic. As with the proposed project, this site's location on East Valley Road would facilitate emergency personnel response to greater Montecito. The site's close proximity to Sheffield Drive and Romero Canyon Road, approximately 0.33 miles to the east, would enable rapid service to areas north and south of East Valley Road. The site has excellent line-of-sight along East Valley Road of more than 500 feet to the east and approximately 480 feet to the west. Line-of-sight at this intersection would be adequate based on the posted speed limit of 35 mph (Caltrans 2010). However, traffic speeds on East Valley Road can exceed 50 mph. Such high speeds could expose emergency vehicles making turns onto East Valley Road to some degree of hazards;



especially from eastbound traffic due to the Romero Creek bridge somewhat limiting sight distance to the west.

Cultural Resources. This site is a recorded historic Catholic cemetery with an unknown number of human burials dating from the late 19th and early 20th centuries. The site's status as an early Catholic cemetery from a historic period of the community indicates a high potential for the presence of burials associated with both early pioneer families as well as Native American Chumash residents. This cemetery would therefore be considered a culturally significant resource. The number and exact location of burials on site is unknown and would require extensive investigation. Adopted County policies strongly discourage development on significant cultural sites and require that project design avoid impacts to such sites. It is unclear if sufficient space is available to accommodate Station 3 and supporting facilities without re-interment or relocation of existing burials. Therefore, construction of Station 3 on the site of an abandoned historic cemetery could create potentially significant and potentially unmitigable impacts to cultural resources which may also raise potential conflicts with the policies of the County's Comprehensive Plan.

Biological Resources. The site supports existing oak woodland with more than 20 oak and a number of other mature trees spread throughout, although understory vegetation is limited due to previous clearing. The site is not designated as ESH. Development of the site with approximately 1.5 acres of new structures and paving would require removal or have the potential to cause damage to the majority of 1 mature coast live oak and other trees on this site. Potential oak removal could also raise



The Archdiocese site facing south towards East Valley Road.

potential conflicts with biological resource protection policies in the MCP and the Santa Barbara County Comprehensive Plan.

Summary. Construction of Station 3 at the Archdiocese site could impact a historic cemetery and create potentially significant and possibly unavoidable impacts to cultural resources. Such impacts could make project approval difficult due to possible conflicts with the adopted cultural resource protection policies of the County's Comprehensive Plan. In addition, due to the small size and wooded nature of this site, this alternative

could also substantially increase tree removal from that anticipated to occur under the proposed project. Because the proposed project could create potentially significant and possibly unavoidable impacts to cultural resources and would have substantially more severe impacts than the proposed project associated with tree removal, this site was dropped from further consideration.

6.4.3 Project Alternatives

Section 15126.6(a) of the CEQA Guidelines states that “an EIR shall describe a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project, and evaluate the comparative merits of the alternatives.” The “basic objectives of the project” are presented in Section 1.2 of this EIR. Section 15126.6(e)(2) of the Guidelines states, “...If the environmentally superior alternative is the “no project” alternative, the EIR shall also identify an environmentally superior alternative among the other alternatives.”

An EIR need not consider every conceivable alternative to a project. Rather it must consider a reasonable range of potentially feasible alternatives that will foster informed decision-making and public participation. An EIR is not required to consider alternatives that are infeasible. The lead agency is responsible for selecting a range of project alternatives for examination and must publicly disclose its reasoning for selecting those alternatives. Section 15126.6(a) of the CEQA Guidelines also states that “there is no ironclad rule governing the nature or scope of the alternatives to be discussed other than the rule of reason.” (Citizens of Goleta Valley v. Board of Supervisors (1990) 52 Cal.3d 553 and Laurel Heights Improvement Association v. Regents of the University of California (1988) 47 Cal.3d 376.)

As required by CEQA, this EIR considers a range of reasonable alternatives to the project, or to the location of the project, which would feasibly attain most of the basic objectives of the project but would avoid or substantially lessen any of the significant effects of the project. Some of these alternatives were identified during scoping or by the Applicant, while others have been developed during EIR preparation. The alternatives selected for analysis include:

- Alternative Location at Kimball-Griffith #1 Site;
- Alternative Location at Birnam Wood Site;
- Alternative Location at Palmer Jackson West Site;

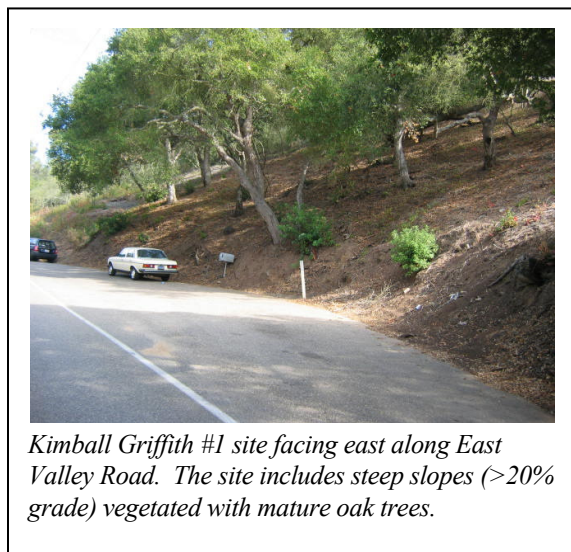
- Alternative Location at Pines Trust Site; and
- the CEQA “No-Project” alternative.

Each alternative consists of a brief description of the alternative itself followed by an analysis of potential impacts and a comparison to those impacts associated with the proposed project. This will permit report reviewers to determine the general significance of impacts (if any) associated with the alternative and their relative severity when compared to those associated with the proposed project. Any substantial new mitigation measures not included in the analysis of project impacts in Section 3.0 are also briefly described.

6.4.3.1 Alternative 1 – Location at Kimball-Griffith #1 Site

Under this alternative, Station 3 would be constructed on a 2 or more-acre portion of this 20-acre parcel located on the south side of East Valley Road, east of Ortega Ridge Road (Figure 6-2). This site slopes relatively steeply upwards from East Valley Road with overall slopes averaging 15 to 25 percent. This parcel is currently undeveloped and is characterized by oak woodland vegetation intermixed with areas of chaparral containing mature coast live oak trees and coastal sage scrub. Under this alternative, construction of Station 3 at this site would require substantial grading and clearing of native vegetation to provide level pads for building locations, level apron areas, and driveways. Based on the existing Station 3 site plan, construction of Station 3 at this site would require creation of approximately 1.5 acres of level building pads and paved areas on this steep site. Level building and paved areas would be surrounded by cut and fill slopes from which vegetation would also be removed.

Transportation and Traffic. This site’s location on East Valley Road, the major east-west arterial serving the study area, would facilitate emergency personnel response to greater Montecito. However, as the eastern-most site under consideration, the site’s location approximately 0.70 miles east of Sheffield Drive and Romero Canyon Road would increase response times to areas north and south of East Valley Road. Still, this site’s



location would meet adopted standards to provide service to the majority of the area currently lacking 5-minute response time service. Line-of-sight for potential driveways at this location is greater than 500 feet in each direction. Line-of-sight at this location would be adequate based on the posted speed limit of 35 mph (Caltrans 2010). However, traffic speeds on East Valley Road can exceed 50 mph, particularly on the long westbound downhill slope fronting this project site. While such high speeds could expose emergency vehicles making turns onto East Valley Road to potential traffic safety hazards, line-of-sight would meet Caltrans standards even for the higher speeds which may exist at this location.

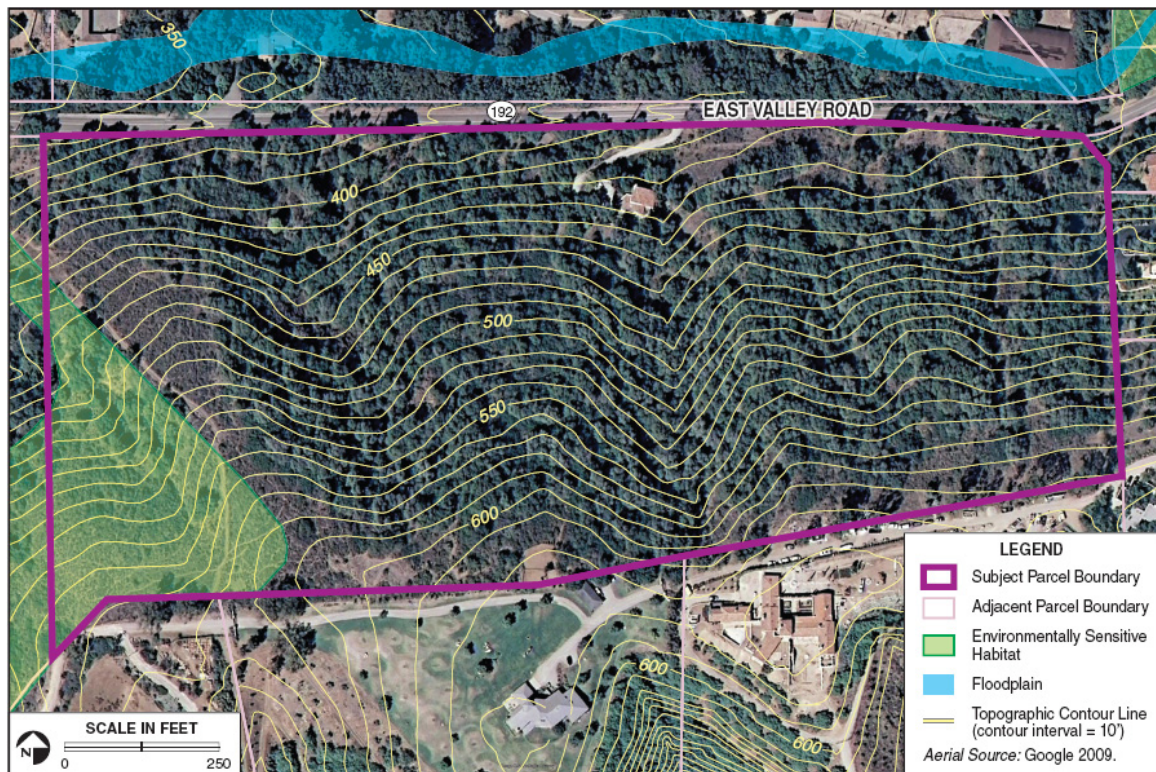


Figure 6-2. Kimball-Griffith #1 Site

Geologic Hazards. This site is characterized by steep slopes generally in excess of 20 percent and erosion-prone soils. On-site soils consist of Ballard Variant (BbC) with 2 to 9 percent slopes immediately fronting East Valley Road, and Todos-Lodo Complex (TdF2) with 30 to 50 percent slopes over the majority of the site (County of Santa Barbara 2006). Todos-Lodo Complex is identified as having severe constraints for construction, including low strength, severe shrink-swell potential, and a variety of erosion hazards (USDA 1981). Construction of Station 3 at this site would require extensive grading to provide level pads for building locations, level apron areas, and

driveways. Based on the existing Station 3 site plan, construction of Station 3 would require creation of approximately 1.5 acres of level building pads and paved areas on this steep site. Grading to create these level pads would create potentially significant impacts associated with erosion and potential for downstream sedimentation as well as potential for failure of fill slopes. It is unknown if this grading would be balanced onsite, or require export of fill. However, given the large amount of grading, export of fill is probable.

These constraints are substantially more severe than those present at the project site and would require costly engineering measures to create safe and usable level areas and implementation of measures to mitigate these geological hazards. Extensive grading on areas in excess of 20 percent slopes and the clearing of large areas of native vegetation would raise substantial conflicts with County Hillside and Watershed Protection, Visual Resource, Environmental Resource Management Element, and MCP biological resource protection policies. Development of Station 3 at this site would have substantially greater impacts to geologic processes than the proposed project, and would require mitigation to reduce impacts to less than significant.

Air Quality. The amount of grading required to prepare this site for construction would result in substantial generation of fugitive dust, as compared to the proposed project. This may present a significant impact that would require mitigation.

Biological Resources. Coast live oak woodland interspersed with chaparral and coastal sage scrub characterize the vegetation of this potential site. Mapped ESH exists in the southwest portion of this site. In addition, AMEC's review of the site indicates that oak trees and other intact native habitats are prevalent throughout the site which may qualify the site for consideration for designation as ESH. Construction of Station 3 on this site would require grading and clearing of 2 acres or more of vegetation as well a clearing or thinning of an additional 1 to 2 acres vegetation to provide for fire safety. Grading and clearing of 2 to 4 acres of oak, chaparral, and coastal sage scrub habitats, and removal of or damage to an unknown number of oak trees could create potentially significant impacts to biological resources. Hillside grading and related potential for erosion and sedimentation could also impact offsite biological resources such as aquatic habitats within downstream portions of Picay Creek. Such impacts would be substantially more severe than those anticipated to occur with construction of Station 3 at the currently proposed project site. Because of these potential impacts, construction of Station 3 at this

site may also raise potential conflicts with Santa Barbara County Comprehensive Plan and MCP habitat and oak protection policy issues.

Noise. No residences are located in the immediate vicinity of the Kimball Griffith #1 site. This would limit the exposure of residents to nuisance noise from fire trucks leaving the proposed Station 3. However, residences located along East Valley Road and other area roads would still be exposed to nuisance noise from fire trucks traveling to calls. Impacts from noise resulting from development and operation of Station 3 at this site would be less than for the proposed project, and would be less than significant.

Aesthetics. Under this alternative, construction of Station 3 on this site would require grading and clearing of 2 to 4 acres or more of scenic native vegetation as well as substantial hillside grading. The site is currently visible from limited portions of public roads, including segments of Romero Canyon and East Valley Roads. Although site visibility appears to be somewhat limited, extensive hillside grading and clearing of oak, chaparral, and coastal sage scrub habitats, and removal of or damage to an unknown number of oak trees could create potentially significant impacts to community aesthetics through hillside scarring and substantial changes to the existing undisturbed character of this hillside.

Summary. Construction of Station 3 at this site would require substantial grading and vegetation clearing with associated impacts to erosion, downstream sedimentation and onsite native habitats, and aesthetics. Although this site would provide direct access to an arterial, its location at the eastern end of the community would result in longer response times as compared to the proposed project. Overall, the impacts of developing station 3 at this site to geological hazards and biological and aesthetic resources would be substantially more severe than those associated with the proposed project. In addition, response times would incrementally increase when compared to the proposed project site.

6.4.3.2 Alternative 2 – Location at Birnam Wood Site

This 2.22-acre site is located within the Birnam Wood Golf Club at the corner of Sheffield Drive and East Valley Road and is developed with over 10,000 square feet (sf) of golf course maintenance buildings and supporting facilities, including the grounds supervisor's single-family residence (Figure 6-3).

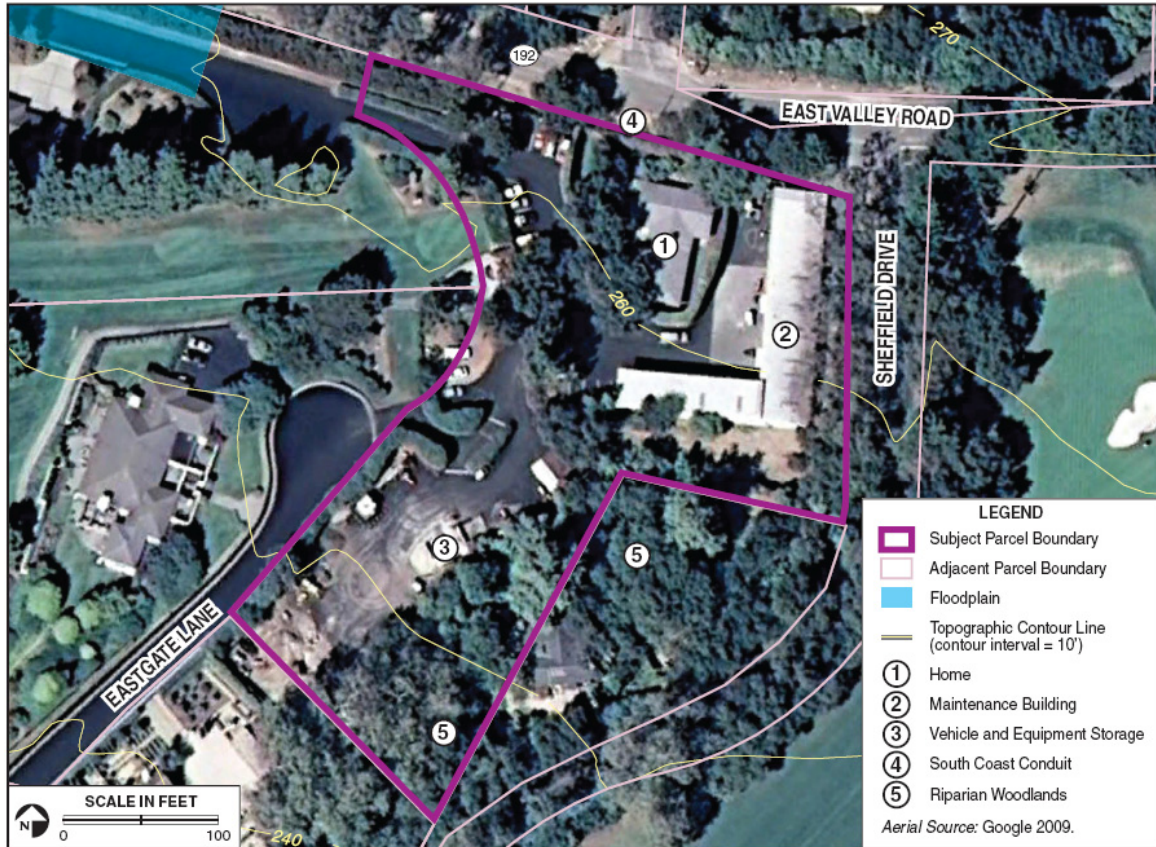


Figure 6-3. Birnam Wood Site

The site slopes gently to the south to an intermittent drainage in the site’s southeast corner. Many large trees, including native oaks and sycamores are located on site. A floodwall along East Valley Road acts as a barrier to sheet flow and sediment transport during extreme rain events.

Under this alternative, the existing single-family residence and 10,000 sf of maintenance building and outdoor storage facilities would be demolished and/ or relocated to a new, yet undisclosed location within Birnam Wood. Key constraint and design issues that may affect development of this site include the presence of over a dozen specimen coast live oak trees throughout currently developed area, the location of a spring fed riparian woodland and a remnant creek channel within and adjacent to the



The Birnam Wood site supports a large number of specimen oak trees which ~~can~~ could be damaged or need to be removed to accommodate development of Station 3.

southeast portions of the site and the presence of the South Coast Conduit, a major regional water delivery line, which runs along the northern site boundary. Additional secondary consideration may include potential costs and indirect impacts of relocating the existing maintenance facilities to another location within Birnam Wood.



A densely vegetated creek channel is located within the southeast portion of the Birnam Wood site and would be disturbed by development of Station 3.

Transportation and Traffic. This site at the corner of Sheffield Drive and East Valley Road is an ideal location for Station 3 and would optimize emergency personnel response to greater Montecito. If access were directly onto East Valley Road (opposite Romero Canyon Road), movement would be facilitated in either direction along this main arterial. However, direct access to East Valley Road would require breaching the existing solid concrete block wall which protects the site from flood hazards, and crossing the South Coast Conduit, a 30-inch diameter high pressure regional water supply pipeline that runs along the site's northern boundary. Driveway design would require investigation of engineering solutions to maintain site protection provided by the existing floodwall as a 30-foot-wide driveway gap in this wall could expose Station 3 to flood damage. This access would also need to be designed to protect the South Coast Conduit, a major water supply pipeline. If access on East Valley Road were aligned with Romero Canyon Road, line-of-sight would be more than 500 feet in each direction along East Valley Road. Line-of-sight at this location would be adequate based on the posted speed limit of 35 mph (Caltrans 2010). Actual vehicular speeds along this segment are generally lower than segments further to the east. With appropriate design modifications to provide access via East Valley Road, development of Station 3 at this site would have less than significant impacts to transportation and traffic.

Flooding. Birnam Wood Golf Club has submitted testimony that this site is subject to flooding, including sediment flows accumulating on the northeast side of the floodwall. A review of County maps and flooding information showed that this site is approximately 100 feet from the Buena Vista Creek floodplain.



Site as seen from East Valley Road opposite Sheffield Drive, including floodwall surrounding property.

However, the source of flooding on the site could be breakout from Buena Vista Creek, sheet flow down Romero Canyon Road, or overflow from local drainages. The existing floodwall along East Valley Road appears to protect the site from these existing flood hazards. Development of the site, particularly with regard to the floodwall, would require further investigation to determine the extent of and potential mitigation for flood-related hazards. Impacts to hydrology and flooding from development of this site would be somewhat greater than for the proposed project, and would be considered potentially significant until final flood protection wall-design issues are resolved.

Biological Resources. This site is almost fully developed; however, more than 12 specimen coast live oaks are present throughout developed portions of the site. Some coast live oaks as large as 36 to 48 inches in trunk diameter are scattered throughout the property. In addition, the intermittent creek shared with the adjacent property southeast of the site supports a large grove of mature multi-trunk California sycamore trees, many 40 to 60 feet in height. Demolition of existing structures, removal of paving and other facilities along with development of approximately 12,500 sf of new structures and surrounding paving and driveways for Station 3 could potentially lead to damage to or removal of a number of mature coast live oaks and other specimen trees. In addition, Station 3 would be developed immediately adjacent to the riparian woodland located within and adjacent to the southeastern portions of this site, potentially impacting that habitat area. Removal of or damage to specimen oak trees and the riparian woodlands could create potential conflicts with MCP biological resource protection policies. Depending upon final station design, impacts to biological resources would appear to be substantially more severe than those for proposed project due to potential impacts to scattered mature oaks across the site and to riparian woodlands. Required mitigation measures, including restoration, tree protection, and/ or replacement could likely reduce such impacts to less than significant; however such measures, such as setbacks from riparian areas, may limit development potential of this site.

Geologic Processes: Regional geologic maps depict the southwest-trending Fernald Point Fault that splays off the Arroyo Parida as running east of this site, and the Mission Ridge/Arroyo Parida/More Ranch Fault (MRIAP Fault) as being located north of this site (Figure 3.7-1; see also Appendix G). Given that existing regional geologic maps depict the Fernald Point Fault as located east of this site and the Arroyo Parida Fault as located north of this site, geologic impacts would be considered as potentially significant. Such impacts would be considered as potentially significant as precise fault locations are unknown. Regional faulting is complex in the vicinity of this site, with several fault

traces possible; therefore, geologic testing similar to that performed for the proposed project, including potentially both boring and trenching, is highly likely to be required for this essential public services building to further refine this analysis (Steve Campbell, Registered Geologist, 3/19/2012).

In addition to seismic hazards, development of this site may also require grading and potentially importation of fill in order to raise this site up to avoid flood hazards and to fill in lower lying areas of the southern part of the site. However, precise amounts of required fill have not been determined. Given potential exposure to seismic hazards and the need for grading on this site, impacts of Geologic Processes would be similar to the proposed project.

Noise. Three existing residences are located within 100 feet of this site's boundary, which is one more than is located within 100 feet of the proposed project site. However, approximately 12 residences are located within 450 feet of this site, substantially more than exist near the proposed project site. Under this alternative, these residences would be exposed to an increased level of short-duration nuisance noise from emergency vehicles exiting the site onto East Valley Road. However, as with the proposed project, the short duration and limited occurrences of such increased nuisance noise, although incrementally greater than for the proposed project, would be less than significant.

Public Facilities. The northern boundary of this site is traversed by the South Coast Conduit, a major water delivery pipeline for the South Coast of Santa Barbara County. Construction of Station 3 at this location has the potential to disrupt or damage this pipeline and may require special engineering efforts to protect this pipeline as well as negotiations with the pipeline operator to permit such actions. Thus, construction of Station 3 at this site may create potentially significant effects on public facilities which may require engineering solutions.

Summary. Site acquisition would be costly due to required demolition and relocation of more than 10,000 sf of Birnam Wood Golf Club's existing maintenance facilities. In addition, this relocation could create unknown potential impacts at the selected new site for these facilities. Access to East Valley Road would require potentially expensive



The potential site is currently used for Birnam Wood Golf Club maintenance facilities.

engineering to protect the South Coast Conduit, and address potential flooding issues as reported by the site owner. Project construction would create potentially significant impacts to biological resources through removal of specimen oak trees and damage to onsite and adjacent riparian areas. County policies may require that all structures be setback a minimum of 50 feet from the onsite riparian area, substantially limiting the development potential of the southern half of the site. ~~Mitigation measures required to protect these resources may limit developable area on this site.~~

6.4.3.3 Alternative 3 – Location at Palmer Jackson West Site

This 17.58-acre site is located on the north (mountain) side of East Valley Road east of Sheffield Drive and west of Ortega Ridge Road (Figure 6-4). The site borders to the east a shared driveway that leads to residences. The site for Station 3 would potentially be located at the southern-most portion of this property, along the parcel's frontage with East Valley Road. The site where Station 3 might be constructed is mostly level and slopes gently to the south, surrounded by agricultural or undeveloped land. The parcel has extensive frontage along East Valley Road (approximately 400 feet) and is part of Rancho San Carlos. Romero Creek runs north-south immediately adjacent to the western edge of the property.



The Palmer Jackson West site is currently cultivated with lemon orchards, similar to the proposed project site.

Transportation and Traffic. This site would be superior to the proposed project site in terms of response time, as it would be closer to the center of the response area and would still be located along East Valley Road. Line-of-sight to the west along East Valley Road is moderately obstructed by the Romero Creek Bridge, located approximately 213 feet from the site. Traffic speeds on East Valley Road frequently exceed 50 mph which may require installation of a warning signal or other methods to permit safe emergency vehicle access. According to the Highway Design Manual, line-of-sight to the east would be inadequate based on the posted speed limit of 35 mph (Caltrans 2010); however, this matter would require further investigation as it is possible that due to their elevation above the road, fire trucks would have adequate line-of-sight.

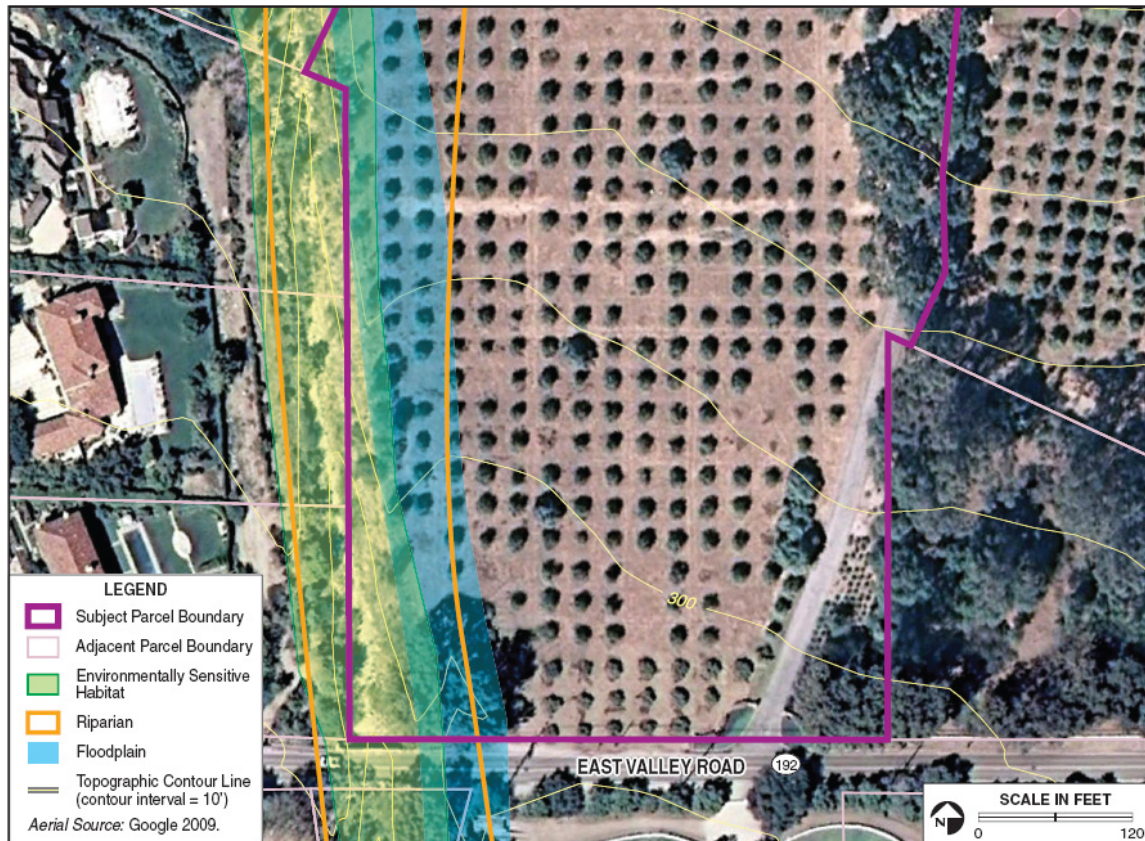


Figure 6-4. Palmer Jackson West Site

Flooding. Romero Creek drains to the south along the western property boundary. However, the site would allow for Station 3 to be ideally located outside the creek’s 100-year floodplain and setback at least 50 feet from the top of the stream bank. Therefore, impacts to flooding from developing Station 3 at this site would be less than significant.

Biological Resources. Similar to the proposed project site, Palmer Jackson West has historically been used for lemon orchards. The only remaining specimen coast live oaks in the vicinity of the potential station location along East Valley Road exist on the corners of the property, to the southwest and southeast. It is not expected that these would be removed for project construction, but there is a potential that line-of-sight issues (see *Transportation and Traffic* above) would necessitate removal of one or more of the trees to the southwest, similar to the proposed project. Required mitigation measures, including restoration and tree protection and/ or replacement would reduce impacts to less than significant.

Geologic Processes: Regional geologic maps depict the southwest-trending Fernald Point Fault that splays off the Arroyo Parida as passing near this site, and the Mission

Ridge/Arroyo Parida/More Ranch Fault (MRIAP Fault) as being located just north of this site (Figure 3.7-1; see also Appendix G). However, extensive geologic testing failed to locate either fault on the proposed Station 3 site, leaving the precise location of these faults unknown. Given that existing regional geologic maps depict both these faults in close proximity to this site, geologic impacts would be considered as potentially significant. Such impacts would be considered as similar to those for the proposed project site. Extensive geologic testing would be required to further refine this analysis.

Noise. Four existing residences are located within 100 feet of the site where Station 3 could be constructed, which is two more than are located within 100 feet of the proposed project site. However, approximately 10 residences are located within 450 feet of this site, substantially more than exist proximate to the proposed project site. Under this alternative, these residences would be exposed to an increased level of short-duration nuisance noise from emergency vehicles exiting the site onto East Valley Road, as well as short-term noise from construction. However, as with the proposed project, the short duration and limited occurrences of such increased nuisance noise and construction noise, although incrementally greater than for the proposed project, would be less than significant.

Aesthetics. Unlike the proposed project site, the frontage of the Palmer Jackson West site is mostly devoid of trees to screen the proposed Station 3 structures. Therefore, development at this site would have greater impacts to aesthetics than the proposed project. However, the frontage would still be limited to approximately 200 feet, resulting in a maximum visual exposure to passing vehicles of approximately 4 seconds. Further, project design features such as setbacks, walls, and landscaping could reduce any visual impacts, and impacts would remain less than significant.

Summary. Impacts associated with development of Station 3 on this site are very similar to those identified for the proposed project. Greater proximity to residences would result in greater impacts from nuisance noise; however, impacts would be still be less than significant and concentrated along the East Valley Road arterial. Inferior line-of-sight to the west as compared to the proposed project could result in greater impacts to transportation; however, this may not be a major issue due to the height of the fire trucks and their resultant vantage point. The lack of screening from trees along the project frontage would increase impacts to aesthetics, but these impacts could be reduced to less than significant. In summary, some impacts would be incrementally greater than for the proposed project.

6.4.3.4 Alternative 4 – Location at Pines Trust Site

This site is located on East Valley Road east of Romero Canyon Road and Sheffield Drive and west of Ortega Ridge Road. Romero Creek runs along the western edge and Picay Creek runs along the southern boundary of the property. The potential location of Station 3 would be along the western portion of the parcel. The site currently contains one single-family residence and horse facilities and is bound by East Valley Road to the north, Ortega Ridge Road and undeveloped areas to the south, the Valley Club Golf Course to the east, and an existing residence to the west (Figure 6-5). Even with creek setbacks, there would be ample room for the facilities that would be associated with Station 3.

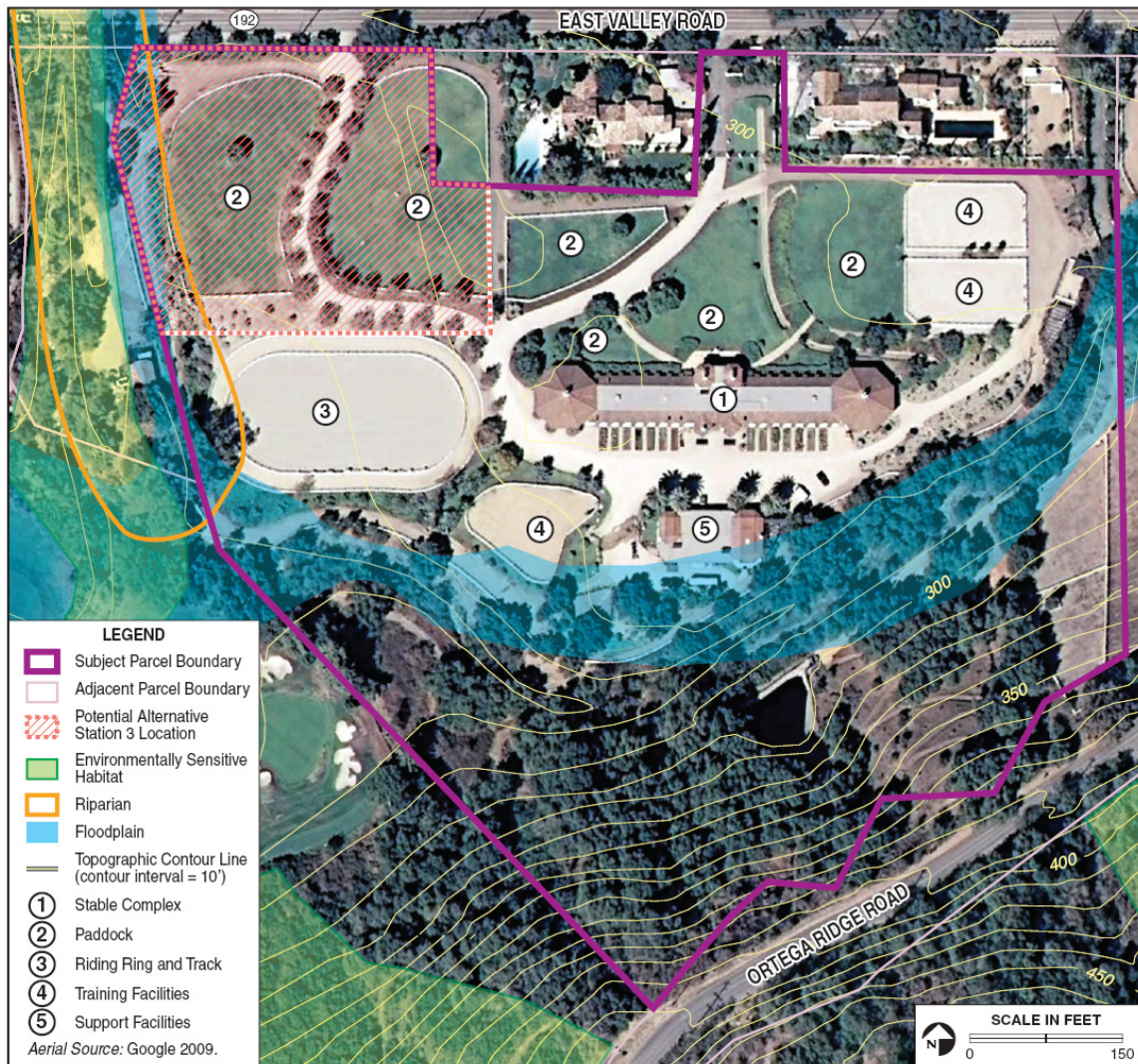


Figure 6-5. Pines Trust Site

This site's location on East Valley Road would facilitate emergency personnel response to greater Montecito. The site's close proximity to Romero Canyon Road and Sheffield Drive, approximately 0.28 miles to the east, would also enable rapid service to areas north and south of East Valley Road.

Traffic and Transportation. This site has an excellent line-of-sight of more than 500 feet to the east. However, line-of-sight to the west is slightly impeded by the Romero Creek Bridge and is approximately 264 feet. Observations indicate traffic speeds along this main arterial frequently exceed 50 mph, which may require installation of a warning signal or other methods to permit safe emergency vehicle access. Line-of-sight to the east would be inadequate based on the posted speed limit of 35 mph (Caltrans 2010); however, this matter would require further investigation as it is possible that due to their elevation above the road, fire trucks would have adequate line-of-sight. Impacts to transportation would be somewhat greater than for the proposed project, and may require mitigation to improve safety related to line-of-sight.

Flooding. Romero Creek runs along the western boundary and Picay Creek runs along the southern portion of the site. However, the western portion of the site along East Valley Road that could be utilized by Station 3 is located outside of the floodplains. Station 3 and any improvements would need to be located a minimum of 50 feet from the top of the bank of Romero Creek. Impacts to hydrology and flooding would be similar to the proposed project, and would still be less than significant.

Biological Resources. The site's western boundary with Romero Creek contains designated ESH (County of Santa Barbara 2006). There is also oak woodland in the southern portion of the site. However, the area under consideration for Station 3 consists of irrigated pasture of low biological value. Station 3 and any improvements would need to be located a minimum of 50 feet from the top of the bank of Romero Creek. Impacts to biological resources would be similar to the proposed project, and would be less than significant with mitigation.

Geologic Processes: Regional geologic maps depict the southwest-trending Fernald Point Fault that splays off the Arroyo Parida as running through this site, and the Mission Ridge/Arroyo Parida/More Ranch Fault (MRIAP Fault) as being located north of this site (Figure 3.7-1). However, extensive geologic testing failed to locate either fault on the proposed Station 3 site, leaving the precise location of these faults unknown. Given that existing regional geologic maps depict the Fernald Point Fault as crossing the Pines Trust site and the Arroyo Parida Fault as located north of this site, geologic impacts would be

considered as potentially significant. Such impacts would be considered as potentially more severe than those for the proposed project site as the mapped fault trace actually crosses this site (although its precise location is unknown). Extensive geologic testing similar to that performed for the proposed project, including potentially both boring and trenching, would be required to further refine this analysis.

Agricultural Resources. On-site soils are considered prime farmland by the County because they are used for irrigated pasture to support horses (MFPD 2008). However, the relatively small amount of prime soils that would be developed for Station 3 is unlikely to be considered a major environmental or policy issue by the County. Impacts to agricultural resources would be similar to the proposed project, and would be less than significant.

Noise. There are two single-family residences immediately east of the potential location for Station 3, and one residence onsite. Other neighboring residences are within 300 feet across East Valley Road to the northwest on Stonehouse Lane. Because of these adjacent residences, construction and operation of Station 3 on this site would have greater nuisance noise impacts than the proposed project, but would remain less than significant.

Summary. The most significant issues with potential development of Station 3 on this site would be its close proximity to the existing residences on the property, the disruption of the site's existing access driveway, and the effect of loss of irrigated pasture on the existing equestrian uses onsite. In addition, line of sight to the east may be inhibited by the Romero Creek Bridge. Generally, constraints are similar to those encountered on the proposed project site.

6.4.3.5 No-Project Alternative

Section 15126.6(e) of the CEQA explains the No-Project Alternative as:

“...the circumstance under which the project does not proceed. Here the discussion would compare the environmental effects of the property remaining in its existing state against environmental effects which would occur if the project is approved.”

Continuation of the existing site conditions (e.g., light agriculture) would generate no impacts to aesthetics and visual resources, agricultural resources, air quality, biological resources, cultural resources, geologic processes, hazardous materials, land use, noise, recreation, transportation and traffic, or water and flooding. However, not constructing a

fire station would result in continued exceedance of the 5-minute response time standard in eastern Montecito, resulting in impacts to fire protection.

6.5 IDENTIFICATION OF ENVIRONMENTALLY SUPERIOR ALTERNATIVE

Table 6-2 summarizes the environmental advantages and disadvantages associated with the proposed project and the analyzed alternatives. Section 15126.6 of the CEQA Guidelines states that if the environmentally superior alternative is the No-Project Alternative, the EIR shall also identify an environmentally superior alternative from amongst the other alternatives. In evaluating alternatives, different weights may be assigned to the relative importance of specific environmental impacts. Based on the analysis in this EIR, the proposed project was identified as the environmentally superior alternative.

Table 6-2. Impact Comparison of Alternatives to the Proposed Project

	Alternative 1 – Kimball Griffith #1	Alternative 2 – Birnam Wood	Alternative 3 – Palmer Jackson West	Alternative 4 – Pines Trust	No Project
Aesthetics and Visual Resources	Substantially More	Similar <u>Somewhat Less</u>	Somewhat More	Similar	None
Agricultural Resources	Somewhat Less	Substantially Less	Similar	Somewhat Less	None
Air Quality	Substantially More	Similar	Similar	Similar	None
Biological Resources	Substantially More	Somewhat <u>Substantially More</u>	Similar <u>Somewhat Less</u>	Similar	None
Cultural Resources	Similar	Similar	Similar	Similar	None
Fire Protection	<u>Somewhat Less</u> (Beneficial) Similar	<u>Somewhat More</u> (Beneficial) Similar	Similar	Similar	Somewhat More
Geologic Processes	Substantially More	Similar	Similar	Similar	None
Hazardous Materials	Similar	Similar	Similar	Similar	None
Land Use	Similar	Similar	Similar	Similar	None
Noise	Somewhat Less	Similar <u>Somewhat More</u>	Somewhat More	Similar <u>Somewhat More</u>	None
Recreation	Similar	Somewhat More	Similar	Similar	None
Transportation and Traffic	Similar	<u>Somewhat Less</u> Similar	Somewhat More	<u>Somewhat More</u> Similar	None
Water and Flooding	Somewhat More	Somewhat More	Similar	Similar	None
All Project Objectives Met	Yes <u>No</u>	Yes <u>No</u>	Yes	No	No

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7.0 COMMENTS AND RESPONSES TO COMMENTS ON DRAFT EIR

Copies of all written comments received during the public review period, as well as copies of the transcripts of the January 17, 2012 and February 21, 2012 MFPD Board hearings on the Draft EIR and Recirculated Draft EIR are provided in this section.

Responses to these comments have been prepared to address the environmental concerns raised by the commenters and to indicate where and how the EIR addresses relevant environmental issues. Changes made to the text of the Draft EIR to correct or clarify information are noted in the EIR using underlined text to show revised or additional text, and by striking out text proposed for deletion.

The following agencies and individuals commented on the Draft EIR, either by written correspondence or by testimony at the MFPD Board public hearings. Copies of the letters received are marked up to identify the individual comments within each letter; codes listed next to each comment correspond to the comment response that follows after the letter. Responses to comments are keyed to the written comment using an abbreviation for the commenting agency or individual, as shown below.

Federal, State, and Local Agencies

PD	Santa Barbara County Planning and Development
PW	Santa Barbara County Public Works
FD	Santa Barbara County Fire Department
CT	California Department of Transportation
CDFG	California Department of Fish and Game
APCD	Santa Barbara County Air Pollution Control District

Individual Comments

JCI	Joseph Cole, Attorney for Pines Trust, Letter Dated February 6, 2012
JCII	Joseph Cole, Attorney for Pines Trust, Letter Dated March 9, 2012
BR	Brian Reekie

Public Hearings Comments

January 17, 2012 (Draft EIR hearing)
February 21, 2012 (recirculated Draft EIR hearing)

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Edmund G. Brown Jr.
Governor

STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Ken Alex
Director

February 3, 2012

Kevin Wallace
Montecito Fire Protection District
595 San Ysidro Road
Santa Barbara, CA 93108

Subject: Fire Station 3 Site Acquisition and Construction
SCH#: 2011031094

Dear Kevin Wallace:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on February 2, 2012, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Scott Morgan
Director, State Clearinghouse

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STATE OF CALIFORNIA

GOVERNOR'S OFFICE of PLANNING AND RESEARCH



EDMUND G. BROWN JR.
GOVERNOR

KEN ALEX
DIRECTOR

March 26, 2012

Kevin Wallace
Montecito Fire Protection District
595 San Ysidro Road
Santa Barbara, CA 93108

Subject: Fire Station 3 Site Acquisition and Construction
SCH#: 2011031094

Dear Kevin Wallace:

The State Clearinghouse submitted the above named Supplemental EIR to selected state agencies for review. On the enclosed Document Details Report please note that the Clearinghouse has listed the state agencies that reviewed your document. The review period closed on March 23, 2012, and the comments from the responding agency (ies) is (are) enclosed. If this comment package is not in order, please notify the State Clearinghouse immediately. Please refer to the project's ten-digit State Clearinghouse number in future correspondence so that we may respond promptly.

Please note that Section 21104(c) of the California Public Resources Code states that:

"A responsible or other public agency shall only make substantive comments regarding those activities involved in a project which are within an area of expertise of the agency or which are required to be carried out or approved by the agency. Those comments shall be supported by specific documentation."

These comments are forwarded for use in preparing your final environmental document. Should you need more information or clarification of the enclosed comments, we recommend that you contact the commenting agency directly.

This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act. Please contact the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process.

Sincerely,

Scott Morgan
Director, State Clearinghouse

Enclosures

cc: Resources Agency

1400 10th Street P.O. Box 3044 Sacramento, California 95812-3044
(916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

**Document Details Report
State Clearinghouse Data Base**

SCH# 2011031094
Project Title Fire Station 3 Site Acquisition and Construction
Lead Agency Montecito Fire Protection District

Type EIR Draft EIR
Description MFPD proposes acquisition of property and development of a District Fire station. Structures would include a main building containing the apparatus bay, offices and living quarters, and two supporting structures. Infrastructure would include approximately 0.78 acres of non-structural paved surfaces, including two entry/exit driveways to East Valley Road. The western driveway would typically be used only for visitors and staff vehicle ingress and egress, while the eastern driveway would typically be used for staff vehicle and emergency vehicle ingress and egress. Grading would include approximately 16,500 cubic yards (cy) of cut and approximately 15,500 cy of fill; all grading would be balanced onsite. The project would require approval of a Major Conditional Use Permit and a Parcel Map Waiver, and issuance of a Certificate of Compliance.

Lead Agency Contact

Name Kevin Wallace
Agency Montecito Fire Protection District
Phone 805 969-7762 **Fax**
email
Address 595 San Ysidro Road
City Santa Barbara **State** CA **Zip** 93108

Project Location

County Santa Barbara
City
Region
Lat / Long 34° 26' 12.37" N / 119° 35' 38.42" W
Cross Streets East Valley Road/Ortega Ridge Road
Parcel No. 155-070-008
Township **Range** **Section** **Base**

Proximity to:

Highways Hwy 192
Airports
Railways UPRR
Waterways Pacific Ocean
Schools
Land Use Present Land Use: Lemon Orchards. Zoning: 2-E-1, Estate Residential

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Biological Resources; Drainage/Absorption; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Noise; Public Services; Soil Erosion/Compaction/Grading; Toxic/Hazardous; Traffic/Circulation; Water Quality; Water Supply; Wetland/Riparian; Landuse; Cumulative Effects

Reviewing Agencies Resources Agency; California Coastal Commission; Department of Conservation; Department of Fish and Game, Region 5; Cal Fire; Office of Historic Preservation; Department of Parks and Recreation; Office of Emergency Management Agency, California; California Highway Patrol; Caltrans, District 5; Regional Water Quality Control Board, Region 3; Department of Toxic Substances Control; Native American Heritage Commission; Public Utilities Commission

Date Received 12/20/2011 **Start of Review** 12/20/2011 **End of Review** 02/02/2012

County Of Santa Barbara

Chandra L. Wallar
County Executive Officer



105 East Anapamu Street, Suite 406
Santa Barbara, California 93101
805-568-3400 • Fax 805-568-3414
www.countyofsb.org

Executive Office

March 6, 2012

Mr. Dan Gira, Project Manager
AMEC Earth & Environmental
104 West Anapamu St., Suite 204A
Santa Barbara, CA 93101

Fax: 805-966-1706
Email: daniel.gira@amec.com

RE: Draft/Recirculated Environmental Impact Report (EIR) - Montecito Fire Protection District Fire Station 3

Dear Mr. Gira:

Thank you for the opportunity to comment on Draft/Recirculated Environmental Impact Report (EIR) for Fire Station 3. At this time, the County submits comments from the Planning and Development Department, Fire Department, and Public Works Department. Please note the Public Works Department is providing a copy of their April 19, 2011, Notice of Preparation comment letter, which includes comments that are currently relevant for the Draft/Recirculated EIR.

The County looks forward to continued dialogue on the Fire Station 3 project. If you should have further questions, please do not hesitate to contact my office directly or Glenn Russell, Director, Planning and Development Department, at 805-568-2085.

Sincerely,

Chandra L. Wallar
County Executive Officer

Cc: Glenn Russell, Director, Planning and Development Department
Scott McGolpin, Director, Public Works Department
Richard Todd, Division Chief/Fire Marshal, Fire Department
Brett Stewart, Senior Development Engineering Manager

Enclosures: Planning and Development Department letter, February 29, 2012
Fire Department letter, February 24, 2012
Public Works Department letter, April 19, 2011

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County of Santa Barbara Planning and Development

Glenn S. Russell, Ph.D., Director

Dianne Black, Director of Development Services

Jeff Hunt, Director of Long Range Planning



February 29, 2012

Dan Gira, Project Manager
AMEC Earth & Environmental
104 West Anapamu St., Suite 204A
Santa Barbara, CA 93101

RE: Draft/Recirculated Environmental Impact Report-Montecito Fire Protection District Fire Station 3

Dear Mr. Gira:

Thank you for the opportunity to comment on the Draft/Recirculated Environmental Impact Report (EIR) for Fire Station 3. The Planning and Development Department submits the following for your consideration:

General Comments

Section 3.3.3.5 Air Quality Cumulative Impacts

Please include in the greenhouse gas (GHG) analysis a discussion of the County interim GHG guidelines, which is based on the thresholds of significance emissions developed and proposed by the Bay Area Air Quality Management District (BAAQMD). The Interim GHG Guidelines and Interim Criteria Supporting Evidence (Santa Barbara County Planning and Development, June 2010) are attached for your reference.

PD-1

Section 3.10.1.2 Existing Conditions, Transit, Bicycle, and Pedestrian Facilities

This Section states, "Sheffield Drive is proposed in the MCP as a Class III Bikeway from North Jameson Lane to East Valley Road..." The Santa Barbara County Bicycle Master Plan (2005), Map 2-1, identifies this area as a Class II Bikeway. This information should be corrected in the EIR.

PD-2

Section 3.11 Water Resources, Supply, and Service

The EIR concludes that the project would have beneficial impacts to water consumption. However, specific impacts to the MWD municipal water supply from a reduction in water use (i.e., from the existing lemon orchard's estimated 3.0 AFY to the project's estimated 1.4 AFY) are unclear since the MWD contribution to the existing agricultural use is not quantified in the EIR. If the data is available, estimates of existing MWD and private well water consumption should be disclosed in the EIR.

PD-3

The County looks forward to continued dialogue on Fire Station 3 and future projects. If you should have further questions, please do not hesitate to contact my office directly, or Jeff Hunt, Director of Long Range Planning Division, at (805) 568-2072.

Sincerely,

A handwritten signature in black ink, appearing to read "Glenn Russell". The signature is fluid and cursive, with a long horizontal stroke at the end.

Glenn Russell, Ph.D.
Director, Planning and Development Department

cc: Jeff Hunt, Director, Long Range Planning Division

Enclosures: Santa Barbara County Interim GHG Guidelines
Santa Barbara County Interim Criteria Supporting Evidence

County of Santa Barbara Planning and Development (PD)

- PD-1 Comment incorporated. A discussion of the County's Interim Procedures for Evaluating GHG Emissions has been incorporated into Sections 3.3.3.1 (Thresholds of Significance) and 3.3.3.5.
- PD-2 Comment incorporated. Text has been amended to note that the Santa Barbara County Bicycle Master Plan identifies Sheffield Drive from North Jameson Lane to East Valley Road as a Class II Bikeway.
- PD-3 Comment noted. However, it is not possible to clearly disaggregate the percentage of Montecito Water District or well water used to irrigate the 2.55 acre site's orchards. Discussion with Laura Menahen, Montecito Water District (MWD) Engineering Assistant confirmed that the Rancho San Carlos has seven MWD water meters, with that water used across the Ranches' six existing Assessors Parcels; however, MWD water use specific to the project site is not available as the site is a small portion of APN 155-070-008 which currently has approximately 60 acres of irrigated orchards. Further, water from individual meters appears to be used across parcel boundaries, further complicating tracking. In addition, because the applicant also utilizes both well water and stream diversions to irrigate onsite orchards, precise tracking of the water source used to irrigate the project site's orchards is further complicated. Nonetheless, all of the site's existing water sources are either directly from the MWD or a key MWD water supply source (i.e., groundwater) or from a source which is indirectly linked to groundwater supply through its role in recharging the Montecito Groundwater Basin (i.e., stream diversions). Section 3.11.1.7 has been revised to incorporate this clarification.

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COUNTY OF SANTA BARBARA
PUBLIC WORKS DEPARTMENT
123 East Anapamu Street
Santa Barbara, CA 93101
805\568-3000 FAX 805\568-3019



SCOTT D. MCGOLPIN
Director

March 6, 2012

Mr. Dan Gira, Project Manager
AMEC Earth & Environmental, Inc.
104 W. Anapamu St., Ste 204A
Santa Barbara, CA 93101

Re: Montecito Fire Protection District Station 3 DEIR

Dear Mr. Gira,

We have reviewed the above referenced document regarding the proposed Fire Station. The comments offered in our letter of April 18, 2011 regarding the IS/EIR NOP for this project have largely been addressed; however, we still have the following concerns:

1. More information/explanation is still needed concerning treatment of storm water to meet the County's NPDES-permitted requirements for water quality. For example, the bioswales don't appear to provide 10 minutes of contact time and there is no detail how the outlet structure will control releases. Given this, we cannot determine whether the treatment provided is consistent with the County's standard conditions needed to meet the NPDES permit requirements. The EIR should provide a description of treatment in enough detail to conclude "no significant water quality impacts". PW-1

2. Page 3.11-8 should state the County's NPDES Municipal General Permit requirements for *new development* (LID, source-control/pollution prevention, and treatment-control measures for 85th percentile storm event - from Attachment 4 of the Municipal General Permit). The EIR includes the construction program and LID, and also appropriately addresses the wash bay that diverts to sanitary in the absence of rain, but lacks detail on the treatment control. PW-2

3. Assuming Fire Stations are subject to the Industrial General Permit, reference to the Permit (page 3.11-13) indicates a SWPPP for long-term operation would include "implementation of BMPs and discharge monitoring". These measures should be explained on Page 3.11-14. PW-3

AA /EEO Employer

Page 2.
Mr. Dan Gira
March 6, 2012

4. Page 3.11-14: Again assuming that this project is subject to the Industrial General Permit, this paragraph should be revised to state that the project is subject to all three NPDES permits: the Construction, Industrial, and Municipal General Permits. The Construction General Permit addresses construction-phase measures whereas the Industrial General Permit and Municipal General Permit both address post-construction or long-term operation measures. The paragraph incorrectly refers to "procuring" the NPDES permit. The permits apply and the project needs to be consistent with the general permits in order to be approved.

PW-4

Thank you for the opportunity to comment on this document.

Sincerely,



Bret A. Stewart, P.E.
Senior Development Engineering Manager

County of Santa Barbara Public Works Department (PW)

PW-1 Thank you for your comment. Given existing mitigation measures and the small project size, the project's impacts to water quality are unlikely to be significant. However, in order to demonstrate compliance with County standards, additional details have been incorporated into Section 3.11.3.4 to provide further clarification of the storm water detention basin and swale. County *Standard Conditions for Project Plan Approval- Water Quality BMPs* require: "The length of flow in the swale should be a minimum of 100 feet or the bioswale should provide 10 minutes of contact time with the vegetation." The southerly vegetated swale is designed to be 105 feet long at no greater than two percent slope, which would meet County standard conditions.

To further ensure that the project meets water quality standards, text has been added to Mitigation Measure *MM-WAT-2* that would require the addition of a vegetated swale of approximately 130 feet in length, 5 feet width and 1 foot in depth approximately in the western portion of the site that would parallel the existing drainage channel and filter water flowing towards the proposed detention basin. This swale would be vegetated with native species only and incorporated into the habitat restoration plan for this area. With regard to the detention basin outlet structure, *MM-WAT-2* has been modified to require a fossil filter, which would further clarify water runoff in compliance with County standards.

PW-2 Comment incorporated on page 3.11-8. Refer to response to comment PW-1 regarding additional water quality treatment control details.

PW-3 Comment noted and incorporated. Section 3.11.3.4, Standard Regulatory Conditions, Mitigation Measure *MM-WAT-1* states: *...Compliance with the General Permit includes the preparation of a Storm Water Pollution Prevention Plan (SWPPP), which is required to identify potential pollutant sources that may affect the quality of discharges to storm water, and includes design and placement of Best Management Practices (BMPs) to effectively prohibit the entry of pollutants from the project site into area water bodies during construction. This measure represents a standard County condition of approval for a project and would likely be required by the County as part of permit approval process.*

State and County guidelines and regulations require development of BMPs during the SWPPP process. Therefore, for the purposes of CEQA, all BMPs specific to project development and implementation are not required to be developed during the EIR process, as this can be duplicative and/or conflict with future BMPs developed during the SWPPP process. However, the EIR has included several BMPs into project design and Mitigation Measures, such as:

- Page 3.11-12: Avoidance of grading during the rainy season and episodic rain events
- Page 3.11-12: Incorporating drainage system elements into site design
- Page 3.11-12: Incorporation of a detention swale and basin and flow-through facilities in compliance with County *Standard Conditions for Project Plan Approval- Water Quality BMPs*

- Page 3.11-12: Use of straw bales during construction

PW-4

Comment incorporated. Text has been modified in *MM-WAT-2* to note that: *“The applicant would be required to apply for and be consistent with all National Pollution Discharge Elimination System (NPDES) permits that apply, which could include Construction and Municipal General Permits. These permits would be consistent with all requirements of the federal Clean Water Act.*



Fire Department

"Serving the community since 1926"

Michael W. Dyer
Fire Chief
County Fire Warden

Christian J. Hahn
Deputy Fire Chief

HEADQUARTERS

4410 Cathedral Oaks Road
Santa Barbara, CA 93110-1042
(805) 681-5500 FAX: (805) 681-5563

February 24, 2012

Montecito Fire Protection District
Attention: Chief Kevin Wallace
595 San Ysidro Road
Santa Barbara, CA 93108

Dear Chief Wallace:

SUBJECT: Montecito Fire Protection District Fire Station 3 Site Acquisition and Construction

FD-1

The above project is located within the County Fire Department's Hazardous Material Unit jurisdiction.

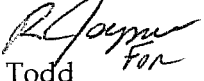
GENERAL NOTICE

1. Stop work immediately and contact the County Fire Department, Hazardous Materials Unit if visual contamination or chemical odors are detected while implementing the approved work at this site. Resumption of work requires approval of the HMU, 805-686-8170.

Please notify the Fire Prevention Division of any changes to the project proposal. Further intensification of use or change in the project description may require additional review.

As always, if you have any questions or require further information, please call 805-681-5523 or 805-681-5500.

In the interest of life and fire safety,


Richard Todd
Division Chief/Fire Marshal

RJ: mkb

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County of Santa Barbara Fire Department (FD)

FD-1 Thank you for your comment. MFPD and its contractors will adhere to all regulations regarding handling of hazardous materials and site contamination, and would notify HMU in the event of chemical odors or visual evidence of site contamination.

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DEPARTMENT OF TRANSPORTATION

50 HIGUERA STREET
 SAN LUIS OBISPO, CA 93401-5415
 PHONE (805) 549-3101
 FAX (805) 549-3329
 TDD (805) 549-3259
<http://www.dot.ca.gov/dist05/>



*Flex your power!
 Be energy efficient!*

January 26, 2012

Chief Kevin Wallace
 Montecito Fire Protection District
 595 San Ysidro Road
 Santa Barbara, CA 93108

SB 192 - pm11.14

Subject: Fire Station 3 Draft Environmental Impact Report

Dear Chief Wallace:

Thank you for the opportunity to review the Draft Environmental Impact Report (DEIR). These comments will center on three items: hydraulics, foliage & sight distance, and traffic operations.

1. Hydraulics: As discussed within the DEIR, a completed drainage analysis is not anticipated until after the project is approved. This completed analysis will be required in order for Caltrans to proceed upon any encroachment permit application. The analysis will need to include pre- and post-development calculations for a 100-year storm event and complete treatment of swales and detention basins to be incorporated into the site design. At postmile 11.1 there is a 3' cross-culvert on SR 192. Caltrans has no net increase policy for development oriented effects. The hydraulic analysis will need to demonstrate what, if any effects occur at this culvert. If additional flow is unavoidable at this location, the analysis must discuss whether the culvert requires upsizing.

CT-1

2. Foliage & site distance: The DEIR discusses removal and trimming of trees located along SR 192. Caltrans is supportive of this action. With respect to removing oak trees which are located within Caltrans right-of-way, the minimum replacement ratio of 10:1 is acceptable. The replacement planting upon the subject project's property is an acceptable location for mitigation planting. This action will improve clear recovery area and sight distance at the proposed driveways.

CT-2

The permittee is responsible to maintain all facilities they construct. If landscaping is allowed in the State's right of way under Encroachment Permit, then the permittee is responsible to maintain said landscaping in perpetuity.

3. Traffic operations: The proposed location of the project driveways, in concept, is supported. Specific details for driveway design and be found in Appendix J of the Caltrans Encroachment Permit Manual. This can be found at [http://www.dot.ca.gov/hq/traffops/developserv/permits/pdf/manual/Appendix_J_\(WEB\).pdf](http://www.dot.ca.gov/hq/traffops/developserv/permits/pdf/manual/Appendix_J_(WEB).pdf).

CT-3

The western driveway is proposed to be 16' wide. For two-way traffic as discussed within the DEIR (basically passenger vehicle uses), the driveway connection onto SR 192 is required to be 20' minimum (see Topic 205.3 Highway Design Manual).

The eastern driveway is proposed to be 26' wide. This may be adequate. During the encroachment permit review, truck turning templates will be required to ensure that the intersection will adequately accommodate the Station's anticipated vehicles.

CT-3

The eastern driveway is proposed to be directly opposite an existing driveway. This is a correctly proposed alignment. Because a proportionately higher number of accidents occur at driveway intersections, driveways should not be located within the functional area of an intersection or in the influence area of an adjacent driveway (American Association of State Highway & Transportation Officials (AASHTO)). This means that connections to a highway (driveways, private roads, public roads) which are on opposite sides of that highway should be either directly opposite, or, located in such a way that respective vehicle movements from the driveways do not adversely influence the other. That is to say, offset driveways are not recommended, nor, given the feasibility of the proposed site layout (figure 2-2), would Caltrans support an encroachment permit with offset driveways.

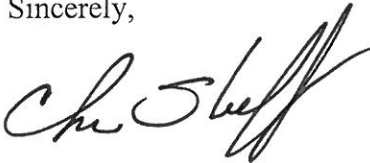
CT-4

4. Caltrans Encroachment Permit: At the earliest convenience, the proponent should make application for a permit. The application and guidance for a permit can be obtained at <http://www.dot.ca.gov/hq/traffops/developserv/permits/>. Subsequent conditions or requirements for permit approval is at the discretion of Permit Engineer, and nothing in this correspondence should be construed as limiting those conditions or requirements.

CT-5

Thank you again for the opportunity to comment upon the DEIR. If there are questions pertaining to this correspondence, please call me at (805) 549-3632.

Sincerely,



Chris Shaeffer
Development Review
Caltrans District 5

c: L. Newland, CT
D. Gira, AMEC

California Department of Transportation (CT)

Thank you for your comments. Please see specific responses below.

- CT-1 Comment noted. Please also see revised drainage analysis contained in Section 3.11.
- CT-2 Comment noted. Please refer to Section 3.4.3.3 which contains a requirement for replanting of native oaks. The MFPD will adhere to accepted standards for replanting and will maintain landscaping and other facilities that the MFPD installs in Caltrans ROW.
- CT-3 Comment noted. The MFPD will work with Caltrans regarding driveway widths and other ROW issues as part of final project design and during the encroachment permit process.
- CT-4 Comment noted. The MPPD has attempted to comply with Caltrans recommended design standards for location of the eastern project driveway.
- CT-5 Comment noted. The MFPD will seek an encroachment permit from Caltrans at the earliest practicable time.

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State of California -The Natural Resources Agency

DEPARTMENT OF FISH AND GAME

South Coast Region
3883 Ruffin Road
San Diego, CA 92123
(858) 487-4201
<http://www.dfg.ca.gov>

EDMUND G. BROWN JR., Governor

CHARLTON H. BONHAM, Director



March 19, 2012

Kevin Wallace, Fire Chief
Montecito Fire Protection District
595 San Ysidro Road
Santa Barbara, CA 93108
Fax No.: (805) 969-3598

**Subject: Draft Supplemental Environmental Impact Report for the Station 3 Site
Acquisition and Construction Project, SCH # 2011031094, Santa Barbara County**

Dear Mr. Wallace:

The Department of Fish and Game (Department), has reviewed the Draft Supplemental Environmental Impact Report (DSEIR) for impacts to biological resources. The Montecito Fire Protection District (MFPD) proposes to acquire a 2.55-acre site and to construct a new fire station in the unincorporated community of Montecito in the County of Santa Barbara (County). The proposed project would include development of a main fire station building and two support structures. Supporting infrastructure would include construction of paved driveways, parking and circulation space, and connections to potable water and sewer. The project also includes landscape buffers, a habitat restoration area, bioswales, a stormwater detention basin, and an offer for dedication of an easement to the County to reserve land for a proposed on-road trail. The project site is located at 2500 East Valley Road, on the north side of East Valley Road, east of Sheffield Drive and Romero Canyon Road, and west of Ortega Ridge Road.

The habitat type with the potential to be impacted by the project is a riparian zone along the drainage channel (drainage) on the western edge of the proposed project site. Proposed project impacts include potential disturbance of 46 mature coast live oak trees (*Quercus agrifolia*), and removal of 3 coast live oak.

Measures proposed to mitigate impacts include:

- a 50-foot wide habitat restoration buffer (buffer), measured from the top of the bank of the drainage;
- an oak protection and replacement plan, including replanting of native oaks removed by the project within project landscaped areas;
- exterior building and site lighting to use hooded fixtures to shield and reduce the spread of light;
- washing of concrete, paint, or equipment to occur only in areas where polluted water and materials can be contained for subsequent removal from the site. Washing shall not be allowed near sensitive biological resources;
- the use of porous paving in parking areas to reduce runoff and increase infiltration, and;
- treatment of runoff in a graded vegetated swale prior to offsite discharge.

The following statements and comments have been prepared pursuant to the Department's authority as Trustee Agency with jurisdiction over natural resources affected by the project (CEQA Guidelines §15386(a)) and pursuant to our authority as a Responsible Agency (CEQA

CDFG-1

Conserving California's Wildlife Since 1870

Kevin Wallace, Fire Chief
March 19, 2012
Page 2 of 4

Guidelines §15381) over those aspects of the proposed project that come under the purview of the Fish and Game Code Section 1600 et seq. As trustee for the State's fish and wildlife resources, the Department has jurisdiction over the conservation, protection, and management of fish, wildlife, native plants, and habitat necessary for biologically sustainable populations of those species.

California Wildlife Action Plan

The California Wildlife Action Plan, a Department guidance document, identified the following stressors affecting wildlife and habitats within the project area: 1) growth and development; 2) water management conflicts and degradation of aquatic ecosystems; 3) invasive species; 4) altered fire regimes; and 5) recreational pressures. The Department looks forward to working with the Montecito Fire Protection District to minimize impacts to fish and wildlife resources with a focus on these stressors.

Impacts to Nesting Birds

Migratory nongame native bird species are protected by international treaty under the Federal Migratory Bird Treaty Act (MBTA) of 1918 (50 C.F.R. Section 10.13). Sections 3503, 3503.5, and 3513 of the California Fish and Game Code prohibit take of all birds and their active nests including raptors and other migratory nongame birds (as listed under the Federal MBTA).

Proposed project activities (including, but not limited to, staging and disturbances to native and nonnative vegetation, structures, and substrates) should occur outside of the avian breeding season which generally runs from February 1-August 31 (as early as January 1 for some raptors) to avoid take of birds or their eggs. Take means to hunt, pursue, catch, capture, or kill, or attempt to hunt, pursue, catch, capture or kill (Fish and Game Code Section 86), and includes take of eggs and/or young resulting from disturbances which cause abandonment of active nests. Depending on the avian species present, a qualified biologist may determine that a change in the breeding season dates is warranted.

If avoidance of the avian breeding season is not feasible, the Department recommends that, beginning thirty days prior to the initiation of project activities, a qualified biologist with experience in conducting breeding bird surveys conduct weekly bird surveys to detect protected native birds occurring in suitable nesting habitat that is to be disturbed and (as access to adjacent areas allows) any other such habitat within 300 feet of the disturbance area (within 500 feet for raptors). The surveys should continue on a weekly basis with the last survey being conducted no more than three days prior to the initiation of project activities. If a protected native bird is found, the project proponent should delay all project activities within 300 feet of on- and off-site suitable nesting habitat (within 500 feet for suitable raptor nesting habitat) until August 31. Alternatively, the qualified biologist could continue the surveys in order to locate any nests. If an active nest is located, project activities within 300 feet of the nest (within 500 feet for raptor nests) or as determined by a qualified biological monitor, must be postponed until the nest is vacated and juveniles have fledged and there is no evidence of a second attempt at nesting. Flagging, stakes, and/or construction fencing should be used to demarcate the inside boundary of the buffer of 300 feet (or 500 feet) between the project activities and the nest. Project personnel, including all contractors working on site, should be instructed on the sensitivity of the area. The qualified biologist should provide MFPD and the Department the results of the surveys and recommend protective measures described above, to document compliance with applicable State and Federal laws pertaining to the protection of native birds. If the biological monitor determines that a narrower buffer between the project activities and

CDFG-2

Kevin Wallace, Fire Chief
March 19, 2012
Page 3 of 4

observed active nests is warranted, he/she should submit a written explanation as to why (e.g., species-specific information; ambient conditions and birds' habituation to them; and the terrain, vegetation, and birds' lines of sight between the project activities and the nest and foraging areas) to MFPD and, upon request, the Department. Based on the submitted information, MFPD (and the Department, if the Department requests) will determine whether to allow a narrower buffer.

CDFG-2

The biological monitor should be present on site during all grubbing and clearing of vegetation to ensure that these activities remain within the project footprint (i.e., outside the demarcated buffer) and that the flagging/stakes/fencing is being maintained, and to minimize the likelihood that active nests are abandoned or fail due to project activities. The biological monitor should send weekly monitoring reports to MFPD during the grubbing and clearing of vegetation, and shall notify MFPD immediately if project activities damage active avian nests.

Impacts to Jurisdictional Drainages

The Department requires a Lake or Streambed Alteration Agreement (LSAA), pursuant to Section 1600 et seq. of the Fish and Game Code, prior to any direct or indirect impact to a lake or stream bed, bank or channel or associated riparian resources. This law requires any person, state or local governmental agency, or public utility to notify the Department before beginning an activity that could substantially modify a river, stream, or lake.

CDFG-3

The project as proposed includes the potential for impacts from construction to streambeds within Department jurisdiction (specifically, creation of the buffer and construction of a stormwater retention basin within the 50 ft. setback adjacent to the drainage). An application for a Lake or Streambed Alteration Agreement (LSAA), under Section 1600 et seq., therefore will be required. You may call our San Diego office at (858) 636-3160 to initiate the 1600 process. You may also obtain a notification package online by visiting the Department's website at <http://www.dfg.ca.gov/1600/1600.html>.

Deferred Mitigation

The creation of the buffer described in the DSEIR is proposed as mitigation to reduce potential adverse effects of the proposed project. Buffer construction is proposed to adhere to a detailed Habitat Restoration Plan (Plan) to be approved by the County. The DSEIR does not contain a detailed description of the Plan, and the Department therefore is unable to evaluate the Plan's effectiveness as mitigation or if creation of the buffer would result in additional adverse impacts.

CEQA Guidelines §15126.4(a)(1)(B) states "Formulation of mitigation measures should not be deferred until some future time." The Department considers the planned preparation of a Habitat Restoration Plan as a deferral of mitigation until some future time. We therefore recommend a draft Plan, including performance standards, be included in a revised DEIR. The draft Plan should include details of amount and locations of ground disturbance, types and amounts of plantings proposed, and methods of erosion control and other drainage protection measures.

CDFG-4

For future projects, early consultation with the Department is encouraged. CEQA requires a lead agency to conduct informal consultation with all responsible and trustee agencies prior to an Initial Study (CEQA Guidelines §15063(g)).

Kevin Wallace, Fire Chief
March 19, 2012
Page 4 of 4

Thank you for this opportunity to provide comment. Questions regarding this letter and further coordination on these issues should be directed to Mr. Martin Potter, Environmental Scientist at (805) 640-3677.

Sincerely,

Betty G Courtney

for

Leslie S. MacNair
Environmental Program Manager
South Coast Region

cc: Department of Fish and Game
Betty Courtney, Santa Clarita
Martin Potter, Ojai
Natasha Lohmus, Carpinteria
Sean Carlson, La Verne

State Clearinghouse
Mr. Scott Morgan, Sacramento

California Department of Fish & Game (CDFG)

Thank you for your comments. Please see specific responses below.

- CDFG-1 Thank you for your comments. Unfortunately, they were sent well after the close of the public comment period on the draft EIR.
- CDFG-2 As discussed in detail in the EIR, the site is a heavily cultivated orchard with ongoing ground disturbance, herbicide use, annual trimming of lemon trees etc. As such, no significant impact to nesting birds is anticipated due to project implementation. However, the MFPD will agree to perform breeding bird surveys as another project component, although such surveys are not required to address any significant impacts due to past and ongoing disturbance within this heavily cultivated orchard. Breeding bird surveys have been added to sections 2.6.6 and 3.4.3.3 of the Final EIR.
- CDFG-3 Comment noted. The proposed project would include imposition of erosion and sedimentation control BMPs such as avoiding grading during rainy season, installation of sediment basins, use of straw bales or bundles, and other measures that would be included in a Storm Water Pollution Prevention Plan (SWPPP) required by the RWQCB and enforced as part of the County's Grading Permit. Potential for erosion and sedimentation at the receiver site for exported soils would be reduced to an acceptable level as the site would need to be determined to be acceptable to receive such export and have all required permissions and associated BMPs in place prior to export of soil. In addition to the sediment control measures included in Section 3.7, Geologic Processes, these practices would include site-specific measures to reduce the occurrence of soil movement during precipitation events and minimize sediment and polluted runoff from entering nearby tributaries and water bodies, per the SWRCB NPDES General Permit. The Habitat Restoration Plan associated with the proposed project would benefit soil stabilization and drainage control, and would result in an increase in biological value and function within the drainage channel. Nonetheless, the potential for requirement of a Section 1600 permit has been added to Section 2.5 of the Final EIR.
- CDFG-4 Comment noted. However, the habitat restoration plan is an enhancement and is not deferred mitigation. There are no significant impacts from the proposed project to this ephemeral drainage, which is surrounded by cultivated lemon orchards and lacks any developed understory. Further, all structural development and paving would generally be set back 50 feet or more from the top of the bank of this drainage and no direct disturbances to the drainage would occur. Finally, the EIR includes a draft landscape plan (refer to Figure 2-5) that depicts the types of native plantings that are proposed. Projects at this stage in the planning process typically rely upon preliminary landscape plans.

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**Santa Barbara County
Air Pollution Control District**

February 3, 2012

Dan Gira
AMEC Environment & Infrastructure, Inc.
104 W. Anapamu Street, Suite 204A
Santa Barbara, CA 93101

Re: APCD Comments on the Draft EIR for Montecito Fire Station, SCH 2011031094

Dear Mr. Gira:

The Air Pollution Control District (APCD) has reviewed the Draft Environmental Impact Report (DEIR) for the above-referenced project. The Montecito Fire Protection District proposes to convert 2.55 acres of agricultural land to institutional use for the fire station site. Included in the development are a 7,377 square foot fire station, a 2,301 square foot training building with hose tower, 2,882 square feet for a maintenance and storage building including fuel storage and emergency generator, associated parking areas, access driveways, landscaping, and creek restoration areas. Grading for the project consists of 16,500 cubic yards of cut and 15,500 cubic yards of fill. The subject property is identified as a portion of Assessor's Parcel Number 155-070-008 and is located on the 2500 block of East Valley Road in the unincorporated community of Montecito.

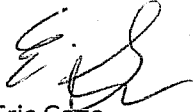
The proposed project includes an emergency generator that is subject to APCD permit requirements and prohibitory rules. Therefore, APCD is a responsible agency under the California Environmental Quality Act (CEQA), and will rely on the EIR when evaluating any APCD permits for proposed equipment. In the case of a diesel-fired emergency generator, an equipment-specific Health Risk Assessment may be required. Please contact David Harris in APCD Engineering and Compliance Division at (805) 961-8824 for more information on HRA screening.

APCD staff offers the following comments on the DEIR:

- Air Quality Section, Thresholds of Significance, Pg. 3.3-6:** The fourth bullet on the page refers to CO hotspot modeling. Please note that the APCD no longer requires hotspot modeling for CO due to relatively low background ambient CO levels in Santa Barbara County. APCD-1
- Air Quality Section, Project Impacts and Mitigation Measures, Pg. 3.3-9:** The emissions from the regular operation of the emergency generator should be included in the operational emissions calculation depicted in Table 3.3-2. Also please note that the significance threshold for operational emissions for ROC or NO_x is 55lb/day for either pollutant separately. The table depicts the threshold as 55lb/day for a summation of ROC and NO_x. APCD-2
- Air Quality Section, Project Impacts and Mitigation Measures, Pg. 3.3-10:** Please note that health risk assessment screening for APCD permitting of the emergency generator will be conducted by APCD engineering staff. Please contact David Harris in APCD Engineering and Compliance Division at (805) 961-8824 for an HRA screening of the project. APCD-3

If you or the project applicant have any questions regarding these comments, please feel free to contact me at (805) 961-8893 or via email at edg@sbcapcd.org.

Sincerely,



Eric Gage,
Air Quality Specialist
Technology and Environmental Assessment Division

cc: Kevin Wallace, MFPD Chief
Project File
TEA Chron File

Santa Barbara County Air Pollution Control District (APCD)

Thank you for your comments. Please see specific responses below.

- APCD-1 Comment noted. The reference to CO hotspot modeling has been removed from the Thresholds of Significance on page 3.3-6.
- APCD-2 Comments noted. The emissions from operation of the generator are now included in Table 3.3-2. In addition, the threshold for ROC and NO_x is now presented separately with 55 lb/day thresholds for each pollutant rather than a combined threshold.
- APCD-3 Comment noted. A Health Risk Assessment screening has now been performed with the assistance of APCD staff and the results are included in Appendix D and referenced in the discussion of Impact AQ-1.

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February 6, 2012

BY HAND DELIVERY

Mr. Roland J. Jensen, Board President
Mr. John Venable, Board Member and Secretary
Mr. Dana Newquist, Board Member
Mr. Kevin Wallace, Fire Chief
Montecito Fire Protection District
595 San Ysidro Road
Montecito, California

Re: Pines Trust: Comments to draft EIR for Station 3.

Gentlemen:

Thank you for your exemplary service to protecting our community. I have lived for 19 years near lower Romero Canyon Road and I am very familiar with your efforts and with the various potential sites and local issues surrounding Station 3.

I represent the Pines Trust, which owns the 14.62 acre ranch called the “Cleese Property” in AMEC’s “Final Station 3 Site Identification Study” dated August 2008, prepared for the District by Dan Gira (the “AMEC Site Study”). My client’s ranch is across East Valley Road from the extraordinary 234 acres of agriculture owned and operated by Palmer Jackson and his family, including the proposed site called “Palmer Jackson East” in the AMEC Site Study.

JCI-1

This letter sets forth the Pine Trust’s comments to the Draft Environmental Impact Report for Station 3, completed by you in December 2011 with assistance from Mr. Gira and his team at AMEC (the “DEIR”). The DEIR selected the Palmer Jackson East site as the “environmentally superior alternative” among the sites reviewed. (DEIR ES-4).

For the reasons set forth in this letter, the DEIR is inadequate and by law must be revised and re-circulated for your own information in making informed decisions and for public review.

I. Historic Agriculture Background of the Jackson properties.

The historic Jackson properties comprising and surrounding the Palmer Jackson East site have been farmed continuously for generations, including the present lemon and avocado groves. (DEIR 2-3) The DEIR Appendices contain historic aerial photos of the agricultural operations at the Jackson properties from 1928, 1938, 1947, 1954, 1967, 1975, 1989, 1994, 2002 and 2005.

JCI-2

Although the Jackson properties are the last, large open spaces in urban Montecito, even before the 1992 Montecito Community Plan (MCP) they were zoned residential, allowing for a maximum buildout of approximately 220 units (*See County Planning Commission Staff Report dated September 11, 1995.*) The Montecito Community Plan in 1992 downzoned the Jackson properties to a maximum of 78 residential units.

In December, 1992, in response, Mr. Jackson filed lawsuits against the County claiming that the 1992 Montecito Community Plan was a “taking” and alleging that the MCP EIR was inadequate. The lawsuits were settled in 1995 when Mr. Jackson successfully processed a General Plan Amendment and a General Plan Rezone that increased his ultimate buildout to the current 93 units. (September 11, 1995 Staff Report.) There were no new “overriding considerations” adopted in 1995 respecting the Jackson properties although “overriding considerations” were made to the multiple Class I impacts during the Montecito Community Plan process concluding in 1992.

JCI-2

II. Need for Improved Critical Emergency Response Times.

Prompted by well-documented critical emergency response time issues that will save lives and protect valuable property, the District determined in the mid-2000’s to build a fire station in eastern Montecito. The District believes that approximately 385 existing residential units in “Zone IV” would better meet the District’s five minute service standards and that “*Zone IV has the potential to increase to a total of approximately 1,119 residential units with development permitted under existing zone (for up to 175 primary residences and with the theoretical addition of up to 559 residential second units/guest houses).*” (DEIR 2.6-10)

The AMEC Site Study, completed in August 2008, found that the Birnam Wood site at the corner of Sheffield Drive and East Valley Road “*would optimize emergency personnel response to greater Montecito.*” (AMEC Site Study page 48). In contrast, the Palmer Jackson East property would result in longer response times to parts of greater Montecito.

JCI-3

The AMEC Site Study report noted, “*In comparison to the ideal response time location at the intersection of East Valley Road with Sheffield Drive or Romero Canyon Road [the Birnam Wood site] where response time to outlying areas would be 5 minutes, this site’s location [Palmer Jackson East] would require an additional 40 seconds to respond to service calls on upper Bella Vista Drive.*” (AMEC Site Study page 36.) The Birnam Wood intersection property is simply closer to many more homes than the more isolated Palmer Jackson East property.

On December 20, 2011, the District released the DEIR. Written comments are due by February 6, 2012.

On January 9, 2012, the Montecito Board of Architectural Review held a public hearing to discuss the three buildings envisioned for the Palmer Jackson East site of 2.55 acres, which is situated squarely in the middle of the lemon groves at historic 2500 East Valley Road. The hearing was attended by a representative of the Pines Trust. The new construction is proposed to be about 12,560 total gross structural square feet, rising to a third floor that will be 35 feet high. (DEIR 2-7). By contrast, Station 1 at 595 San Ysidro is two stories, 1.25 acres, 10,000 square feet of building. Station 2 at 2300 Sycamore Canyon Road is one story, .61 acres, 8,000 square feet of building. (DEIR Appendices)

JCI-4

On January 17, 2012, the District held a hearing on the draft EIR, attended by a representative of the Pines Trust. It was announced at the meeting that grading and related traffic issues were greater than anticipated and the District was going to circulate some kind of a supplemental or updated EIR section to inform the District's Board and the public about those issues.

JCI-5

During all the events surrounding locating and building a new fire station in eastern Montecito, Mr. Jackson has continued the historic agriculture uses of his family's properties and maintained the extraordinary rural aesthetics. He does not appear to be ready to change soon. On May 27, 2008, for example, Mr. Jackson wrote the District in part, "*As you recall, at your meeting on March 12, I stated that development options for our properties are very complex and not something we have been pushing for in the near future.*"

JCI-6

The DEIR confirms that the Palmer Jackson East Project will need a slew of additional and potentially contentious governmental approvals, including a Major Conditional Use Permit, Parcel Map Waiver (since the Jackson properties will not be filing a tract map) and a Certificate of Compliance. (DEIR ES-2)

III. The DEIR has Fatal Legal Flaws that must be Addressed by the District.

A. The Draft EIR Is Inadequate under CEQA.

The DEIR plainly lacks critical information and evidentiary support required by the California Environmental Quality Act ("CEQA"). For this reason, and due to the additional flaws and omissions discussed below, the draft EIR is legally inadequate. The law requires that the DEIR be revised and re-circulated for public review.

"A legally adequate EIR . . . 'must contain sufficient detail to help ensure the integrity of the process of decisionmaking by precluding stubborn problems or serious criticism from being swept under the rug.'" (*Kings County Farm Bureau v. City of Hanford* (1990) 221 Cal.App.3d 692, 733.) "The EIR must contain facts and analysis, not just the bare conclusions of a public agency." (*Santiago Water District v. County of Orange* (1981) 118 Cal.App.3d 818, 831.)

JCI-7



“A conclusory statement ‘unsupported by empirical or experimental data, scientific authorities, or explanatory information of any kind . . . affords no basis for a comparison of the problems involved with the proposed project and the difficulties involved in the alternatives.’” (*People v. County of Kern* (1974) 39 Cal.App.3d 830, 841-842, quoting *Silva v. Lynn* (1973) 482 F.2d 1282, 1285.)

JCI-7

a. Incomplete Project Description.

The description of the potential Palmer Jackson East site in the DEIR is missing critical information. “An accurate project description is necessary for an intelligent evaluation of the potential environmental effects of a proposed activity.” (*San Joaquin Raptor/Wildlife Rescue Center v. County of Stanislaus* (1994) 27 Cal.App.4th 713, 730.)

JCI-8

The DEIR’s project description is inaccurate and incomplete because it:

(a) fails to include information regarding grading and the related traffic generation that was omitted from the current DEIR but revealed at the District’s hearing on Tuesday, January 17, 2012 attended by a Pines Trust representative; and

JCI-9

(b) fails to describe the development of “off-site driveway and drainage improvements within the right away [sic] of State Highway 192” (DEIR p. 2-20).

JCI-10

With respect to grading, the approach taken by the District is unclear but reportedly the District will make revisions to the DEIR that will be circulated for public and agency review *separately*, after the DEIR comment period expires on February 6, 2012. This approach deprives the public of the ability to comment on a legally adequate DEIR. An EIR must analyze the project as a whole to properly analyze its impacts. CEQA Guidelines section 15378 (a) (“Project” means the whole of an action”); (*see Bozung v. Local Agency Formation Commission* (1975) 13 Cal. 3d 263.)

JCI-11

With respect to improvements within the Highway 192 right-of-way, more information must be incorporated into the project description and the impact analysis must be revised to account for this new information. Caltrans, for example, wrote Chief Wallace on April 15, 2011, before the DEIR was published, asking that the DEIR “... include analysis specifically centering on environmental resources (biology, cultural, etc.) that are located within the state’s right of way.” (Department of Transportation Letter, 4/15/11). Caltrans further describes “removing oak trees which are located within the Caltrans right-of-way” (Department of Transportation

JCI-12

Letter, 1/26/12). These and other potential impacts of the right-of-way improvements must be included in the revised EIR.

JCI-12

b. Flawed Impact Analysis.

i. Aesthetics: Improper Methodology for Analyzing Cumulative Aesthetic Impacts.

The proposal places an approximately 12,560 total gross square feet, three-story, 24/7, emergency facility on East Valley Road in the middle of the last large open agricultural open space in Montecito. The cumulative impact regarding aesthetics, however, concludes that the conversion of 2.55 acres of orchard, reduction of farmland and “associated rural aesthetics” is considered *insignificant* “[g]iven that the project would be consistent with MCP and MGMO development guidelines and zoning”. (DEIR pp. 3.1-23 – 3.1-24.) As discussed in detail in sections ii.1 and ii.3.b, below, this is not a legally permissible method of analyzing a Project’s cumulative impacts.

JCI-13

ii. Agricultural Resources.

1. Failure to Analyze and Mitigate the Loss of Prime Soils and Conversion of Prime Farmland

The proposed Palmer Jackson East site and immediately surrounding Jackson Ranch parcels support historic and ongoing agricultural operations (DEIR p. 3.2-3) and soils on the site are identified as prime (DEIR p. 3.2-2). “Development of the proposed project would result in the direct physical conversion of approximately 2.5 acres of prime soils on Prime Farmland.” DEIR p. 3.2-9.

The Project thus eliminates approximately 2.5 acres of lemon orchards and terminates associated active agriculture on the Project site. (See DEIR p. 3.4-12.) The DEIR however declines to address impacts related to the loss of prime soils and conversion of prime farmland, reasoning that:

JCI-14

“However, analysis of the loss of agricultural soils is not included as the County already committed the project site to residential use in 1995 and adopted the appropriate findings and overriding considerations to support that decision as required under CEQA.” (DEIR p. 3.2-6.)

CEQA caselaw provides that this is not a legally permissible approach. An EIR must compare the proposed project to what *actually* is happening, not to what *could* happen, that is,



it “must focus on impacts to the existing environment, not hypothetical situations.”
(*Communities for a Better Environment v. South Coast Air Quality Management District* (2010)
48 Cal. 4th 310, 20 (quoting *County of Amador v. El Dorado County Water Agency* (1999) 76
Cal.App.4th 931, 955).)

Using an “illusory” basis for a finding of no significant adverse effect “can only mislead the public as to the reality of the impacts and subvert full consideration of the actual environmental impacts”. (*Environmental Planning & Information Council v. County of El Dorado* (1982) 131 Cal.App.3^d 350, 358 (EIR failed as an informative document because it compared the potential population density allowed under the existing general plan with that allowed under a proposed amendment to the plan, both of which were far higher than the actual population)); (*Communities for a Better Environment, supra*, 48 Cal. 4th at 21 (EIR’s use of the prior permits’ maximum operating levels as a baseline provided an illusory basis for a finding of no significant adverse effect despite an acknowledged increase in emissions exceeding the District’s published significance threshold).)

JCI-14

In addition to legal impermissibility, the County’s microfiche records of what happened in 1995 factually differ to some extent with the statements in the DEIR that overriding considerations were actually adopted in 1995.

In sum, the DEIR’s approach of pretending that the orchards and prime farmland currently existing on the site will not be impacted by the Project because the site is zoned residential instead of agricultural is unambiguously prohibited by CEQA. Accordingly, the agricultural impact discussion must be thoroughly revised.

2. Failure to Identify and Analyze Consistency with Applicable Policy.

Not only does the DEIR fail to analyze impacts related to the loss of prime soils and conversion of prime farmland, it also fails to discuss the Project’s consistency with policies applying to preservation of prime soils. (DEIR p. 3.2-4.) The EIR must analyze the Project’s consistency with applicable plans and policies, and CEQA recognizes that significant impacts can result from policy inconsistency. (*See Pocket Protectors v. City of Sacramento* (2004) 124 Cal.App.4th 903.) Accordingly, in the CEQA context policy consistency must also be analyzed against actual and not hypothetical conditions. (*See Communities for a Better Environment, supra*, 48 Cal. 4th at 20-21.)

JCI-15

The DEIR must therefore be revised to include analysis of the Project’s consistency with policies applying to preservation of prime soils and also any policies protecting existing agricultural operations that were omitted from the DEIR.

JCI-15

3. Improper Methodology for Analyzing Cumulative Agricultural Impacts.

a. Contribution to Transition to Estate Residential Uses.

The DEIR concedes that “[c]onstruction of the proposed project would incrementally contribute to the gradual transition of eastern Montecito from a more rural area with substantial agricultural areas, to estate residential uses.” (DEIR p. 3.2-9.) As noted above, Zone IV alone “has the potential to increase to a total of approximately 1,119 residential units . . .” (DEIR 2.6-10). This impact is associated with the fact that the fire station will provide emergency services to eastern Montecito, thereby expanding the areas capacity to accommodate additional residential estates, which include a main house, guest house and potentially other living quarters. The DEIR utilizes the same faulty analysis discussed in section ii.1, above, to negate the significance of this cumulative effect of the Project.

JCI-16

b. Improper Reliance on MGMO Guideline Compliance.

The DEIR concludes that the Project, despite the fact that it will result in the direct conversion of 2.5 acres of Prime Farmland that is currently productively farmed, would not have had a cumulatively considerable contribution to the reduction of prime soils and Prime Farmland in Santa Barbara County. Aside from applying the same impermissible analysis discussed in section ii.1, above, the only other basis for this conclusion is that the project would be consistent with Montecito Community Plan and Montecito Growth Management Ordinance (MGMO) development guidelines and zoning. (DEIR p. 3.2-10.)

JCI-17

CEQA is clear that an EIR may not rely exclusively on a project’s compliance with established standards in determining the significance of an effect. “A threshold of significance is not conclusive . . . A public agency cannot apply a threshold of significance or regulatory standard ‘in a way that forecloses the consideration of any other substantial evidence showing that there may be a significant effect.’” (*Mejia v. City of Los Angeles* (2005) 130 Cal.App.4th 322, 342.) Here, converting 2.5 acres of farmland in an area with vanishing farmland may be significant notwithstanding compliance with the MGMO; the DEIR must be revised to include that analysis.

iii. Impacts to Biological Resources.

1. Failure to Perform Biological Surveys.

The DEIR lacks evidentiary support for the environmental baseline for biological resources other than oaks. “Without accurate and complete information pertaining to the setting of the project and surrounding uses, it cannot be found that the [DEIR] adequately investigated and discussed the environmental impacts of the development project.” (*Cadiz Land Co. v. County of San Bernardino* (2000) 83 Cal.App.4th 74, 87.)

JCI-18

Specifically, no field surveys were performed other than those performed by an arborist. (DEIR p. 3.4-1.) The DEIR indicates that “AMEC team members visited the site on four occasions in 2010 and 2011” (DEIR p. 3.4-1) but fails to indicate when the site visits occurred, what methodology, if any, was employed, and whether these “AMEC team members” possess the requisite credentials to carry out biological surveys. Without this critical information it is impossible for the public and decisionmakers to determine whether the environmental baseline with respect to biological resources is accurate.

2. Failure to Establish the Absence of Sensitive Plant Species.

As discussed in the preceding section, the DEIR lacked bona fide biological surveys that would establish the presence or absence of sensitive plant and wildlife species. The DEIR notes that Sonoran maiden fern may occur in the Project vicinity, but merely asserts that a prior sighting of this sensitive plant species “has not been confirmed” by the California Department of Fish and Game. (DEIR p. 3.4-2.) Given the potential presence of Sonoran maiden fern, a County approved biologist must perform surveys when the fern is likely to be visible to determine its presence or absence on the Project site.

JCI-19

3. Failure to Analyze Mitigation Measure Bio-2.

The DEIR impermissibly failed to analyze and mitigate potentially significant impacts associated with biological resource mitigation measures. “If a mitigation measure would cause one or more significant effects in addition to those that would be caused by the project as proposed, the effects of the mitigation measure shall be discussed but in less detail than the significant effects of the project as proposed.” (CEQA Guidelines section 15126.4 (a)(1)(D).) Mitigation Measure Bio-2 provides, among other things, that:

JCI-20



“Trees that are impacted from root damage (even minimally) shall be sprayed in the early spring and late summer with permethrin (Astro) to help restrict attach of oak bark beetles. The application of the chemical shall be applied to the lower 6 inches of trunk. Treatments shall be repeated for at least two years after completion of the project or if drought prevails for longer periods.” DEIR p. 3.4-15.

Permethrin is a broad-spectrum chemical that kills indiscriminately and is highly toxic to honeybees, fish, and aquatic invertebrates due to disruption of sodium channels. Permethrin Technical Fact Sheet, National Pesticide Information Center (available at <http://npic.orst.edu/factsheets/Permttech.pdf>). The Project site is surrounded with active orchards that presumably utilize honey bees for pollination, and there are two creeks in the vicinity of the Project (*see* DEIR Figure 1-1, showing the location of Romero and Picay Creeks relative to the Project site).

JCI-20

The EIR is flawed for failing to analyze the impacts to nearby honeybee populations and agricultural operations, and aquatic life from Permethrin application required by Mitigation Measure Bio-2. (CEQA Guidelines section 15126.4 (a)(1)(D); *Save Our Peninsula Committee v. Monterey County Bd. Of Supervisors* (2001) 87 Cal.App.4th 99, 130.)

b. Inadequate Alternatives Analysis.

i. Failure to Adequately Analyze Alternative 2: Birnam Wood Site.

Of the alternatives considered in the DEIR, the Birnam Wood site stands out as improving critical emergency response times above what is achievable at the proposed Palmer Jackson East site. (DEIR p. 6-22: *“This site at the corner of Sheffield Drive and East Valley Road is an ideal location for Station 3 and would optimize emergency personnel response to greater Montecito”*). As noted above, the Birnam Wood site maintains a significant response time advantage over the Palmer Jackson East site, which is crucial in saving lives and protecting property.

The Birnam Wood site has fewer environmental impacts under CEQA than the proposed Project. Simply from a common sense perspective, the Birnam Wood site is essentially a corrugated metal maintenance shed and carport, a wood frame caretaker’s residence, a large cement maintenance yard and a parking lot. The Birnam Wood site is not comprised of historic prime farmland.

JCI-21

The DEIR’s analysis of the Birnam Wood alternative is riddled with speculation and unsubstantiated conclusions. The DEIR, for example, speculates that mitigation measures to protect specimen trees and riparian woodland “may limit developable area on this site.” (DEIR p.



6-25.) But the DEIR lacks any analysis of how the mitigation measures might limit developable area on the Birnam Wood site, and whether a comparable fire station facility to the one proposed could feasibly be constructed on the developable area of the Birnam Wood site.

The DEIR also speculates that “construction of Station 3 at the Birnam Wood site *may* create potentially significant effects on public facilities which *may* require engineering solutions” without providing any detail or evidence.

Additionally, the DEIR speculates regarding the costs associated with alternative, but fails to provide any financial projections or other evidence supporting that Alternative 2 would be economically infeasible.

JCI-21

The DEIR notes that while traffic speeds at the Palmer Jackson East site “can exceed 50 mph” (DEIR 6-19) that “actual vehicular speeds” at the Birnam Wood site “are generally lower than segments to the east” (DEIR 6-23), without actually quantifying and analyzing the differences.

These unsupported conclusions regarding Birnam Wood Alternative 2 alone merits re-circulation to provide the public and decisionmakers with “no basis for a comparison of . . . the difficulties involved in the alternatives.” (*People v. County of Kern*, 39 Cal.App.3d at 841-842.)

ii. Improper Identification of the Project as the Environmentally Superior Alternative.

The DEIR identifies the proposed Palmer Jackson East Project as the environmentally superior alternative, however this conclusion is based in the DEIR on two incorrect assumptions:

First, the proposed project will have significant impacts on agricultural resources by virtue of terminating existing agricultural operations on the project site, eliminating 2.5 acres of lemon orchards, and converting 2.5 acres of Prime Farmland to non-agricultural use. (*See* section A.b.ii, above.) The DEIR only arrives at a conclusion of no significant impact by employing the incorrect baseline for its analysis. (*Id.*)

JCI-22

Second, Alternative 2, the Birnam Wood site, would avoid the significant agricultural impacts associated with the Project’s proposed location, and as discussed in section I, above, appears not to result in any significant environmental impacts.

Accordingly, the EIR should have concluded that Alternative 2 is the environmentally superior alternative.

iii. CEQA's Substantive Mandate.

An agency is prohibited under CEQA from approving a project “as proposed if there are feasible alternatives or feasible mitigation measures available which would substantially lessen the significant environmental effects of such projects.” (Public Resources Code section 21002.) As discussed in the preceding section, Alternative 2, Birnam Wood, avoids the Project’s significant agricultural and soil impacts and appears feasible.

JCI-23

Accordingly, CEQA requires that the District to either adopt Alternative 2, Birnam Wood, or reject the Project. (*Id.*)

B. CEQA Compels Recirculation of the DEIR.

The Draft EIR must be revised and re-circulated for public review to comply with the requirements of CEQA. CEQA Guidelines section 15088.5 (a) compels recirculation where “significant new information is added to the EIR after public notice is given of the availability of the draft EIR for public review . . . but before certification.” Disclosures that are considered “significant new information” include but are not limited to: a new significant environmental impact, a substantial increase in the severity of an environmental impact, and/or a new feasible alternative or mitigation measure considerably different from those previously analyzed. CEQA Guidelines section 15088.5 (a)(1-3).

JCI-24

CEQA Guidelines section 15088.5 (a)(4) also requires recirculation where “[t]he draft EIR was so fundamentally and basically inadequate and conclusory in nature that meaningful public review and comment were precluded.”

As discussed below, the Draft EIR must be re-circulated to include significant new information and correct fundamental inadequacies.

a. New Significant Impacts to Agriculture Is Significant New Information.

As discussed in section A.b.ii, above, the DEIR failed to analyze the Project’s impacts associated with the loss of prime soils and conversion of prime farmland. These impacts are significant under the CEQA Guidelines (Would the project: a) “[c]onvert Prime Farmland, Unique Farmland or Farmland of Statewide Importance . . . to non-agricultural use?). CEQA Guidelines Appendix G section II (a).

JCI-25

Accordingly, the DEIR must be revised and re-circulated to incorporate these new significant effects of the Project. CEQA Guidelines section 15088.5 (a)(1).

b. The Draft EIR Is Fundamentally Inadequate.

As discussed throughout this letter, the DEIR is lacking relevant information, including, without limitation:

- (a) grading;
- (b) right-of-way improvements;
- (c) biological resource surveys;
- (d) cumulative impacts; and
- (e) alternatives.

Additionally the DEIR's analysis utilizes prohibited methodologies and relies excessively on unsubstantiated assumptions.

Due to these failures, the DEIR lacks critical information necessary for the public, government agencies, and decisionmakers to evaluate the significance of the Project's impacts. Under these circumstances, CEQA compels recirculation to allow the public to meaningfully comment. (CEQA Guidelines section 15088.5 (a)(4); *see Cadiz Land Co. v. Rail Cycle* (2000) 83 Cal. App. 4th 74.)

C. Public Comments.

Thank you for the opportunity to present these comments. The courts commented on the weight of public comments. The Court in *County of Amador v. El Dorado County Water Agency* (76 Cal. App. 4th 66, at 75 (1999)) noted, for example, as follows: "*In the course of preparing a final EIR, the lead agency must evaluate and respond to comments relating to significant environmental issues. [Citations.] In particular, the lead agency must explain in detail its reasons for rejecting suggestions and proceeding with the project despite its environmental effects. [Citation.] 'There must be good faith, reasoned analysis in response [to the comments received.] Conclusory statements unsupported by factual information will not suffice.'* [Citation.] Thus, it is plain that the final EIR will almost always contain information not included in the draft EIR."

JOSEPH COLE
COUNSELOR AT LAW

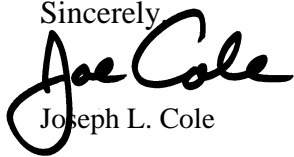
MFPD Board and Chief Wallace

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February 6, 2012

Please copy me on all further notices from the District to the Pines Trust. If you have any questions or comments, please let me know.

Sincerely,



Joseph L. Cole

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Joseph Cole, Counselor at Law; February 6, 2012 (JCI)

Thank you for your comments. Please see detailed responses below. Please also note Sections of the final EIR where clarifications and additional information have been added to the EIR.

- JCI-1 Comments noted. Please see responses JC-7 through JC-23 below regarding the legal adequacy of the draft EIR.
- JCI-2 Comments noted.
- JCI-3 Comments noted. The Station 3 Site Identification Study identified a weighted range of factors that should be considered for station location. These included response times to the primary service area, site size and configuration, minimal traffic constraints, minimal hazards or environmental issues, low potential for neighborhood conflicts, a willing seller, etc (Table 7, Station 3 Site Identification Study, MFPD, 8/2008). While response times are a critical factor, the MFPD Board of Directors considered these and other factors during the site selection process. Each of the 13 considered sites exhibited certain benefits and drawbacks. As discussed in detail in Section 6.0 (Alternatives) of the EIR, while the Birnam Wood site is ideally situated from a response time perspective, it conflicted with a number of the MFPD site selection criteria and had constraints such that development would create environmental impacts substantially more severe than those associated with the Palmer Jackson East site that was selected by the MFPD Board.
- JCI-4 Comments noted. As discussed in the Station 3 Site Identification Study, the MFPD considered both minimally acceptable and ideal site sizes and configurations for the proposed Station 3 site. The location and size of the Station 1 and 2 sites were driven by historic community development patterns and do not represent an ideal site to meet MFPD operational and equipment storage needs.
- JCI-5 Comments noted. The MFPD determined it appropriate to recirculate portions of the EIR as set forth under Section 15088.5 (c, d) of the State Guidelines for the Implementation of the California Environmental Quality Act (CEQA Guidelines). Although no new significant impacts were identified, appropriate sections of the EIR were recirculated to provide the public with opportunity to review and consider adjustments in the project description regarding grading and the potential for increased export of fill material.
- JCI-6 Comment noted. As a provider of emergency response services, the MFPD is tasked with planning for and providing such services to existing and planned development. The MFPD does not have authority over the timing of potential development of the Rancho San Carlos or other properties in eastern Montecito. However, the MFPD must account for both existing service demands and County land use plans and reasonably foreseeable levels of growth within its service area. The proposed Station 3 Project is a direct outgrowth of both existing service demand issues and reasonably foreseeable potential for future development in

eastern Montecito. Please refer to the Station 3 Site Identification Study for background information on these issues.

- JCI-7 Comments noted. The commenter here presents certain legal conclusions that rely upon comments in sections of his letter that follow. See responses below.
- JCI-8 Comments noted. The draft EIR contains a 24-page Project Description section that includes 6 maps and figures and is replete with detailed information regarding Station 3 layout, design and operation. As set forth in responses JC-9, JC-10, and JC-11 below, the EIR includes a sufficiently detailed project description and the review process for both the initial draft and recirculated EIRs allowed the public meaningful opportunity to comment on these matters.
- JCI-9 Comment noted. However, the Project Description actually provides substantial information on both proposed grading and construction-related traffic. Please refer to Section 2.4 (page 2-5), Section 2.4.5 (page 2-12), Figure 2-4 (proposed Grading and Drainage Plan) and Section 2.4.8.3 (Construction Traffic Estimates). After issuance of the draft EIR, the project engineers determined that it would not be possible to completely balance cut and fill onsite as identified in the draft EIR. Therefore, although no new significant effects associated with this change were identified, consistent with CEQA Guideline Section 15088.5 (c, d), the MFPD determined that it was appropriate to recirculate portions of the EIR that would be affected by this adjustment in the Project Description.
- JCI-10 Comment noted. However, the commenter is referred to page 2-20 and Figure 2-4 (Proposed Grading and Drainage Plan) of the draft EIR which clearly describe and depict driveway and drainage improvements within the Caltrans ROW. Specifically, page 2-20 notes the need for encroachment permits from Caltrans for such improvements while Figure 2-4 clearly depicts these improvements in the Caltrans ROW and notes 9 and 12 on this figure describe these improvements. While such improvements within road rights-of-way are standard measures of almost all driveways for new development and are already described and depicted in detail as noted above, additional text has been added to Section 2.4.3 of the Project Description to assist the commenter and other reviewers in understanding this improvement.
- JCI-11 Comment noted. As described in responses JC-5 and JC-9 above, the MFPD determined that the adjustment in the Project Description with regards to grading would be of sufficient interest to the community to warrant recirculating portions of the EIR potentially affected by this change, consistent with the provisions of Section 15088.5 (c, d) of the State CEQA Guidelines. The MFPD undertook this recirculation even though the changes to the overall project description were relatively modest, no new significant impacts were identified and no impacts became substantially more severe. This approach provides the public with substantial opportunity to comment on these changes.
- JCI-12 Comments noted. However, as described in response JC-10 above, the DEIR (Figure 2-4) already clearly describes both physical improvements within the Caltrans ROW (“concrete spandrel and cross gutter”; 12” high by 48” wide box

culvert”). Further, analysis throughout the document fully described potential impacts on biological and cultural resources within the ROW. The analysis in Impact BIO-2 clearly describes the removal of oaks along the site’s East Valley Road frontage and Figure 2-4 (Proposed Grading and Drainage Plan depicts the trunk location of the oaks along the site frontage. As described in Section 3.5, a Phase I Cultural Resource was performed and no cultural resources were identified on the site or within the vicinity. Although no impacts are identified, language has been added to Section 3.5 regarding the Caltrans ROW. Although not related to the proposed project’s environmental effects, language has been added to the text in Impact BIO-2 to clarify that these oaks are within Caltrans ROW and Figure 2-4 has been modified to more clearly depict the oaks along the frontage.

JCI-13 Comment noted. Section 3.1 provides extensive analysis of the project’s potential aesthetic impacts and no project-specific significant impacts are identified. As such, the project’s contribution to cumulative aesthetic impacts is unlikely to be significant. However, additional discussion has been added to the cumulative analysis to clarify the project’s contribution or lack thereof to cumulative aesthetic issues.

JCI-14 Comments noted. The draft EIR does not ignore the site’s agricultural resources, but fully describes the existing physical setting with regards to agricultural production onsite and the existence of prime agricultural soils. Unlike the hypothetical situations referred to in cases cited by the commenter, the present EIR concerns agricultural land where the County of Santa Barbara not only has rezoned the property but also has specifically overridden impacts to agriculture in its environmental review for the 1992 Montecito Community Plan (MCP) EIR.

Consistent with the direction provided under section 15152 (d) of the State CEQA Guidelines (Tiering), this EIR builds upon and incorporates the findings of the MCP EIR. This section notes “Where an EIR has been prepared for a program, plan, policy or ordinance consistent with the requirements of this section, any lead agency for a project pursuant to or consistent with the program, plan, policy or ordinance should limit the EIR or negative declaration on the later project to effects which: (1) were not examined as significant effects on the environment in the prior EIR...”.

Because the MCP EIR identified impacts to agriculture as significant, the EIR focuses on more site-specific issues not addressed in the MCP EIR. Nonetheless, in the interest of full disclosure, Section 3.2.1.3 and Appendix K of the Final EIR provide additional information on the project’s potential effects on agricultural resources. This information clearly demonstrates that although this issue has previously been addressed by the County, potential project effects on agriculture would be insignificant due to the site’s small size, urban land use designation, inability to qualify for agricultural preserve status and its small contribution to the overall Rancho San Carlos agricultural operation. Further, the loss of these 2.5

acres would not substantially impair overall production on Rancho San Carlos or the individual parcel which the project site is a part of. This analysis is further support by a review of potential project impacts using the County's Agricultural Resource Guidelines (Appendix K).

- JCI-15 Comment noted. Please refer to response JC-14 above. The MFPD does not have regulatory authority over the site's now urban land use designations nor can it affect the County's past decision-making on this matter. Sections 3.2.2.2 and Section 4.0 of the draft EIR already include a discussion of several agricultural-related policies from the County Agricultural Element and Montecito Community Plan. As noted above, the County has previously considered this matter and apparently found that loss of the site's agricultural resources through urban development would be consistent with adopted County policy, as it adopted overriding considerations for development of agricultural land in Montecito and approved urban land use designations for the site. The MFPD is not in a position to second guess past County actions on this matter. However, although the County has apparently already addressed such policy issues and potential project impacts to agricultural resources would be insignificant, in the interest of full disclosure, additional agricultural resource policy discussion has been added to Sections 3.2.2.2 and 4.0.
- JCI-16 Comment noted. As discussed in responses JC-14 and JC-15 above, the County has already addressed the issue of loss of agricultural resources in Montecito and the project itself would have insignificant impacts to agricultural resources and therefore is unlikely to contribute substantially to cumulative agricultural impacts. However, in the interest of full disclosure additional discussion has been added to Section 3.2.3.5 and Appendix K provides supporting analysis.
- JCI-17 Comment noted. Please see responses JC-14, 15 and 16 as well as additional text added to Section 3.2.1.3 and 3.2.3.5 of the final EIR.
- JCI-18 Comment noted. However, the EIR provides a clear and sufficiently detailed description of the biological resources on the project site based on site reconnaissance by knowledgeable professionals including an arborist, review of existing studies (e.g., MCP and MCP EIR; MGMO EIR), County Environmentally Sensitive Habitat (ESH) Maps and the California Natural Diversity Data Base. It should be noted that no part of the site, including the existing oak lined drainage, was designated by the County as ESH during the adoption of the MCP. Further, during the subsequent General Plan Amendment and Rezone of the site in 1995, no ESH designation was adopted for the site or adjacent drainage, although more than 40 acres of other portions of the Rancho San Carlos were designated as ESH by the County at that time. As further confirmation regarding the lack of significant biological resources onsite (aside from oak trees), as part of the formal Planner Consult process ongoing between the MFPD and County, the County has waived any requirement for a biological resources survey on the site for the proposed project due to the absence of resources.

In contrast to the evidence cited above, the commenter provides no information regarding biological resources of note on the project site beyond the oak trees as currently described in the EIR. AMEC staff personnel have visited the site on multiple occasions and walked the entire property repeatedly. Personnel who have visited the site include those trained in wetland delineation as well as those familiar with native plant species and habitats and that possess long-standing expertise in assessment of biological resource impacts for Santa Barbara County. As discussed in Section 3.4.1.2 of the EIR and documented in photographs on pages 3.1-18 and 3.1-19, the vast majority of the site consists of an actively cultivated lemon orchard with an understory of sparse non-native grasses and weedy species typical of an active orchard environment or “primarily bare ground” as noted in the EIR as a result of cultivation, application of herbicides, etc. The drainage channel located primarily offsite to the west is similarly maintained and largely devoid of understory (refer to Section 3.4.1.2 and associated photograph). Given such circumstances, the EIR properly focuses on potential impacts to existing oak trees and the largely offsite adjacent drainage, the only biological resources of value on or adjacent to the project site. Provision of full biological surveys under such circumstances are unwarranted as supported by the discussion above and the information already contained in the draft EIR.

JCI-19 Comment noted. Again, the commenter fails to provide any evidence that sensitive plants or other biological resources beyond oak trees occur within this active orchard. Please note that, as discussed in the EIR, the record for the Sonoran maiden fern is located approximately 0.5 miles north of the site, in Romero Creek Canyon (California Natural Diversity Data Base). Typical habitat for the Sonoran maiden fern consists of riparian areas, seeps and wet meadows (www.calflora.org). Locally, such ferns are often found in wet places along stream banks in shaded canyons (A Flora of the Santa Barbara Region, California, Clifton Smith, 1998). Existing extremely disturbed habitat within the orchard and the generally dry intermittent drainage channel with regularly maintained and disturbed understory are not suitable habitat for this species. No ferns, Sonoran or otherwise, have been observed on the site during repeated walkovers.

JCI-20 Comment noted. Brief additional discussion regarding Permethrin has been added to Section 3.4 of the EIR and mitigation measures BIO-2 has been modified to address this issue and ensure proper pesticide application. However, it should be noted that the site is under active agricultural cultivation and that it is part of the larger Rancho San Carlos agricultural operation which applied six different types of pesticides to crops in 2011 alone (refer to Section 3.2.1.3). Thus, the existing environmental baseline for existing oak trees and potentially affected honey bees, fish and aquatic life is not a pristine habitat, but is that of a major agricultural operation for which biocides of various types are already regularly applied under supervision of the County Agricultural Commissioner’s office. Any future application of Permethrin to oak trees would be subject to appropriate regulations governing such application.

JCI-21 Comment noted. However, as discussed in Section 6.4.3.2 of the draft EIR, the Birnam Wood site is subject to substantial environmental constraints. The

commenter fails to acknowledge the constraints on this site and provides no evidence to support the contention that that the Birnam Wood site has “fewer environmental impacts under CEQA than the proposed project”. Potential impacts of developing this site would include damage to or removal of more than one dozen specimen oak trees, several of which are located in the middle of the northern segment of the site, and potential impacts to an onsite and adjacent spring fed riparian woodland that occupies approximately 15-20% of the site (refer to Figure 6-3 of the EIR). Impacts to biological resources would clearly be potentially significant and would appear to be substantially more severe than those for the project site which involves removal of one specimen oak, two small oaks and the enhancement of habitat along a currently degraded drainage.

Further, impacts of noise would also be more severe at the Birnam Wood site as a greater number of homes are located in close proximity to this site. In addition, the EIR also discusses possible impacts to the South Coast Conduit; a major water supply pipeline for the entire south coast region has potential to be impacted by driveway construction. The EIR also identifies flood hazards as a potential concern which would require further investigation.

The analysis of the Birnam Wood site meets the criteria outlined in Section 15126.6 of the State CEQA Guidelines for adequacy of analysis of alternatives. Section 15126.6 (b) notes that the discussion of alternatives shall focus on alternatives to the project or its location which are capable of avoiding or lessening any significant effects of the project. It should be noted that the project would not create any unavoidable and significant effects and would have limited potentially significant effects. While the Birnam Wood site would provide improved response times to some areas (a key project objective), development at that site would substantially increase impacts to biological resources and may also arouse substantial community concerns that were expressed during the Station 3 Site Identification Study process. Thus, selection of the Birnam Wood site may not fully meet or could conflict with Project Objectives 3 and 4 related to station location and design meeting community concerns and avoiding or minimizing adverse environmental impacts (please see revised Table 6-2).

Further, Section 15126.6 (d) notes that the EIR need only contain sufficient information on each alternative to allow “meaningful evaluation, analysis and comparison”. Although the analysis meets this test, additional photographs and discussion has been added to section 6.4.3.2 to provide yet more information.

In addition to these direct impacts of construction of Station 3 on this site, the relocation of the Birnam Wood maintenance facility would also be required, with potential for secondary impacts. Aside from the economic costs and impacts of demolition of the existing residence and maintenance structures on this site, loss of the maintenance facility could create potential secondary impacts to an important recreational facility. In addition, the relocation and the construction of a new maintenance facility would have unknown potential secondary impacts depending upon the location of such a facility. It is beyond the requirements of Section 15126.6 to assess such secondary impacts of an alternative, particularly

when the EIR provides substantial evidence that the alternative would create more severe impacts than the proposed project and may not fully meet project objectives. However, it should be noted that AMEC investigated alternative sites for the maintenance facility as part of the Station 3 Site Identification Study. Few such sites are available within Birnam Wood, which is largely built out. Each of the sites reviewed raised issues of concern including impacts to recreation, interference with a flood detention facility and substantial neighborhood incompatibility. The commenter is referred to the Station 3 Site Identification Study and Appendix A of that study which is hereby incorporated by reference.

It should be noted that the MFPD Board gave detailed consideration to this site during the Station 3 Site Identification Study process due to its location and ability to provide improved response times to upper Romero Canyon. However, the MFPD Board found that the site did not meet many of the District's siting criteria, particularly site configuration, a site that is safe from major hazards (e.g., flooding), few constraints (biological resources), the presence of a willing seller, being undeveloped or underdeveloped, and having a reasonable acquisition and development costs (due to demolition and relocation requirements).

- JCI-22 Comment noted. While the commenter asserts that the draft EIR relied upon two incorrect assumptions in designating the environmentally superior alternative, the draft EIR's conclusions are based upon solid factual analysis of the alternatives. As discussed in response JCI-14, the draft EIR correctly based its analysis of agricultural impacts on earlier County determinations. As discussed in response JCI-21, the commenter is incorrect in stating that there are significant agricultural impacts associated with the selected site and that the alternative Birnam Wood site would avoid all significant environmental impacts. The Birnam Wood site has relatively severe biological resource and other constraints, its development could produce secondary environmental consequences associated with relocation of existing facilities, and the site may not meet or only partially meet several project objectives.
- JCI-23 Comment noted. The commenter asserts in a conclusory fashion that the District must select the Birnam Wood alternative or reject the Project because Birnam Wood is both feasible and avoids the Project's significant agricultural and soils impacts. As discussed in response JCI-21, the Station 3 Site Identification Study and additional analyses completed for the draft EIR support the conclusion that the selected site is the environmentally superior alternative.
- JCI-24 Comment noted. The commenter here asserts that the draft EIR must be recirculated, for reasons stated in comments that follow. See responses JCI-25 and JCI-26.
- JCI-25 Comment noted. However, the draft EIR correctly referred to and relied upon the County's prior determinations and its statement of overriding considerations. The new information provided in the final EIR is only for purposes of providing clarification. The expanded agricultural information is not significant new information within the meaning of the CEQA Guidelines. Please see responses

JC-14 through JC-16 above as well as revised text regarding agricultural issues in Section 3.2.1.3 of the final EIR as well as Appendix K.

JCI-26

Comments noted. Please see responses JC-5 and JC-9 (for bullet a), JC-9 and JC-10 (for bullet b), JC-18 and JC-19 (for bullet c), JC-13 and JC-16 (for bullet d) and JC-21 and JC-22 (for bullet e). Further, as discussed in JC-24 above, the MFPD has provided extensive opportunities for public comment on this project throughout the planning and environmental process. These have been six (6) noticed meetings on the Station 3 Site Acquisitions Study, two (2) to date on the draft and recirculated EIR and a total of more than 75 days of review time for the EIR. Taken together, the responses above and the additions to the draft EIR provide a reasoned good faith effort to respond to comments received. Additional opportunity for comment will be available at MFPD board hearings on this project.

JOSEPH COLE
COUNSELOR AT LAW

March 9, 2012

Mr. Roland J. Jensen, Board President
Mr. John Venable, Board Member and Secretary
Mr. Dana Newquist, Board Member
Mr. Kevin Wallace, Fire Chief
Montecito Fire Protection District
595 San Ysidro Road
Montecito, California

**Re: Pines Trust: Comments to Recirculated Draft EIR for Station 3
dated February, 2012 (the "REIR"), which modifies the original Draft
EIR dated December, 2011 (the "DEIR")**

Gentlemen:

Thank you again for your service in protecting our community. I moved to Montecito in 1975 and the life-saving response time improvements and the environment protections at issue here impact me and my family personally.

As noted in my public comments delivered to you on February 6, 2012, I represent the Pines Trust. The Trust owns the 14.62 acre ranch across East Valley Road from the 234 acres of prime agriculture owned and operated since the 1920's by Palmer Jackson and his family. The District proposes to carve from the heart of the Jackson's historic open space the multi-acre site of the new fire station (the "Palmer Jackson East site").

Thank you for answering my questions at the February 21, 2012, REIR public comment meeting about the math for the increased traffic from the 8,000 cubic yards of soil to be exported from the site. Since the meeting was noticed solely for REIR comments, I resisted the opportunity to engage in a broader presentation at that time about the unintended negative consequences for our community from the District's proposed real estate deal with the Jackson family. That deal fueled the AMEC Site Study prepared for the District by Dan Gira and AMEC in August 2008 and underlies in my opinion the proposed outcome of the DEIR and the REIR.

My February 6, 2012 letter sets forth the reasons why the DEIR is inadequate and by law must be revised and re-circulated. Now that we have the new REIR, which we did not have when you set forth your February 6, 2012 deadline for my client's DEIR comments, this letter sets forth the reasons why the REIR is also inadequate and by law must be revised and re-circulated.

JCII-1

1. Procedural Problems with DEIR and REIR Process.

At the February 21, 2012 public meeting, the Board surprisingly announced that the public would have a new extended deadline, until March 9, 2012, to comment on the original DEIR as well as on the new REIR. This news has resulted in a prejudicial and unfair situation for the public, including for the Pines Trust:

- At the January 17, 2012 *DEIR* comments meeting, the public learned for the first time that a new *REIR* would be circulated because of the 8,000 cubic yards export problems. A representative of the Pines Trust, Nancy Patterson, attended that meeting.
- Ms. Patterson, two days later, on January 19, 2012, called Geri Ventura of the District to confirm whether the comment period for the DEIR would be extended until after the public had the opportunity to review the unreleased REIR.
- Ms. Ventura informed us that the deadline for the general public to comment on the DEIR would not be extended and would remain 5:00 p.m., February 6, 2012.
- We scrambled and in good faith complied with the February 6, 2012 deadline, but we did so blind to the rumored grading and other issues later described in the REIR.
- The public has been prejudiced in not being given the additional time to respond to the DEIR and not being permitted to review both the DEIR and the REIR before having to submit comments to the DEIR by 5:00 p.m., February 6, 2012. We understood that, had we not met that deadline, our comments and those of any other member of the public would not have been accepted.
- If the public would have been given the additional four or five weeks, for example, we would have amplified our original comments. We would have had the time to interview and retain fire, engineering, biological and other experts to provide you with detailed information, including an in-depth comparison of the Palmer Jackson East site against the Birnam Wood site. The Birnam Wood site of course has significantly lower emergency response times for the bulk of the affected residents of your District and we believe the DEIR gave you insufficient information as we detailed on February 6, 2012.

JCII-2

JCII-2a

JCII-2b

JCII-2c

JCII-2d

2. Perceived Bias.

At the February 21, 2012 meeting, Mr. Gira of AMEC gave a PowerPoint presentation and answered questions. He briefly defended his choice of the prime farmland of the Palmer Jackson East site as the DEIR's *environmentally superior alternative* by listing the environmental factors affecting the cement maintenance yard, caretaker's house and parking lot comprising the bulk of the Birnam Wood site.

I respect Mr. Gira and AMEC, but I left that meeting with the same concern about potential bias raised by the Trust's neighbor, Gene Sinser, at an earlier District meeting. Mr. Sinser questioned whether Mr. Gira, with all due respect by Mr. Sinser, was a "fox in the hen house," since Mr. Gira conducted the site selection study and is now supervising the EIR process.

The site selection recommendation, obtained at significant public expense, focused on the Palmer Jackson East site in large part since Mr. Jackson is willing to make a voluntary real estate deal. Mr. Gira's EIR process that he is supervising, also conducted at significant public expense, picks the Palmer Jackson East site as the "environmentally superior alternative" which supports his site selection recommendation.

JCII-3

Despite the semantics of the DEIR and now the REIR, it is impossible to conceive under current law how carving 2.55 acres from the heart of prime historic agricultural lands and open space is not a Class I Impact under CEQA.

CEQA does not allow agencies to predetermine project approval. (*Laurel Heights Improvement Association v. Regents of the University of California* (1988) 47 Cal. 3d 376, 294 (A "fundamental purpose" of CEQA review "is to provide decision makers with information they can use in deciding *whether* to approve a proposed project, not to inform them of the environmental effects of projects that they have already approved.") Unfortunately, here, it appears that Mr. Gira's EIR is largely an ad hoc rationalization for choosing the Palmer Jackson East site.

3. Public Benefit, Attorney's Fees and Expanded Board Expertise.

The DEIR at 6-22 notes that the Birnam Wood site maintains a significant response time advantage over the Palmer Jackson East site: "*This site at the corner of Sheffield Drive and East Valley Road is an ideal location for Station 3 and would optimize emergency personnel response to greater Montecito*". This optimization is a substantial public benefit that over the long-term

JCII-4

operation of the new station will save additional lives compared to alternative sites and will protect substantial additional property compared to alternative sites.

It is indisputably a public benefit to save additional lives and property. In the unfortunate event the courts ultimately have to decide these issues, if members of the public have to protect this public benefit the District may have to reimburse any prevailing party its attorneys' fees – which is money much better spent on fire protection.

JCII-4

At the very least, the critical question of optimizing the saving of lives and property, and maximizing the protection of the environment in our unique community, should await the results of the election for the District this fall, where the number of directors will increase from three to five.

4. Incomplete Project Description.

The purpose of recirculating the DEIR is to “*permit public comment on adjustments in the project description and resultant potential changes in project impacts.*” (REIR p. 1-1). Adjustments to the project description, however, are not adequately described in the REIR to inform the public and decision makers of the nature of the adjustments and their impacts. As stated in our February 6, 2012 DEIR comment letter, CEQA requires a complete and accurate Project Description, and an inadequate Project Description affects the adequacy of the EIR’s impact and alternatives analysis.

Specifically, the REIR’s project description is inadequate for failing to include relevant information concerning the hauling and disposal of the cut material. Per the REIR, export of grading cut would require up to 800 dump truck trips to and from the site. (REIR p. 2-18). The REIR does not disclose the origin or destination of the dump trucks, which is necessary information for analyzing the air quality, global warming, and traffic impacts of the Project. The REIR merely states “*the receiver site for fill would be an acceptable site with any required permissions and associated BMPs in place.*” (See REIR p. 3.7-12). Based on this vague description, those receiver sites could be quite distant from the Project site. Also troubling, the REIR assumes a typical capacity of 10 cubic yards per truck, but does not require the use of trucks with this capacity. (See above.). Accordingly more or fewer truck trips may be required, which in turn would alter the impact analysis.

JCII-5

The REIR’s project description is also inadequate for failing to describe the location of topographical changes associated with exporting 8,000 cubic yards of cut offsite. The visual impact section reveals that portions of the site will be lowered by one to two feet, and other



portions lowered by three to five feet. (REIR p. 3.1-21). The project description, however, is silent about where on site the lowering would occur, which is necessary information for an adequate visual impact analysis.

JCII-5

5. Aesthetics and Visual Resources.

The REIR's discussion of aesthetic impacts associated with the grading changes is inadequate. The REIR states that the "*export of soil would lead to slight changes in overall site topography with much of the site being lowered 1 to 2 feet below existing grade, and more limited areas being lowered from 3 to 5 feet below existing grade.*" (REIR p. 3.1-21). The visual impact analysis only briefly addresses the impact associated with lowering of the site by one to two feet as having "*the effect of incrementally reducing building profiles to passers-by on East Valley Road.*" (REIR p. 3.1-23). The analysis fails to discuss impacts associated with the areas lowered by three to five feet below existing grade, resulting in a flawed and incomplete analysis. (*See above.*)

JCII-6

The REIR also lacks visual simulations that show the effect of the grading changes, rendering the conclusion of no significant impact purely speculative. Visual impacts from regional viewpoints should be analyzed, including from public trails, roads and viewing locations on Ortega Ridge Road and the Los Padres National Forest, in addition to private viewpoints.

Moreover, the reliance on landscaping to mask the changes in topography is problematic because as the REIR admits, "*trees which currently screen a project site can be burned during wildfire events or die from old age or disease.*" (REIR p. 3.1-15). While oaks may be known for their post-fire regenerative capabilities, oaks also die from old age and disease. (*See above.*) Moreover, the landscaping relied on to screen the Project does not solely consist of oak trees (*see above.*) ("*Landscaping would consist of an approximately 60-foot-deep buffer along East Valley Road, vegetated with a mix of trees and shrubs.*") Accordingly the visual impact analysis should assume no landscaping to accurately describe the Project's impacts, including the impacts associated with the grading changes.

6. Air Quality.

The REIR does not accurately characterize or analyze the air quality impacts associated with the hauling of cut from the Project site. The air quality impact analysis concludes that the "*export of soil and associated haul truck traffic would lead to a slight increase in construction emissions as the majority of emissions would continue to be related to operation of heavy*

JCII-7

construction equipment on the project site, which typically exhibit relatively high emission rates when compared to trucks and other on-road vehicles.” (REIR p. 3.3-11). However, the REIR does not identify the assumptions relied upon for the emissions calculations, including the distance associated with the 800 haul truck trips. The air quality data appended to the REIR includes a vehicle miles traveled (VMT) figure of 347.83 associated with “On Road Truck Travel,” but provides no information regarding the source or parameters of this figure (*see* REIR Appendix A, p. 6). Without this critical information, the air quality impact analysis is inadequate.

JCII-7

7. Biological Resources.

The REIR does not include any analysis of the biological impacts associated with the grading changes. The Water Resources section acknowledges the potential for soil erosion to “*degrade offsite surface water quality, and damage downstream aquatic habitats*” (REIR p. 3.11-11). Given the potential for increased soil erosion associated with removing 8,000 cubic yards of cut from the site to impact aquatic habitats, the REIR should have included a revised analysis of biological resource impacts.

JCII-8

8. Noise.

The REIR impermissibly failed to include an analysis of noise impacts associated with the export of cut material. Adding 800 dump truck trips to and from the site over a three-month period, with up to 30 daily truck trips being added within a one-month period, will generate significant noise impacts that must be analyzed in a revised and recirculated document (*see* CEQA Guidelines § 15088.5 (a)(1-2)). The temporary nature of the impacts does not excuse the REIR from identifying and analyzing these impacts (*see e.g. City of Arcadia v. State Water Resources Control Bd.* (2006) 135 Cal. App. 4th 1392, 1425 (environmental analysis impermissibly ignored the temporary impacts associated with the construction of pollution control devices including an increase in noise levels)).

JCII-9

9. Transportation and Traffic.

The traffic impact analysis in the REIR omits crucial information regarding impacts associated with increased truck traffic and lacks adequate mitigation for these impacts. Specifically, the REIR fails to analyze impacts to the new East Valley Road/project driveway intersections associated with adding haul-truck traffic. Large trucks entering and exiting the Project site create a potential hazard due to the partial obstruction of the view of approaching vehicles acknowledged in the REIR (*see* p. 3.10-12). A recent accident at a Goleta intersection

JCII-10

involving a semi resulted in one fatality¹, highlighting the hazard posed by introducing 30 daily truck trips to the East Valley Road/project driveway intersection.

The impact analysis also fails to disclose the routes or destinations of the haul trucks, discussed in the Project Description section above, and below with respect to mitigation. The REIR provides that “[i]f fill were required to be transported out of the project vicinity, haul trucks would utilize East Valley Road and Sheffield Drive, and the maximum of 30 daily trips added to these roads would represent less than 1 percent of the daily traffic.” (REIR p. 3.10-10). The obvious flaw in this analysis however is that the REIR fails to analyze the potential impacts involved in the haul trucks reaching their destination, because potential destinations are not disclosed in the document.

With respect to mitigation, the REIR includes the preparation of a construction traffic management plan including the “preparation of haul truck access and routing plan with designated haul truck route when the receiver site is designated” and “acquisition of a County haul permit to the selected receiver site”. (REIR pp. 3.10-9 – 10). CEQA requires that mitigation measures be specified in the document and not deferred to some future time, unless there are adequate performance standards in place. (See CEQA Guidelines § 15126.4 (a)(1)(B)). The future preparation of a construction management plan leaves the routing of truck traffic wholly undetermined and lacks performance standards to ensure that truck routing avoids significant traffic impacts. Identification of the routes and destinations of the haul trucks is critical information necessary to ensure the mitigation of significant traffic impacts.

JCII-10

Finally, the REIR impermissibly fails to include haul truck traffic in the cumulative impact analysis with respect to both roadway and intersection impacts, focusing exclusively on long-term impacts. (See REIR pp. 3.10-14 – 3.10-15).

10. Global Warming.

The air quality section, discussed above, is flawed and incomplete, and requires revised emissions calculations that reflect the VMT associated with the 8,000 haul truck trips needed to export cut material from the Project site. This emissions data is also relevant to the Project’s impact on global warming, and accordingly that section also should have been revised and included in the recirculated document.

JCII-II

¹ See <http://www.independent.com/news/2011/aug/18/motorcyclist-killed-accident-semi/>

11. Alternatives.

As discussed in our DEIR comments, there are several problems associated with the selection of the proposed Project as the environmentally superior alternative. The comparative impacts of the proposed Project and the identified alternatives must be informed by an analysis of the impacts associated with the export of 8,000 cubic feet of soil from the proposed Project site and the 800 haul truck trips required to export that material.

JCII-12

12. Consistency with Plans and Policies.

MCP Policy AQ-M-1.3 requires that air pollution emissions from new development *and associated construction activities* be minimized to the maximum extent feasible. The REIR's discussion of this policy refers to the use of BACT and BMP to minimize fugitive dust during construction, but does not establish that air pollution emissions associated with all construction activities is minimized to the maximum extent feasible. Specifically, limitations on the length of haul-truck trips is notably absent from the REIR, discussed in various sections above. Minimizing emissions to the maximum extent feasible clearly requires these limitations so as to avoid unnecessary emissions associated with hauling cut material long distances.

JCII-13

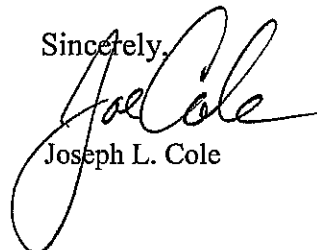
The REIR's discussion of transportation and traffic policies fails to analyze traffic associated with hauling cut material off-site (*see* REIR pp. 4-11 – 4.12). This policy discussion must be updated to include this additional traffic generated by the Project.

13. Conclusion.

As before, thank you for the opportunity to present these comments. As I wrote you on February 6, 2012, the courts give great weight to public comments under CEQA.

As requested in my letter to you dated February 6, 2012, please copy my office on all further notices from the District to the Pines Trust. Despite my earlier request, I did not receive any notice about the REIR, including the public comment dates or the deadlines.

Sincerely,



Joseph L. Cole

Joseph Cole, Counselor at Law; March 9, 2012 (JCII)

Thank you for your comments. Please see detailed responses below. Please also note Sections of the final EIR where clarifications and additional information have been added to the EIR.

- JCII-1 Comments noted. Please see responses to the JCI letter dated February 6, 2012 regarding the legal adequacy of the draft EIR. As can be seen from these responses, the MFPD disagrees that the draft EIR is legally inadequate and has provided detailed analysis in the final EIR and responses to comments to support this conclusion. Please also note that Mr. Gira and District Counsel clarified at the hearing of February 21, 2012, at which you were present, that the MFPD Board wished for the fullest possible community participation and that comments would continue to be welcome on all aspects of the project.
- JCII-2 Comments noted. Generally, the MFPD has gone substantially beyond the minimum requirements for noticing, public outreach efforts and provision of public opportunities for comment for the Station 3 Site Acquisition and Construction EIR. The invitation to continue to submit comments on the original draft EIR also went beyond legal minimums and was provided to assist the community in participation. The MFPD has been engaged in detailed planning for the Station 3 project for over 4 years. During this period, over 10 noticed public hearings, workshops and meetings have been held regarding site selection, public concerns and associated issues such as response times, environmental constraints and the comparative merits and drawbacks of over 13 individual sites (refer to Appendix M). In addition to formal noticed hearings, MFPD's team extended individual meeting invitations to affected property owners (including the former owners of the site now owned by Pines Trust) and has met on multiple occasions with concerned owners and neighbors to tour sites and understand community concerns. In summary, the outreach, noticing and planning efforts for Station 3 have been both inclusive and exhaustive as further discussed below.
- JCII-2a Comment noted. As soon as the MFPD determined it appropriate to recirculate portions of the draft EIR under Sections 15088.5 (c, d) of the State Guidelines for Implementation of the California Environmental Quality Act (CEQA Guidelines), the public was notified. Additional legal notices were published in papers of record and notices sent to property owners with 1,000 feet of the site. When queried, Ms. Ventura understandably conveyed the noticing deadlines set forth in both letters and newspaper ads.
- JCII-2b Comment noted. However, the commenter had more than the 45-day minimum required period to respond to the original draft EIR, a substantial amount of time to prepare comments. There was no need to respond to the grading issue in the original set of comments as the MFPD had plainly announced its intention to recirculate portions of the EIR with an additional public comment period to be provided.

JCII-2c Comment noted. However, the public was not prejudiced in any way by the MFPD decision. As described in response JCII-2 above, the MFPD has consistently gone beyond minimum standards in seeking and allowing for public participation in and comment on this project. As noted in responses JCI-5 and JCI-11, although no new significant impacts were identified and none became substantially more severe, appropriate sections of the EIR were recirculated to provide the public with an opportunity to review and consider adjustments in the project description regarding grading and the potential for increased export of fill material. This approach is entirely consistent with or exceeds the requirements of the guidance set for in Section 15088.5 (c, d) for such circumstances.

JCII-2d Comment noted. However, the commenter had 48 days within the original comment period to retain experts, compare the alternatives and prepare detailed fact-based comments on the project. In addition, the commenter had an additional 30 days to comment on the limited changes associated with adjustments in the project description due to a change from largely balanced onsite cut and fill to export of a portion of the excess soil. At the public hearing of 2/21/12, the MFPD decided to permit an additional 17 days of comment on the entire project. This would be over and above the legally required 45-day minimum review period already provided by the MFPD on the original draft EIR. In total, the public was provided with 65 days to comment on the original draft EIR (initial 48 day comment period plus the added 17 days allowed from the public hearing of 2/21/12). The MFPD has met and exceeded its legal obligations to provide for public comment on the draft EIR and the project as a whole. Finally, the EIR acknowledges that the Birnam Wood site would have improved response times, particularly to upper Romero Canyon. However, as described in responses JCI-21 and Section 6.4.3.2 of the final EIR, development of the Birnam Wood site is not environmentally superior to the proposed project, having additional direct impacts to biological resources, public infrastructure, recreation, potential flood hazards, and noise, as well as potential secondary impacts associated with relocation of the existing Birnam Wood maintenance facility.

JCII-3 Comments noted. As described under response JCII-2 above, the selection of the proposed Station 3 project site was the outcome of an extended study that included an extensive open public process as well as multiple meetings with neighbors and potentially affected property owners. The MFPD Board of Directors initially adopted objective site selection criteria to guide their decision-making on site selection. These criteria were accepted by the Board at an open public hearing and were subject to public review and comment. At each step throughout this extended public process, the MFPD has carefully considered the information provided in the Station 3 Site Selection Study, public comment and MFPD Board of Directors-accepted site selection criteria. The entire process has been transparent and required the MFPD to consider and balance the attributes and drawbacks of each site. This process will continue as the MFPD Board of Directors considers the final EIR, including public comment.

With regard to the environmental impacts of developing the Birnam Wood site, please see responses JCI-21, JCII-2d, and Section 6.4.3.2 of the final EIR. With

regard to the loss of 2.55 acres of agricultural land and open spaces being a class I impact under CEQA, please see responses JCI-13 through JCI-17 as well as Section 3.2.1.3 and Appendix K of the Final EIR. It should also be noted that the commenter has provided no analysis to substantiate the claims that impacts to agricultural and open space resources would be significant, merely asserting that this is the case. Further, stating that the project site is in the heart of prime agricultural land mischaracterizes the location of the project site, which is at the southern edge of the orchards developed on the Rancho San Carlos, which has long been designated by the County of Santa Barbara for residential use; the loss of this agricultural land to urban development has been acknowledged by the County (please see responses JCI-13 through JCI-17).

Finally, the EIR provides analysis of the project's potential environmental consequences as well as those of a reasonable range of alternatives. The MFPD Board of Directors will consider all of the data and analysis in the final EIR along with public comments when determining whether to proceed with the proposed project. Given the extensive and open nature of the public process to date, the range of potential alternatives provided in the EIR, and the fact that the MFPD Board retains full discretion in this matter, it is simply inaccurate to assert that decisions have been predetermined.

JCII-4 Comments noted. Both the Station 3 Site identification Study and the EIR acknowledge the differing response times of various sites. Please see also responses JCI-3 and JCI-4.

JCII-5 Comments noted. However, the Project Description is as detailed as possible at this time regarding export of fill. The EIR describes what is known at the time of document preparation regarding the proposed destination of haul trucks. As project construction may occur from 1-5 years in the future, it is not possible to identify a precise location for fill at this time. The EIR analyzes potential impacts to known probable haul routes (e.g., East Valley Road, Sheffield Drive). CEQA Section 15145 prohibits speculation in an EIR. It would be speculative at this time to identify a destination for exported material, as it is not known at this time. This is frequently the case for development projects that export fill. Instead, the project description includes preparation of a construction management plan, which would be subject to County review and approval, and the use of a site for fill disposal that has been preapproved to accept fill. In terms of haul truck size, the industry standards are generally either a haul truck with 10 cubic yard dump box capacity or a double dump box haul truck with 20 cubic yard capacity. The EIR assumes a single dump box type of haul truck due to the narrow nature of the roads in this part of Montecito. Text has been added to Section 2.5 of the EIR to clarify this. In determining emissions from such haul trucks, The EIR assumes a reasonable worst case estimate of 20 miles per trip; however, even a substantial increase in mileage would not result in emissions exceeding thresholds. With regards to topographic changes on the site, Figure 2.4 (Proposed Grading and Drainage Plan) depicts final site topography and its relationship to existing topography. As shown on this figure, changes in topography would be greater toward the rear of the site and modest along the site's East Valley Road frontage.

To facilitate understanding of grading-related issues, text has been added to Section 2.4.5.

JCII-6 Comments noted. The primary public viewing area potentially affected by the project is East Valley Road, with views of the project site's foreground along East Valley road most prominent. In these areas, topographic changes would be limited, with no grading or elevation changes along most of the sites immediate frontage. Areas subject to 3-5 feet or more of grading would be along the northern site boundary 100 or more feet from East Valley Road, and would only be visible to passersby during site construction and the project's first 2-5 years of occupancy until landscaping begins to mature. Please see additional description added to Section 2.4.5 (Grading and Drainage), and Section 3.4.3.4 (Aesthetic Impact Analysis).

Photosimulations are not required for aesthetic and visual impact analysis under CEQA and the project description provides both site elevations which depict the proposed project, a landscape plan and the grading and drainage plan. In addition, views from Ortega Ridge Road and local trail were considered. Please refer to photographs from Ortega Ridge Road in Section 2.3.1, discussion in Section 3.1.3.2 and photograph from key viewing location E in Section 3.1.3.4. Impacts to private views are not considered under CEQA, but would be similar to those from the Key Viewing Location photographs along East Valley Road and Ortega Ridge Road.

With regards to existing oaks and landscaping, an important component of the project description are the deep landscape buffers proposed to surrounding the site, the retention of most mature oaks on the site and the planting of dense new landscaping. Therefore, it would not be appropriate to analyze impacts associated with no landscaping as that would conflict with the proposed project description. However, text has been added to Sections 3.1.3.2 (Impact Assessment Methodology) and 3.1.3.4 (Impact Analysis) which describes immediate post-construction or post-fire views.

JCII-7 Comments noted. Please see clarifications regarding assumptions for short-term truck emissions in Section 3.3.3.4 (Air Quality Impacts and Mitigations) and the calculations presented in Appendix D (Air Quality). However, it should be noted that short-term emissions are far below APCD guidelines and therefore project export of fill does not have the potential to trigger significant air quality impacts, and the analysis is adequate under CEQA. Please refer to the added information noted above.

JCII-8 Comment noted. However, it site preparation and grading itself (and exposure of soils to wind and water erosion), not the export of fill which creates potential for erosion and sedimentation. Potential for such impacts are addressed in detail in Section 3.7 (Geologic Processes) and Section 3.11 (water Resources, Supply, and Service). It should be noted that the project includes multiple mitigation measures to ensure protection of water quality both during project construction and over the long term as described in Sections 3.7 and 3.11. In addition, the

restoration of drainage side habitat areas is identified as having a beneficial effect on biological and function within the drainage channel (refer to Impact BIO-3).

- JCII-9 Construction Noise impacts are addressed in the EIR with construction noise identified as a Class III, adverse but not significant impact. The addition of 30 truck trips per day would not exceed adopted County Thresholds for noise and would continue to be considered as an adverse, but not significant short-term impact. Please see Impact NO-1 in Section 3.9 (Noise) of the final EIR.
- JCII-10 Comments noted. The potential for 30 haul truck trips per day would increase traffic on East Valley Road and Sheffield Drive by less than 1% for a period of 2-4 months. Haul truck routing and operation would be subject to review and approval by the County Public Works Department as well as Caltrans through their encroachment permit process. The increase in truck traffic is discussed under Impact TT-1 and has been reviewed by licensed traffic engineers at Associated Transportation Engineers and no significant impacts have been identified. Further, as discussed under Impact TT-3, access points to the project site have excellent line of sight which exceeds Caltrans standards, allowing trucks entering and exiting the site full visibility of oncoming traffic. Further, industry standards for traffic analyses typically require assessment of impacts to roads and intersections in the project vicinity that could be substantially affected by project traffic. The EIR meets this standard. Analysis of impacts at a fill receiver site would be speculative as the site is not currently known and the EIR requires that any fill site be pre-approved and have BMPs in place to address issues associated with receipt of fill. As noted above, CEQA Section 15145 prohibits speculation in an EIR and the commenter has submitted no analysis or expert opinion to support the contention that 30 daily truck trips would create significant impacts. Nonetheless, the construction management plan mitigation measure in Section 2.6.6 has been modified to explicitly state that site access and truck safety provisions must be addressed in the construction management plan.
- JCII-11 Comment noted. GHG emissions identified in Table 3.3-5 already account for the increased truck traffic. Further, County standards for assessment of GHG impacts require assessment of only operational GHG emissions; thus, by quantifying construction emissions the analysis already goes beyond County requirements.
- JCII-12 Comment noted. A brief statement has been added to the alternatives regarding export of fill from the site.
- JCII-13 Comment noted. The EIR discloses policy issues as required. A final determination of consistency with adopted County policy will be made by the County during review of the Conditional Use Permit. However, the project meets or exceeds standard County practices for control of construction emissions. Please see also responses JCII-5, JCII-7 and JCII-10.

Dear Chief Wallace:

Thank you for your recent communication concerning the grading of Fire Station number 3, dated February 7, 2012. As the closest owner/occupied residence to the Fire we are greatly concerned about the recent changes to the development.

My wife and I are concerned with the following:

1. Our seven year old daughter Reagan's bedroom is located some 100 feet from the southwest of the site where the grading will take place. Reagan has previously been to the doctors with allergy from dust and pollen. My wife also is susceptible to allergies from dust borne particles.

BR-1

2. The increased traffic and noise just outside our property will prevent our quiet enjoyment of our property. We would very much like to hear how you plan to mitigate the increased traffic volumes to prevent the nuisance of dump trucks being on what until now has been a relatively quiet rural stretch of East Valley Road .

BR-2

3. After completing an extensive renovation that included a new tile roof, new gates, and paintwork on our residence, this increased air borne particulate will we believe cause significant detriment to the physical appearance and use of our home. Our home has extensive outside entertaining area which we use with friends and family on a regular basis, this encroachment of air borne pollutants would greatly curtail our ability to host these events both from the concern from our guests health and our ability to keep our entertaining areas free from dirt and noise.

BR-3

Thank you for the opportunity to convey our concerns. We look forward to them being addressed in the near future.

Best regards,

Brian Reekie

Mr. Brian Reekie (BR), email of February 15, 2012

Thank you for your comments and for expressing your concerns. The MFPD strives to construct and operate its fire stations in a manner that is as respectful as possible of neighbors. The MFPD is proceeding carefully with Station 3 design and incorporating mitigation measures such as dense landscaping, setbacks, noise reduction measures and construction management practices to minimize adverse effects from the construction and operation of proposed Station 3. Your specific concerns are addressed below.

- BR-1 Comments noted. Construction of the proposed Station 3 will be subject to rigorous measures to control dust generated on the project site. These measures include regular site watering and tarping of haul trucks carrying soil. Please refer to Section 3.3.3.3 of the EIR for a list of dust reduction measures included in the project. Such measures will be monitored and enforced by the County Planning and Development Department and the Air Pollution Control District.
- BR-2 Comment noted. These issues are addressed in Sections 3.09 (Noise) and 3.10 (Traffic) of the EIR. Export of fill is anticipated to require an average of 30 haul trucks per day over a 3-month period, a short term increase of less than 1% in the volume of traffic along East Valley Road. The operation of haul trucks will be subject to County review and approval of a construction management plan designed to limit impacts to public roads and the neighborhood. The MFPD will also carefully monitor construction activity to ensure that project construction moderates effects on the neighborhood.
- BR-3 Comment noted. Please see response BR-1 above. Heavy grading activity and associated potential for dust generation should be limited to up to a 3-month period, with potential for dust generation much reduced after completion of grading. The MFPD will employ dust suppression techniques to reduce potential for offsite migration of particulates.

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EIR Hearing February 21, 2012

Mr. Joseph Cole, representing the Pines Trust, asked for clarification regarding the construction traffic estimates. Mr. Cole's comment was further elaborated upon in his formal comment letters (refer to comment letters JCI and JCII and responses to those letters).

No other comments were made at the February 21 hearing.

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EIR Hearing January 17, 2012

Members of the public asked questions regarding the EIR process and public comment period. However, no formal comments on the contents of the EIR were made.

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8.0 MITIGATION MONITORING PROGRAM

8.1 INTRODUCTION

The California Environmental Quality Act (CEQA) Section 21081.6 requires that a mitigation monitoring program be established upon certification of an Environmental Impact Report (EIR). It stipulates that "the public agency shall adopt a reporting or monitoring program for the changes to the project that it has adopted or made a condition of project approval in order to mitigate or avoid significant effects on the environment. The reporting or monitoring program shall be designed to ensure compliance during project implementation."

The following Mitigation Monitoring Program has been developed in compliance with Section 21081.6 of CEQA and identifies 1) the agency responsible for implementing the mitigation measure, 2) the approximate timing of when plans should be provided by the agency implementing the mitigation measure, 3) how the mitigation measure will be enforced by the monitoring division, and 4) where funding to implement the mitigation measure would be obtained.

Mitigation Measure	Implementation Responsibility	Timing	Monitoring Division	Funding
<i>Aesthetics and Visual Resources</i>				
VIS-1 (No mitigation measures required.)				
VIS-2 (No mitigation measures required.)				
<i>Agricultural Resources</i>				
AG-1 (No mitigation measures required.)				
<i>Air Quality</i>				
AQ-1 (No mitigation measures required.)				
<p>MM AQ-2a The measures listed should be implemented to minimize fugitive dust emissions. These measures represent standard County conditions of approval for a project and would likely be required by the County as part of permit approval process.</p> <ul style="list-style-type: none"> • During construction, use water trucks or sprinkler systems to keep all areas of vehicle movement damp enough to prevent dust from leaving the site. At a minimum, this should include wetting down such areas in the late morning and after work is completed for the day. Increased watering frequency should be required whenever the wind speed exceeds 15 mph. Reclaimed water should be used whenever possible. However, reclaimed water should not be used in or around crops for human consumption. • Minimize amount of disturbed area and reduce on site vehicle speeds to 15 miles per hour or less. • If importation, exportation and stockpiling of fill material is involved, soil stockpiled for more than two days should be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site should be tarped from the point of origin. • Gravel pads must be installed at all access points to prevent tracking of mud on to public roads. • After clearing, grading, earth moving or excavation is 	MFPD	Prior to and During Construction	Planning and Development Dept. and Air Pollution Control District	MFPD

Mitigation Measure	Implementation Responsibility	Timing	Monitoring Division	Funding
<p>completed, treat the disturbed area by watering, or revegetating, or by spreading soil binders until the area is paved or otherwise developed so that dust generation will not occur.</p> <ul style="list-style-type: none"> The contractor or builder should designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust offsite. Their duties should include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons should be provided to the Air Pollution Control District prior to land use clearance for map recordation and land use clearance for finish grading for the structure. 				
<p>MM AQ-2b The measures listed below should be implemented to minimize particulate emissions from diesel exhaust. These measures represent standard County conditions of approval for a project and would likely be required by the County as part of permit approval process.</p> <ul style="list-style-type: none"> All portable diesel-powered construction equipment should be registered with the state's portable equipment registration program OR should obtain and APCD permit. Fleet owners fleet owners of mobile construction equipment are subject to the California Air Resources Board Regulation for In-Use Off-road Diesel Vehicles (Title 13, California Code of Regulations Chapter 9, § 2449), the purpose of which is to reduce diesel particulate matter and criteria pollutant emissions from in-use (existing) off-road diesel-fueled vehicles. All commercial diesel vehicles are subject to Title 13, § 2485 of the California Code of Regulations, limiting engine idling time. Idling of heavy-duty diesel construction equipment and truck during loading and unloading should be limited to five minutes; electric auxiliary power units should be used 	MFPD	Prior to and During Construction	Planning and Development Dept. and Air Pollution Control District	MFPD

Mitigation Measure	Implementation Responsibility	Timing	Monitoring Division	Funding
<p>whenever possible.</p> <ul style="list-style-type: none"> • Diesel construction equipment meeting the California Air Resources Board Tier 1 emission standards for off-road heavy-duty diesel engines should be used. Equipment meeting Tier 2 or higher emission standards should be used to the maximum extent feasible. • Diesel powered equipment should be replaced by electric equipment whenever feasible. • If feasible, diesel construction equipment should be equipped selective catalytic reduction systems, diesel oxidation catalysts and diesel particulate filters as certified and/or verified by EPA or California. • Catalytic converters should be installed on gasoline-powered equipment, if feasible. • All construction equipment should be maintained in tune per the manufacturer’s specifications. • The engine size of construction equipment should be the minimum practical size. • The number of construction equipment operating simultaneously should be minimized through efficient management practices to ensure that the smallest practical number is operating at any one time. • Construction worker trips should be minimized by requiring carpooling and by providing for lunch onsite. 				
AQ-3 (No mitigation measures required.)				
Biological Resources				
BIO-1 (No mitigation measures required.)				
MM BIO-2 The applicant shall implement a Tree Protection and Replacement Plan, including the following tree protection measures to	MFPD	Prior to Issuance of Construction-related	Planning and Development Dept.	MFPD

Mitigation Measure	Implementation Responsibility	Timing	Monitoring Division	Funding
<p>address potential adverse effects on oak trees:</p> <ul style="list-style-type: none"> • A pre-construction meeting should be held with contractors, prior to commencement of work, to discuss tree protection measures. • Chain link or other acceptable fencing shall be installed, to establish tree protection zones (TPZs) at the outside edge of the drip lines or work areas (if drip lines are encroached upon). Fences must be maintained in upright positions throughout the duration of the project. Tree protection fencing shall also remain upright during landscape installation. Oaks in the drainage channel shall be protected with fencing at the buffer zone and at the edge of the road where it bisects the row of trees. • The TPZs shall be void of all activities, including parking vehicles, operation of equipment, storage of materials and dumping (including temporary spoils from excavation). • All excavation and grading near trees shall be monitored by the project arborist with particular attention to construction of the drainage swale in the site’s northwestern corner and of the vegetated swale and detention basin on the southern portion of the site. • Excavation within the drip lines but outside of the TPZs shall be done by hand where reasonable. Any roots encountered that are 6 inches and greater shall be cleanly cut. • Tree pruning, where limbs may conflict with equipment and proposed structures, shall be done prior to excavation and grading. • Pruning shall be performed or supervised by a qualified Certified Arborist. The project arborist shall review the goals with workers prior to commencement of any tree pruning. Tree workers shall be knowledgeable of American National Standards Institute (ANSI) A-300 Pruning Standards and ISA Best Management Practices for Tree Pruning. 		Permits and During Construction and Operation		

Mitigation Measure	Implementation Responsibility	Timing	Monitoring Division	Funding
<ul style="list-style-type: none"> • Results of the soil analysis shall be reviewed and soil shall be treated if necessary, or additional diagnostic protocol shall be performed on stressed trees and treated accordingly. • Trees that are impacted from root damage (even minimally) shall be sprayed in the early spring and late summer with permethrin (Astro) to help resist attack of oak bark beetles. The application of the chemical shall be applied to the lower 6 inches of trunk. Treatments shall be repeated for at least two years after completion of the project or if drought prevails for longer periods. All application of permethrin shall be approved by the County Agricultural Commissioner’s Office and, if applicable, by the state Department of Pesticide Regulation to avoid secondary impacts to aquatic species; spraying of oaks along the bank of the drainage shall not be permitted unless it includes best management practices or mitigation measures specifically pre-approved by the County Agricultural Commissioner’s Office. • If determined necessary by the project arborist, supplemental irrigation shall be used to aid trees that incur root loss and/or during hot and dry periods. • Removal of oaks shall be mitigated by planting at a ratio of 10 to 1 with 1-gallon saplings along the drainage channel, or at a ratio of 3 to 1 with 15-gallon oaks in landscaped areas. • The project arborist shall monitor activities on the site throughout the duration of the project. This shall be more frequent during fencing installation, excavation and grading, and less frequent as the project progresses, provided fences remain upright and TPZs are not violated. • All in-channel energy dissipaters shall minimize or void the use of grouting. • Final engineering design of and landscaping within the proposed detention basin and vegetated swale on the southern portion of the site shall account for the location of these two 				

Mitigation Measure	Implementation Responsibility	Timing	Monitoring Division	Funding
facilities partially within the drip lines of oak trees. Final design of these drainage features shall be subject to review by the project arborist to ensure that that their construction minimizes oak tree root damage and changes in soil moisture and drainage which may damage these oaks over the long-term.				
BIO-3 (No mitigation measures required.)				
Cultural Resources				
CR-1 (No mitigation measures required.)				
Fire Protection				
FP-1 (No mitigation measures required.)				
Geologic Processes				
GEO-1 (No mitigation measures required.)				
MM GEO-2 Soils engineering design recommendations addressing expansive soils and differential settlement in the site-specific geotechnical evaluation report shall be incorporated into the project design in accordance with applicable sections of the California Building Code and County of Santa Barbara Building Code.	MFPD	Prior to issuance of Development permits	Building and Safety Division/ Public Works Division	MFPD
MM GEO-3 Grading and erosion and sediment control plans, including the measures listed below, would be required to be designed to minimize erosion. These measures represent standard County conditions of approval for a project and would likely be required by the County as part of permit approval process. 1. Except for approved access roads, drives and trails, grading would be prohibited within 50 feet of the top of bank of the intermittent drainage along the western boundary of the project site. The protected areas would be required to be designated with orange construction fencing or other barrier to prevent entry by equipment or personnel.	MFPD	Prior to and during Construction	Planning and Development/Permit Compliance	MFPD

Mitigation Measure	Implementation Responsibility	Timing	Monitoring Division	Funding
<ol style="list-style-type: none"> 2. The applicant would be required to limit excavation and grading to the dry season of the year (i.e., April 15 to November 1) unless a Building and Safety-approved erosion and sediment control plan is in place and all measures therein are in effect. All exposed graded surfaces would be required to be reseeded with ground cover vegetation to minimize erosion. 3. Methods such as geotextile fabrics, erosion control blankets, retention basins, drainage diversion structures, siltation basins and spot grading would be required to reduce erosion and siltation into adjacent water bodies or storm drains during grading and construction activities. 4. Any sediment or other materials tracked offsite would be required to be removed the same day as they are tracked using dry cleaning methods. 5. Storm drain inlets would be required to be protected from sediment-laden waters by the use of inlet protection devices such as gravel bag barriers, filter fabric fences, block and gravel filters, and excavated inlet sediment traps. 6. Grading on slopes steeper than 5:1 would be required to be designed to minimize surface water runoff. 7. Temporary storage of construction equipment would be limited to a 50 by 50-foot area located along existing paved or dirt road on the property; equipment storage sites shall be located at least 100 feet from any water bodies. 				
<i>Land Use</i>				
LU-1 (No mitigation measures required).				

Mitigation Measure	Implementation Responsibility	Timing	Monitoring Division	Funding
Noise				
NO-1 (No mitigation measures required).				
NO-2 (No mitigation measures required).				
Transportation and Traffic				
TR-1 (No mitigation measures required).				
TR-2 (No mitigation measures required).				
TR-3 (No mitigation measures required).				
TR-4 (No mitigation measures required).				
Water Resources				
MM WAT-1 Prior to issuance of any construction/grading permit and/or the commencement of any clearing, grading, or excavation, a Notice of Intent (NOI) would be required to be submitted to the State Water Resources Control Board Storm Water Permit Unit. Compliance with the General Permit includes the preparation of a Storm Water Pollution Prevention Plan (SWPPP), which is required to identify potential pollutant sources that may affect the quality of discharges to storm water, and includes design and placement of Best Management Practices (BMPs) to effectively prohibit the entry of pollutants from the project site into area water bodies during construction. This measure represents a standard County condition of approval for a project and would likely be required by the County as part of permit approval process.	MFPD	Prior to Issuance of Construction-related Permits	SWRCB Storm Water Permit Unit/ Planning and Development	MFPD
MM WAT-2 The applicant would be required to apply for and be consistent with all National Pollution Discharge Elimination System (NPDES) permits that apply, which could include Construction and Municipal General Permits. These permits would be consistent with all requirements of the federal Clean Water Act.	MFPD	Prior to Issuance of Construction-related Permits and Operation-related permits	SWRCB/ Planning and Development	MFPD
MM WAT-3 The on-site detention basin shall be designed such that the post-developed peak discharge rate to off-site drainages shall not exceed the pre-developed peak discharge rate for the 2-year	MFPD	Prior to Issuance of CUP	Planning and Development/ Flood Control	MFPD

Mitigation Measure	Implementation Responsibility	Timing	Monitoring Division	Funding
through 100-year storm events.				
WAT-4 (No mitigation measures required).				

9.0 LIST OF PREPARERS

Montecito Fire Protection District

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Michael Henry, PhD Assistant Project Manager/ QA/QC
Rita Bright Land Use/Permitting Specialist
Brian Cook Senior Noise Specialist
Steve Ochs Air Quality Specialist
David King Biologist
Andrea Bardsley, RPA Archeologist
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ATE

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10.0 REFERENCES AND PERSONS OR ORGANIZATIONS CONTACTED

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