COUNTY OF SANTA BARBARA

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Draft Mitigated Negative Declaration

Jalama Beach County Park Improvements

Case Nos. 16DVP-00000-00017, 16CDP-00000-00106 & 17CUP-00000-00046

September 3, 2019

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1.0 REQUEST/PROJECT DESCRIPTION

The project is a request of Jill Van Wie an agent for the County of Santa Barbara Community Services Department, Parks Division, applicant, for a Final Development Plan to validate the existing, as-built development at Jalama Beach County Park (Park) and to permit the new development proposed in the project description below. The project also includes a Major Conditional Use Permit for the use of the portion of the campground which occurs on Assessor Parcel Number (APN) 083-510-064, which is zoned AG-II-320.

RV Cabins. The County of Santa Barbara proposes to install four new prefabricated recreational vehicle (RV) cabin structures within the existing Jalama Beach County Park to help satisfy low cost visitor serving needs in the Coastal Zone of Santa Barbara County. The four new RV cabins would be placed in an area that is currently the Starfish Cove Group Camp Area, located at the northernmost portion of the County Park adjacent to an existing basketball court and camp tent site #s 45 to 51. Construction in this area, in preparation for placement of the RV cabins, would consist of a new 20-foot-wide two-way access drive; installation of four RV cabin building pads; retaining walls of up to four feet in height around three sides of the cabin building pads; 530 cubic yards of cut and 850 cubic yards of compacted fill to be covered with pavement (asphalt and concrete) and landscaping; and new electrical pedestal connections to each cabin, utility lines for site electricity, hose-bibs and a 1,500 gallon replacement septic tank along with new sewer lines to the existing septic systems. Each RV cabin would be approximately 12 ft. x 26 ft. in size and 14 ft. in height, and would have an outdoor barbeque and picnic table. The RV cabins would be fabricated off site, trucked to the site, placed on the modular building pads, and connected to electrical, water, and sanitary utilities as needed.

Tent Site Conversion. Four tent sites (#s 37 to 40), which are located southwest of the RV cabins and near the Park entry and ranger kiosk, would be converted into the new Starfish Cove Group Camp Area (approx. 7,000 sq. ft.), resulting in an overall reduction of four existing tent sites within the County Park. Construction of the relocated Starfish Cove Group Camp Area would require 20 cubic yards of over excavation and recompaction and five cubic yards of fill, as well as installation of new and relocated utility lines for electric, water, and sewer.

Restroom Replacement and Remodel. Five existing restroom facilities in the Park would be demolished, including the removal of existing slab foundations, and replaced with three “larger type” restroom facilities (383 gross sq. ft. and 13 ft. in height) and two “smaller type” restroom facilities (221 gross sq. ft. and 13 ft. in height). The new replacement facilities would each include ADA accessible restrooms. The upgraded restroom facilities would be constructed on site and would require concrete and block work, utility connections, erection of structural systems, and final finishes. The north restroom facility would be constructed on top of eight inches (five cubic yards) of imported fill. In total, the new restroom facilities would require 15 cubic yards of over excavation and recompaction. Any new utility lines in the north restroom project area would be located within the same footprint of the existing utility lines, with no additional trenching or grading required.

Additionally, three new showers would be added onto the eastern end of an existing shower structure, including one ADA accessible shower. The shower addition (approx. 140 sq. ft.) would be located in the

western area of existing camp site #17, which is currently not available for reservations and would be abandoned completely.

Septic System. The Park would continue to be served by an existing septic system under the permitting authority of the Regional Water Quality Control Board. One new replacement 1,500 gallon septic tank would be installed in the new RV cabin area and be connected to the existing septic system. This new septic tank would be placed in the dirt fill at the new RV cabin area and replace an existing septic tank currently located under the existing grade at the same area. The existing septic tank would be filled and abandoned in place. No other improvements are required to accommodate the upgraded and/or replaced restroom or shower facilities. However, one previously abandoned septic tank adjacent to camp site #17 would be capped with compacted filled and abandoned in place.

Photovoltaic System. In order to reach the California New Zero Net Energy policy for the proposed construction, a 17-panel photovoltaic (PV) system and six-panel solar thermal flat plate collection system would be provided. The PV system is proposed to be installed on the rooftop of the existing Workshop Building (located at the northeast side of the Park), and would connect into the existing electric grid of the Park. The solar thermal system would be installed on the rooftop of the existing/addition Shower Facility to reduce the amount of propane gas used for providing hot water to the showers. Structural review and upgrade of existing roof structures would also be provided for the installation of both systems if necessary.

Grading. Total grading figures for the project would include 530 cubic yards of cut, 950 cubic yards of fill, 380 cubic yards of import, and 35 cubic yards of over excavation and recompaction. All fill soils would be obtained from locally available sources.

2.0 PROJECT LOCATION

Jalama Beach County Park is an existing campground facility located at the terminus of Jalama Road approximately 19 miles south of the City of Lompoc and 56 miles north of the City of Santa Barbara, on APNs 083-510-001 and 083-510-064, in the Third Supervisorial District.

2.1 Site Information	
Comprehensive Plan Designation	Coastal Zone, Rural, Gaviota Community Plan area, Recreation / Open Space (APN 083-510-064), and Agriculture, one dwelling per 320 acres (APN 083-510-064)
Zoning District, Ordinance	Article II, REC, Recreation District (APN 083-510-001), and AG-II-320, Agriculture, 320-acre minimum parcel size (APN 083-510-064); North Gaviota Coast Rural Region; Critical Habitat Overlay, Environmentally Sensitive Habitat Overlay, Riparian Corridor Overlay, Flood Hazard Overlay, Lompoc Habitat Management Plan, Military Notification Buffer, Trail Corridor, Hydrologic and Wetland area, and Fire Hazard area.
Site Size	19.5 acres within APN 083-510-001 (23.57 acres) and APN 083-510-064 (14.61 acres)
Present Use & Development	Jalama Beach County Park (recreational day use and camping facilities)
Surrounding Uses/Zoning	North: Agriculture, 100-AL-O (Jalama Creek and federal lands

	owned by Vandenberg Air Force Base) South: Agriculture, AG-II-320 (Dangermond Preserve) East: Transportation Corridor, TC (Union Pacific Railroad) Agriculture, AG-II-320 (Dangermond Preserve and Jalama Road) West: Pacific Ocean
Access	Jalama Road
Public Services	Water Supply: Water wells located on Vandenberg Air Force Base Sewage: Onsite septic system Fire: Santa Barbara County Fire Protection District, Station 51 Santa Barbara County Fire Protection District, Station 18 Police: County Sheriff Other: Lompoc Landfill (solid waste disposal)

3.0 ENVIRONMENTAL SETTING

3.1 PHYSICAL SETTING

The Park, which is addressed as 9999 Jalama Road, straddles two parcels. The majority of the Park is located on APN 083-510-001, a 23.57 acre parcel zoned REC. The southeast portion of the Park is located on APN 083-510-064, a 14.61-acre parcel zoned AG-II-320. The Park is accessed via Jalama Road, a two-lane, 15 mile-long road that connects State Highway 1 to the coast. The Jalama Road turnoff from Highway 1 is located approximately five miles south of Highway 246 in Lompoc.

The proposed project would occur within the currently existing Jalama Beach Park campground. The Park is nestled in the hills along the coast, bounded to the north by Jalama Creek and Vandenberg Air Force Base, to the south by the Dangermond Preserve (formerly the Cojo-Jalama Ranch), to the west by Jalama Beach and the Pacific Ocean, and to the east by the Pacific Railroad, Jalama Road, and the Dangermond Preserve. Jalama Beach is one of only four remaining areas along the northern coast of Santa Barbara County that provides opportunities for public access and recreation. Point Conception, an area rich in natural resource diversity, is located less than 5 miles south of the Park.

Surrounding Land Uses

Undeveloped open space lands surround the Park to the north, south, and east. The site is bounded by Vandenberg Air Force Base to the north, the Dangermond Preserve to the east and south, and the Pacific Ocean to the west. The Park has approximately 1,700 linear ft. of ocean frontage.

North: Jalama Creek borders the project site on the north. Across the creek, all lands are currently under federal jurisdiction as part of Vandenberg Air Force Base. The ocean front area north of the Park is backed by steep coastal bluffs.

South: Landforms located south of the Park include coastal bluffs of approximately 75 ft. in height, a thin strip of beach, and coastal terrace. The Dangermond Preserve is located on the southern side of the project site and includes approximately 24,000 acres. The Dangermond Preserve consists of primarily open space used as grazing for an existing livestock operation. Much of the Dangermond Preserve is in

agricultural preserve. Jalama Road is also located south and east of the Park. Jalama Road connects the Park to Highway 1.

East: The Dangermond Preserve is also adjacent to the project site on the east. A Union Pacific Railroad easement and railway and the entry to the Park (Jalama Road) is located south and east of the Park. Jalama Road connects the Park to Highway 1.

West: Jalama Beach and the Pacific Ocean are located to the west.

Existing Development

The Park currently offers a range of year-round camping and day use recreational opportunities. A day-use area provides access for surfing, windsurfing, surf-fishing, swimming, beach walking, picnicking, and bird watching. The camping facilities include seven cabins (with bathrooms), 31 sites with electronic hookups available to recreational vehicles (RVs), and 78 tent sites, of which 76 are currently available for reservation. Each camping site includes a picnic table and barbecue pit. The park also includes the Starfish Grove and Abalone Point group camping areas, five restroom facilities, and 105 day use parking spaces. An entry gate and pay station allow access to the central Park camping area.

Amenities at the site include shower facilities, public telephones, children's play areas with play structures, a general store and restaurant/grill/snack bar, horseshoe pits, and a basketball court. Handicap accessible facilities are available for camping, parking, restrooms, and showers.

Five ranger housing units, one of which is currently vacant, two host units, a Park office, host bus, and a Park maintenance service yard are located onsite, at the north-easternmost portion of the County Park. Staffing varies during the year to correlate with visitor levels, but four County Park Rangers reside at the Park year-round. Additional seasonal support is brought in to increase staffing during the peak summer months.

The beach is heavily used by surfers throughout the year. In recent years, approximately 210,500 people visited the Park annually. These numbers are estimated by the County based on traffic counts conducted between 2010-2014. June through September are typically the months of heaviest use. Demand for camping during these peak season months exceeds supply. During the off-season, demand does not usually exceed capacity, except on some holiday weekends.

Slope/Topography

The width of the beach varies with the rise and fall of the tides, seasonal changes, and surf conditions, but generally ranges between 50 to 100 ft. from the water's edge to the mean high tide level. Moving eastward (inland), there are a series of dunes, varying in size, that are subject to constant movement and shifting by the area's strong winds. Slopes of approximately 0 to 10 percent dominate the low-lying dune areas, with the topography transitioning to steeper slopes of between 0 and 35 percent on the terraced coastal bluffs above the Park. The developed portion of the Park lies landward of the dune system.

Flora

The restroom renovations and shower addition would occur in previously developed areas. The proposed RV cabin pad area includes developed and disturbed bare ground and disturbed ruderal habitat dominated by non-native turf grasses. Within the disturbed habitat are several mature individual trees, including cypress (*Cupressus sp. – potentially Monterey cypress - C. macrocarpa*) and pine (*Pinus sp.*). A group of small cypress trees is located approximately 60 ft. south of the proposed RV cabins. Monterey cypress can be considered a special status species (CRPR 1B.2) in their native habitat, but does not qualify as special status species when used as ornamental plantings or where naturalized outside their native range. Therefore, impacts to native specimen trees are considered less than significant. A small Class 1 wetland comprised primarily of cattails is located approximately 100 ft. southeast of the RV cabin pad work areas. Jalama Creek and its associated riparian area dominated by arroyo willow border are located approximately 200 ft. north of the proposed development area (with the exception of the existing building where the PV array would be installed, which is located approximately 50 ft. from the creek). While not located adjacent to the proposed development areas, the Jalama Beach County Park and Beach also supports beach, tidal, southern foredune, southern coastal bluff scrub, Venturan coastal sage scrub, and various riparian and wetland habitats.

The California Natural Diversity Database (CNDDB) indicates that the following special status plants have the potential to occur in the area: Coulter's saltbush (*Atriplex coulteri*), Gaviota tarplant (*Deinandra increscens ssp. villosa*), and chaparral ragwort (*Senecio aphanactis*). In addition, the site contains natural plant communities considered rare by the California Department of Fish and Wildlife (CDFW, 2010), including Arroyo willow thickets (*Salix lasiolepis*) Alliance.

Fauna

Wildlife species expected to inhabit the campgrounds include common species. Species observed during the site visit include red-winged blackbird (*Agelaius phoeniceus*), Brewer's blackbird (*Euphagus cyanocephalus*), song sparrow (*Melospiza melodia*), house finch (*Carpodacus mexicanus*), black phoebe (*Sayornis nigricans*), pied-billed grebe (*Podilymbus podiceps*), Allen's/rufous hummingbird (*Selasphous sp.*), Eurasian collared-dove (*Streptopelia decaocto*), American coot (*Fulica americana*), western gull (*Larus occidentalis*), common yellowthroat (*Geothlypis trichas*), monarch butterfly (*Danaus plexippus*), and western pond turtle (*Actinemys marmorata*). Special-status wildlife species known to occur on or adjacent to the campgrounds include western pond turtle and monarch butterfly. However, the campgrounds do not contain suitable eucalyptus groves to support wintering monarchs. The CNDDB indicates that the following special status animal species have the potential to occur in the area: tidwater goby (*Eucyclogobius newberryi*), California red-legged frog (*Rana draytonii*) and pallid bat (*Antrozous pallidus*).

Cultural Resources

Archaeological site CA-SBA-205 is located within the Park. This site is believed to be the ethnohistorically inhabited Purisimeño Chumash village of Shilimaqshtush.

Soils

The campground area is composed of sand and alluvial sediments and is only slightly higher in elevation than the adjacent beach. This area is bordered by coastal bluffs composed of shale bedrock overlain by

terrace deposits. Five mapped soil types occur in the project area: Agueda silty clay loam (2-9% slopes); Beaches; Camarillo fine sandy loam; Concepcion fine sandy loam (9-15% slopes, eroded); and Santa Lucia shaly clay loam (15-30% slopes, eroded).

Surface Water Bodies

Jalama Creek and its associated estuary are located approximately 200 ft. north of the proposed RV cabin site. A small Class 1 wetland is located approximately 100 ft. southeast of the proposed RV cabin site. Emergent freshwater wetlands and riparian habitats are located further inland and at a significant distance away from any of the project elements. The Pacific Ocean is located approximately 200 ft. west of the campground.

3.2 ENVIRONMENTAL BASELINE

The environmental baseline from which the project's impacts are measured consists of the on-the-ground conditions described above. Additional environmental setting information is provided, where necessary, to establish a baseline for assessing project impacts.

4.0 POTENTIALLY SIGNIFICANT EFFECTS CHECKLIST

The following checklist indicates the potential level of impact and is defined as follows:

Potentially Significant Impact: A fair argument can be made, based on the substantial evidence in the file, that an effect may be significant.

Less Than Significant Impact with Mitigation: Incorporation of mitigation measures has reduced an effect from a Potentially Significant Impact to a Less Than Significant Impact.

Less Than Significant Impact: An impact is considered adverse but does not trigger a significance threshold.

No Impact: There is adequate support that the referenced information sources show that the impact simply does not apply to the subject project.

Reviewed Under Previous Document: The analysis contained in a previously adopted/ certified environmental document addresses this issue adequately for use in the current case and is summarized in the discussion below. The discussion should include reference to the previous documents, a citation of the page(s) where the information is found, and identification of mitigation measures incorporated from the previous documents.

4.1 AESTHETICS/VISUAL RESOURCES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. The obstruction of any scenic vista or view open to the public or the creation of an aesthetically offensive site open to public view?			X		
b. Change to the visual character of an area?			X		
c. Glare or night lighting which may affect adjoining areas?		X			
d. Visually incompatible structures?			X		

Existing Setting: The proposed project would occur within an existing campground at Jalama Beach County Park. The County Park is nestled in the hills along the coast approximately 15 miles from Highway 1. It is bounded to the north by Jalama Creek and Vandenberg Air Force Base, to the south by the Dangermond Preserve, to the west by Jalama Beach and the Pacific Ocean, and to the east by the Union Pacific Railroad, Jalama Road, and the Dangermond Preserve. The majority of the County Park is designated recreational/open space and is characterized by the existing campground facilities, which consist of Jalama Beach Store and Grill, open campsites with barbecue/fire pits, camping cabins, picnic areas, parking spaces for day use, and facilities for visitors and staff such as restrooms, showers, and office and ranger buildings. Public views in this area are dominated by sweeping views of the Pacific Ocean, Jalama Beach, coastal bluffs, and rolling hills. The campground exists on terraced levels ranging from approximately 14 to 60 foot in elevation above sea level and is not visible from State Scenic Highway 1, but is visible from the Union Pacific Railroad and Jalama Road, a public road, once vehicles have reached the coast.

County Environmental Thresholds: The County's Visual Aesthetics Impact Guidelines classify coastal and mountainous areas, the urban fringe, and travel corridors as "especially important" visual resources. A project may have the potential to create a significantly adverse aesthetic impact if (among other potential effects) it would impact important visual resources, obstruct public views, remove significant amounts of vegetation, substantially alter the natural character of the landscape, or involve extensive grading visible from public areas. The guidelines address public, not private views.

Impact Discussion:

(a, b, d) Less than Significant. The project includes four new RV cabin pads in the location of the existing Starfish Cove Group Camp Area. The new cabins would be 12 feet in width, 26 feet in length, and 14 feet in height. The cabins would be adjacent to a proposed two-way paved road leading into the proposed cabin area. The cabins and paved road would be located approximately 350 feet east of the heavily used beach area and near existing structures already onsite including a restroom facility, Park office, and ranger housing. The project also proposes the demolition of three 150 gross square foot restrooms and two 275 gross square foot restrooms, new construction of two 221 gross square foot restrooms and three 383 gross square foot restrooms, and a 140 gross square foot addition to the existing shower facility. The new restrooms would be 10'-6" tall and the renovated shower facility would remain 12'-10" tall.

The proposed improvements would not further obstruct public scenic views available from the current campground, Jalama Road, or the Union Pacific Railroad, or block views of the coastal bluffs from the beach. The project would not change the visual character of the area due to the presence of the campground's current existing development, including numerous structures, RV cabins, tent sites and paving which all contribute to the site's existing visual character. Additionally, the proposed cabins and renovated facilities would not be visually incompatible with the existing structures due to the similarity in design and size. The project received advisory comments from the Central Board of Architectural Review which only commented on the proposed blue color of the restrooms. As a result, the project has been revised to utilize a more muted and lighter blue color tone for the proposed restrooms, which is consistent with mitigation measure AEST-6. With the required incorporation of general County standards and the proposed project's compatibility with the campground's existing aesthetic character, the project would not result in significant impacts and impacts would be **less than significant**.

(c) Less than Significant with Mitigation. The project is required to be found consistent with County lighting standards. Specifically, the County's Code contains Section 35-139 Exterior Lighting, which restricts the type and direction of exterior lighting fixtures. Implementation of mitigation measure AEST-1, which requires that new and retrofitted exterior night lighting is dark sky compliant, would ensure that no light spillover occurs from exterior night lighting associated with new structures. As a result, impacts would be less than significant.

Cumulative Impacts: The implementation of the project would not result in any substantial change in the aesthetic character of the area as discussed above. Thus, the project proposed would not cause a cumulatively considerable effect on aesthetics.

Mitigation and Residual Impact:

As the proposed project would be required to incorporate general County standards and adhere to the following mitigation measure, impacts to Aesthetics/Visual Resources would be **less than significant**.

1. **MM-AEST-1 Lighting.** The applicant shall ensure any new exterior night lighting installed on the project site is dark sky compliant: of low intensity, low glare design, minimum height, and shall be hooded to direct light downward onto the subject lot and prevent spill-over into adjacent lots. **PLAN REQUIREMENTS**: The applicant shall develop a Lighting Plan incorporating these requirements and showing locations and height of all exterior lighting fixtures with arrows showing the direction of light being cast by each fixture. **TIMING**: Lighting shall be installed in compliance with this measure prior to final occupancy clearance. **MONITORING**: The County Parks Project Manager shall inspect structures upon completion to ensure that exterior lighting fixtures have been installed consistent with their depiction on the final Lighting Plan.

2. **MM-AEST-06 Building Materials**. Natural building materials and colors compatible with surrounding terrain (earth-tones and non-reflective paints) shall be used on exterior surfaces of all structures. **PLAN REQUIREMENT**: Materials shall be denoted on building plans. **TIMING:** Structures shall be painted prior to final occupancy clearance. **MONITORING**: The County Parks Project Manager shall inspect prior to final occupancy clearance.

With the implementation of the required measure, residual impacts would be less than **significant**.

4.2 AGRICULTURAL RESOURCES

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Convert prime agricultural land to non-agricultural use, impair agricultural land productivity (whether prime or non-prime) or conflict with agricultural preserve programs?			X		
b. An effect upon any unique or other farmland of State or Local Importance?				X	

Existing Setting: The proposed project elements are located within the existing campground at Jalama Beach County Park. The approximately 19.5 acre County Park straddles two parcels: a 23.57 acre parcel (APN 083-510-001) zoned REC (Recreation) and a 14.61-acre parcel (APN 083-510-064) zoned AG-II-320. The County Park is bordered to the north by agricultural lands (100-AL-O), Jalama Creek, and Vandenberg Air Force Base. The County Park is bordered to the west by extensive sand dunes and the Pacific Ocean, agricultural land (AG-II-320) associated with the Dangermond Preserve is located to the south and east, and the Union Pacific Railroad Transportation Corridor (TC) is located immediately east of the park. Whereas the Dangermond Preserve owned APN 083-510-064 in fee when this project was initiated, a land transfer was completed before the County Board of Supervisors on April 2, 2019 that deeded approximately 36 acres of land to the County, including APN 083-510-064. The land transfer included the adjacent parcels 083-510-063 and 083-510-065 and was followed up with a Notice of Nonrenewal to remove these parcels from the Dangermond Preserve's Agricultural Preserve Contract No. 07AGP-00000-00026. Therefore, the campground is now located on land owned entirely by the County and no land encompassing the campground is located within an active agricultural area.

County Environmental Thresholds: A project which would result in the loss or impairment of agricultural resources would create a potentially significant impact.

Impact Discussion:

(a) Less than Significant Impact. The majority of the Park is located on APN 083-510-001, which is zoned REC and is not in agricultural use. The remainder of the Park, including its southernmost restroom, is located on the northern portion of APN 083-510-064, which is zoned AG-II-320 and is also not in agricultural use. In addition to being developed with the southeast portion of the campground, APN 083-510-064 also is developed with Jalama Road and is a bluff top parcel with the western portion of the parcel consisting of beach. Whereas, this parcel may have historically been used for cattle grazing associated with the Cojo Jalama Ranch, grazing has not occurred on this parcel in at least 43 years since it was developed with Jalama Road. Therefore, the proposed project would not convert agricultural land to non-agricultural use, impair agricultural land productivity, or conflict with agricultural preserve programs. Impacts would be **less than significant** to the neighboring agricultural land and cattle/grazing operations.

(b) No Impact. The proposed project would include the renovation of the Park's existing southernmost restroom facility, which is located on an agriculturally zoned parcel APN 083-510-064. The remainder of

this parcel is not used for grazing and is not identified as unique or other farmland of State or Local Importance. Therefore, demolition and reconstruction of the restroom facility located on this parcel would not change the current use of the existing development or have any effect on unique or other important farmland.

Cumulative Impacts: The County's Environmental Thresholds were developed, in part, to define the point at which a project's contribution to a regionally significant issue constitutes a significant effect at the project level. In this instance, the proposed project would not exceed the threshold of significance for agricultural resources as the project would not convert agricultural land to non-agricultural use. As the proposed project would include the renovation of an existing non-agricultural facility currently located on the perimeter of an agricultural parcel, the project would not result in additional loss of agricultural land. Therefore, the project's contribution to the regionally significant loss of agricultural resources would not be considerable, and would have **no cumulative effect** on regional agriculture.

Mitigation and Residual Impact:

No impacts are identified. No mitigation is necessary.

4.3a AIR QUALITY

Will the proposal result in:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No Impact**	**Reviewed Under Previous Document**
a. The violation of any ambient air quality standard, a substantial contribution to an existing or projected air quality violation, or exposure of sensitive receptors to substantial pollutant concentrations (emissions from direct, indirect, mobile and stationary sources)?			X		
b. The creation of objectionable smoke, ash or odors?			X		
c. Extensive dust generation?			X		

Existing Setting: The project site is located within the South Central Coast Air Basin, which includes Ventura County, Santa Barbara County, and San Luis Obispo County, and is within the jurisdictional boundaries of the Santa Barbara County Air Pollution Control District (SBCAPCD).

Criteria air pollutants are defined as pollutants for which the federal and state governments have established ambient air quality standards, or criteria, for outdoor concentrations to protect public health. Criteria air pollutants that are evaluated include reactive organic compounds (ROCs; also referred to as volatile organic compounds (VOCs)), oxides of nitrogen (NO_x), carbon monoxide (CO), sulfur oxides (SO_x), particulate matter with an aerodynamic diameter less than or equal to 10 microns in size (PM_{10}), and particulate matter with an aerodynamic diameter less than or equal to 2.5 microns in size ($PM_{2.5}$). ROCs and NO_x are important because they are precursors to ozone (O_3).

In analyzing cumulative air quality impacts from the proposed project, the assessment must specifically evaluate a project's contribution to the cumulative increase in pollutants for which the County is designated

as nonattainment for the National Ambient Air Quality Standards (NAAQS) or the California Ambient Air Quality Standards (CAAQS). An area is designated in attainment when it is in compliance with the NAAQS and/or CAAQS, which are set by the U.S. Environmental Protection Agency (EPA) or California Air Resources Board (CARB) for the maximum level of a given air pollutant that can exist in the outdoor air without unacceptable effects on human health or the public welfare. Generally, if the recorded concentrations of a pollutant are lower than the standard, the area is classified as "attainment" for that pollutant. If an area exceeds the standard, the area is classified as "nonattainment" for that pollutant. If there are not enough data available to determine whether the standard is exceeded in an area, the area is designated as "unclassified." The County of Santa Barbara is currently in attainment of NAAQS and is in attainment for all CAAQS with the exception of the state 8-hour O_3 standard and the state standards for PM_{10} (CARB 2014; EPA 2015).

Potentially Applicable SBCAPCD Rules and Regulations:

The SBCAPCD Rules and Regulations establish emission limitations and control requirements for various sources, based upon their source type and magnitude of emissions. The SBCAPCD rules applicable to the proposed project may include the following:

- Rule 302 (Visible Emissions). Rule 302 prohibits emissions of visible air contaminants from any potential source of air contaminants. The rule prohibits air contaminants, other than water vapor, that are a certain level of darkness or opacity from being discharged for a combined period of more than three minutes in any one hour.

- Rule 303 (Nuisance). This rule could apply to fugitive dust emitted during proposed construction activities or odors during operation. This rule states that a person shall not discharge air contaminants from any source that can cause injury, detriment, nuisance, or annoyance to any considerable number of persons, or that can endanger the comfort, repose, health, or safety of any such persons or their business or property.

- Rule 311 (Sulfur Content of Fuels). The purpose of this rule is to limit the sulfur content in gaseous fuels, diesel and other liquid fuels, and solid fuels for the purpose of both reducing the formation of SO_x and particulates during combustion.

- Rule 329 (Cutback and Emulsified Asphalt Paving Materials). This rule applies to the application and sale of cutback and emulsified asphalt materials for the paving, construction and maintenance of streets, highways parking lots and driveways and reduces potential emissions by restricting the percent by volume of ROCs in asphalt material.

- Rule 345 (Control of Fugitive Dust from Construction and Demolition Activities). Rule 345 establishes limits on the generation of visible fugitive dust emissions at demolition and construction sites. The rule includes measures for minimizing fugitive dust from on-site activities and from trucks moving on- and off-site.

County Environmental Thresholds: Chapter 5 of the Santa Barbara County Environmental Thresholds and Guidelines Manual (as amended in July 2015) addresses the subject of air quality. The thresholds

provide that a proposed project will not have a significant impact on air quality if operation of the project will:

- emit (from all project sources, mobile and stationary), less than the daily trigger (55 pounds per day of NO_x or ROC, 80 pounds per day for PM_{10}) for offsets set in the APCD New Source Review Rule, for any pollutant; and
- emit less than 25 pounds per day of NO_x or ROC from motor vehicle trips only; and
- not cause or contribute to a violation of any California or National Ambient Air Quality Standard (except ozone); and
- not exceed the APCD health risk public notification thresholds adopted by the APCD Board; and
- be consistent with the adopted federal and state Air Quality Plans.

The County has not established thresholds for temporary impacts associated with construction activities; however, the County's Grading Ordinance requires standard dust control conditions for all projects involving grading activities.

The SBCAPCD does not currently have quantitative thresholds of significance in place for short-term construction emissions; however, the SBCAPCD uses 25 tons per year for any pollutant[1] as a guideline for determining the significance of construction impacts (Barham, pers. comm. 2015). In addition, standard dust control measures must be implemented for any discretionary project involving earth-moving activities. Some projects have the potential for construction-related dust to cause a nuisance. Because Santa Barbara County is currently in nonattainment for the state PM10 standard, dust mitigation measures are required for all discretionary construction activities (regardless of the significance of the fugitive dust impacts) based on policies within the 1979 Air Quality Attainment Plan (SBCAPCD 2015a).

Although quantitative thresholds of significance are not currently in place for short-term emissions, CEQA requires that short-term impacts such as exhaust emissions from construction equipment and fugitive dust generation during grading be discussed in the environmental document. In the interest of public disclosure, the SBCAPCD recommends that construction-related NO_x, ROC, PM_{10} and $PM_{2.5}$ emissions from diesel and gasoline powered equipment, paving, and other activities be quantified.

Impact Discussion:

[1] The 25 tons per year guideline is based on the SBCAPCD rule for stationary source construction emissions offsets (Rule 202 D.16), which considers any pollutant (i.e., all pollutants for which an AAQS has been established by the EPA or CARB and the precursors to such pollutants), except CO. The SBCAPCD staff recommends that for CEQA assessments for typical land use projects that all criteria air pollutants estimated, which typically include ROC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$, be compared to the guideline of 25 tons per year (Barham, pers. comm. 2015). The approach utilized in this air quality assessment is consistent with the direction provided by the SBCAPCD staff for the proposed project.

Whereas the originally envisioned project included eight new RV-cabins, the proposed project includes only four RV-cabins. The numerical air quality analysis provided below was prepared under the original project scope (eight RV-cabins) and therefore represents a worst-case scenario with respect to all air quality impacts; however the written analysis provided below reflects the actual project scope of four RV-cabins. Additionally, whereas construction was originally anticipated to occur during 2016-2017, delays in permit processing have occurred. Nevertheless, the numerical analysis presented below would not change significantly given the delayed construction schedule and therefore is still adequate.

(a, c) Less than Significant. The proposed project would generate criteria pollutants from both short-term (construction related) and long-term (operational) activities. Project-generated criteria air pollutant emissions are estimated using the most recent version of the California Emissions Estimator Model (CalEEMod) (Version 2013.2), consistent with the SBCAPCD recommendations for project-level review because CalEEMod uses current emission factors and updated default values (SBCAPCD 2015a).

Short-Term Construction Impacts. Construction activities will be planned to minimize impacts to seasonal Park operations, promote efficient construction schedules, and minimize Park closures. For purposes of estimating project emissions, and based on information provided by the County (Green, pers. comm. 2015) and CalEEMod default values, it was assumed that construction of the project would commence in Fall 2016[2] and will last approximately 12 months, ending in Fall 2017. The analysis contained herein is based on the following assumptions (duration of phases is approximate):

- Demolition – 1 month (September 2016)
- Grading – 2 months (October 2016 – November 2016)
- Building Construction – 8 months (December 2016 – July 2017)
- Paving and Site Concrete – 2 weeks (August 2017).
- Application of Architectural Coatings – 2 weeks (August 2017)

The variety of construction equipment used for estimating the construction emissions of the project is based on information provided by the County (Green, pers. comm. 2015) and is shown in Table AQ-1, Construction Scenario Assumptions. For this analysis, it was assumed that heavy construction equipment will operate 5 days a week (22 days per month) during project construction.

Construction of the proposed project would result in a temporary addition of pollutants to the local airshed caused by soil disturbance, dust emissions, and combustion pollutants from on-site construction equipment, as well as from off-site trucks hauling construction materials. Construction emissions can vary substantially from day to day, depending on the level of activity, the specific type of operation, and, for dust, the prevailing weather conditions. Therefore, such emission levels can only be approximately estimated with a corresponding uncertainty in precise ambient air quality impacts.

[2] The analysis presented herein assumes a construction start date of 2016, which represents the earliest date at which construction would initiate. Assuming the earliest start date for construction represents the worst-case scenario for criteria air pollutant emissions because equipment and vehicle emission factors for later years would be slightly less due to more stringent standards for in-use off-road equipment and heavy-duty trucks, as well as fleet turnover replacing older equipment and vehicles in later years.

Project-related construction activities are anticipated to require approximately 380 cubic yards of import during grading, which would be minimized to the greatest extent possible. Assuming a haul truck capacity of 16 cubic yards, import of 380 cubic yards of fill would require 24 haul truck round trips (48 one-way trips). Haul truck trips were also assumed to occur during the building construction phase to transport the pre-fabricated cabins from an offsite location to the campground.

Implementation of the project would generate construction-related air pollutant emissions primarily from entrained dust, and equipment and vehicle exhaust, and to a lesser extent from off-gassing associated with paving and architectural coatings. Entrained dust results from the exposure of earth surfaces to wind from the direct disturbance and movement of soil, resulting in PM_{10} and $PM_{2.5}$ emissions. To account for dust-control measures in the calculations, it was assumed that the active sites would be watered at least three times daily, resulting in an approximately 61 percent reduction, to represent compliance with SBCAPCD standard dust control measures. Because the County is currently in nonattainment for the state PM_{10} standard, standard dust control measures are required for all discretionary construction activities (regardless of the significance of the fugitive dust impacts), based on policies in the 1979 Air Quality Attainment Plan (SBCAPCD 2015a). Exhaust from internal combustion engines used by construction equipment, haul trucks, vendor trucks (delivery trucks), and worker vehicles would result in emissions of ROC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$. The application of architectural coatings, such as paint and other finishes, would also produce ROC emissions; however, the contractor is required to procure architectural coatings from a supplier in compliance with the requirements of SBCAPCD's Rule 323 (Architectural Coatings).

Table AQ-1 Construction Scenario Assumptions

Construction Phase	Average Daily Worker Trips	Average Daily Vendor Truck Trips	Total Haul Truck Trips	Equipment	Quantity	Usage Hours
Demolition	14	0	6	Rubber Tired Dozers	1	8
				Tractors/Loaders/Backhoes	2	8
Grading	30	0	188	Rollers	1	7
				Rubber Tired Dozers	1	6
				Rubber Tired Loaders	1	7
				Tractors/Loaders/Backhoes	1	7
Building Construction	30	2	32	Rollers	1	8
				Rubber Tired Dozers	1	8
				Tractors/Loaders/Backhoes	1	8
				Trenchers	1	8
Paving	8	2	0	Pavers	1	6
				Paving Equipment	1	8
				Rollers	1	7
Architectural Coating	2	0	0	Air Compressors	1	6

Source: Green, pers. comm. 2015.

The total one-way trips per day is presented for workers and vendor trucks. The total one-way trips over the construction phase duration is presented for haul trucks. Each worker, vendor truck, and haul truck was estimate to generate two one-way trips.

Table AQ-2, Estimated Maximum Daily Construction Emissions, shows the estimated maximum unmitigated daily summer or winter construction emissions associated with construction of the proposed project.

Table AQ-2 Estimated Maximum Daily Construction Emissions

	ROC (lbs/day)	NO_x (lbs/day)	CO (lbs/day)	SO_x (lbs/day)	PM_{10} (lbs/day)	$PM_{2.5}$ (lbs/day)
2016	2.20	23.24	16.84	0.02	3.24	2.09
2017	1.70	16.29	10.43	0.02	1.25	0.96
Maximum Daily Emissions	**2.20**	**23.24**	**16.84**	**0.02**	**3.24**	**2.09**

Notes: See Attachment AQ for detailed results.
lbs/day - pounds per day.
Emissions presented are the maximum daily summer or winter emissions results from CalEEMod.
These estimates reflect compliance with SBCAPCD standard dust control measures, resulting in a 61percent reduction of on-site fugitive dust.

As previously mentioned, although the SBCAPCD does not currently have quantitative thresholds of significance in place for short-term or construction emissions, it uses 25 tons per year for any pollutant as a guideline for determining the significance of construction impacts (Barham, pers. comm. 2015). Table AQ-3, Estimated Annual Construction Emissions, presents estimated annual construction emissions in 2016 and 2017.

Table AQ-3 Estimated Annual Construction Emissions

	ROC (tons/year)	NO_x (tons/year)	CO (tons/year)	SO_x (tons/year)	PM_{10} (tons/year)	$PM_{2.5}$ (tons/year)
2016	0.09	0.92	0.65	0.00	0.10	0.07
2017	0.14	1.28	0.83	0.00	0.10	0.08
Maximum Annual Emissions	0.14	1.28	0.83	0.00	0.10	0.08
SBCAPCD Guideline	*25*	*25*	*25*	*25*	*25*	*25*
Guideline Exceeded?	No	No	No	No	No	No

Notes: See Attachment AQ for detailed results.
These estimates reflect compliance with SBCAPCD standard dust control measures, resulting in a 61percent reduction of on-site fugitive dust.

As shown in Table AQ-3, the construction of the proposed project would not exceed the SBCAPCD's general rule of 25 tons per year of ROC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ used for determining significance of construction emissions. Therefore, impacts on air quality during construction would be less than significant.

Operation of the project would produce ROC, NO_x, CO, SO_x, PM_{10}, and $PM_{2.5}$ emissions from vehicular (mobile) sources, including vehicle trips generated by visitors traveling to and from the campground; area sources, including fire pits (wood burning), use of consumer products, architectural coatings for repainting, and landscape maintenance equipment; and energy sources, including combustion of natural gas. It was conservatively assumed that each proposed cabin would include a wood burning fit pit that would operate for 3 hours per day for 365 days per year, which represents the primary source of emissions for ROC, CO, SO_x,

PM_{10}, and $PM_{2.5}$. Vehicles traveling to and from the project site are estimated to be the primary source of NO_x emissions. As average daily trip information was not available at the time this analysis was prepared, it was assumed that each cabin would include two one-way trips per day based on the assumption that the net increase of maximum capacity for vehicles at the campground would increase from 244 to 252 vehicles as a result of the proposed project.

The improvements would include the addition of four cabins and associated barbecues/fire pits for the proposed cabins, but would also relocate the Starfish Cove group site to the area of existing tent sites 37 to 41 and tent site #17 would be permanently abandoned. As a result the changes, there would be a total net decrease of 1 fire pit from current existing conditions. As with the proposed cabins and fire pits, the existing campsites and fire pits would generate minor operational emissions; however, the emissions associated with the replaced facilities are not subtracted from the estimated project-generated emissions. Therefore, this impact analysis presents a conservative approach to evaluating potential long-term, operational impacts.

Table AQ-4, Estimated Maximum Daily Operational Emissions, presents the maximum unmitigated daily summer or winter emissions associated with operation of the proposed project in 2018.

Table AQ-4 Estimated Maximum Daily Operational Emissions

	ROC (lbs/day)	**NO_x (lbs/day)**	**CO (lbs/day)**	**SO_x (lbs/day)**	**PM_{10} (lbs/day)**	**$PM_{2.5}$ (lbs/day)**
Area Source Emissions[a]	8.04	0.13	9.20	0.00	1.18	1.18
Vehicular Source Emissions	0.07	0.22	0.94	0.00	0.15	0.04
Combined Total Emissions	**8.11**	**0.35**	**10.14**	**0.00**	**1.33**	**1.22**
Vehicle Source Emissions Threshold	*25*	*25*	—	—	*N/A*	—
Threshold Exceeded?	No	No			N/A	
Area + Vehicle Source Emissions Threshold	*240*	*240*			*80*	
Threshold Exceeded?	No	No			No	

Notes: See Attachment AQ for detailed results.
lbs/day - pounds per day.
Emissions presented are the maximum daily summer or winter emissions results from CalEEMod.
[a] Emissions associated with natural gas usage (energy source emissions) are included in the Area Source Emissions consistent with the SBCACPD includes heating and cooling (natural gas usage) in the for the air quality impact analysis (SBCAPCD 2015a).

As shown in Table AQ-4, estimated net vehicle emissions would not exceed the SBCAPCD thresholds for ROC and NO_x, and estimated net combined area source (including energy source) and vehicle emissions would not exceed the SBCAPCD thresholds for ROC, NO_x, or PM_{10}.

Facilities and structures where air pollution-sensitive people live or spend considerable amounts of time are known as sensitive receptors. Land uses where air pollution-sensitive individuals are most likely to spend time include schools and schoolyards, parks and playgrounds, daycare centers, nursing homes, hospitals, and residential communities (sensitive sites or sensitive land uses) (CARB 2005). Surrounding land uses of the project site include agriculture and transportation corridors, which are not sensitive receptor land uses. As such, no offsite sensitive receptors are located near the project that would potentially be exposed to

substantial concentrations of pollutant emissions. In addition, implementation of County-required Mitigation Measure AQ-1 would ensure less than significant PM_{10} and $PM_{2.5}$ fugitive dust emissions.

Fugitive Dust Mitigation Measures

As stated previously, the SBCAPCD has not established construction PM_{10} emissions thresholds. However, because the County is currently in nonattainment for the state PM_{10} standard, dust mitigation measures are required for all discretionary construction activities, regardless of the significance of the fugitive dust impacts, based on policies within the 1979 Air Quality Attainment Plan. These measures are required for all projects involving earthmoving activities regardless of the project size or duration. Proper implementation of these measures is assumed to fully mitigate fugitive dust emissions. Nonetheless, the following mitigation measure will be implemented to ensure that PM_{10} emissions do not result in adverse impacts:

1. **MM-AQ-1.** Consistent with SBCAPCD requirements, the following dust control measures shall be implemented by the contractor/builder to reduce fugitive dust PM_{10} emissions generated during earthmoving construction activities as applicable:

    a. 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.

    b. Minimize amount of disturbed area and reduce on-site vehicle speeds to 15 miles per hour or less.

    c. If importation, exportation, and stockpiling of fill material are involved, soil stockpiled for more than 2 days shall be covered, kept moist, or treated with soil binders to prevent dust generation. Trucks transporting fill material to and from the site shall be tarped from the point of origin.

    d. Gravel pads shall be installed at all access points to prevent tracking of mud onto public roads.

    e. After clearing, grading, earthmoving, 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.

    f. The contractor or builder shall designate a person or persons to monitor the dust control program and to order increased watering, as necessary, to prevent transport of dust off site. Their duties shall include holiday and weekend periods when work may not be in progress. The name and telephone number of such persons shall be provided to the SBCAPCD prior to land use clearance for map recordation and land use clearance for finish grading of the structure.

    PLAN REQUIREMENTS: These dust control requirements shall be noted on all grading and building plans. **PRE-CONSTRUCTION REQUIREMENTS**: The contractor or builder shall provide staff and APCD with the name and contact information for an assigned onsite dust control monitor(s) who has the responsibility to:

    a. Assure all dust control requirements are complied with including those covering weekends and holidays.
    b. Order increased watering as necessary to prevent transport of dust offsite.

c. Attend the pre-construction meeting.

TIMING: The dust monitor shall be designated prior to the initiation of grading. The dust control components apply from the beginning of any grading or construction throughout all development activities until final occupancy clearance is issued. **MONITORING**: Grading Permit staff shall ensure measures are on plans. Inspectors shall spot check and shall ensure compliance onsite. APCD inspectors shall respond to nuisance complaints.

Visible Emissions. The proposed project is not anticipated to generate smoke or ash during construction. Implementation of the project would result in no net increase in barbecue/fire pits (removal of five fire pits and addition of four fire pits). The proposed fire pits would be located in a predominantly unvegetated area in the center of the existing campground. Potential smoke or ash associated with the barbecues/fire pits would be localized onsite and are not anticipated to impact offsite sensitive receptors.

Furthermore, the project would be required to comply with SBCAPCD Rule 302 (Visible Emissions), which prohibits emissions of visible air contaminants from any potential source of air contaminants, and Rule 303 (Nuisance), which prohibits discharge of air contaminants from any source that can cause injury, detriment, nuisance, or annoyance to any considerable number of persons, or that can endanger the comfort, repose, health, or safety of any such persons or their business or property. Potential impacts related to visible emissions, including smoke and ash, would be **less than significant.**

(b) Less than Significant. Certain projects have the potential to cause significant odor impacts because of the nature of their operation and their location. Examples of odor-generating land uses include fast food restaurants, bakeries, and coffee roasting facilities (SBCAPCD 2015). Land uses and industrial operations that are also associated with odor complaints include agricultural uses, wastewater treatment plants, food processing plants, chemical plants, composting, refineries, and landfills. Odors are a form of air pollution that is most obvious to the general public. Odors can present significant problems for both the source and surrounding community. Although offensive odors seldom cause physical harm, they can be annoying and cause concern. Construction and operation of the proposed project, including the addition of four fire pits and restroom improvements, would not create objectionable odors affecting a substantial number of people.

Construction Odor Impacts. Potential sources that may emit odors during construction activities include diesel equipment and gasoline fumes. Odors from these sources would be localized and generally confined to the project site. Construction would be temporary and construction activity would not occur in one location for an extended period of time. The proposed project would utilize typical construction techniques in compliance with County and SBCAPCD rules. The project would be required to comply with SBCAPCD Rule 311, which limits the sulfur content in gas and diesel fuel, which would reduce the formation of SO_x during combustion and associated odors. As such, proposed project construction would not cause an odor nuisance, and odor impacts would be **less than significant.**

Operational Odor Impacts. As previously discussed, implementation of the proposed project would result in no net increase in barbecues/fire pits. Odors associated with food preparation or burning of wood would likely be associated with use of the barbecue/fire pits. However, these odors are characteristic of the existing campground operation as well as camping activities in general throughout the County. Therefore, project operations would result in a **less than significant** odor impact.

Mitigation and Residual Impact:

Implementation of standard APCD conditions would reduce potential short-term dust impacts to a less than significant level. The project would not result in significant project-specific long-term air quality impacts. No further mitigation measures are required.

Cumulative Impacts: Cumulative air quality impacts are the effect of long-term emissions of the proposed project on the projected regional air quality or localized air pollution problems in the County. The County's Environmental Thresholds were developed, in part, to define the point at which a project's contribution to a regionally significant impact constitutes a significant effect at the project level. As discussed in the County's 1993 CEQA Guidelines (as amended in 2008), the cumulative contribution of project emissions to regional levels should be compared with existing programs and plans, including the SBCAPCD's Final 2013 Clean Air Plan (adopted by the SBCAPCD Board on March 19, 2015). To evaluate the cumulative impacts of localized pollutants, the contribution of the project's emissions to background levels should be considered. Due to the County's nonattainment status for ozone and the regional nature of the pollutant, if a project's total emissions of the ozone precursors (NO_x or ROC) exceed the long-term threshold, then the project's cumulative impacts would be significant. The proposed project would not generate significant long-term, operational emissions and would not exceed the thresholds of significance for air quality. Therefore, the project's contribution to regionally significant air pollutant emissions is not considerable, and its cumulative effect is less than significant.

4.3b AIR QUALITY - GREENHOUSE GAS EMISSIONS

Greenhouse Gas Emissions - Will the project:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No Impact**	**Reviewed Under Previous Document**
a. Generate greenhouse gas emissions, either directly or indirectly, that may have a significant impact on the environment?			X		
b. Conflict with an applicable plan, policy or regulation adopted for the purpose of reducing the emissions of greenhouse gases?			X		

(a, b) Greenhouse Gas Emissions

Existing Setting: Greenhouse gases (GHGs) are gases that absorb infrared radiation in the atmosphere. The greenhouse effect is a natural process that contributes to regulating the Earth's temperature. Global climate change concerns are focused on whether human activities are leading to an enhancement of the greenhouse effect. Principal GHGs include carbon dioxide (CO_2), methane (CH_4), nitrous oxide (N_2O), O_3, and water vapor. If the atmospheric concentrations of GHGs rise, the average temperature of the lower atmosphere will gradually increase. Globally, climate change has the potential to impact numerous environmental resources through uncertain impacts related to future air temperatures and precipitation patterns. Although climate change is driven by global atmospheric conditions, climate change impacts are felt locally. Climate change is already affecting California: average temperatures have increased, leading to more extreme hot days and fewer cold nights; shifts in the water cycle have been observed, with less winter precipitation falling as snow,

and both snowmelt and rainwater running off earlier in the year; sea levels have risen; and wildland fires are becoming more frequent and intense due to dry seasons that start earlier and end later (CAT 2010).

The effect each GHG has on climate change is measured as a combination of the mass of its emissions and the potential of a gas or aerosol to trap heat in the atmosphere, known as its global warming potential (GWP), which varies among GHGs. Total GHG emissions are expressed as a function of how much warming would be caused by the same mass of CO_2. Thus, GHG emissions are typically measured in terms of pounds or tons of CO_2 equivalent (CO_2E).[3]

Global climate change is a cumulative impact; a project participates in this potential impact through its incremental contribution combined with the cumulative increase of all other sources of GHGs (SBCAPCD 2015a). This approach is consistent with the *Final Statement of Reasons for Regulatory Action* for amendments to the CEQA Guidelines, which confirms that an environmental impact report or other environmental document must analyze the incremental contribution of a project to GHG levels and determine whether those emissions are cumulatively considerable (CNRA 2009).

Environmental Thresholds:

Santa Barbara County's Energy and Climate Action Plan (ECAP), adopted in 2015, is a GHG emission reduction plan. The County has been implementing the plan's emission reduction measures since 2016. However, the County is not projected to meet the 2020 GHG emission reduction goal contained within the plan, and the plan is going to be updated beginning in fiscal year 2019-2020. Therefore, at this time, a significance threshold is more appropriate for project-level GHG emission analysis, rather than tiering off the ECAP's Environmental Impact Report (EIR).

CEQA Guidelines Section 15064.4(a) states "A lead agency should make a good-faith effort, based to the extent possible on scientific and factual data, to describe, calculate or estimate the amount of GHG emissions resulting from a project." CEQA Guidelines Section 15064.4(b) further states,

> A lead agency should consider the following factors, among others, when assessing the significance of impacts from greenhouse gas emissions on the environment:
>
> (1) The extent to which the project may increase or reduce greenhouse gas emissions as compared to the existing environmental setting;
>
> (2) Whether the project emissions exceed a threshold of significance that the lead agency determines applies to the project…

[3] The CO_2E for a gas is derived by multiplying the mass of the gas by the associated GWP, such that metric tons of CO_2E = (metric tons of a GHG) × (GWP of the GHG). CalEEMod assumes that the GWP for CH_4 is 21, which means that emissions of 1 metric ton of CH_4 are equivalent to emissions of 21 metric tons of CO_2, and the GWP for N_2O is 310, based on the Intergovernmental Panel on Climate Change (IPCC) Second Assessment Report. Although the IPCC has released subsequent Assessment Reports with updated GWPs, CARB reporting and other statewide documents utilize the GWP in the IPCC Second Assessment Report. As such, it is appropriate to use the hardwired GWP values in CalEEMod from the IPCC Second Assessment Report.

The County of Santa Barbara does not have an adopted GHG emission significance threshold for sources other than industrial stationary sources. Therefore, significance thresholds from other California jurisdictions or agencies can be appropriately applied to land use projects within Santa Barbara County, as long as substantial evidence is provided to describe why the selected threshold is appropriate (CEQA Guidelines, § 15064.7(d)).

In 2012, San Luis Obispo County Air Pollution Control District (APCD) established an annual significance threshold of 1,150 metric tons of carbon dioxide equivalent ($MTCO_2e/yr$) for both residential and commercial projects. This significance threshold is approximately equivalent to the operational GHG emissions associated with a 70- unit residential subdivision in an urban setting (49- unit rural development) or a 70,000 sq. ft. office building (San Luis Obispo County APCD 2012). Santa Barbara County selected the San Luis Obispo County APCD threshold of 1,150 $MTCO_2e/yr$ as the most appropriate threshold to determine significance of cumulative impacts from GHG emissions for this proposed project. The rationale for applying the San Luis Obispo County APCD GHG emissions significance threshold is discussed below.

Threshold Applicability

- The threshold applies to GHG emissions that are not industrial stationary sources, but that are subject to discretionary approvals by the County, where the County is the CEQA lead agency.

- The threshold was developed to be consistent with Assembly Bill 32 (the California Global Warming Solutions Act of 2006), which established the State of California's 2020 GHG emissions reduction goal.

- The selected threshold considers GHG emissions comprehensively by measuring in annual metric tons of carbon dioxide equivalent.

- The threshold assessed historical and potential future land use development trends in San Luis Obispo County to establish the significance threshold. San Luis Obispo and Santa Barbara Counties have similar historical and potential future land use development trends.

- The threshold applies to GHG emissions from residential and commercial land use projects.

- The threshold assumes that construction emissions will be amortized over the life of a project and added to the operational emissions.

Impact Analysis:

GHG Emissions and Conflict with an Applicable GHG Reduction Plan

(a, b) Less than Significant. GHG emissions resulting from construction and operation of the project were estimated and included herein for disclosure purposes. Project-generated GHG emissions are estimated using CalEEMod consistent with the SBCAPCD recommendations for project-level review because CalEEMod has the ability to quantify indirect GHG emissions and GHG mitigation (SBCAPCD

2015a). Construction of the proposed project would result in GHG emissions, which are primarily associated with use of off-road construction equipment, on-road hauling and vendor (material delivery) trucks, and worker vehicles. GHG emissions associated with temporary construction activity were quantified using the CalEEMod. On-site sources of GHG emissions include off-road equipment, and off-site sources include hauling and vendor trucks and worker vehicles. Table GHG-1, Estimated Annual Construction Greenhouse Gas Emissions, presents construction emissions for the proposed project in 2016 and 2017 from on-site and off-site emission sources, which would not change significantly given the delayed construction schedule.

Table GHG-1 Estimated Annual Construction Greenhouse Gas Emissions

	CO_2 (MT/year)	CH_4 (MT/year)	N_2O (MT/year)	CO_2E (MT/year)
2016	90.74	0.02	0.00	81.16
2017	127.51	0.03	0.00	128.22
Total	**218.25**	**0.05**	**0.00**	**209.38**

Notes: See Attachment AQ for detailed results.
MT/year – metric tons per year, CO_2 – carbon dioxide, CH_4 – methane, N_2O – nitrous oxide, CO_2E – carbon dioxide equivalent

As shown in Table GHG-1, the estimated GHG emissions generated during project construction would be approximately 81 MT CO_2E in 2016 and 128 MT CO_2E in 2017 for a total of 209 MT CO_2E over project construction. Estimated project-generated construction emissions annualized over 25 years would be approximately 8 MT CO_2E per year.

The estimated operational project-generated GHG emissions from area sources, energy usage, motor vehicles, solid waste generation, water supply, and wastewater treatment, in 2018 (i.e., first full year of project operation) for the proposed project and existing land uses are shown in Table GHG-2, Estimated Annual Operational Greenhouse Gas Emissions.

Table GHG-2 Estimated Annual Operational Greenhouse Gas Emissions

Source	CO_2 (MT/year)	CH_4 (MT/year)	N_2O (MT/year)	CO_2E (MT/year)
Area	19.09	0.00	0.00	19.61
Energy	18.57	0.00	0.00	18.66
Vehicle (Mobile)	26.69	0.00	0.00	26.71
Solid Waste	0.19	0.01	0.00	0.39
Water Supply and Wastewater	1.16	0.12	0.00	3.77
Total Operational Emissions	65.70	0.13	0.00	69.14
Amortized Construction Emissions				8.38
Total Operational + Amortized Construction Emissions				**77.52**

Notes: See Attachment AQ for detailed results.
MT/year – metric tons per year, CO_2 – carbon dioxide, CH_4 – methane, N_2O – nitrous oxide, CO_2E – carbon dioxide equivalent

As shown in Table GHG-2, estimated annual project-generated GHG emissions in 2018 would be approximately 69 MT CO_2E/year as a result of project operations. Estimated annual project-generated operational emissions and amortized project construction emissions would be approximately 78 MT CO_2E/year.

While climate change impacts cannot result from a particular project's GHG emissions, the project's incremental contribution of GHG emissions combined with all other sources of GHGs may have a significant impact on global climate change. For this reason, a project's contribution to GHG emissions is analyzed below under "Cumulative Impacts."

Cumulative Impacts: Comparison of the proposed project's scope (installation of four new prefabricated RV cabins in what is currently the Starfish Cove Group Camp Area, relocation of the Starfish Cove Group Camp Area to the location of tent sites #s 37 to 40, permanent abandonment of tent sites #s 37 to 40, demolition of five restroom facilities and replacement with three larger restroom facilities, a 140 square foot addition to the existing shower facility, and installation of a 17-panel roof mounted photovoltaic system) to the County of San Luis Obispo APCD threshold of significance (1,150 $MTCO_2e$/yr, equivalent to the operational GHG emissions associated with a 70,000 sq. ft. office building), demonstrates that the project's incremental contribution to the cumulative effect is not cumulatively considerable and would not have a significant impact on the environment (Class III).

Mitigation and Residual Impact:

Since the proposed project would not have a significant impact on the environment, no additional mitigation is necessary. Therefore, residual impacts would be less than significant.

References:

California Air Resources Board, *Climate Change Scoping Plan*, December 2008.

County of Santa Barbara Long Range Planning Division, *Energy and Climate Action Plan*, May 2015.

County of Santa Barbara Long Range Planning Division, *Step-by-Step Guide for Evaluating Significance of Greenhouse Gas Emissions*, June 2019.

County of Santa Barbara Long Range Planning Division, *2016 Greenhouse Gas Emissions Inventory Update and Forecast*, June 2018.

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4.4 BIOLOGICAL RESOURCES

Will the proposal result in:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No Impact**	**Reviewed Under Previous Document**
Flora					
a. A loss or disturbance to a unique, rare or threatened plant community?		X			
b. A reduction in the numbers or restriction in the range of any unique, rare or threatened species of plants?		X			
c. A reduction in the extent, diversity, or quality of native vegetation (including brush removal for fire prevention and flood control improvements)?		X			
d. An impact on non-native vegetation whether naturalized or horticultural if of habitat value?			X		
e. The loss of healthy native specimen trees?			X		
f. Introduction of herbicides, pesticides, animal life, human habitation, non-native plants or other factors that would change or hamper the existing habitat?			X		
Fauna					
g. A reduction in the numbers, a restriction in the range, or an impact to the critical habitat of any unique, rare, threatened or endangered species of animals?		X			
h. A reduction in the diversity or numbers of animals onsite (including mammals, birds, reptiles, amphibians, fish or invertebrates)?		X			
i. A deterioration of existing fish or wildlife habitat (for foraging, breeding, roosting, nesting, etc.)?		X			
j. Introduction of barriers to movement of any resident or migratory fish or wildlife species?		X			
k. Introduction of any factors (light, fencing, noise,		X			

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
human presence and/or domestic animals) which could hinder the normal activities of wildlife?					

Existing Plant and Animal Communities/Conditions:

Background and Methods:

Santa Barbara County has a wide diversity of habitat types, including chaparral, oak woodlands, wetlands and beach dunes. These are complex ecosystems and many factors are involved in assessing the value of the resources and the significance of project impacts. For this project, a focused wildlife and floristic survey was conducted on March 4, 2015, and monarch butterfly surveys were conducted on November 16, 2017, and December 1, 2017, and biological reports were prepared (Letter to Todd Morrison from M. Blundell and J. Davis dated November 15, 2017; Memorandum to Todd Morrison from M. Blundell and J. Davis dated January 2, 2018). The 2015 biological survey was conducted prior to the addition of four additional proposed work areas and therefore assessed the (1) new showers/replaced restroom, (2) proposed cabins, and (3) relocated starfish cover/replaced restroom. The additional four new proposed work areas include (1) replaced restrooms located between RV sites #83 and 84, and the following three sites along the western boundary of the site: (2) replaced restroom – smaller type, (3) replaced shower, and (4) replaced restroom - larger type. The following analysis is based on the reports cited above, with extrapolations for the latter four sites based on the results of the site visits. Note that the installation of PV panels on the roof of the existing workshop in the northeast area of the Park is not analyzed, as the system would tie into the existing grid, and no on-the-ground impacts would occur. Note also that the analysis below was performed for the originally envisioned project, which included eight new RV-cabins. The currently proposed project includes only four RV-cabins. As a result, the impact discussion represents a worst-case scenario with respect to all biological impacts.

Flora:

The areas surveyed around the proposed project work locations consist primarily of disturbed habitat. The following is a brief description of all vegetation types encountered in the survey areas. Approximately 36 species were identified on site, the majority of which are non-native (naturalized) or cultivated species.

Ruderal

Ruderal lands on site are primarily dominated by non-native turf grasses (pot. crabgrass (*Digitaria* sp.)). This land cover includes various combinations of herbaceous non-native species interspersed with natives including non-native grasses (e.g., *Pennisetum clandentinum*), Canary Island date palm (*Phoenix canariensis*), Washington fan palm (*Washingtonia robusta*), smilograss (*Stipa miliacea* var. *miliacea*), blue elderberry (*Sambucus nigra* ssp. *caerulea*), hottentot fig (*Carpobrotus edulis*), sweet fennel (*Foeniculum vulgare*), bigleaf periwinkle (*Vinca major*), coyote brush (*Baccharis pilularis*), bristly oxtongue (*Helminthotheca echioides*), blessed milkthistle (*Silybum marianum*), common sowthistle (*Sonchus oleraceus*), spiny sowthistle (*Sonchus asper*), mule-fat (*Baccharis salicifolia*), Indian hedgemustard (*Sisymbrium orientale*), California goosefoot (*Chenopodium*

californicum), nettleleaf goosefoot (*Chenopodium murale*), burclover (*Medicago polymorpha*), musky stork's bill (*Erodium moschatum*), zonal geranium *(Pelargonium ×hortorum*), bull mallow (*Malva nicaeensis*), cheeseweed mallow (*Malva parviflora*), ngaio tree (*Myoporum laetum*), dandelion (*Taraxacum* sp.), barley (*Hordeum* sp.), goldenbush (*Isocoma* sp.), and ragweed (*Ambrosia* sp.).

Within the disturbed habitat are several mature individual trees, including cypress (*Cupressus* sp. – potentially Monterey cypress - *C. macrocarpa*) and pine (*Pinus* sp.). These species are located approximately 125 ft. to the northeast and directly south of the proposed new cabin sites. Disturbed areas are present throughout the majority of the survey areas. Approximately 2.76 acres of this community exist within the project area.

Riparian - *Salix lasiolepis* (Arroyo willow thickets) Alliance

Riparian habitat within the project survey area was dominated by arroyo willow (*Salix lasiolepis*) and interspersed with both native and non-native vegetation including (but not limited to) California blackberry (*Rubus ursinus*), New Zealand spinach (*Tetragonia tetragonoides*), nasturtium (*Tropaeolum majus*), and false bindweed (*Calystegia* sp. (potential)). Riparian habitat on-site was interspersed with public walking trails and showed signs of maintenance along trail routes. Riparian areas totaling 0.2 acres occur adjacent to Jalama Creek. This community, however, does not exist within the project impact area. The *Salix lasiolepis* (Arroyo willow thickets) alliance has a rank of G4S4 in CDFG (2010), meaning it is considered apparently secure globally and in the state. Although this alliance is listed as G4S4, the association *Salix lasiolepis* is considered a G3 or rarer. This community is considered special-status by CDFW.

Wetland - *Typha* (angustifolia, domingensis, latifolia) (Cattail marshes) Alliance

Areas characterized as a wetland were dominated by cattail (*Typha sp*.). Wetlands totaling 0.8 acres border Jalama Creek, approximately 250 ft. to the north of the proposed RV cabins. A second, smaller wetland measuring 513 square feet is located approximately 100 ft. southeast of the proposed RV cabins. Neither community exists within the project impact area.

The Typha (*angustifolia, domingensis, latifolia*)(Cattail marshes) alliance has a rank of G5S5 in CDFG (2010), meaning it is globally secure and secure in the state. This community is not considered special-status by CDFW.

Open Water/ Riverine

Open water/riverine habitat occurs within Jalama Creek. This creek is known to support populations of western pond turtle and California red-legged frog (as further discussed below). This open water/riverine is also designated as Environmentally Sensitive Habitat. This habitat totaling 0.72 acre occurs at least 300 ft. from the nearest proposed project area, and is not directly within the survey area or project impact area.

Beach

Beach substrates occur approximately 75 ft. in distance adjacent to the westernmost replacement restroom (smaller type). This area was proposed after the site visit. This area is assumed to contain sandy substrates with mainly unvegetated areas. Herbaceous species are assumed to be interspersed throughout the eastern portion of this area. This habitat totaling 0.08 acres is not directly within the survey area or project impact area.

Special-Status Plants

The California Natural Diversity Database (CNDDB) indicates that the following special status plants have the potential to occur in the area: Coulter's saltbush (*Atriplex coulteri*), Gaviota tarplant (*Deinandra increscens* ssp. *villosa*), and chaparral ragwort (*Senecio aphanactis*). In addition, the site contains natural plant communities considered rare by the California Dept. of Fish and Wildlife (CDFW, 2015), including *Salix lasiolepis* (Arroyo willow thickets) Alliance. Although this alliance is listed as G4S4, the association *Salix lasiolepis* is considered a G3 or rarer. See above for a description of this habitat on site.

Fauna:

Wildlife species expected to inhabit the site include common species. Species observed during the site visit include red-winged blackbird (*Agelaius phoeniceus*), Brewer's blackbird (*Euphagus cyanocephalus*), song sparrow (*Melospiza melodia*), house finch (*Carpodacus mexicanus*), black phoebe (*Sayornis nigricans*), pied-billed grebe (*Podilymbus podiceps*), Allen's/rufous hummingbird (*Selasphous* sp.), Eurasian collared-dove (*Streptopelia decaocto*), American coot (*Fulica americana*), western gull (*Larus occidentalis*), and common yellowthroat (*Geothlypis trichas*),. Special-status wildlife species known to occur on or adjacent to the site include monarch butterfly (*Danaus plexippus*) and western pond turtle (*Actinemys marmorata*). However, the site does not contain suitable eucalyptus groves to support wintering monarchs. The CNDDB indicates that the following special status animal species have the potential to occur in the area: tidwater goby (*Eucyclogobius newberryi*), California red-legged frog (*Rana draytonii*), steelhead trout (*Oncorhynchus mykiss)*, and pallid bat (*Antrozous pallidus).*

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

Wetlands: Projects which result in a net loss of important wetland area or wetland habitat value, either through direct or indirect impacts to wetland vegetation, degradation of water quality, or would threaten the continuity of wetland-dependent animal or plant species are considered to have a potentially significant effect on the environment. Projects which substantially interrupt wildlife access, use and dispersal in wetland areas would typically be considered to have a potentially significant impact. Projects which disrupt the hydrology of wetlands systems would be considered to have a potentially significant impact.

Riparian Habitats: Project created 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.

Individual Native Trees: Project created impacts may be considered significant due to the loss of 10 percent or more of the trees of biological value on a project site.

Impact Discussion:

This section takes into consideration direct and indirect impacts. **Direct** impacts refer to 100 percent permanent loss of a biological resource. **Indirect** impacts are reasonably foreseeable effects caused by project implementation on remaining or adjacent biological resources outside of the direct limits of excavation/grading work areas. Impacts are further distinguished into **short-term** effects – those that are immediately related to construction activities and may affect areas within the project area but outside the limits of excavation (including work areas) – and **long-term** or permanent effects – those related to permanent maintenance of the project site.

Overall, **long-term direct** impacts would occur only within ruderal and minimal expansions into beach land types. Long-term direct impacts would result from direct excavation/grading and increased human activity leading to trampling of vegetation outside of work areas. **Short-term indirect** impacts would occur as a result of changes in hydrology from construction, including sedimentation and erosion; and excessive use of chemical pollutants such as herbicides and pesticides. **Long-term indirect** impacts would occur as a result of excessive use of chemical pollutants such as herbicides and pesticides.

Flora:

(a, b, e) Less than Significant with Mitigation. Five cypress trees (*Cupressus* sp. – potentially Monterey cypress - *C. macrocarpa*) are located within the Jalama Beach County Park campground. Cypress trees have been assigned a California Rare Plant Rank of 1B (rare, threatened, or endangered in California and elsewhere). One cypress tree is located approximately 125 ft. northeast of the proposed RV cabin site and four are located approximately 60 ft. south of the proposed RV cabins. The proposed improvements are located outside of the dripline of all cypress trees. Additionally, no limbing or trimming of the trees would be required as part of the subject improvements. Impacts are considered less than significant. Nevertheless, in order to ensure project consistency with County policies regarding the protection of sensitive vegetation, mitigation measure BIO-5 requires that native trees are protected during construction with fencing placed 25 feet from the base of each tree or six feet beyond the dripline, whichever is greater. As such, the proposed project would not result in any impacts to cypress trees.

(c, d, f) Less than Significant with Mitigation. The proposed project would occur within currently existing and heavily used developed campgrounds at Jalama Beach County Park. The proposed grading, demolition, and construction would occur in heavily used areas that have been previously improved and developed with campsites and, where vegetation occurs, it is ruderal. There are no areas of environmentally sensitive habitat within areas of proposed ground disturbance. A small area of cattail-dominated wetland is located approximately 100 ft. southeast of the proposed RV cabins. All proposed development activity would be located outside of the 100-ft. ESH buffer from this wetland. Ground disturbance would only occur within ruderal areas (0.38 acre total) with minimal encroachment into mostly unvegetated beach land types. No vegetation removal would occur within the beach land types. In order to ensure that no project-related disturbance to areas of biological sensitivity occurs, mitigation measure BIO-1 requires that the construction work area be limited to the smallest area possible and that areas of construction and project activity are delineated on plans and fenced. Mitigation measures BIO-2, BIO-3, BIO-5, and BIO-6 specifically require that foredunes, creek and riparian areas, individual native trees, and ESH are shown on plans and fenced to protect them from construction-related impacts. Mitigation measure BIO-7 requires implementation of an erosion control plan to prevent construction-related sediment or pollutants from entering Jalama Creek or other riparian or wetland habitat. Thus, the proposed project would not result in a reduction in the extent, diversity,

or quality of native vegetation. Although some on-site non-native vegetation may be used by wildlife (specifically birds) as habitat, including the palm trees and shrubs located adjacent to the proposed new RV cabins, removal of this non-native vegetation of potential habitat value is not proposed.

Jalama Beach County Park operations and maintenance have historically and currently utilize herbicides and pesticides within the campgrounds. Thus, the proposed project would not result in the introduction of additional herbicides and pesticides that would change or hamper the existing habitat. Additionally, the project does not propose the introduction of animal life, non-native plants, or other factors that would change or hamper the existing habitat. As the County Park is currently a heavily utilized recreational campground, short- and long-term impacts to the existing habitat from the additional human presence within the project site would be less than significant.

Fauna:

(g, h) Less than Significant with Mitigation. The proposed sites for the new cabins, paved road, and northernmost renovated restroom are located approximately 250 ft. (minimum) from Jalama Creek. While the existing workshop where the roof-mounted PV array (solar panels) would be installed is less than this distance from the creek, the PV system would connect to the existing grid and no ground disturbance would be associated with this element of the project. The southern creek bank and adjacent Park area have been identified as a critical habitat for the threatened California red-legged frog (*Rana draytonii*) by the U.S. Fish & Wildlife Service. As documented in the biological report prepared for the proposed project, the region identified as migratory space for the California red-legged frog when it moves onto land is approximately 50 ft. from the nearest proposed work location. As a result, the proposed project could potentially result in a reduction in the range of critical habitat for the special-status California red-legged frog. Although the proposed project would not result in any physical loss of critical habitat, construction-related and operational activities could potentially impact the safe travel distance for the frogs. Impacts would be less than significant with the implementation of mitigation measures to reduce potential indirect impacts during construction. These include mitigation measures BIO-1 through BIO-4 and BIO-6, discussed above, which require limiting construction activity to the smallest area possible and avoidance and fencing of habitat areas, and BIO-3, which requires clearance surveys for special status species in work areas prior to construction.

Jalama Creek has also been identified as USFWS Critical Habitat for the endangered steelhead trout (*Oncorhynchus mykiss)*. Although the nearest proposed work areas that would require ground disturbance are approximately 250 ft. from Jalama Creek, potential short-term and long-term indirect impacts could result from construction-related activities as a result of erosion or chemical pollution. This impact would be mitigated to less than significant by mitigation measures BIO-1 and BIO-3 above; BIO-7, which requires implementation of an erosion control plan for construction; and BIO-8, -9, -10, and -11, which require avoidance of coastal bluff and sage scrub to the maximum extent possible, and if not possible, collection and re-distribution of topsoil from these areas to reduce the potential for bluff erosion and promote re-growth of the scrub vegetation.

(i, j, k) Less than Significant with Mitigation. Existing fish habitat can be found in Jalama Creek (approximately 250 ft. in distance from the nearest proposed ground-disturbing activity), and wildlife habitat exists in the areas surrounding the campgrounds and in the limited tree and shrub coverage within the currently existing developed campgrounds. However, the proposed project would not result in deterioration of the existing riparian, wetland, and tree habitats due to the implementation of the mitigation measures BIO-1 through BIO-11 described above,

including minimization and fencing of work areas, avoidance and fencing of habitat areas, clearance surveys for special status species, and minimization of erosion potential. Impacts to critical habitats and special-status species would be less than significant.

The proposed project would occur within currently existing developed campgrounds and would not introduce any additional permanent barriers to movement of resident or migratory fish or wildlife species. During construction-related activities, the proposed project would introduce factors that could hinder the normal activities of wildlife such as light, fencing, and noise. Existing policies require the limitation of noise-generating construction-related activities to Monday-Friday during normal business hours (8:00 a.m.-5:00 p.m.). Additionally, mitigation measure AEST-1, which requires dark-sky compliant lighting on new and refurbished structures, will ensure that night lighting and potential spillover impacts to the riparian area that might affect fauna will be reduced. The proposed project would occur within a heavily used recreational campground and so would not increase any impacts to the normal activities of wildlife from the currently existing condition. Although fencing could result in temporary impediments to normal wildlife activity, it is necessary to avoid impacts to critical habitats and special-status species. With implementation of the mitigation measures described above including the use of dark-sky compliant lighting, minimization and fencing of work areas, avoidance and fencing of habitat areas, clearance surveys for special status species, and minimization of erosion potential (mitigation measures BIO-1 through BIO-11), impacts would be less than significant.

Cumulative Impacts: The proposed project would occur on currently existing developed campground within Jalama Beach County Park. The proposed sites of grading and construction would not occur directly on locations of critical habitats or directly affecting special-status species. The proposed project would not significantly impact biological resources onsite and would not have a cumulatively considerable effect on the County's biological resources.

Mitigation and Residual Impact:

Adherence to the following mitigation measures would reduce impacts to Biological Resources to a **less than significant level**. These mitigation measures include those described in the *Jalama Beach County Park Master Plan Draft Initial Study* (County 1999). Note that some of the measures have been revised to include updated and standard condition language, including specific plan requirements, timing, and monitoring.

1. **MM-BIO-1 Fencing.** The extents of construction and project activity shall be delineated with fencing to ensure avoidance of construction activities in adjacent habitats or areas. The construction work area shall be reduced to the smallest area required for project completion. All areas of biological sensitivity, including riparian habitats, wetland habitats, and suitable habitats for special-status species (i.e., California red-legged frog, tidewater goby, western pond turtle, and fore dunes or beach substrates) would be protected with the establishment of exclusion fencing to prevent construction activities and equipment from entering these habitats. **PLAN REQUIREMENTS AND TIMING:** Fencing shall be delineated and approved by a qualified biologist prior to the start of construction activities. **MONITORING**: Inspectors shall confirm installation of fencing prior to the onset of construction.

2. **MM-BIO-2 Foredune Protection.** Foredunes shall be fenced to avoid inadvertent impacts from construction activities and equipment. Fencing will also ensure foredunes are avoided for use as staging or storage areas. **PLAN REQUIREMENTS AND TIMING:** Fencing shall be delineated and approved

by a qualified biologist prior to the start of construction activities. **MONITORING**: Inspectors shall confirm installation of fencing prior to the onset of construction.

3. **MM-BIO-3 Avoidance of Creek and Riparian.** Jalama Creek, any creek buffers, and willow stands shall be avoided and not used for any construction activities, including vehicle access, storage, and stockpiling. These areas shall be marked on all construction plans and fenced in the field. **PLAN REQUIREMENTS AND TIMING**: Fencing shall be delineated and approved by a qualified biologist prior to the start of construction activities. **MONITORING**: Inspectors shall confirm installation of fencing prior to the onset of construction.

4. **MM-BIO-4 Clearance Surveys**. Clearance surveys for special-status species in all works areas shall be conducted by a qualified biologist prior to the start of construction activities. **PLAN REQUIREMENTS**: The above measure shall be noted on all grading and construction plans. **MONITORING**: Inspection staff shall ensure compliance on site prior to construction.

5. **MM-BIO-5 Individual Native Trees.** Each native tree (i.e., *Pinus sp.* and *Cupressus sp.*) shall be protected with exclusion fencing. Fencing shall be delineated and approved by a qualified biologist prior to the start of construction activities. Fencing shall be established at approximately 25 ft. from the base of the tree or six feet from the dripline whichever is greater. **PLAN REQUIREMENTS:** The above measure shall be noted on all grading and construction plans. **TIMING:** Fencing shall be delineated and approved by a qualified biologist prior to the start of construction activities. **MONITORING**: Inspectors shall confirm installation of fencing prior to the onset of construction.

6. **MM-BIO-6 Environmentally Sensitive Areas.** Construction plans shall show riparian areas as environmentally sensitive areas (ESA). These areas shall be avoided and fenced during construction at their 100 foot buffer. **PLAN REQUIREMENTS**: The above measure shall be noted on all grading and construction plans. **MONITORING**: Inspection staff shall ensure compliance on site during construction.

7. **MM-BIO-7 Erosion Control Plan.** Prior to zoning clearance issuance the applicant shall prepare an Erosion Control Plan (Plan) to ensure sediments and erosion generated during construction will not enter Jalama Creek or directly impact riparian or wetland habitats. This plan shall include measures that will ensure the avoidance of impacts to these biological resources. The plan may include the following measures: (1) grading shall be prohibited during rainfall or the wet season; (2) all finished graded slopes must be protected from erosion using control techniques (e.g., hillslope benching, erosion control matting, hydroseeding with non-invasive grasses mixed with native broadleaf species which will be selected in consultation with a qualified biologist); (3) silt fencing and straw wattles will be used to ensure sediment in work areas does not seep into adjacent natural vegetation; and (4) any additional erosion control measures or standards provided by the County of Santa Barbara shall be incorporated into the Plan. Any erosion control material (e.g., straw wattles or fencing) moved during the day shall be replaced before leaving the site for the day. Any sediment captured by erosion control materials shall be collected by hand and spread throughout the site, where appropriate, prior to project completion. **PLAN REQUIREMENTS**: The grading and Erosion Control Plan (Plan) shall be submitted for review and approved by P&D prior to approval of zoning clearances. The plan shall be designed to address erosion, sediment and pollution control during all phases of development of the site until all disturbed areas are permanently stabilized. **TIMING**: The Plan requirements shall be implemented prior to the

commencement of grading and throughout the year. **MONITORING**: Inspection staff shall perform site inspections throughout the construction phase.

8. **MM-BIO-8 Bluff and Scrub Avoidance.** Coastal bluff and coastal sage scrub shall be avoided to the maximum extent possible. These areas shall be avoided and fenced during construction at their 10 foot buffer. **PLAN REQUIREMENTS**: The above measure shall be noted on all grading and construction plans. **MONITORING**: Inspection staff shall ensure compliance on site during construction.

9. **MM-BIO-10 Slopes.** The final layer of soil on disturbed slopes shall use topsoil. Dressed slopes shall be mulched with compacted/crushed native material. **PLAN REQUIREMENTS**: The above measure shall be noted on all grading and construction plans **TIMING**: Prior to grading, the top 8 inches of soil shall be collected and stockpiled. All stockpiled areas shall be protected from wind and rain erosion with the implementation of erosion protection measures (e.g., covered stockpiles). **MONITORING**: Inspection staff shall ensure compliance on site during construction.

With the incorporation of these measures, residual impacts would be **less than significant**.

References:

Dudek, *Biological Report for Jalama Beach Affordable Overnight Accommodations, Lompoc, Santa Barbra County, California,* November 15, 2017.

Dudek, *Monarch Butterfly Surveys for Jalama Beach Affordable Overnight Accommodations, Lompoc, Santa Barbra County, California,* January 2, 2018.

4.5 CULTURAL RESOURCES

Will the proposal:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No Impact**	**Reviewed Under Previous Document**
a. Cause a substantial adverse change in the significance of any object, building, structure, area, place, record, or manuscript that qualifies as a historical resource as defined in CEQA Section 15064.5?		X			
b. Cause a substantial adverse change in the significance of a prehistoric or historic archaeological resource pursuant to CEQA Section 15064.5?		X			
c. Disturb any human remains, including those located outside of formal cemeteries?		X			

Will the proposal:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
d. Cause a substantial adverse change in the significance of a tribal cultural resource, defined in the Public Resources Code Section 21074 as either a site, feature, place, cultural landscape that is geographically defined in terms of the size and scope of the landscape, sacred place, or object with cultural value to a California Native American tribe, and that is: 1) Listed or eligible for listing in the California Register of Historical Resources, or in a local register of historical resources as defined in Public Resources Code section 5020.1(k), or 2) A resource determined by the lead agency, in its discretion and supported by substantial evidence, to be significant pursuant to criteria set forth in subdivision (c) of Public Resources Code Section 5024.1. In applying the criteria set forth in subdivision (c) of Public Resource Code Section 5024.1, the lead agency shall consider the significance of the resource to a California Native American tribe.		X			

Existing Setting:

For at least the past 10,000 years, the area that is now Santa Barbara County has been inhabited by Chumash Indians and their ancestors. Based on three technical reports conducted in support of the proposed project: (1) Archaeological Survey Report, Jalama Beach Restroom Replacement Project, Santa Barbara County, California (Munns, March 2015); (2) Phase 2 Archaeological Investigations at CA-SBA-205 for the Jalama Beach County Park Restroom and Shower Improvements Project, Santa Barbara County, California (Nocerino et al., August 2016); and (3) Letter report from Eric Nocerino to Jill Van Wie Re: Extended Phase 1 Investigations for the Proposed Cabins at Jalama Beach County Park, Santa Barbara County, California, dated December 19, 2017 cultural resources are located in the vicinity of the proposed project.

Built Environment. The proposed project would occur within the existing campground within the Park. The Park was originally privately owned land belonging to the Atlantic Richfield Oil Company. In 1943, approximately 23.5 acres of the privately owned land was donated to the County of Santa Barbara, and was

later used to create the County Park. The main Park structures, such as the five restroom facilities, were constructed in 1972. Further Park maintenance and improvement from 1973 to 1992 resulted in construction ranging from storage sheds, ranger residences, the Park Office, and maintenance facilities, to the most recent shower facility.

CA-SBA-205. Jalama Beach County Park is sited within archaeological site CA-SBA-205. This site comprises the buried remains of a medium-sized prehistoric and historically occupied Chumash village, believed to be the Purisimeño Chumash village of *Shilimaqshtush*. The site is characterized by zones of dense shell midden containing a diverse array of artifacts and faunal remains. Some of the deposits remain intact. Lathrap and Hoover (1975) found evidence of two occupational strata—an upper layer dating to the late prehistoric, protohistoric, and historic eras, and a lower stratum of unknown age. Although the site has not been formally evaluated against CRHR criteria, it clearly constitutes a significant archaeological resource that contains information important to the understanding of prehistory. As Arnold (1980) notes, this data potential is in addition to its importance as a population center on the coast north of Point Conception and its status as a named village occupied at the time of Spanish contact.

Previous investigations. The CA-SBA-205 site boundary was delineated through survey and subsurface testing by Arnold (1980) and Cooley and Santoro (1990), which was conducted in order to meet cultural resource regulatory requirements for previous proposed Park improvements. Arnold (1980:4–5) also describes key landform alterations undertaken during the late 1950s and delineates areas within the site termed "Primary and Secondary sensitivity zones." Additionally, several other archaeological investigations are documented in the immediate project vicinity. A survey for a GTE underground telephone cable passed through CA-SBA-205 (Rudolph 1986). Cultural resources monitoring of grading and underground electrical service line installation was reported by Santoro and Toren (1993). Additional monitoring was reported by Romani and Toren (1998) for underground electrical service utilities at and beyond the southeastern part of CA-SBA-205, where construction disturbance was largely confined to previously disturbed sediments. Finally, a surface survey was completed in support of potential plans for Park expansion under consideration in the late 1990s (Romani 1999). It is unclear whether the survey encompassed the current Project area; however, no changes were made to the CA-SBA-205 site boundary as a result of the study.

Work conducted for the proposed project. In 2015 and 2016, Applied EarthWorks, Inc. analyzed previous investigations and completed Phase 1 and 2 archaeological studies in support of the Jalama Beach Restrooms and Shower Improvements project (Munns 2015; Nocerino et al. 2016). The Phase 1 study addressed the proposed replacement of the two existing larger (southernmost) Park restrooms, found no surface evidence of cultural materials in the proposed work areas and concluded that archaeological materials are unlikely to be encountered during construction at those locations.

A subsequent Phase 2 study (Nocerino et al. 2016) was conducted for proposed new restrooms and shower facilities (the "north restroom" and "east restroom"), located within the previously recorded site boundaries. The Phase 2 study did not address the RV cabins near the north restroom, as the cabins were designed to be placed on a fill pad in order to avoid impacting the archaeological site. The goal of the Phase 2 study was to determine whether archaeological resources are present within the proposed restroom and shower improvements work areas and, if so, to (1) evaluate their importance under CEQA and (2) assess whether the proposed improvements would adversely affect the qualities that confer significance to the resource. The

results of the Phase 2 investigation indicated that the upper 60 centimeters of soil is disturbed within the north restroom work area. Below 60 centimeters there is evidence of an intact dense midden to a depth of at least 100 centimeters. A small amount of archaeological material was recovered from the east restroom work area; however, no intact archaeological deposits were observed. Archaeological material recovered within the east restroom work area is likely the result of secondary deposition.

Given the depth of ground disturbance, only archaeological materials from the intact levels at the north restroom were analyzed. Technical analyses revealed that the site contains evidence of specialized bead manufacture during the Late Period and the early Historic Period, which is rare for sites on the mainland north of Point Conception. Recovered faunal remains suggest site inhabitants used seasonally available subsistence resources that were within a short distance from the site. Radiocarbon samples taken from the upper and lower portions of the intact levels revealed dates spanning A.D. 1670–1895.

In 2017, Applied Earthworks conducted extended Phase 1 investigations in the location of the proposed RV cabins (letter report from Eric Nocerino to Jill Van Wie dated December 19, 2017) which is located outside of the primary sensitivity zone (Arnold 1980). This work was conducted because, although the cabins would be placed on imported fill in order to avoid impacting the archaeological site, retaining walls would be required to keep the fill in place. In order to assess the presence or absence of archaeological deposits in the location of the proposed retaining wall footings, a backhoe was used to excavate trenches in this area. The trenches were approximately 6 by 2 feet to a maximum depth of 7 feet. The trenches were excavated to the proposed retaining wall depths, and thus varied depending on their position along the wall. In addition, 20 cm. by 20 cm. column samples were manually excavated into four of the trench walls where archaeological materials were observed. All excavated materials were water-screened on site through 1/8-inch mesh.

The trenches, trench profile analysis, and column samples excavated in 2017 revealed a landform formation process that reflects construction of an elevated platform on which current Park buildings sit just east of the proposed cabin area. It appears that the slope east of the proposed cabin area (where the eastern retaining wall will be placed) was artificially created to build an elevated platform. Once the base of the elevated platform to the east had been constructed, the slope where the eastern retaining wall is proposed was capped with shell midden. Based on the configuration of the cap, it appears that midden was pushed up the slope because the midden follows the artificial slope contour. The midden was then extensively compacted, undoubtedly by heavy equipment, to stabilize the artificial slope. Along the western and southern retaining walls, trenches reveal grading and compaction in the flat areas. Trench stratigraphy indicated that archaeological deposits in the tested areas had been mechanically mixed.

Single-component site deposits that have experienced mixing may still retain data potentials, providing information important to addressing regional research questions. To assess whether the redeposited midden at the cabin wall footing trenches reflected a single Late/Contact Period occupation, six radiocarbon samples were submitted for age analysis. Each sample was a single piece of *Mytilus californianus* (California mussel) selected from various depths in multiple trenches. That analysis indicated that three of the samples are similar in date to those from the Phase 2 effort and reflect a contact era occupation. However, three dates suggest another occupation around 6,600–6,900 years ago. As suggested by Lathrop and Hoover (1975), it appears that there was a much older occupation at the site. However, because the

redeposited midden reflects two disparate time periods and that the archaeological materials from the two periods have been mixed, the data potentials of the deposit in this area are severely compromised.

Tribal Cultural Resources. To date, Santa Barbara County has received one tribal request, from the Barbareño/Ventureño Band of Mission Indians, to participate in government-to-government consultation pursuant to Public Resources Code (PRC) Section 21080.3.1 and in accordance with the provisions of Assembly Bill (AB) 52. On June 21, 2018, a formal notice of application completeness for the proposed project was sent to Julie Tumamait-Stenslie, Chair, Barbareño/Ventureño Band of Mission Indians. The notice provided notification of the opportunity for consultation under AB 52, and included a description of the proposed project and a summary of the Phase 1, extended Phase 1, and Phase 2 study methods and results.

On July 2, 2018, Chair Stenslie requested to initiate consultation. The AB52 consultation included a site visit with Chair Stenslie and Frank Arredondo on July 16, 2018, subsequent follow up emails and phone calls, and a second meeting on January 25, 2019. At the January 25, 2019 meeting it was agreed that the archaeological site qualifies as a Tribal Cultural Resource under CEQA. At both the site visit and the meeting, appropriate mitigation measures, consistent with those described below, were discussed.

On May 23, 2019, the County transmitted formal correspondence to Chair Stenslie and Frank Arredondo, including updated plans reflecting requested mitigations and information showing the exact location of the proposed sewer line as it relates to existing and proposed development and the primary sensitivity zone, along with a request to provide input regarding testing of this area. No response was received from either Chair Stenslie or Frank Arredondo. Numerous attempts by County staff were made to contact both individuals via email and telephone, but no responses were received. Consultation was therefore concluded on July 12, 2019.

County Environmental Thresholds:

Chapter 8 of the Santa Barbara County Environmental Thresholds and Guidelines Manual (2008, revised February 27, 2018) contains guidelines for the identification, significance evaluation, and mitigation of impacts to cultural resources, including archaeological, historic, and tribal cultural resources. In accordance with the requirements of CEQA, these guidelines specify that if a resource cannot be avoided, it must be evaluated for importance under specific CEQA criteria. CEQA Section 15064.5(a)(3)A-D contains the criteria for evaluating the importance of archaeological and historic resources. For archaeological resources, the criterion usually applied is: (D), “Has yielded, or may be likely to yield, information important in prehistory or history.” A project that may cause a substantial adverse effect on an archaeological resource may have a significant effect on the environment. Generally, a resource shall be considered by the lead agency to be “historically significant” if the resource meets the significance criteria for listing in the California Register of Historical Resources: (A) Is associated with events that have made a significant contribution to the broad patterns of California’s history and cultural heritage; (B) Is associated with the lives of persons important in our past; (C) 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 (D) Has yielded, or may be likely to yield, information important in prehistory or history. The resource also must possess integrity of at least some of the following: location,

design, setting, materials, workmanship, feeling, and association. For archaeological resources, the criterion usually applied is (D).

CEQA calls cultural resources that meet these criteria "historical resources." Specifically, a "historical resource" is a cultural resource listed in, or determined to be eligible for listing in, the California Register of Historical Resources, or included in or eligible for inclusion in a local register of historical resources, as defined in subdivision (k) of Section 5020.1, or deemed significant pursuant to criteria set forth in subdivision (g) of Section 5024.1. As such, any cultural resource that is evaluated as significant under CEQA criteria, whether it is an archaeological resource of historic or prehistoric age, a historic built environment resource, or a tribal cultural resource, is termed a "historical resource".

CEQA Guidelines Section 15064.5(b) states that "a project that may cause a substantial adverse change in the significance of an historical resource is a project that may have a significant effect on the environment." As defined in CEQA Guidelines Section 15064.5(b), substantial adverse change in the significance of an historical resource means physical demolition, destruction, relocation, or alteration of the resource or its immediate surroundings such that the significance of an historical resource would be materially impaired. The significance of an historical resource is materially impaired when a project: (1) demolishes or materially alters in an adverse manner those physical characteristics of an historical resource that convey its historical significance and that justify its inclusion in, or eligibility for, inclusion in the California Register of Historical Resources; (2) demolishes or materially alters in an adverse manner those physical characteristics that account for its inclusion in a local register of historical resources; or (3) demolishes or materially alters in an adverse manner those physical characteristics of a historical resource that convey its historical significance and that justify its eligibility for inclusion in the California Register of Historical Resources as determined by a lead agency for purposes of CEQA.

For the built environment, a project that follows the Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings or the Secretary of the Interior's Standards for Rehabilitation and Guidelines for Rehabilitating Historic Buildings (Weeks and Grimmer 1995), is generally considered as mitigated to a less than a significant impact level on the historical resource.

Impact Discussion:

(a, b) Historical and Archaeological Resources. Less than Significant With Mitigation.

Historic Resources (Built Environment)

The proposed development does not include the demolition or alteration of structures in excess of 50 years in age. As a result, no impacts to significant historic (built environment) resources are anticipated.

Archaeological Resources

As discussed above, archaeological site CA-SBA-205 is located in the project area and qualifies as a "historical resource" (a significant cultural resource) under CEQA Section 15064.5 criterion (D), "Has yielded, or may be likely to yield, information important in prehistory or history." Extensive prior research, as well as

the three studies conducted in support of the proposed project, identified the horizontal and vertical extent of intact site deposits with respect to the proposed project. These studies also identified (1) areas of mixed and/or redeposited materials that have limited potential to yield information important in prehistory or history; and (2) specific areas of intact deposits that are likely to contain data potential.

Demolition and reconstruction of the two southernmost "larger-type" Park restrooms would not impact any cultural resources, since the Phase 1 study did not identify archaeological materials in these work areas. Similarly, no impact would occur from placement of the new electrical service line between the proposed cabins and the new photovoltaic array because it would coincide exactly with the trench previously excavated for the current electrical service running north-northeast from the cabins area. However, because this area is within the overall site boundary of CA-SBA-205, County archaeological policies still apply and Native American and archaeological monitoring of all ground-disturbing activities associated with these areas of work would be required. The project's other proposed elements (east restroom, north restroom, and pad created for the four new RV cabins including associated retaining walls, utilities, septic tank, and sewer line) are located in areas that have potential to yield information important in prehistory or history, and therefore, each element is discussed in more detail below.

East restroom. The results of the Phase 2 study (Nocerino 2016) indicate that the work area for the east restroom contains a small amount of archaeological material. However, no intact archaeological deposits were observed here and these materials appear to be the result of secondary deposition, and thus lack any data potential. As a result, this work would not impact significant archaeological resources. Monitoring of all ground-disturbing activities by a Native American observer and County-qualified archaeologist would still be required.

North restroom. Work at the north restroom would require grading to a depth of 70 centimeters (27.5 inches) below the finished grade. The Phase 2 investigation (Nocerino 2016) identified an intact archaeological deposit beginning 60 centimeters (23.6 inches) below the existing surface in the proposed north restroom work area. In order to avoid impacts to the intact site materials, the proposed north restroom project has been designed to include the placement of geofabric above the intact deposit with at least 30 inches of imported fill on top of the geofabric, which would result in sufficient fill to protect the intact significant archaeological resource. Mitigation measure CUL-6 provides standards for the capping of development areas located over the intact archaeological deposit in this location to ensure construction would begin on top of the imported fill. As the depth of disturbance would not exceed 70 centimeters (27.5 inches), the intact site deposit would not be impacted.

RV cabins. The proposed RV cabins would be placed on a fill pad ranging from one to four feet in depth, in order to avoid potential impacts to significant resources. The fill pad would require a retaining wall to hold it in place. Installation of the retaining wall would include grading of up to 7 feet (215 centimeters) into portions of the hillside around the fill pad, and so extended Phase 1 testing consisting of trench excavation and profile analysis was conducted in the retaining wall footing locations. The results of the extended Phase 1 study indicate that no significant site deposits would be impacted by grading related to installation of the retaining wall because the underlying site material is composed of mixed and redeposited midden from two separate time periods. Due to the mixing of the midden, this area does not have the potential to yield information important in prehistory or history and thus does not contribute to the site's overall significance under CEQA criteria. However, because this area is within the overall site

boundary of the CA-SBA-205, County archaeological policies still apply to this area of work and Native American and archaeological monitoring would be required.

In accordance with these policies and in order mitigate potential impacts from the unanticipated discovery of archaeological resources, mitigation measure CUL-1 requires pre-construction training of construction personnel to inform them about the cultural resource sensitivity of the area. Mitigation measure CUL-2 requires preparation of a monitoring plan, and monitoring of all project ground-disturbing activities by a Native American observer and County-qualified archaeologist. Additionally, in the event that previously unidentified significant cultural resources are discovered during construction activities, the standard archaeological discovery measures CUL-3 and CUL-4, along with the requirement for an approved discovery plan (CUL-5), would be implemented to mitigate unanticipated impacts to such resources, and would ensure consistency with state and county regulations. Capping standards per mitigation measure CUL-6 do not apply to this area of work given that existing resources in this area are already mixed and therefore do not have potential to yield information important in prehistory or history. With implementation of these mitigation measures, the proposed project elements described above would not cause a substantial adverse change in the significance of a historical resource as defined in CEQA, nor would they cause a substantial adverse change in the significance of a prehistoric or historic archaeological resource pursuant to CEQA.

Septic tank and associated new sewer line. This project element was identified after completion of the Phase 1, Extended Phase 1, and Phase 2 studies described above. A new replacement 1,500-gallon septic tank is proposed to be located within the RV pad fill area and an approximately 190-foot-long proposed sewer line would connect the tank to an existing leach field. The replacement tank would sit 5'-6" below imported fill and existing grade native soil. Cultural resource testing was not done in the proposed tank's location given that the native soil on which the new tank would sit is flanked by Extended Phase 1 test units BHT 1, BHT 2, and BHT 5 (Eric Nocerino December 19, 2017). Test units BHT 1 and BHT 5 were excavated to 7', while BHT 2 was excavated to 6.8'. Therefore, adequate test depths were achieved. No significant site deposits were found as test unit BHT 2 was sterile and test units BHT 1 and BHT 5 found mixed and redeposited midden from two separate time periods mixed with fill and modern debris (Eric Nocerino December 19, 2017). The Munns 2015 Phase 1 report provides further support that the excavation associated with the septic tank has low potential to encounter potentially significant archaeological deposits as it references the infill of the low-lying central portion of the park with 8-10 feet of shaley deposits excavated from the slope above and east of the entry kiosk.

Approximately 30' of the proposed sewer line would be located within CA-SBA-205's primary sensitivity zone. The remaining 160' portion would be located outside of CA-SBA-205's primary sensitivity zone as mapped by Arnold (1980). Required trenching would be approximately 1' to 3' deep into native soil. Shallower trenching would occur near the septic tank (approximately 1' of native soil disturbance), whereas 3' of trenching in native soil is anticipated as the sewer line progresses west from the tank. Test unit BHT 5 was conducted in the vicinity of the eastern portion of the sewer line; as discussed above, it yielded mixed and redeposited midden from two separate time periods mixed with fill and modern debris.

No additional testing was performed for the proposed sewer line. Absent testing, deposits in native soil and within the mapped area of primary sensitivity are assumed to be significant resources under CEQA criteria since they have the potential to yield information important in prehistory. If project design requirements

preclude avoidance of this area, then impacts would be less than significant with implementation of Mitigation Measure CUL-7. This measure requires preparation of a testing plan and testing within the footprint of proposed work within any areas within or adjacent to Arnold's high sensitivity zone. Testing would occur after finalization of the sewer line route and any other elements of the septic system still to be identified, but prior to grading activities. The purpose of the testing would be (1) to confirm the presence or absence of cultural deposits; (2) to evaluate the significance of deposits, if present; and (3) to recover sufficient data to mitigate impacts to any significant resources present within the proposed project area.

(c) Human Remains. Less than Significant With Mitigation. Based on the results of prior studies summarized above, no evidence of human remains has been encountered in the areas of proposed disturbance. However, as CA-SBA-205 represents a prehistoric and historically occupied Chumash village, there is the potential for unknown cultural resources, including human remains, to be encountered during grading and ground disturbance. **Impacts are considered significant but mitigable** with pre-construction training of the construction personnel (CUL-1), monitoring of earth disturbances within the site by a qualified archaeologist and Native American observer (CUL-2), the measures requiring that work be stopped and specific actions taken in the event that cultural materials, including human remains or funerary objects, are uncovered during grading (CUL-3, -4, and -6) would reduce impacts to less than significant.

(d) Tribal Cultural Resources. As described above in the "Existing Setting" section, AB 52 consultation with Julie Tumamait-Stenslie, Chair, Barbareño/Ventureño Band of Mission Indians, resulted in the identification of the ethnohistoric Chumash village site CA-SBA-205, located within the Park, as a tribal cultural resource (TCR). As the proposed project would occur within and potentially impact areas of this resource, mitigation measures were also discussed during consultation. These include pre-construction training of the construction personnel (CUL-1), monitoring (CUL-2), and the standard conditions requiring that work be stopped and specific measures taken in the event that cultural materials are uncovered during grading (CUL-3, and 4). Additionally, Mitigation Measure CUL-5 requires preparation of a supplemental resource discovery treatment plan, and Mitigation Measure CUL-6 requires capping of the intact archaeological deposit at the north restroom sufficient to ensure construction would begin on top of the imported fill. Finally, Mitigation Measure CUL-7 requires identification of any intact resources located within the proposed septic system, once these design elements have been finalized, and data recovery if intact deposits cannot be avoided. These measures would ensure that any TCRs discovered during site development are treated in accordance with the requirements of CEQA and Chapter 8 of the County's Environmental Thresholds and Guidelines. **Impacts would be less than significant with mitigation.**

Cumulative Impacts: The County of Santa Barbara does not include cumulative thresholds of significance for cumulative impacts to cultural resources within its Thresholds and Guidelines Manual. However, as discussed within the County Guidelines for the Implementation of the California Environmental Quality Act of 1970 (Santa Barbara County, 2010), unless otherwise specified, a project's potential contribution to cumulative impacts should be assessed utilizing the same significance criteria as those for project specific impacts. The Project is located in an area with identified cultural resources and, as such, the proposed project has the potential to impact previously unidentified cultural resources, which in the analysis above is considered a significant project-specific impact. Should this occur, it could be considered a cumulatively considerable effect on the County's cultural resources. In the event that unanticipated significant cultural resources or human remains are discovered during project construction activities, implementation of the project mitigation

measures (CUL-1, CUL-2, CUL-3, CUL-4, CUL-5, CUL-6, and CUL-7) would mitigate impacts to less than significant levels on a Project-specific and cumulative basis.

Mitigation and Residual Impact:

The following mitigation measures would reduce the Project's cultural resource impacts to a less than significant level:

1. **MM-CUL-1 Worker Training**. A pre-construction training shall be conducted by a County-qualified archaeologist and a local Native American representative. Attendees shall include the applicant, construction supervisors, and heavy equipment operators to ensure that all parties understand the cultural resources monitoring program and their respective roles and responsibilities. All construction personnel, including subcontractors, who would work during any phase of the proposed project, including non-ground disturbing activities, shall be required to attend the workshop.

   The training shall include the following: a review of the types of archaeological resources that may be uncovered; a review of examples of common archaeological artifacts and other cultural materials to examine; a description of why monitoring is required and what makes an archaeological resource significant; a description of monitoring procedures including what would temporarily stop construction and for how long; a description of a reasonable worst-case resource discovery scenario (i.e., discovery of intact human remains or a substantial midden deposit); and a description of reporting requirements and the responsibilities of the construction supervisor and crew. The training shall make attendees aware of prohibited activities, including unauthorized collecting of artifacts, which can result in impacts on cultural resources. **PLAN REQUIREMENTS AND TIMING:** These components shall be listed on the grading plan to be reviewed and approved prior to Coastal Development Permit issuance. **Monitoring:** The construction contractor shall provide the County Parks Project Manager with a list of all personnel who attend the workshop prior to construction. The County Parks Project Manager shall periodically visit the project site during construction.

2. **MM-CUL-2 Cultural Resource Monitor and Monitoring Plan**. The Owner/Applicant shall have all earth disturbances including scarification and placement of fill within the archaeological site area (defined as those areas identified by Arnold and others as Primary and Secondary sensitivity zones) monitored by a P&D approved archaeologist and a Native American consultant in compliance with the provisions of the County Archaeological Guidelines. Areas where monitoring will occur shall be approved by the archaeologist and P&D and shown on grading plans. **TIMING**: Prior to issuance of Zoning Clearance, the Owner/Applicant shall submit for P&D review and approval, a contract or Letter of Commitment between the Owner/Applicant and the archaeologist, consisting of a project description, scope of work, and monitoring plan. The monitoring plan shall include graphic depiction on the most current grading plans of areas to be monitored, and also shall identify areas where cut material may be placed. Prior to issuance of Zoning Clearance, P&D shall ensure that the archaeological site area where monitoring will occur is accurately shown on grading plans. **MONITORING**: The Owner/Applicant shall provide P&D planner with the name and contact information for the assigned onsite monitor(s) prior to Zoning Clearance issuance and pre-construction meeting. The County Parks Project Manager staff shall confirm monitoring by archaeologist and Native American consultant and shall spot check field work.

3. **MM-CUL-3 Stop Work at Encounter**. The Owner/Applicant and/or their agents, representatives or contractors shall stop or redirect work immediately in the event archaeological remains are encountered during grading, construction, landscaping or other construction-related activity. The Owner/Applicant shall immediately contact P&D staff. If archaeological and Native American monitors are not already on site, the Owner/Applicant shall retain a P&D approved archaeologist and Native American representative to evaluate the significance of the find. All work shall be conducted in compliance with the provisions of the County Archaeological Guidelines. **PLAN REQUIREMENTS AND TIMING**: This condition shall be printed on all building and grading plans. **MONITORING**: P&D permit processing planner shall check plans prior to issuance of Zoning Clearance and the County Parks Project Manager shall spot check in the field throughout grading and construction.

4. **MM-CUL-4 Discovery of Human Remains**. In accordance with State Health and Safety Code Section 7050.5, in the event of the inadvertent discovery of human remains, no further disturbance shall occur until the County Coroner has made the necessary findings as to origins and disposition pursuant to Public Resources Code Section 5097.98. **PLAN REQUIREMENTS**: This condition shall be printed on all building and grading plans. In the event that human remains or funerary-related artifacts are unearthed during construction activities, the Owner/Applicant shall immediately stop or redirect work and notify P&D and the County Coroner. If the remains are determined to be of Native American descent, the coroner has 24 hours to notify the Native American Heritage Commission who will appoint a Most Likely Descendant (MLD) to determine the appropriate disposition of the remains. **MONITORING**: Inspection staff shall spot check in the field throughout grading and construction.

5. **MM-CUL-5 Supplemental Resource Discovery Treatment Plan**. The Owner/Applicant shall have a P&D-approved archaeologist prepare a Resource Discovery Treatment Plan to address all aspects of unanticipated significant archaeological resource discovery. This Plan shall supplement mitigation measure CUL-3 Stop Work at Encounter and provide specific guidance regarding the reporting, handling, placement, evaluation, and relocation of significant archaeological resources, in accordance with the requirements of CEQA and the County's Guidelines for Determining the Significance of and Impacts to Cultural Resources (Chapter 8 and Appendix B of the County's Environmental Thresholds and Guidelines Manual, Rev. February 2018). **TIMING**: Prior to issuance of Zoning Clearance, the Owner/Applicant shall submit the Resource Discovery Treatment Plan for P&D review and approval. P&D may have the Plan peer reviewed at their discretion. **PLAN REQUIREMENTS**: This condition shall be printed on all building and grading plans and the Resource Discovery Treatment Plan shall be provided to construction staff and reviewed during worker training (CUL-1). **MONITORING**: The County Parks Project Manager shall spot check in the field throughout grading and construction. The Owner/Applicant shall submit a written report to P&D of significant archaeological resources discovered.

6. **MM-CUL-6 Resource Capping**. Culturally sterile soil shall be used to cap the work area of the north restroom to a sufficient depth such that no grading or other earth disturbance shall disturb intact site deposits. Geofabric shall be laid down over native soil in all resource capping areas prior to any soil import. All imported soils shall be free of prehistoric cultural material (if imported from a construction excavation site source, the location shall be reviewed by the project archaeologist prior to its use to ensure it does not contain cultural material). Imported soils would be chemically inert (neither acidic nor basic) relative to existing campground soil. This would be determined by

measuring the pH of the existing Jalama soils. The pH of imported fill soils would also be tested and only those within 1.0 pH of the existing Jalama soils would be accepted for use in capping. **TIMING:** Prior to issuance of Zoning Clearance, the Owner/Applicant shall submit a capping plan for P&D review and approval. **PLAN REQUIREMENTS**: A capping plan shall be prepared by a qualified archaeologist for the north restroom work area. The plan shall depict on the final grading plans the location and depth of the fill cap. The fill shall be of sufficient depth to ensure that no grading or other ground disturbance occurs in native soil. The plan shall provide plan and profile views of the area and depth of fill superimposed on views of the area and depth grading. This condition shall be printed on all building and grading plans. **MONITORING**: Prior to issuance of Zoning Clearance the applicant shall submit documentation to P&D permit processing planner that the capping soil proposed for import complies with the requirements of this condition. The County Parks Project Manager shall spot check in the field throughout grading and construction.

7. **MM-CUL 7 Septic/Sewer Line Testing Plan.** In the event that proposed septic line tie-in elements cannot avoid the high sensitivity zone identified by Arnold and others, a testing plan shall be prepared and implemented in the previously untested footprint of proposed work within or adjacent to Arnold's high sensitivity zone. The purpose of the testing is (1) to assess the presence or absence of cultural deposits; (2) to evaluate the significance of deposits, if present; and (3) to recover sufficient data to mitigate impacts to any significant resources present within the proposed project area. **TIMING:** Archaeological testing shall be completed prior to Zoning Clearance issuance and the commencement of grading. **PLAN REQUIREMENTS:** Prior to issuance of Zoning Clearance, the Owner/Applicant shall submit for P&D review and approval, a contract or Letter of Commitment between the Owner/Applicant and the archaeologist, consisting of a project description, scope of work, and testing plan. The testing plan shall include a graphic depiction of the area(s) to be tested and a depiction of Arnold's sensitivity zone(s) on the final grading plans. The testing plan shall include provisions for Extended Phase 1, Phase 2, and Phase 3 testing, reporting, and curation, if required, in accordance with the requirements of CEQA and Chapter 8 and Appendix B of the County Environmental Thresholds and Guidelines Manual (Revised February 2018). **MONITORING:** The County Parks Project Manager shall receive and shall submit to P&D a Field Closure Report by the archaeologist, confirming completion of the testing in accordance with the testing plan, prior to commencement of grading. The Owner/Applicant shall submit a written report to P&D describing the work methods and results in accordance with the requirements of Appendix B of the County Environmental Thresholds and Guidelines Manual (Revised February 2018).

With the incorporation of these measures, residual impacts would be **less than significant.**

4.6 ENERGY

Will the proposal result in:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No Impact**	**Reviewed Under Previous Document**
a. Substantial increase in demand, especially during peak periods, upon existing sources of energy?			X		

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
b. Requirement for the development or extension of new sources of energy?			X		

Existing Setting: As currently configured, the Jalama Beach County Park campground includes the Jalama Beach Store and Grill (3,238 sq. ft.), seven cabins equipped with electricity and showers, 31 camping sites with electric-hookup capabilities, 5 restroom facilities (1,083 sq. ft.), a communal shower facility (400 sq. ft.), maintenance facilities (totaling 3,024 sq. ft.), and other Park operational facilities (totaling 7,313(+) sq. ft.). Electricity is provided to the subject parcel by Southern California Edison, and propane is provided by Delta Liquid Energy.

County Environmental Thresholds: The County has not identified significance thresholds for electrical and/or natural gas service impacts (Thresholds and Guidelines Manual). Private electrical and natural gas utility companies provide service to customers in Central and Southern California, including the unincorporated areas of Santa Barbara County.

Impact Discussion:

(a, b) Less than Significant. The proposed project would include the addition of four new RV cabin pads with electricity and hose-bib connections. The project also proposes the reconstruction of the five existing restroom facilities and shower facility. The four new RV cabin pads would require the extension of utility lines to the proposed new pad locations. The negligible net increase of four cabins with 16 total occupants maximum would result in minimal impact to current energy use during peak periods. Additionally, as the existing restroom and shower facilities were constructed in 1972 and 1992, the reconstructed facilities would improve the efficiency of energy use with the inclusion of new fixtures.
Therefore, the proposed project would not result in a substantial increase in demand, especially during peak periods, upon existing sources of energy. The extension of utility lines to the new cabins would result in a minimal increase on energy use. In summary, the project would have a negligible effect on regional energy needs and no adverse impacts would result. Impacts would be **less than significant**.

Cumulative Impacts: The proposed project's contribution to the regionally significant demand for energy would not be considerable. Thus, impacts related to energy would be **less than significant**.

Mitigation and Residual Impact:

No mitigation would be required. Residual impacts would be **less than significant**.

4.7 FIRE PROTECTION

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Introduction of development into an existing high fire hazard area?				X	
b. Project-caused high fire hazard?			X		
c. Introduction of development into an area without adequate water pressure, fire hydrants or adequate access for fire fighting?				X	
d. Introduction of development that will hamper fire prevention techniques such as controlled burns or backfiring in high fire hazard areas?				X	
e. Development of structures beyond safe Fire Dept. response time?			X		

Existing Setting: According to the Santa Barbara County Fire Hazard Severity Zones map (2007), the County Park is located in a moderate fire hazard severity zone in a State Responsibility Area. Fire protection services are provided by Santa Barbara County Fire Station No. 51, located at 3510 Harris Grade Road in Lompoc. The proposed project site is located approximately 23.8 miles from Station No. 51 with an approximate response time of 40 minutes. Back- up service can be provided by Santa Barbara County Fire Station No. 18, located at 17200 Calle Mariposa Reina in Gaviota. The project site is approximately 32 miles from Station No. 18. Response time to the site from this location is approximately 45 minutes. Additionally, the County Park is equipped throughout with fire protection piping and pumps.

County Environmental Thresholds: Predictions about the long-term effects of global climate change in California include increased incidence of wildfires and a longer fire season, due to drier conditions and warmer temperatures. Any increase in the number or severity of wildfires has the potential to impact resources to fight fires when they occur, particularly when the state experiences several wildfires simultaneously. Such circumstances place greater risk on development in high fire hazard areas.

Impact Discussion:

(a) No Impact. The project would not introduce new development into an undeveloped area. The County Park is determined as a moderate fire hazard severity zone. Therefore, the proposed project would result in **no significant impacts** regarding introduction of development to an existing high fire hazard area.

(b) Less than Significant. The improvements would include the addition of four barbecue/fire pits for the proposed RV cabin pads, but would also eliminate 1 existing campsite barbecue/fire pit with the permanent termination of campsite #17. The fire pits would be located in a predominantly unvegetated area in the center of the existing campground. The net increase of three fire pits would not increase fire risk from the currently existing setting. Therefore, the proposed project would not result in a project-caused high fire hazard and the impacts would be **less than significant**.

(c, d) No Impact. According to a Facility Condition Assessment (2014) conducted by Jorgensen Facilities Services for the County of Santa Barbara, the campground is equipped throughout with fire protection piping

and pumps. Additionally, the paved access drive along the eastern RV cabin pad area was developed in consultation with County Fire personnel to ensure that it meets their access requirements. Therefore, the proposed project would not introduce development into an area unequipped with fire prevention measures. Due to its location within the existing campgrounds in a moderate fire hazard zone, the proposed project would not introduce development that would hamper fire prevention techniques such as controlled burns or backfiring in a high fire hazard area. Therefore, the proposed project would not result in impacts related to adequate fire protection capabilities or fire prevention techniques.

(e) Less than Significant. County Fire's current response time to the existing, developed campground facility is approximately 40 - 45 minutes from the two closest fire stations. In addition to the five existing restroom structures, and the camp sites, which regularly contain RVs as well as tent campers, the facility contains more than a dozen permanent structures including seven previously existing RV cabins. The proposed project would result in the placement of four additional RV cabins into the developed central part of the campground. The addition of the four proposed RV cabins would not significantly increase the existing condition related to the Fire Department's response time. Therefore, impacts related to the development of structures beyond safe response times would be **less than significant**.

Cumulative Impacts: The proposed project would not create significant fire hazards due to the project's proposed location in a moderate fire hazard severity zone and currently developed surroundings. Thus, the project would **not have a cumulatively considerable effect** on fire safety within the County.

Mitigation and Residual Impact:

No impacts are identified. No mitigation is necessary.

4.8 GEOLOGIC PROCESSES

Will the proposal result in:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No Impact**	**Reviewed Under Previous Document**
a. Exposure to or production of unstable earth conditions such as landslides, earthquakes, liquefaction, soil creep, mudslides, ground failure (including expansive, compressible, collapsible soils), or similar hazards?			X		
b. Disruption, displacement, compaction or overcovering of the soil by cuts, fills or extensive grading?			X		
c. Exposure to or production of permanent changes in topography, such as bluff retreat or sea level rise?			X		
d. The destruction, covering or modification of any unique geologic, paleontologic or physical features?				X	
e. Any increase in wind or water erosion of soils, either on or off the site?		X			

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
f. Changes in deposition or erosion of beach sands or dunes, or changes in siltation, deposition or erosion which may modify the channel of a river, or stream, or the bed of the ocean, or any bay, inlet or lake?				X	
g. The placement of septic disposal systems in impermeable soils with severe constraints to disposal of liquid effluent?				X	
h. Extraction of mineral or ore?				X	
i. Excessive grading on slopes of over 20%?				X	
j. Sand or gravel removal or loss of topsoil?		X			
k. Vibrations, from short-term construction or long-term operation, which may affect adjoining areas?		X			
l. Excessive spoils, tailings or over-burden?				X	

Existing Setting: The existing campground area is composed of sand and alluvial sediments and exists on naturally terraced levels ranging from approximately 14.4 to 60 ft. in elevation above sea level. The campgrounds are located approximately 150 ft. to the east of Jalama Beach and the Pacific Ocean and are separated from the beach by sand dunes that extend up to 10 ft. in height. The proposed project site would be located approximately 250 ft. from Jalama Creek to the north, with the exception of the existing workshop structure where roof-mounted solar panels would be installed, which is located approximately 50 ft. from the creek.

The nearest fault to the proposed project area is the geologically active Pacifico fault. Geologically active faults are those which have had documented activity within the past 10,000 years. The Pacifico fault, considered a component of the Santa Ynez fault zone, trends in an east-west direction for 13 miles at the western end of the Santa Ynez Mountains. The fault is mapped as generally following the Jalama Creek riverbed approximately 250 ft. to the north of the nearest proposed project improvements. The northern branch of the Santa Ynez fault intersects the Pacifico fault 10 miles east of the ocean. The project area and vicinity is, therefore, considered an area of potential high seismic activity.

According to the County of Santa Barbara Comprehensive Plan Seismic Safety Element and Maps, the proposed project area has a low potential for high groundwater, compressive or collapsible soils, or liquefaction. The Jalama Beach County Park campground is located on naturally occurring terraced levels with no existing slope stability issues. The overall Geologic Problems Index of the proposed project area is Category III (moderate) and IV (moderate to severe) based mainly on the potential for seismic activity. The proposed project site is not designated a geological “problem area” by the County.

County Environmental Thresholds. Pursuant to the County’s Adopted Thresholds and Guidelines Manual, impacts related to geological resources may have the potential to be significant if the proposed project involves any of the following characteristics:

1. The project site or any part of the project is located on land having substantial geologic constraints, as determined by P&D or PWD. Areas constrained by geology include parcels 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 Problems" areas designated by the Board of Supervisors have been established based on geologic constrains, flood hazards, and other physical limitations to development.

2. The project results in potentially hazardous geological conditions such as the construction of cut slopes exceeding a grade of 1.5 horizontal to 1 vertical.

3. The project proposes construction of a cut slope over 15 ft. in height as measured from the lowest finished grade.

4. The project is located on slopes exceeding 20% grade.

Impact Discussion:

(a) Less than Significant. The geologically active Pacifico fault is mapped along Jalama Creek, approximately 250 ft. from the proposed improvement area. Potential earthquakes associated with this fault or the Santa Ynez fault 10 miles away have the potential to generate strong ground shaking at the proposed site in the event of an earthquake, resulting in potential structural damage. All proposed structures would be constructed pursuant to the most current Building Code standards. Incorporation of these standards in building design would ensure that any potential impacts resulting from active fault ground shaking are **less than significant**.

Liquefaction is the combination of groundwater, sand, and soil during an earthquake resulting in a quicksand-like soil. Liquefaction potential in the area has been determined to be low. Expansive soils, or shrink-swell soils, can fluctuate in volume up to thirty percent or more depending on moisture content. However, implementation of standard engineering practices including the use of non-expansive engineered fill would ensure compliance with Santa Barbara Building Code standards and ensure that potential impacts resulting from potential seismic earth shaking and expansive soils are **less than significant**.

The proposed facilities improvements would occur on relatively level, previously developed sections of terraced campground. The proposed RV cabins would be placed on an engineered fill pad secured by retaining walls. The proposed work areas would not be subject to landslides or slope failure impacts. As the currently existing facilities were constructed between 1972 and 1992 (Jorgensen, 2014), the proposed improvements would ensure the renovated facilities meet current seismic standards outlined in the most current California Building Standards Code. Thus, impacts would be **less than significant**.

(b, c) Less than Significant. The proposed project would require a total of 530 cubic yards of cut, 380 cubic yards of import, and 950 cubic yards of fill. The majority of the grading would be associated with creation of a pad for the RV cabins and is not considered extensive grading. The 1 ft. to 4 ft. of fill required to create the RV cabin pad area would be retained by a 4 ft. high (maximum) reinforced allan block wall along the western and southern sides of the proposed RV cabin pads. A 4 ft. high (maximum) CMU block retaining wall would be constructed along the eastern side of the new access drive at the RV cabins, where a small area of pad

would be cut into the hillside. All grading would occur within existing developed areas of the campground. As the campgrounds exist on existing terraced levels, the placement of the pad and construction of the proposed retaining walls would not substantially alter the topography.

Predictions about the long-term effects of global climate change include rising sea levels due to the melting of glaciers and thermal expansion. The State of California released updated sea level rise science and projections its "Rising Seas in California: An Update on Sea-Level Rise Science" and "State of California Sea-Level Rise Guidance" documents (Griggs et al., 2017; California Natural Resources Agency and California Ocean Protection Council, 2018). The State predicts that the "likely range" (67% probability) of sea level rise for Santa Barbara is 0.4-1.0 feet by the year 2050 and 0.6-3.1 feet by the year 2100. However, there is a 1-in-20 chance (5% probability) that sea level rise will meet or exceed 4.1 feet in Santa Barbara by the year 2100.

With the exception of the existing western small restroom to be replaced and the PV panels on the existing workshop building, the proposed work areas are located at least 250 ft. from Jalama Creek and at least 150 ft. from Jalama Beach and the Pacific Ocean. The proposed project areas would occur at a minimum elevation of 14.4 ft. above current sea level. 14.4 ft. is approximately 8.6 ft. above current high tide levels (approximately 5.8 ft.). Rising sea levels caused by global climate change will increase the rate of coastal-bluff retreat due to scouring of the base of bluffs (County of Santa Barbara, 2017). Since the project includes areas subject to coastal erosion, coastal bluff retreat has been modeled for the project location for the year 2100 and with 'high' sea level rise (Coastal Resilience California, 2016). Based on this modeling, the proposed areas of improvement would appear to be adequately set back from coastal erosion within that planning horizon and would remain above estimated rates of sea level rise. As a result, the project would not be exposed to or result in bluff retreat or sea level rise. Therefore, impacts related to unstable earth conditions or extensive grading would be **less than significant**.

(d) No Impact. The proposed improvements would be located within the previously disturbed and developed campground. No unique geologic, paleontological, or physical features exist in the proposed development area. Thus, the proposed project would result in **no impact** to unique geologic, paleontological, or physical features.

(e) Less than Significant with Mitigation. The proposed project would require the implementation of standard erosion and sediment control best management practices (BMPs) outlined in Chapter 14 of the County Grading Ordinance and associated reference documents. These practices would include measures to stabilize the site, prevent erosion, convey storm water runoff to existing drainage systems, and to keep contaminants and sediment onsite. Measure **GEO-1**, below, outlines the implementation of said project BMPs. Additionally, mitigation measures **BIO-7 through BIO-11** require implementation of an erosion control plan, minimization of impacts to bluff vegetation, retention of topsoil (with crushed bluff vegetation) from disturbed areas, protection of topsoil stockpiles from wind and rain erosion, and replacement of topsoil as the final layer of soil on disturbed slopes. Implementation of these measures would ensure that the project would not cause any increase in wind or water erosion of soils, either on or off the site.

(f) No Impact. The Park is located adjacent to Jalama Creek and the Pacific Ocean. However, the proposed project is limited to refurbishment of five existing restroom facilities and a shower building plus expansion, placement of four RV cabins on a new pad, and placement of PV panels on an existing building, within an

existing developed campground. As such, it would not cause any changes in deposition or erosion of beach sands or dunes, or changes in siltation, deposition or erosion which may modify the channel of a river, or stream, or the bed of the ocean, or any bay, inlet or lake.

(g, h, i, l) No Impact. Jalama Beach County Park is currently serviced by seven existing septic tanks, a pump station, and over 1,500 sq. ft. of leach lines within sand and alluvial soils. The proposed project would not require any new or expanded septic systems. The proposed project does not involve the extraction of minerals or ore, or involve development on slopes exceeding 20 percent. As the project would require 530 cubic yards of cut, 950 cubic yards of fill, and 380 cubic yards of import, no spoils, tailings, or over-burden would result.

(j) Less than Significant with Mitigation. The proposed project does not involve sand or gravel removal. Mitigation measure BIO-9 requires that prior to grading, the top eight inches of soil is collected and stockpiled, and protected from wind and rain erosion. Mitigation measure BIO-10 requires the re-use of this topsoil as the final layer of soil on disturbed slopes. Implementation of these measures would ensure that impacts resulting from loss of topsoil would be less than significant.

(k) Less than Significant with Mitigation. The proposed construction would involve the use of large equipment to complete the required demolition and grading. Construction of the proposed project is likely to produce minor ground vibration associated with this activity. There are no nearby sensitive offsite receptors, four to five rangers live on site and the campground is generally filled to capacity. Due to these existing sensitive noise receptors, a mitigation measure is included in Section 4.11 - Noise (mitigation measure NOISE-1) which restricts construction hours to 8 a.m. to 5 p.m. and prohibits noise-generating construction activities on weekends and State holidays. With implementation of this mitigation measure, disturbances to nearby receptors from the ground vibration involved in the proposed construction would be reduced to less than significant.

Cumulative Impacts: The proposed project would occur in a previously developed area and would incorporate best management practices required by the County (**GEO-1** listed below, **BIO-7** through **BIO-10,** listed in Section 4.4, Biological Resources, and **NOISE-1,** listed in Section 4.11, Noise). The proposed project would not result in any significant geologic impacts and would have no cumulatively considerable effect on geologic hazards within the County.

Mitigation and Residual Impact:

The following standard BMPs incorporated in to the proposed project specifications would ensure impacts on geological resources to be **less than significant**:

1. **MM-GEO-1: Erosion and Sediment Control Plan**. Where required by the latest edition of the California Green Code and/or Chapter 14 of the Santa Barbara County Code, a Storm Water Pollution Prevention Plan (SWPPP), Storm Water Management Plan (SWMP) and/or an Erosion and Sediment Control Plan (ESCP) shall be implemented as part of the project. Grading and erosion and sediment control plans shall be designed to minimize erosion during construction and shall be implemented for the duration of the grading period and until re-graded areas have been stabilized by structures, long-term erosion control measures or permanent landscaping. The Owner/Applicant shall submit the SWPPP, SWMP or ESCP) using Best Management Practices

(BMP) designed to stabilize the site, protect natural watercourses/creeks, prevent erosion, convey storm water runoff to existing drainage systems keeping contaminants and sediments onsite. The SWPPP or ESCP shall be a part of the Grading Plan submittal. Information on Erosion Control requirements can be found on the County web site re: Grading Ordinance Chapter 14 (http://sbcountyplanning.org/building/grading.cfm) refer to Erosion and Sediment Control Plan Requirements; and in the California Green Code for SWPPP (projects < 1 acre) and/or SWMP requirements. **PLAN REQUIREMENTS**: The plan shall be designed to address erosion, sediment and pollution control during all phases of development of the site until all disturbed areas are permanently stabilized. **TIMING**: The SWPPP requirements shall be implemented prior to the commencement of grading and throughout the year. The ESCP/SWMP requirements shall be implemented between November 1st and April 15th of each year, except pollution control measures shall be implemented year round. **MONITORING**: The County Parks Project Manager shall perform site inspections throughout the construction phase.

Residual impacts on geologic resources would be **less than significant**.

4.9 HAZARDOUS MATERIALS/RISK OF UPSET

Will the proposal result in:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No Impact**	**Reviewed Under Previous Document**
a. In the known history of this property, have there been any past uses, storage or discharge of hazardous materials (e.g., fuel or oil stored in underground tanks, pesticides, solvents or other chemicals)?				X	
b. The use, storage or distribution of hazardous or toxic materials?		X			
c. A risk of an explosion or the release of hazardous substances (e.g., oil, gas, biocides, bacteria, pesticides, chemicals or radiation) in the event of an accident or upset conditions? **n**			X		
d. Possible interference with an emergency response plan or an emergency evacuation plan?				X	
e. The creation of a potential public health hazard?				X	
f. Public safety hazards (e.g., due to development near chemical or industrial activity, producing oil wells, toxic disposal sites, etc.)?				X	
g. Exposure to hazards from oil or gas pipelines or oil well facilities?				X	
h. The contamination of a public water supply?				X	

Existing Setting: The majority of Jalama Beach County Park is currently designated recreational/open space. The extreme southern portion of the Park as well as the parcels surrounding the Park to the north, east, and south are designated agricultural lands (100-AL-O & AG-II-320). There is no evidence of hazardous materials in the surrounding soils and the County environmental health database contains no records of spills or

hazardous materials in the area. Vandenberg Air Force Base, approximately 350 ft. to the north, is the nearest public water source. The County Park is serviced by this public water source located on Vandenberg Air Force Base.

County Environmental Thresholds: The County's safety threshold addresses involuntary public exposure from projects involving significant quantities of hazardous materials. The threshold addresses the likelihood and severity of potential accidents to determine whether the safety risks of a project exceed significant levels.

Impact Discussion:

(a) No Impact. According to the County of Santa Barbara Environmental Health Hazardous Materials database, there has been no known use, storage or discharge of hazardous materials in the vicinity of the proposed project site. Thus, the proposed project would result in **no impacts** from releases of hazardous materials previously used at the project site.

(b, c) Less than Significant with Mitigation. The project would not involve bulk storage or distribution of hazardous materials, or involve the use of explosives, oil and gas, biocides, bacteria, or radiation. The proposed project would not increase the use or storage of toxic or hazardous materials such as fuels and lubricating oils, paint and painting related chemicals, and concrete, which are already used and stored on site. Jalama Beach County Park operations and maintenance currently utilize herbicides and pesticides within the campgrounds. The project would not propose the increased use of herbicide or pesticides. Potential impacts from construction-related fuel storage, fueling, equipment storage, and maintenance (e.g. lubrication) of the machinery and equipment would be reduced to less than significant by mitigation measure HAZ-1, which requires that these activities occur in designated areas protected with tarps to minimize the potential for impacts related to fuel spills.

(d) No Impact. The proposed project would not affect access to/from or within the County Park. No road closures (Jalama Road, circulation roads within the Park) would be proposed during construction. Thus, there would be no expected interference and **no impacts** related to emergency access, an emergency response plan, or an emergency evacuation plan.

(e-h) No Impact. The proposed project would not be located near any chemical or industrial facilities, near toxic disposal sites, and would not involve the production of oil wells. The proposed project would not occur near commercial oil/gas pipelines or oil well facilities. The proposed project would result in **no significant impacts** to public safety hazards or hazard exposure. The proposed project site is located approximately 250 ft. from Jalama Creek, the creek is not used as a public water supply. The proposed project site is located approximately 350 ft. from Vandenberg Air Force Base. Although Vandenberg Air Force Base is used as a public water supply, the base is a substantial distance from the proposed site. Therefore, the proposed project would result in **no impacts** related to the creation of a public health hazard, public safety hazards, exposure to hazards, or the contamination of a public water supply.

Cumulative Impacts: The proposed project would not create significant impacts with respect to hazardous materials and/or risk of upset. The implementation of **HAZ-1,** below (Equipment Maintenance and Storage - Construction), **BIO-7** (listed in Biological Resources), and best management practices (BMPs) would

minimize impacts resulting from the proposed project to **less than significant** levels. Thus, the proposed project would not have a cumulatively considerable effect on safety within the County.

Mitigation and Residual Impact:

The following measure would reduce the project's impacts regarding hazardous materials and/or risk of upset to a **less than significant** level:

1. **MM-HAZ-1 Equipment Maintenance and Storage -Construction**. In order to reduce potential impacts from construction-related fuel storage, fueling, equipment storage, and maintenance (e.g. lubrication) of the machinery and equipment, these activities shall occur in designated areas protected with tarps to minimize the potential for impacts related to fuel spills. **PLAN REQUIREMENTS:** The Owner/Applicant shall designate one or more County approved fuel and equipment storage and maintenance areas for use during construction activities on all grading and building plans. The areas shall be located at least 100 feet from any storm drain, waterbody or sensitive biological resources. **TIMING**: The Owner/Applicant shall install the area prior to commencement of construction. Polluted water and materials shall be contained in these areas and removed from the site a minimum of once a week **MONITORING**: The County Parks Project Manager shall ensure compliance prior to and throughout construction.

With the incorporation of these measures, residual impacts associated with hazardous materials/risk of upset would be **less than significant**.

4.10 LAND USE

Will the proposal result in:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No Impact**	**Reviewed Under Previous Document**
a. Structures and/or land use incompatible with existing land use?				X	
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?		X			
c. The induction of substantial growth or concentration of population?				X	
d. The extension of sewer trunk lines or access roads with capacity to serve new development beyond this proposed project?				X	
e. Loss of existing affordable dwellings through demolition, conversion or removal?				X	

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
f. Displacement of substantial numbers of existing housing, necessitating the construction of replacement housing elsewhere?				X	
g. Displacement of substantial numbers of people, necessitating the construction of replacement housing elsewhere?				X	
h. The loss of a substantial amount of open space?				X	
i. An economic or social effect that would result in a physical change? (i.e. Closure of a freeway ramp results in isolation of an area, businesses located in the vicinity close, neighborhood degenerates, and buildings deteriorate. Or, if construction of new freeway divides an existing community, the construction would be the physical change, but the economic/social effect on the community would be the basis for determining that the physical change would be significant.)				X	
j. Conflicts with adopted airport safety zones?				X	

Existing Setting: The proposed project site is located mostly within a 23.57 acre parcel (APN 083-510-001) zoned Recreation (REC) and designated Recreation/Open Space by the Santa Barbara County Comprehensive Plan. Jalama Beach County Park is currently used for recreational day use and has developed facilities to accommodate overnight camping. The project site is bounded by agriculturally zoned parcels. It is bordered to the north by Jalama Creek and federal lands owned by Vandenberg Air Force Base (100-AL-O), to the south and east by the Dangermond Preserve (AG-II-320), to the east by the Union Pacific Railroad (Transportation Corridor, TC), and the west by Jalama Beach and the Pacific Ocean. There are no permanent residential dwellings located in the County Park and the nearest residential areas are located in Lompoc, approximately 20 miles away. The nearest airport is also located in Lompoc, approximately 21.8 miles in distance from the County Park.

County Environmental Thresholds: The Thresholds and Guidelines Manual contains no specific thresholds for land use. Generally, a potentially significant impact can occur if a project as proposed is potentially inconsistent with policies and standards adopted by an agency for the purposes of environmental protection or would result in substantial growth inducing effects.

Impact Discussion:

(a) No Impact. The majority of the proposed project would occur within the Jalama Beach County Park currently zoned Recreation (REC) and designated Recreation/Open Space. The proposed project would also include the demolition and reconstruction of the existing southernmost Park restroom, which is located on an agriculturally zoned parcel (AG-II-320). However, this parcel has not been utilized for agricultural purposes in

at least 43 years since it was developed with Jalama Road. Therefore, the proposed project would not result in structures and/or land use incompatible with the existing land use.

(b) Less than Significant with Mitigation.

With implementation of the mitigation measures contained in this document, the proposed project would be modified to be consistent with all applicable land use plans, policies, and regulations of Santa Barbara County including, but not limited to the general plan, specific plan, local coastal program, and/or zoning ordinance adopted for the purpose of avoiding or mitigating an environmental effect.

(c, d, e, f, g) No Impact. The proposed project would occur on existing developed campgrounds. The project proposes the addition of overnight camping accommodations, upgrades to existing restroom and shower facilities, and paving of an already existing compacted road area. The proposed improvements would enhance the recreational experience for Park users. The proposed project would not include the introduction of permanent residential facilities, extension of sewer trunk lines, or the extension or addition of access roads. Thus, the proposed project would result in **no impacts** related to the induction of growth, concentration of population, ability to serve new development, loss of dwellings, or displacement of housing or people.

(h, i, j) No Impact. The proposed improvements would occur within currently existing campgrounds designated Recreation/Open Space. The proposed project would improve currently existing facilities and would not include additional loss of open space land. There is no existing permanent community living within the County Park area. The nearest airport is located in Lompoc, approximately 21.8 miles in distance from the County Park. The proposed project would result in **no impacts** related to loss of open space, economic or social effects resulting in physical change, or conflicts with adopted airport safety zones.

Cumulative Impacts: The implementation of the proposed project would not result in substantial changes to the site's conformance with environmentally protective policies and standards. The proposed project would not be incompatible with existing land use and would not conflict with any land use policies determined by Santa Barbara County. Thus, the proposed project would not result in a cumulatively considerable effect on land use.

Mitigation and Residual Impact:

With incorporation of mitigation measures contained in this document, impacts would be reduced to less than significant. Residual impacts would be **less than significant**.

4.11 NOISE

Will the proposal result in:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No Impact**	**Reviewed Under Previous Document**
a. Long-term exposure of people to noise levels exceeding County thresholds (e.g. locating noise sensitive uses next to an airport)?				X	
b. Short-term exposure of people to noise levels exceeding County thresholds?		X			

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
c. Project-generated substantial increase in the ambient noise levels for adjoining areas (either day or night)?		X			

Existing Setting: The primary noise sources in the proposed project area include overnight and day-use recreational visitors to the County Park, incoming and outgoing vehicle traffic to the County Park, wind, birds, sounds of the ocean, and infrequent air traffic. The proposed project site is located outside of 65 dB(A) noise contours for roadways, public facilities, airport approach, and take-off zones. The existing campground at the site would be considered a noise sensitive land use. The campground is surrounded by open space, beach, and agricultural land to the north, south, and east. No noise sensitive land uses are located adjacent to the campground.

County Environmental Thresholds: Noise is generally defined as unwanted or objectionable sound which is measured on a logarithmic scale and expressed in decibels (dB(A)). The duration of noise and the time period at which it occurs are important values in determining impacts on noise-sensitive land uses. The Community Noise Equivalent Level (CNEL) and Day-Night Average Level (L_{dn}) are noise indices which account for differences in intrusiveness between day- and night-time uses. County noise thresholds are: 1) 65 dB(A) CNEL maximum for exterior exposure, and 2) 45 dB(A) CNEL maximum for interior exposure of noise-sensitive uses. Noise-sensitive land uses include: residential dwellings; transient lodging; hospitals and other long-term care facilities; public or private educational facilities; libraries, churches; and places of public assembly.

Impact Discussion:

(a) No Impact. The proposed project would not result in long-term exposure of people to noise levels exceeding County thresholds such as locating noise sensitive uses next to an airport. The nearest airport would be located in Lompoc approximately 21.8 miles away. Additionally, the Park is generally temporarily closed during periodic rocket launches from Vandenberg Air Force Base. Therefore, the proposed project would result in **no impacts** related to long-term exposure of people to noise levels exceeding County thresholds.

(b, c) Less than Significant with Mitigation. The project proposes the installation of four new RV cabin pads, paving of the compacted road adjacent to the proposed site for the new cabins, relocation of the group campsite, and renovation of the existing restroom and shower facilities. Noise generated from heavy equipment during construction-related activities typically can exceed County noise thresholds of 65 dB(A) CNEL for noise sensitive land uses for a distance of up to 1,600 ft. Construction-related activities would occur within 1,600 ft. of campground residents (considered a noise sensitive land use). Mitigation measure NOISE-1 limits construction-related activities to occurring Monday through Friday from 8:00 a.m. to 5:00 p.m., with no activities occurring on weekends or State holidays, as stated in the project plans. Implementation of this measure would reduce the impacts regarding short-term noise exposure and project-generated increase in ambient noise levels to **less than significant**.

Cumulative Impacts: The proposed project would include limitations to hours of construction (**NOISE-1**) which would require project improvements to occur Monday through Friday between the hours of 8:00 a.m. and 5:00

p.m. The implementation of the proposed project would not result in substantial impacts and would not result in cumulatively considerable noise impacts within the project area.

Mitigation and Residual Impact:

The implementation of the following measures required in the proposed project plan would reduce the project's noise impacts to a **less than significant** level:

1. **MM-NOISE-1 Construction Hours.** The Owner /Applicant, including all contractors and subcontractors shall limit construction activity, including equipment maintenance and site preparation, to the hours between 8:00 a.m. and 5:00 p.m. Monday through Friday. No construction shall occur on weekends or State holidays. Non-noise generating interior construction activities such as plumbing, electrical, drywall and painting (which does not include the use of compressors, tile saws, or other noise-generating equipment) are not subject to these restrictions. Any subsequent amendment to the Comprehensive General Plan, applicable Community or Specific Plan, or Zoning Code noise standard upon which these construction hours are based shall supersede the hours stated herein. **PLAN REQUIREMENTS:** The Owner/Applicant shall provide and post a sign stating these restrictions at all construction site entries. **TIMING**: Signs shall be posted prior to commencement of construction and maintained throughout construction. **MONITORING**: The Owner/Applicant shall demonstrate that required signs are posted prior to the commencement of construction. The County Parks Project Manager shall spot check and respond to complaints.

With the incorporation of the required measure, residual impacts would be **less than significant**.

4.12 PUBLIC FACILITIES

Will the proposal result in:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No Impact**	**Reviewed Under Previous Document**
a. A need for new or altered police protection and/or health care services?				X	
b. Student generation exceeding school capacity?				X	
c. Significant amounts of solid waste or breach any national, state, or local standards or thresholds relating to solid waste disposal and generation (including recycling facilities and existing landfill capacity)?			X		
d. A need for new or altered sewer system facilities (sewer lines, lift-stations, etc.)?				X	
e. The construction of new storm water drainage or water quality control facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?				X	

Existing Setting: Jalama Beach County Park currently offers a range of year-round camping and day-use recreational opportunities. The County Park currently offers 7 cabins with restrooms and showers, 31

campsites with electronic hookups available to recreational vehicles (RVs), and 78 tent camping sites. The campgrounds are equipped with barbecues and fire pits for each cabin, campsite, and group camp areas. The current facilities include 5 restroom facilities, one group shower facility, and 105 day use parking spaces. Jalama Beach Store and Grill is also located onsite. The campgrounds do not include any permanent residential facilities. Solid waste generated from the County Park is serviced by the active Tajiguas Landfill in Goleta approximately 38.7 miles away.

Jalama Beach County Park currently has a daily/design sewage flow of 2,700 gallons per day (gpd). The Park is serviced by seven (7) septic tanks, a pump station, and over 1,500 feet of leachline. Treatment facilities consist of septic tanks with a total capacity of 6,500 gallons and wastewater is discharged to dual leachfield systems with a disposal capacity of approximately 5,600 gpd.

Police protection for the County Park is provided by Santa Barbara County Sheriff's Department with the nearest substation in Lompoc. The closest fire station is located in Lompoc, approximately 23.8 miles in distance from the Park. The closest emergency healthcare facility is also located in Lompoc, approximately 18.7 miles in distance from the Park.

County Environmental Thresholds: *(Schools)* A significant level of school impacts is generally considered to occur when a project would generate sufficient students to require an additional classroom.

(Solid Waste) A project is considered to result in significant impacts to landfill capacity if it would generate 196 tons per year of solid waste. This volume represents five percent of the expected average annual increase in waste generation, and is therefore considered a significant portion of the remaining landfill capacity. In addition, construction and demolition waste from remodels and rebuilds is considered significant if it exceeds 350 tons. A project which generates 40 tons per year of solid waste is considered to have an adverse effect on solid waste generation, and mitigation via a Solid Waste Management Plan is recommended.

Impact Discussion:

(a, b) No Impact. The proposed project would result in the conversion of a group rental space to four new RV cabin pads equipped with an associated outdoor barbecue, two hose-bibs, five replaced restrooms (three larger, two smaller), one replaced shower structure with addition, and the conversion of four tent sites to a seasonal group rental space within an already developed area. The Park's existing daily maximum capacity for camping is 956 people. The proposed project's daily maximum capacity for camping would increase to 972 people; an increase of 16 people daily. The proposed project would result in no introduction or increase in residential or permanent living facilities. This level of development would not require new or altered police protection and/or healthcare services. Existing service levels would be sufficient to serve the proposed project. As the proposed project would not include permanent residential facilities, no new student generation would occur that would affect school capacities. Thus, the proposed project would result in **no impacts** to police protection, health care services, or school capacities.

(c) Less than Significant. The solid waste generated by the project would not exceed 196 tons per year, and construction and demolition waste would not exceed 350 tons. Other impacts to public services would also be **less than significant**.

(d, e) No Impact. Jalama Beach County Park currently has a daily/design sewage flow of 2,700 gallons per day (gpd). The Park is serviced by seven septic tanks, a pump station, and over 1,500 feet of leach line. Treatment facilities consist of septic tanks with a total capacity of 6,500 gallons and wastewater is discharged to dual leach field systems with a disposal capacity of approximately 5,600 gpd. The proposed project's increase in daily maximum capacity would be minimal. Thus, the existing facilities would have adequate capacity to service County Park visitors and no new or altered sewer system facilities would be required. The proposed project would not include the construction of new storm water drainage, water quality control facilities, or expansion of any existing facilities. Therefore, the proposed project would result in **no impacts** related to new or altered sewer system facilities, new storm water drainage, water quality control facilities, or expansion of existing facilities that would cause significant environmental effects.

Cumulative Impacts: The County's Environmental Thresholds were developed, in part, to define the point at which a project's contribution to a regionally significant impact constitutes a significant effect at the project level. In this instance, the proposed project would not exceed the threshold of significance for public services. The proposed project would not result in the need for increased police protection or healthcare services, generate additional students affecting school capacity, break any solid waste disposal and generation standards, require new or altered sewer system facilities, or construct new storm water drainage or water quality control facilities. Therefore, the proposed project's contribution to the regionally significant demand for public services would not be considerable and would be **less than significant**.

Mitigation and Residual Impact:

No impacts are identified. No mitigation is necessary.

4.13 RECREATION

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Conflict with established recreational uses of the area?				x	
b. Conflict with biking, equestrian and hiking trails?				x	
c. Substantial impact on the quality or quantity of existing recreational opportunities (e.g., overuse of an area with constraints on numbers of people, vehicles, animals, etc. which might safely use the area)?			x		

Existing Setting: Jalama Beach County Park is designated Recreation/Open Space. Recreational facilities provided by the Park include year-round camping (7 cabins, 31 campsites with electronic hookups available to recreational vehicles (RVs), 78 campsites, and two group campsites) and day-use recreational opportunities (105 day-use parking spaces, access for surfing, windsurfing, surf-fishing, swimming, beach walking, picnicking, and bird watching).

County Environmental Thresholds: The Thresholds and Guidelines Manual contains no threshold for park and recreation impacts. However, the Board of Supervisors has established a minimum standard ratio of .7 acres of recreation/open space per 1,000 people to meet the needs of a community. The Santa Barbara County

Parks Department maintains more than 900 acres of parks and open spaces, as well as 84 miles of trails and coastal access easements.

Impact Discussion:

(a, b) No Impact. The proposed project site is located within the Jalama Beach County Park campground. The County Park is currently designated recreational space and improvements to the County Park to improve accommodations for recreational purposes would not conflict with the current uses of the area. The proposed project is not located near any established biking, equestrian, or hiking trails. Thus, the proposed project would not conflict with established recreational uses of the area or with biking, equestrian, or hiking trails. **No impacts** to recreation would result.

(c) Less than Significant. The proposed project would include the addition of four new RV cabins for recreational purposes and the renovation of five existing restroom facilities and a shower facility with addition to better accommodate County Park visitors. The proposed project would increase Jalama Beach County Park's maximum vehicle capacity by four (from 244 to 248 camping vehicles), maximum camping capacity by 16 (from 956 to 972 campers), and the replacement of public facilities would improve the quality of Park amenities. The project would not result in any population increase. However, the proposed construction would occur over the course of 12 months in six month phases. The project proposes construction to be phased to reduce the impact to available recreational opportunities within the County Park. The project proposes construction activities to be scheduled to minimize impacts to seasonal Park operations, promote efficient construction schedules, and minimize Park closures. As such, construction-related impacts on recreation would be **less than significant**.

Cumulative Impacts: The proposed project would not affect recreational resources, conflict with existing recreational opportunities, or impact the quality or quantity of recreational opportunities. Thus, the proposed project would not have a cumulatively considerable effect of recreational resources within the County.

Mitigation and Residual Impact:

No impacts are identified. No mitigation is necessary.

4.14 TRANSPORTATION/CIRCULATION

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
a. Generation of substantial additional vehicular movement (daily, peak-hour, etc.) in relation to existing traffic load and capacity of the street system?			X		
b. A need for private or public road maintenance, or need for new road(s)?			X		
c. Effects on existing parking facilities, or demand for new parking?			X		

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
d. Substantial impact upon existing transit systems (e.g. bus service) or alteration of present patterns of circulation or movement of people and/or goods?				X	
e. Alteration to waterborne, rail or air traffic?				X	
f. Increase in traffic hazards to motor vehicles, bicyclists or pedestrians (including short-term construction and long-term operational)?		X			
g. Inadequate sight distance?				X	
ingress/egress?				X	
general road capacity?				X	
emergency access?				X	
h. Impacts to Congestion Management Plan system?				X	

Existing Setting: Jalama Beach County Park is located in the southwestern region of Santa Barbara County, at the westernmost end of Jalama Road. The County Park can be accessed from State Highway 1 (also known as Pacific Coast Highway (PCH), Highway 1, Cabrillo Highway, Route 1, or SR-1) taking Jalama Road west. Jalama Road is a two-lane 15 mile road which links State Highway 1 with the coast. The road is mostly used by local motorists to access sparsely located residences west of the intersection with State Highway 1 and the recreational traffic to Jalama Beach County Park. According to Santa Barbara County Public Works Transportation Division, only one traffic count for Jalama Road was obtained in September 2000: Average Daily Traffic (ADT) on Jalama Road west of State Highway 1 was 544 (Santa Barbara Public Works Transportation Division, 2014). The County confirms the traffic has likely not changed significantly since the year 2000 reading and the information provided is appropriate for the currently existing setting (Will Robertson, Santa Barbara County Public Works Transportation Department, 2015).

Jalama Beach County Park currently has 116 various sized campsites that accommodate 956 campers at maximum capacity. The campsites are accompanied by a total of 244 vehicles allowed at maximum capacity. The County Park also has 105 day-use parking spaces for non-camping visitors.

The Santa Barbara Public Works Department has developed a screening table to estimate LOS of the County Roads. Per this table, a two-lane local road design capacity is 1,875 ADT. For this type of road, a LOS A would be maintained at or below 750 ADT. Thus, Jalama Road LOS is A with a V/C of .29.

County Environmental Thresholds: The County of Santa Barbara is responsible for establishing acceptable Levels of Service (LOS) for roadway networks on County roads. Operating conditions are described by Level of Service (LOS), which is derived by comparing traffic volumes with roadway capacity. LOS A represents the best traffic operation, while LOS F represents the worst.

According to the County's Environmental Thresholds and Guidelines Manual, a significant traffic impact would occur when:

a. The addition of project traffic to an intersection increases the volume to capacity (V/C) ratio by the value provided below, or sends at least 15, 10, or 5 trips to an intersection operating at LOS D, E, F.

LEVEL OF SERVICE (including project)	**INCREASE IN VOLUME/CAPACITY GREATER THAN**
A	**0.20**
B	**0.15**
C	**0.10**
	Or the addition of:
D	**15 trips**
E	**10 trips**
F	**5 trips**

b. Project access to a major road or arterial road would require a driveway that would create an unsafe situation, or would require a new traffic signal, or major revisions to an existing traffic signal.

c. Project adds traffic to a roadway that has design features (e.g., narrow width, road side 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. Exceeding the roadway capacity designated in the Circulation Element may indicate the potential for the occurrence of the above impacts.

d. Project traffic would utilize a substantial portion of an intersection(s) capacity where the intersection is currently operating at acceptable levels of service (A-C) but with cumulative traffic would degrade to or approach LOS D (V/C 0.81) or lower. Substantial is defined as a minimum change of 0.03 for intersections which would operate from 0.80 to 0.85 and a change of 0.02 for intersections which would operate from 0.86 to 0.90, and 0.01 for intersections operating at anything lower.

Impact Discussion:

(a) Less than Significant. The proposed project would occur within the campgrounds of Jalama Beach County Park. The County Park is accessible from State Highway 1 by Jalama Road. Jalama Road is a two-lane 15 mile road with a road design capacity of 1,875 Average Daily Trips (ADT). According to the last traffic count in 2000, Jalama Road has an ADT of 544 (Santa Barbara County Public Works, 2009). The proposed project would increase the maximum capacity of vehicles for camping form 244 to 248 vehicles daily. The proposed project would not include the addition of any day-use parking spaces to the currently existing 105 parking spaces.

The proposed project would generate additional vehicular movement from construction-related activities, construction workers, and additional capacity for campers. The proposed construction would occur over 365 days to be phased in 6 month periods. The proposed fill during construction would require up to 188 total haul-

truck trips over the course of 6 months[4]. The proposed project estimates approximately 16 total trips for movement of equipment, 40 total vendor trips for supplies, and daily trips for approximately 15 workers over the 12 months. Although the proposed project would generate additional vehicular movement, the increase in construction-related trips would be negligible when spread out over the course of 12 months in six month periods. The addition of eight vehicles to the maximum vehicular capacity of the campgrounds (between camping vehicles and the 105 day-use parking spaces) would be negligible on the daily traffic movement. Due to the road design capacity, currently existing ADT of 544, the impacts related to the generation of additional vehicle movement would be **less than significant**.

(b, c) Less than Significant. The project also proposes the paving of a new approximately 180 ft. long, 14-20 ft. wide, access driveway that would be located on the north side of the proposed cabins. The proposed driveway would allow for vehicles to access the proposed new cabins from already existing Jalama Beach Road and would be located in the area of the currently existing Starfish Cove. The proposed new access drive would not increase the potential for further new development in the area and would only be used to access the proposed new cabins.

The proposed project would not require new roads or road maintenance aside from the proposed new access driveway to the proposed site of the new RV cabin pads. The proposed project would not require any additional parking aside from the assigned vehicles spaces for the new RV cabins and relocated Starfish Cove. The 105 day-use parking spaces would remain the same. The net increase of maximum capacity for campers (from 956 to 972 campers) and vehicles (from 244 to 248 vehicles) is negligible. The existing parking, in addition to the allotted parking by each campsite, would be sufficient for County Park visitors. Thus, the proposed project would result in **less than significant** impacts regarding the need for new roads, road maintenance, and additional parking.

(d, e) No Impact. Jalama Beach County Park is not accessible via public transit. The County Park also does not have a public transit system within the campgrounds. The roads currently existing within the County Park are specifically for circulation within the Park itself. The project would not propose the closure of any roads during construction-related activities. The Union Pacific Railroad operates to the east of Jalama Beach County Park. However, the proposed project would not have any effects on waterborne, rail, or air traffic. Thus, the proposed project would result in **no impacts** regarding impacts upon existing transit systems, circulation or movement of people or goods, or the alteration of waterborne, rail, or air traffic.

(f) Less than Significant with Mitigation. The proposed project would result in short-term construction-related traffic hazards to motor vehicles and pedestrians within the Jalama Beach County Park. These impacts would include the staging, parking, and movement of construction-related equipment and fencing of construction areas, which could affect circulation within the Park. The proposed project would require the implementation of **CIR-1** (Construction Timing, Access, and Circulation Plan – listed below) to reduce the impact on motor vehicles and pedestrians while within the County Park campgrounds. The Construction Timing, Access, and Circulation Plan would provide County Park visitors with the necessary information to be

[4] These figures represent trips and construction schedules related to (1) eight cabins rather than four, and (2) a previously considered access drive, which would have required a larger amount of grading. The currently proposed project for four cabins and the shorter, narrower access driveway requires 700 fewer cubic yards of grading. As a result, these figures represent worst-case scenarios.

aware of the construction-related activities going on within the Park. With the implementation of **CIR-1**, listed below, construction-related traffic hazards to motor vehicles and pedestrians would be **less than significant**.

(g, h) No Impact. The proposed project would occur within the currently developed Jalama Beach County Park campgrounds. The campgrounds exist on naturally-occurring terraced levels. The proposed improvements would not occur in areas with inadequate site distance. The proposed improvements would also not occur in locations that would affect the ingress/egress or emergency access into/out of the County Park. According to the traffic count, completed by Santa Barbara County Public Works Transportation Division in 2000, the proposed project would not substantially increase the vehicular volume to levels that would result in significant impacts to general road capacity. Roadways and intersections in the proposed project area would operate at acceptable levels of service and would not be subject to Congestion Management Plan requirements. Thus, the proposed project would result in **no impacts** regarding inadequate sight distance, impacts to ingress/egress and general road capacity, emergency access, or impacts to the Congestion Management Plan system.

Cumulative Impacts: The County's Environmental Thresholds were developed, in part, to define the point at which a project's contribution to a regionally significant impact constitutes a significant effect at the project level. Due to the proposed project's location, minimal traffic conditions, and the implementation of **CIR-1**, the project would not exceed the threshold of significance for traffic. Therefore, the proposed project's contribution to the regionally significant traffic congestion would not be considerable and would be **less than significant**.

Mitigation and Residual Impact:

Implementation of the following measure would reduce the project's transportation and circulation impacts to a less than significant level:

1. **MM-CIR-1 Construction Timing, Access, and Circulation Plan.** The County shall prepare a Construction Timing, Access, and Circulation Plan, which would include measures to avoid impacts to vehicular and pedestrian traffic and parking in the project area during construction activities. Feasible measures would likely include the use of directional signage, stop controls, detours, and safety railing, as necessary, to control pedestrian and vehicular traffic through or near any area that would be utilized by heavy equipment, construction workers, or materials. **Plan Requirements and Timing**: All Plan elements shall be graphically depicted on plans. The plan shall be approved by the County Parks Project Manager prior to the start of construction. **Monitoring**: Inspectors shall ensure compliance in the field.

With the incorporation of the required measure, residual impacts would be **less than significant**.

4.15 WATER RESOURCES/FLOODING

Will the proposal result in:	**Poten. Signif.**	**Less than Signif. with Mitigation**	**Less Than Signif.**	**No Impact**	**Reviewed Under Previous Document**
a. Changes in currents, or the course or direction of water movements, in either marine or fresh waters?				X	

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
b. Changes in percolation rates, drainage patterns or the rate and amount of surface water runoff?		X			
c. Change in the amount of surface water in any water body?		X			
d. Discharge, directly or through a storm drain system, into surface waters (including but not limited to wetlands, riparian areas, ponds, springs, creeks, streams, rivers, lakes, estuaries, tidal areas, bays, ocean, etc) or alteration of surface water quality, including but not limited to temperature, dissolved oxygen, turbidity, or thermal water pollution?		X			
e. Alterations to the course or flow of flood water or need for private or public flood control projects?				X	
f. Exposure of people or property to water related hazards such as flooding (placement of project in 100 year flood plain), accelerated runoff or tsunamis, sea level rise, or seawater intrusion?				X	
g. Alteration of the direction or rate of flow of groundwater?				X	
h. Change in the quantity of groundwater, either through direct additions or withdrawals, or through interception of an aquifer by cuts or excavations or recharge interference?				X	
i. Overdraft or over-commitment of any groundwater basin? Or, a significant increase in the existing overdraft or over-commitment of any groundwater basin?				X	
j. The substantial degradation of groundwater quality including saltwater intrusion?				X	
k. Substantial reduction in the amount of water otherwise available for public water supplies?				X	
l. Introduction of storm water pollutants (e.g., oil, grease, pesticides, nutrients, sediments, pathogens, etc.) into groundwater or surface water?		X			

Existing Setting: Jalama Beach County Park is bound to the north by Jalama Creek and to the west by Jalama Beach and the Pacific Ocean. The Jalama Creek watershed is approximately 16,000 acres, and the stream length is 53.56 miles, of which the perennial length is 14.74 miles. Minimum precipitation in the watershed area, which supplies water into the creek, is 15 inches/year; maximum precipitation is 21 inches/year (Conception Coast Project, 2009). The creek discharges to the Pacific Ocean. The lowest water levels are from August through October. Potable water is provided to Jalama Beach County Park from a groundwater well

located approximately 3,000 ft. northeast of the site on Vandenberg Air Force Base property. The nearest groundwater basin is the Santa Ynez River Groundwater Basin located approximately 27 miles to the north.

According to a Percolation Study conducted in 2003, percolation rates in the clayey and silty sands and sandy clays varied from 44 min/inch to 95 min/inch (GSI Soils Inc., 2003). Groundwater was not encountered during the Percolation Study. DWA Mapping (2012) provides information about the potential problem with flooding, but most recent available data from FEMA (January, 2014) states that Jalama Beach County Park is not located in a 100 year floodplain.

County Environmental Thresholds: A significant water quality impact is presumed to occur if the 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;
- Is an industrial facility that falls under one or more of categories of industrial activity regulated under the NPDES Phase I industrial storm water regulations (facilities with effluent limitation; manufacturing; mineral, metal, oil and gas, hazardous waste, treatment or disposal facilities; landfills; recycling facilities; steam electric plants; transportation facilities; treatment works; and light industrial activity);
- 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 uses[5] of a receiving water body;
- Results in a discharge of pollutants into an "impaired" water body that has been designated as such by the State Water Resources Control Board or the RWQCB under Section 303 (d) of the Federal Water Pollution Prevention and Control Act (i.e., the Clean Water Act); or
- Results in a discharge of pollutants of concern to a receiving water body, as identified by the RWQCB.

Impact Discussion:

[5] Beneficial uses for Santa Barbara County are identified by the Regional Water Quality Control Board in the Water Quality Control Plan for the Central Coastal Basin, or Basin Plan, and include (among others) recreation, agricultural supply, groundwater recharge, fresh water habitat, estuarine habitat, support for rare, threatened or endangered species, preservation of biological habitats of special significance.

(a) Less than significant. With two exceptions, the proposed work within the Park would occur a minimum of approximately 250 ft. from Jalama Creek to the north and approximately 150 ft. from Jalama Beach and the Pacific Ocean to the west. Solar panels would be installed on the roof an existing building located approximately 50 feet from Jalama Creek; however, no ground disturbance would be required. Also, the existing smaller-type northwest restroom is located on a paved area approximately 100 feet from the beach. As the proposed project is limited to work within the previously developed areas of the Park, it would not result in any impacts related to changes in currents, or the course or direction of water movements, in either marine or fresh waters.

(b, c, d, l) Less than Significant with Mitigation. As stated above, the proposed project is limited to work within the previously developed areas of the Park. Due to the proximity to Jalama Creek, the proposed improvements could potentially result in the introduction of storm water pollutants into nearby surface water. However, the project proposes required storm water quality measures including Best Management Practices (BMPs) to minimize the potential impact to water resources. Mitigation measures **BIO-3** (Avoidance of Creek & Riparian Habitats)**, BIO-6** (Environmentally Sensitive Areas)**, BIO-7** (Erosion Control Plan)**, GEO-1** (Erosion & Sediment Control Plan)**,** and **HAZ-1** (Equipment Maintenance and Storage –Construction) would minimize potential impacts to water resources. Additionally, mitigation measure **WAT-1,** requires a Storm Water Pollution Prevention Plan (SWPPP), Storm Water Management Plan (SWMP), or Water Pollution Control Plan (WPCP) incorporating Best Management Practices (BMPs) according to Chapter 14 of the Santa Barbara County Code. Implementation of these measures would reduce impacts related to the potential for runoff to introduce pollutants into water bodies to less than significant.

(e, f) No Impact. The proposed improvements would occur within the currently existing campgrounds of Jalama Beach County Park. The project would not propose the alteration of the creek banks or Jalama Creek itself. Any proposed covering of project areas with impermeable tarps would be temporary and all tarps would be removed at the conclusion of the project. The California Department of Water Resources (DWR) provides floodplain mapping data that documents the potential problem with flooding in the area, but the most recent available data (map effective date September 2005) from FEMA's National Flood Hazard Layer database indicates that the existing developed campgrounds of Jalama Beach County Park are outside of the 100 year floodplain. Thus, the proposed project would result in **no impacts** regarding alterations to the flow of flood water, need for flood control projects, and exposure of people or property to water-related hazards.

(g, h, i, j, k) No Impact. Jalama Beach County Park receives its water from a groundwater well located approximately 3,000 ft. northeast of the site on Vandenberg Air Force Base property. The well likely takes water from the Santa Ynez River Groundwater Basin located approximately 27 miles to the north from Jalama Beach. According to a Percolation Study conducted in 2003, percolation rates in the clayey and silty sands and sandy clays varied from 44 min/inch to 95 min/inch (GSI Soils Inc, 2003) and groundwater was not encountered throughout the County Park. Due to the absence of groundwater in the proposed project area, the proposed project would not result in alterations to the direction or rate of flow of groundwater. The proposed project would not change the quantity of groundwater through direct addition or withdrawals, or through interception of an aquifer by cuts or excavations. The proposed project would not overdraft or over commit any groundwater basin as it proposes minimal use of water resources. The proposed project would not result in the substantial degradation of groundwater quality or substantially reduce the amount of water available for public water sources.

Cumulative Impacts: The County's Environmental Thresholds were developed, in part, to define the point at which a project's contribution to a regionally significant impact constitutes a significant effect at the project level. In this instance, the proposed project would not exceed the threshold of significance for water resources. The location of the proposed improvements, the absence of groundwater during percolation reports, and the implementation of required storm water quality measures would greatly minimize potential impacts resulting from the proposed project. Therefore, the project's contribution to the regionally significant issues of water supplies and water quality would not be considerable and would be **less than significant**.

Mitigation and Residual Impact:

The implementation of the required storm water quality measures would minimize potential impacts to water quality and reduce impacts to a **less than significant level**:

1. **MM-WAT-1 Preparation of a Storm Water Management Plan (SWMP).** The County shall prepare a Storm Water Management Plan (SWMP), Storm Water Pollution Prevention Plan (SWPPP), or Water Pollution Control Plan (WPCP) which shall include Best Management Practices (BMPs) to be implemented and monitored prior to and during construction. The following BMPs shall be incorporated into the SWMP, SWPPP, or WPCP to minimize potential water quality impacts:

    1. All ground disturbances shall be limited to the dry season or periods when rainfall is not predicted, to minimize erosion and sediment transport to surface waters.

    2. Disturbed areas shall be stabilized or re-vegetated prior to the start of the rainy season; Impacts to vegetation shall be minimized. The work area shall be flagged to identify its limits. Vegetation shall not be removed or intentionally damaged beyond these limits.

    3. Construction materials and soil piles shall be placed in designated areas where they could not enter Jalama Creek or storm drains due to spillage or erosion.

    4. Waste and debris generated during construction shall be stored in designated waste collection areas and containers away from watercourses, and shall be disposed of regularly.

    5. During construction, washing of concrete trucks, paint, equipment, or similar activities shall occur only in areas where polluted water and materials can be contained for subsequent removal from the site. Wash water shall not be discharged to the storm drains, street, drainage ditches, creeks, or wetlands. The concrete washout area shall be isolated from Jalama Creek, and wash water and waste shall be removed from the project site. The location of the washout area shall be clearly noted at the construction site with signs.

    6. All fueling of heavy equipment shall occur in a designated area removed from Jalama Creek and other drainages, such that any spillage would not enter surface waters. The designated refueling area shall include a drain pan or drop cloth and absorbent materials to clean up spills. The location of the fueling area shall be clearly noted at the construction site with signs.

    7. Vehicles and equipment shall be maintained properly to prevent leakage of hydrocarbons and coolant, and shall be examined for leaks on a daily bases. All maintenance shall occur in a designated offsite area. The designated area shall include a drain pan or drop cloth and absorbent materials to clean up spills.

8. Any accidental spill of hydrocarbons or coolant that may occur on the construction site shall be cleaned up immediately. Absorbent materials shall be maintained on the construction site for this purpose.
9. Temporary placement of fill shall be located outside of any drainage ways.
10. Adequate measures shall be applied to all disturbed portions of the project site to control dust, such as daily watering or hydro-mulching until vegetation cover is well established. Any fill or stockpiling that is to be left more than 30 days shall be hydro-seeded or covered immediately upon completion of the fill or stockpiling work.
11. All fill materials shall be "clean" and free of any potentially hazardous materials or hazardous waste.

PLAN REQUIREMENTS AND TIMING: All elements of the SWMP shall be graphically indicated on plans prior to issuance of zoning clearances. **MONITORING**: Inspectors shall inspect in the field.

With the incorporation of these required storm water quality measures, residual impacts would be **less than significant**.

6.0 INFORMATION SOURCES

6.1 County Departments Consulted

Public Works, Flood Control, Parks, General Services

6.2 Comprehensive Plan

x	Seismic Safety/Safety Element		Conservation Element
	Open Space Element		Noise Element
x	Coastal Plan and Maps		Circulation Element
	ERME		

6.3 Other Sources

x	Field work		Ag Preserve maps
	Calculations	x	Flood Control maps
x	Project plans	x	Other technical references
	Traffic studies		(reports, survey, etc.)
	Records		Planning files, maps, reports
x	Grading plans	x	Zoning maps
x	Elevation, architectural renderings		Soils maps/reports
x	Published geological map/reports	x	Plant maps
	Topographical maps	x	Archaeological maps and reports
		x	Other: See following list of sources

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7.0 PROJECT SPECIFIC *(short- and long-term)* AND CUMULATIVE IMPACT SUMMARY

The following is a summary of project-specific impacts:

Class I Impacts (Significant and Unavoidable):
None identified.

Class II Impacts (Potentially Significant and Subject to Mitigation):
Aesthetics, Biological Resources, Cultural Resources, Geologic Processes, Hazardous Materials/Risk of Upset, Noise, Transportation/Circulation, and Water Resources/Flooding.

Significant direct short- and long-term project specific impacts would be reduced to a less than significant level through the implementation of the mitigation measures listed in the sections above.

Class III Impacts (Less than Significant):
Energy, Fire Protection, Public Facilities, and Recreation.

The project would have no impacts on Agriculture, Land Use, and Historic Resources.

Cumulative Impacts:
With the implementation of the mitigation measures discussed above in each section, the proposed project's contribution to cumulative environmental impacts would not be substantial or significant.

8.0 MANDATORY FINDINGS OF SIGNIFICANCE

Will the proposal result in:	Poten. Signif.	Less than Signif. with Mitigation	Less Than Signif.	No Impact	Reviewed Under Previous Document
1. Does the project have the potential to substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, substantially reduce the number or restrict the range of a rare or endangered plant or animal, contribute significantly to greenhouse gas emissions or significantly increase energy consumption, or eliminate important examples of the major periods of California history or prehistory?		x			
2. Does the project have the potential to achieve short-term to the disadvantage of long-term environmental goals?				x	
3. Does the project have impacts that are individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects and the effects of probable future projects.)			x		
4. Does the project have environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly?				x	
5. Is there disagreement supported by facts, reasonable assumptions predicated upon facts and/or expert opinion supported by facts over the significance of an effect which would warrant investigation in an EIR ?				x	

Impact Discussion:

(1) Project specific biological resource and water quality impacts would be mitigated to a less than significant level through mitigation measures, as discussed in Section 4.4 (Biological Resources) and Section 4.15 (Water Resources). Therefore, the project would not substantially degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, or substantially reduce the number or restrict the range of a rare or endangered plant or animal. Further, as discussed in sections 4.3 (Air Quality), Section 4.6 (Energy) and Section 4.5 (Cultural Resources), the project would not contribute significantly to greenhouse gas emissions, to increased energy consumption, nor would it eliminate important examples of the major periods of California history or prehistory. Mitigation measures have been identified, where applicable, to ensure that impacts to these resources are less than significant.

(2-5) As discussed throughout this document, the project will not achieve short-term gains to the disadvantage of long-term environmental goals. It does not have impacts that are individually limited, but cumulatively

considerable. Any contribution of the project to significant cumulative impacts would be adequately reduced by mitigation measures identified to address project-specific impacts. There are no environmental effects which will cause substantial adverse effects on human beings, either directly or indirectly due to the implementation of identified mitigation measures. Finally, there is no disagreement supported by facts, reasonable assumptions predicated upon facts and/or expert opinion supported by facts over the significance of an effect which would warrant investigation in an EIR.

9.0 INITIAL REVIEW OF PROJECT CONSISTENCY WITH APPLICABLE SUBDIVISION, ZONING AND COMPREHENSIVE PLAN REQUIREMENTS

9.1 Zoning Requirements: The majority of the Jalama Beach County Park is zoned REC, Recreation District, while minimal encroachment of existing campground facilities on the southernmost portion of the County Park occurs on a portion of a parcel zoned AG-II-320, minimum lot size 320 acres, under the Article II Coastal Zoning Ordinance. The project is subject to the requirements of, and is consistent with these zone districts.

9.2 Comprehensive Plan Requirements: The proposed project is subject to, and consistent with implementation of identified mitigation measures, the following Policies of the County Comprehensive Plan:

Coastal Land Use Plan Policy 2-4: 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.

Coastal Land Use Plan Policy 2-5: Water-conserving devices shall be used in all new development.

Coastal Land Use Plan Policy 2-6: Prior to issuance of a development permit, the County shall make the finding, based on information provided by environmental documents, staff analysis, and the applicant, that adequate public or private services and resources (i.e., water, sewer, roads, etc.) are available to serve the proposed development.

Coastal Land Use Plan Policy 2-11: All development, including agriculture, adjacent to areas designated on the land use plan or resource maps as environmentally sensitive habitat areas, shall be regulated to avoid adverse impacts on habitat resources. Regulatory measures include, but are not limited to, setbacks, buffer zones, grading controls, noise restrictions, maintenance of natural vegetation, and control of runoff.

Coastal Land Use Plan Policy 3-8: Applications for grading and building permits, and applications for subdivision shall be reviewed for adjacency to, threats from, and impacts on geologic hazards arising from seismic events, tsunami runup, landslides, beach erosion, or other geologic hazards such as expansive soils and subsidence areas. In areas of known geologic hazards, a geologic report shall be required. Mitigation measures shall be required where necessary.

Coastal Land Use Plan Policy 3-14: All development 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 for development because of known soil, geologic, flood, erosion or other hazards shall remain in open space.

Coastal Land Use Plan Policy 3-18: 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 a result of development. Water runoff shall be retained on-site whenever possible to facilitate groundwater recharge.

Coastal Land Use Plan Policy 3-19: 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.

Coastal Land Use Plan Policy 4-3: In areas designated as rural on the land use plan maps, the height, scale, and design of structures shall be compatible with the character of the surrounding natural environment, except where technical requirements dictate otherwise. Structures shall be subordinate in appearance to natural landforms; shall be designed to follow the natural contours of the landscape; and shall be sited so as not to intrude into the skyline as seen from public viewing places.

Coastal Land Use Plan Policy 4-4: 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 44 character of the existing community. Clustered development, varied circulation patterns, and diverse housing types shall be encouraged.

Coastal Land Use Plan Policy 7-4: The County, or appropriate public agency, shall determine the environmental carrying capacity for all existing and proposed recreational areas sited on or adjacent to dunes, wetlands, streams, tidepools, or any other areas designated as “Habitat Areas” by the land use plan. A management program to control the kinds, intensities, and locations of recreational activities so that habitat resources are preserved shall be developed, implemented, and enforced. The level of facility development (i.e., parking spaces, camper sites, etc.) shall be correlated with the environmental carrying capacity.

Coastal Land Use Plan Policy 7-5: For areas controlled by Federal, State, County, or District agencies, in a zone extending approximately 250 feet inland from the mean high tide line, priority shall be given to coastal dependent and related recreational activities and support facilities. However, camping facilities should be set back from the beach and bluffs and nearshore areas reserved for day use activities. Recreational activities that are not coastal dependent may be located within this 250-foot zone if the less desirable coastal dependent support facilities (parking, restrooms, etc.) are located inland. In no case shall facilities, except for required structures (i.e., lifeguard towers, volleyball nets, etc.), be located directly on the dry sandy beach.

Coastal Land Use Plan Policy 7-6: Recreational uses on oceanfront lands, both public and private, that do not require extensive alteration of the natural environment (i.e., tent campgrounds) shall have priority over uses requiring substantial alteration (i.e., recreational vehicle campgrounds).

Coastal Land Use Plan Policy 7-21: Jalama Road shall be maintained as a two-lane road with only minor realignment from the summit to the park. All improvements shall be designed and constructed to minimize adverse impacts on Jalama Creek. Improvements shall result in a minimum removal of any riparian vegetation along the creek.

Coastal Land Use Plan Policy 7-22: Expanded opportunities for public access and recreation shall be provided in the North Coast planning area.

Coastal Land Use Plan Policy 7-29: Visitor-serving commercial recreational development in rural areas should be limited to low intensity uses, i.e., campgrounds, that are designed to protect and enhance visual resources, and minimize impacts on topography, habitats, and water resources.

Coastal Land Use Plan Policy 8-2: If a parcel is designated for agricultural use and is located in a rural area not contiguous with the urban/rural boundary, conversion to non-agricultural use shall not be permitted unless such conversion of the entire parcel would allow for another priority use under the Coastal Act, e.g., coastal dependent industry, recreation and access, or protection of an environmentally sensitive habitat. Such conversion shall not be in conflict with contiguous agricultural operations in the area, and shall be consistent with Section 30241 and 30242 of the Coastal Act.

Coastal Land Use Plan 9-1: Prior to the issuance of a development permit, all projects on parcels shown on the land use plan and/or resource maps with a Habitat Area overlay designation or within 250 feet of such designation or projects affecting an environmentally sensitive habitat area shall be found to be in conformity with the applicable habitat protection policies of the land use plan. All development plans, grading plans, etc., shall show the precise location of the habitat(s) potentially affected by the proposed project. Projects which could adversely impact an environmentally sensitive habitat area may be subject to a site inspection by a qualified biologist to be selected jointly by the County and the applicant.

Coastal Land Use Plan 9-2: Because of their State-wide significance, coastal dune habitats shall be preserved and protected from all but resource dependent, scientific, educational, and light recreational uses. Sand mining and oil well drilling may be permitted if it can be shown that no alternative location is feasible and such development is sited and designed to minimize impacts on dune vegetation and animal species.

Coastal Land Use Plan 9-9: A buffer strip, a minimum of 100 feet in width, shall be maintained in natural condition along the periphery of all wetlands. No permanent structures shall be permitted within the wetland or buffer area except structures of a minor nature, i.e., fences, or structures necessary to support the uses in Policy 9-10.

Coastal Land Use Plan 9-14: New development adjacent to or in close proximity to wetlands shall be compatible with the continuance of the habitat area and shall not result in a reduction in the biological

productivity or water quality of the wetland due to runoff (carrying additional sediment or contaminants), noise, thermal pollution, or other disturbances.

Coastal Land Use Plan Policy 10-1: All available measures, including purchase, tax relief, purchase of development rights, etc., shall be explored to avoid development on significant historic, prehistoric, archaeological, and other classes of cultural sites.

Coastal Land Use Plan Policy 10-2: When developments are proposed for parcels where archaeological or other cultural sites are located, project design shall be required which avoids impacts to such cultural sites if possible.

Coastal Land Use Plan Policy 10-3: When sufficient planning flexibility does not permit avoiding construction on archaeological or other types of cultural sites, adequate mitigation shall be required. Mitigation shall be designed in accord with guidelines of the State Office of Historic Preservation and the State of California Native American Heritage Commission.

Coastal Land Use Plan Policy 10-5: Native Americans shall be consulted when development proposals are submitted which impact significant archaeological or cultural sites.

Coastal Act Policy 30231: The biological productivity and the quality of coastal waters, streams, wetlands, estuaries, and lakes appropriate to maintain optimum populations of marine organisms and for the protection of human health shall be maintained and, where feasible, restored though, among other means, minimizing adverse effects of waste water discharges and entrainment, controlling runoff, preventing depletion of ground water supplies and encouraging waste water reclamation, maintaining natural vegetation buffer areas that protect riparian habitats, and minimizing alteration of natural streams.

Coastal Act Policy 30240: (a) Environmentally sensitive habitat areas shall be protected against any significant disruption of habitat values, and only uses dependent on such resources shall be allowed within such areas.

Coastal Act Policy 30251: The scenic and visual qualities of coastal areas shall be considered and protected as a resource of public importance. Permitted development shall be sited and designed to protect views to and along the ocean and scenic coastal areas, to minimize the alteration of natural land forms, to be visually compatible with the character of surrounding areas, and, where feasible, to restore and enhance visual quality in visually degraded areas.

10.0 RECOMMENDATION BY P&D STAFF

On the basis of the Initial Study, the staff of Planning and Development:

__X__ Finds that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because the mitigation measures incorporated into the REVISED PROJECT DESCRIPTION would successfully mitigate the potentially significant impacts. Staff recommends the preparation of an ND. The ND finding is based on the assumption that mitigation measures will be acceptable to the applicant; if not acceptable a revised Initial Study finding for the preparation of an EIR may result.

_____ With Public Hearing _____ Without Public Hearing

PREVIOUS DOCUMENT:

PROJECT EVALUATOR: **Sean Stewart** **DATE:**

11.0 DETERMINATION BY ENVIRONMENTAL HEARING OFFICER

____ I agree with staff conclusions. Preparation of the appropriate document may proceed.
____ I DO NOT agree with staff conclusions. The following actions will be taken:
____ I require consultation and further information prior to making my determination.

SIGNATURE:_____ **INITIAL STUDY DATE**: _____

SIGNATURE:_____ **NEGATIVE DECLARATION DATE**:_____

SIGNATURE:_____ **REVISION DATE:** _____

SIGNATURE:_____ **FINAL NEGATIVE DECLARATION DATE:** _____

12.0 ATTACHMENTS

1. Regional Vicinity Map
2. Project Plans
3. Biological Report, Dudek, November 2017
4. Monarch Butterfly Survey, Dudek, January 2018

REGIONAL VICINITY MAP