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ENVIRONMENTAL LAW

September 30, 2025

VIA EMAIL TO:

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Ms. Barbara Burkhart
Project Planner
City of Santa Barbara
Community Planning Division
630 Garden Street
Santa Barbara, CA 93101

RE: Comments concerning the City's Govt Code §65589.5(h)(6)(D) notice and CEQA review of proposed development at 1609-1615 Grand Avenue (PLN2024-00181)

Dear Ms. Burkhart:

We are writing on behalf of our client, Smart Action for Growth & Equity – Santa Barbara (“SAGE”), to provide comments on the development application submitted for 1609-1615 Grand Avenue (hereinafter the “Project”) and specifically pursuant to the City’s website notice entitled, “Housing Accountability Act Notice of Environmental Delay for 1609 Grand Ave.”¹ SAGE is a Santa Barbara community-based organization dedicated to promoting safe and equitable housing and development, supporting affordable and workforce housing, and taking action to safeguard a sustainable, resilient and equitable community.

SAGE asserts that the developer’s notice under Government Code Section 65589.5(h)(6)(D) was defective, and submits the following comments on the proposed scope of the Project’s environmental impact report (“EIR”) under the California Environmental Quality Act (CEQA), Pub Res Code §21000, *et seq.*

¹ <https://santabarbaraca.gov/services/construction-land-development/development-activity/environmental-documents/housing>

I. The Applicant's August 1, 2025 Notice is Defective, and The City's CEQA Actions are Exempt from Being Deemed a "Disapproval" of the Project

The City must consider public comments concerning the applicant's notice under Govt Code §65589.5 (h)(6)(D). (Govt Code §65589.5(h)(6)(D)(iii) ["The local agency shall consider all objections, comments, evidence, and concerns about the project or the applicant's written notice." [emphasis added].) In an email on August 1, 2025 to the City from Ben Eilenberg, the applicant for the proposed development at 1609-1615 Grand Avenue (hereinafter "Applicant") stated:

As you are aware, this is a Builder's Remedy project. As per Government Code Section 65589.5(f)(6)(D)(iii): "[A]ll of the following apply to a housing development project that is a builder's remedy project...(D)(iii)Any project that complies with this paragraph shall be deemed consistent, compliant, and in conformity with an applicable plan, program, policy, ordinance, standard, requirement, redevelopment plan, and implementing instruments, or other similar provision for all purposes, and shall not be considered or treated as a nonconforming lot, use, or structure for any purpose."

Therefore, as there is no issue that exists, the CEQA analysis is now complete and there is no further CEQA action necessary.

Please confirm in writing by Wednesday, August 6, 2025 that you will come into compliance with Government Code Section 65589.5(f)(6)(D)(iii). If not, please consider this our notice that we are invoking Government Code Section 65589.5(h)(6)(D) as of today.

Government Code Section 65589.5(h)(6)(D) provides that a local agency's actions on a project may be deemed a "disapproval" if the local agency, "Fails to cease a course of conduct undertaken for an improper purpose, such as to harass or to cause unnecessary delay or needless increases in the cost of the proposed housing development project, that effectively disapproves the proposed housing development without taking final administrative action if all of the following conditions are met: (i) The project applicant provides written notice detailing the challenged conduct and why it constitutes disapproval to the local agency established under Section 65100."

The Applicant's notice did not detail the challenged conduct nor detail why the City's conduct (in asserting CEQA applies to the Project) constitutes disapproval, thus violating Government Code Section 65589.5(h)(6)(D)(i). The plain meaning of "detailing" in a notice would include facts and circumstances relevant to the underlying purpose of the notice, as the plain meaning of "detail" is to "describe item by item; give the full particulars of." (*See Jackpot*

Harvesting Co., Inc. v. Superior Court (2018) 26 Cal.App.5th 125, 142 [court looks to plain meaning of statute]; Oxford Languages, English Edition.) A bare or conclusory notice would undermine legislative intent to limit arbitrary and improper disapprovals. The requirement to “detail” the challenged conduct must at least require enough factual specificity to permit the City and public to understand the basis for the alleged “disapproval.” Here, the Applicant failed to identify let alone “detail” what conduct by the City was undertaken for an improper purpose.

Additionally, the City’s conduct was clearly not undertaken for an improper purpose, but to comply with CEQA and, through the environmental review process, identify, consider, and seek to avoid or mitigate the Project’s potentially significant adverse impacts, including impacts to the safety of prospective Project occupants and others that utilize the nearby and connected road network for both routine circulation and emergency ingress and egress.

The Applicant also fundamentally misapplied Government Code Section 65589.5(f)(6)(D)(iii), which is relevant to when a city attempts to require an applicant to apply for a general plan amendment. The City has expressly stated in the past that it will not do so. Govt Code Section 65589.5(f)(6)(D) provides:

- (D)(i) The project shall not be required to apply for, or receive approval of, a general plan amendment, specific plan amendment, rezoning, or other legislative approval.
- (ii) The project shall not be required to apply for, or receive, any approval or permit not generally required of a project of the same type and density proposed by the applicant.
- (iii) Any project that complies with this paragraph shall be deemed consistent, compliant, and in conformity with an applicable plan, program, policy, ordinance, standard, requirement, redevelopment plan and implementing instruments, or other similar provision for all purposes, and shall not be considered or treated as a nonconforming lot, use, or structure for any purpose.

The Applicant impliedly argued that (D)(iii) applies as a sort of blanket waiver of all general plan inconsistencies, including CEQA review of plan inconsistencies. However, subdivision (D)(iii) cannot be read to waive CEQA obligations. The Housing Accountability Act itself states that “nothing... shall be construed to relieve the local agency” of CEQA compliance (Govt. Code § 65589.5(e)). CEQA Guidelines § 15125(d) independently requires disclosure and analysis of any inconsistencies with applicable plans and policies. At most, subdivision (D)(iii) operates to prevent a project from being deemed “nonconforming” for local entitlement purposes. It does not amend CEQA or excuse the City from disclosing, analyzing, and mitigating environmental impacts arising from policy inconsistencies. Any contrary reading would conflict with CEQA’s mandatory requirements and the Legislature’s explicit retention of CEQA in §

65589.5(e). (*City of Ontario v. Superior Court* (1993) 12 Cal.App.4th 894, 902 [“We must assume that the Legislature knew how to create an exception if it wished to do so; nothing would have been simpler than to insert [language creating an exception].”].)

The applicant further ignores the timing and sequencing of the Legislature actions, contending in essence that the earlier AB 1893 changes preempt the subsequent AB 130 changes to the CEQA exemption. While AB 1893 contains “deemed consistent” language to allow Builders Remedy projects that conflict with applicable objective General Plan policies, zoning ordinance requirements and development standards, AB 130 and SB 131 were enacted later, and specifically required General Plan consistency as a condition of the revised Builders Remedy CEQA exemption.

Finally, the Applicant stated its notice is to “invoke” Government Code Section 65589.5(h)(6)(D). However, the City’s actions taken in furtherance of CEQA compliance is not subject to the (h)(6)(D) process. Government Code Section 65589.5(h)(6)(D)(vi) provides: “A local agency’s action in furtherance of complying with the California Environmental Quality Act (Division 13 (commencing with Section 21000 of the Public Resources Code), including, but not limited to, imposing mitigating measures, ***shall not constitute project disapproval under this subparagraph.***” (Emphasis added.) Therefore, there has been and cannot be a “disapproval” under (h)(6)(D) since the City is simply and properly subjecting the Project to CEQA’s environmental review process.

We assert that the applicant’s notice is defective, and does not legally invoke the (h)(6)(D) process because the City’s actions under CEQA are not subject to that process. As such, any process undertaken pursuant to (h)(6)(D) is inappropriate and legally defective.

Nevertheless, because the City issued a notice specifically pursuant to Government Code Section 65589.5(h)(6)(D), we submit the following comments regarding the Project and CEQA’s application to it. The Housing Accountability Act expressly provides that nothing in its provisions relieves a local agency from making the required CEQA findings or otherwise complying with CEQA. (Gov. Code § 65589.5(e).) No CEQA exemption applies here—including AB 130—and SB 131 offers no streamlining. Accordingly, the City’s notice should be treated as initiating a CEQA scoping process, and the public’s comment should be considered in identifying the topics to be addressed in the environmental review document. (See CEQA Guidelines, §15083.)

II. The Scope of the Project's EIR Must Include All Potentially Significant Environmental Impacts.

SB 131 allows for streamlined CEQA review of housing projects that narrowly miss qualifying for an exemption due to a “single [disqualifying] condition.” (Pub Res Code §21080.1(b)(1).) The City has identified one disqualifying condition (inconsistencies with the City’s General Plan and zoning code). However, the Project is also disqualified from AB 130’s exemption due to the Project site containing habitat for a protected species, the Crotch's bumblebee (*Bombus crotchii*). In order to qualify for the AB 130 exemption, a Project must comply with Government Code §65913.4(a)(6)(J), which requires that the development cannot be located on a site that is habitat “for protected species identified as candidate, sensitive, or species of special status...” (Pub. Res. Code §21080.66(a)(6).) The Crotch’s bumblebee is listed as a candidate species under the California Endangered Species Act (CESA) (Chapter 1.5 (commencing with Section 2050) of Division 3 of the Fish and Game Code). There is substantial evidence that the Project site provides habitat for the Crotch bumblebee. (Exhibit A [Gonella Report].) Thus, neither AB 130 nor SB 131 apply to the Project. (Pub. Res. Code §21080.66(a)(6); Pub. Res. Code §21080.1(b)(4).)

Nevertheless, even assuming, *arguendo*, SB 131 applies, the scope of the Project’s EIR must not be unnecessarily narrowed. Under SB 131, a “condition” is defined as “a physical or regulatory feature of the project or its setting or an effect upon the environment caused by the project.” (Pub Res Code §21080.1(b)(1).) Given this broad definition of “condition,” all potentially significant impacts flowing from a Project’s failure to meet that condition must be fully addressed in an EIR.

A. The EIR Must Study, Analyze, Disclose And Mitigate Or Avoid The Project’s Impact On Public Safety And The Safety Of Its Occupants Relating To Emergency Evacuation.

The Project is inconsistent with the General Plan Safety Element, S37, which requires a Project adhere to “Fire Hazard Reduction Design Requirements.” S37 states, “Project designs shall adequately address fire hazard, providing for appropriate site layout; building design and materials; fire detection and suppression equipment; landscaping and maintenance; road access and fire vehicle turnaround; road capacity for evacuation; and water supply.” Thus, the EIR must fully address all impacts related to fire hazards, including evacuation.

The CEQA threshold for determining impacts related to wildfire evacuation is located in Section XX of Appendix G of CEQA Guidelines, which asks whether a project would

“[s]ubstantially impair an adopted emergency response plan or emergency evacuation,” and Section IX(g) of the [CEQA Guidelines, Appendix G] which directs lead agencies to determine whether a project will “expose people or structures, either directly or indirectly, to a significant risk of loss, injury or death involving wildland fires”.

Regrettably, California and many other parts of the world have experienced conditions where the flame front of fast-moving wildfires overtakes vehicles containing persons that are attempting to evacuate, exposing those people, and any others that instead shelter or remain in structures, to potential loss of life and injury. Mass casualty events from these conditions include the Oakland Hills fires of 1991, Camp/Paradise fire in 2018, the Alta Dena/Eaton and Pacific Palisades in January, 2025. Santa Barbara’s 1990 Paint Fire, 2008 Tea Fire,² 2009 Jesusita Fire, 2018 Thomas Fire, and 1964 Coyote Fire, each created conditions that directly threatened City residents and other residents in foothill communities. Persons seeking to evacuate fire-prone areas during each of these episodes experienced, at various times and locations, extreme traffic conditions, bottlenecks, queueing, and uncertainties regarding both road and fire conditions. Roads serve both as collectors and arterials during evacuation conditions. The Project site and location, adjacent to CalFire’s 2007 designated Very High Fire Hazard Severity Zone³ and on a designated emergency evacuation roadway⁴, subject the Project and its occupants to substantial risks of loss, injury and death. Additionally, Project-related traffic creates risks during evacuations to others seeking to evacuate on roads adjacent to the Project and on roads impacted by Project-related traffic.

The California Attorney General—who has previously joined lawsuits that challenged development projects regarding their evacuation impact studies—released guidance in October 2022 for assessing and mitigating a project’s impact on wildfire ignition risk, emergency access, and evacuation for both new and existing developments.⁵ The guidance recommends more

² The Tea Fire burned 1,940 acres and destroyed 210 homes within a matter of hours. It was fueled by high winds, and warm weather giving citizens only moments to evacuate. The fire injured 25 people. Citizens evacuated from Alameda Padre Serra 0.4 miles away from 1609 Grand Avenue. The western evacuation boundary reached Mission Canyon which is only 1.1 miles away from Grand Avenue.

Sources:

<https://www.independent.com/2008/11/20/brief-but-violent-life-tea-fire/>

<https://keyt.com/news/santa-barbara-s-county/2023/11/13/santa-barbara-county-reflects-on-15th-anniversary-of-2008-montecito-tea-fire/>

Google Maps.

³ City of Santa Barbara 2021 Community Wildfire Protection Plan (“CWPP”) Figures 2 and 14.

⁴ Id., Figure 9

⁵ State of California Office of the Attorney General, Rob Bonta, *Best Practices for Analyzing and Mitigating Wildfire Impacts of Development Projects Under the California Environmental Quality Act*, (hereinafter “Attorney General Guidance”).

analysis of projects located in wildfire-prone areas for EIRs compared to the general “good faith effort at full disclosure” standard outlined in Section 15151 of the CEQA Guidelines. The Attorney General advised local agencies to specifically analyze how a project affects evacuation capabilities: “Local jurisdictions should consider whether *any* increase in evacuation times for the local community would be a significant impact.”⁶

According to the Attorney General Guidance, evacuation modeling and analysis should evaluate: how the addition of new development affects the evacuation of project residents; the capacity of roads to accommodate evacuations while also allowing access for emergency responders; the timing for community evacuation during emergencies; alternative plans for evacuations depending upon the location and dynamics of the emergency; how new projects will impact existing evacuation plans and the existing population; and local traffic to quantify travel times under various likely scenarios. The City must analyze the Project’s potential impacts to each of these issue areas and disclose them in the EIR for the Project.

Given the Project’s proposed placement of a high-density residential complex on an already compromised evacuation route (by the City’s own determination), the Project poses significant impacts. The Project proposes to add 53 residential units on a narrow hillside road (Grand Avenue) that serves as an evacuation route, as identified by the City’s Community Wildfire Protection Plan (“CWPP”) and the County.⁷ The Project is inconsistent with CWPP Policy 7, which requires an “Increase in evacuation safety for residents and the general public in a High Fire Hazard Area.” The City must consider the Project’s increase in evacuation times for the community. Specifically, Grand Avenue, where the Project’s traffic will flow to and from, is located directly abutting the Very High fire hazard severity zone⁸ (as depicted below) and thus will be impacted by the Project’s increase in traffic and parking features.

⁶ *Id.* at p. 12. (emphasis added.)

⁷ The CWPP map for evacuation routes listed Santa Barbara County as its source.

⁸ <https://content.civicplus.com/api/assets/ebc26205-512c-48d7-bca7-cfa0a18faa24>



The City’s Riviera neighborhoods are characterized by narrow, steep, twisty roadways. The ability to evacuate this area is constrained by these narrow, steep, and twisty roadways; compromised lines of sight; parked and oversize vehicles that narrow roadways and create pinch-points; and uphill traffic. Wildfire evacuation conditions typically entail extremely high temperatures, strong and erratic gusty winds, and dense smoke obscuring visibility. For an adequate CEQA analysis and assessment of Project risks, the City must commission a comprehensive evacuation study of the Project area and roadways both “upstream” and “downstream” of the Project.

The EIR must fully address the Project’s setting, and fully analyze the effect of the Project on the safety of residents in the nearby Very High fire hazard severity zone.

Evacuation for Santa Barbara⁹ would be severely impacted by this Project, if built, threatening the health and safety of area residents. Santa Barbara County Hazard Mitigation Plan¹⁰ acknowledged as such:

“...emergency access and evacuation can be constrained in hillside neighborhoods and rural communities where limited ingress and egress can slow and prevent the efficient movement of people and vehicles. This is particularly true in denser communities with larger populations served by narrow local roads *such as the Riviera* in the City of Santa

⁹ The City of Santa Barbara has 321 fire threat acres in Very high zone, 746 acres in the high wildfire threat zone (County HMP, at p. 6-34.)

¹⁰ AB 747 (Gov. Code §65302.15) provides that the City must update its Safety Element to identify evacuation routes and their capacity, safety and viability. The City has yet to comply with Gov. Code §65302.15. The City’s current CWPP relies on the County’s evacuation route mapping.

Barbara, the Goleta foothills, and areas of the Santa Ynez Valley and Orcutt. This vulnerability may be exacerbated in the future under changing housing laws in California that incentivize additional density within existing neighborhoods, including allowances for accessory dwelling units (ADUs), as well as urban lot splits and duplexes under Senate Bill 9, which increase the service population.

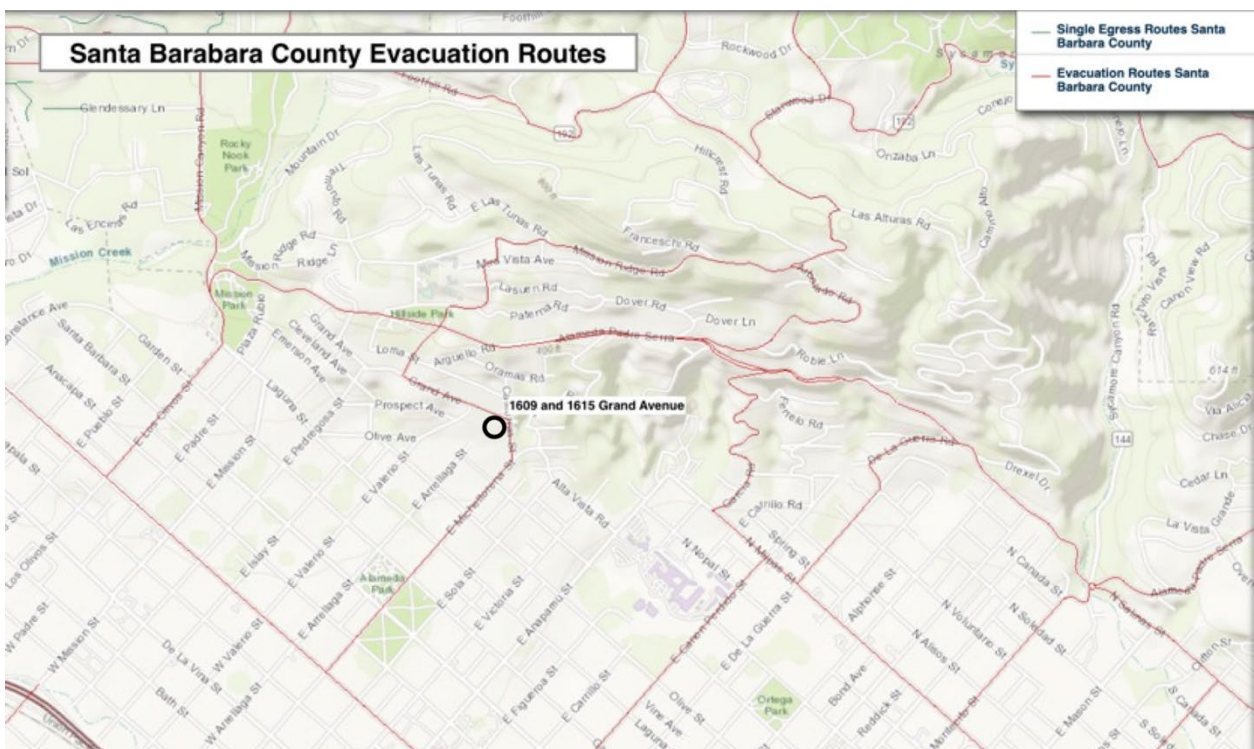
During an evacuation, additional residents would depend on the existing roadway network to flee and emergency responders would have additional residents to protect and serve. Further, in most cases, the same roads used for civilian evacuation to leave an area are also used by emergency responders to access the incident area.

(Santa Barbara County Hazard Mitigation Plan [“County HMP”] p. 6-41 [emphasis added][attached by reference as Exhibit 3].)

The Project site is located within the Lower Riviera Neighborhood (a neighborhood particularly susceptible to fire and called out above by the County Hazard Mitigation Plan), on the southern portion of Grand Avenue that is bordered by East Valerio Street to the west and California Street to the east. The Grand Ave Project sits alongside a designated evacuation route that serves as a primary egress route for portions of the Foothill Very High Fire Hazard Area. The Evacuation Route directs evacuating traffic down Moreno Road, across APS, to Grand Avenue, turns right onto California Street directly past the proposed Project driveway and then onto Micheltorena to get into the urban grid. The 1605 Grand Ave Project’s traffic is likely to

impact the intersections of Grand Avenue and Valerio Street, Grand Avenue and California Street, and California and Micheltorena. The following image depicts the area evacuation routes:

Other development (including past, pending and future residential development) within the High Fire Zones and the Very High Fire Hazard Severity Zones would depend upon the use of Grand Avenue, California Street and other area evacuation roads for emergency access to and evacuation from the Project. The EIR must assess cumulative impacts from past, present and future residential projects on evacuation capacity.



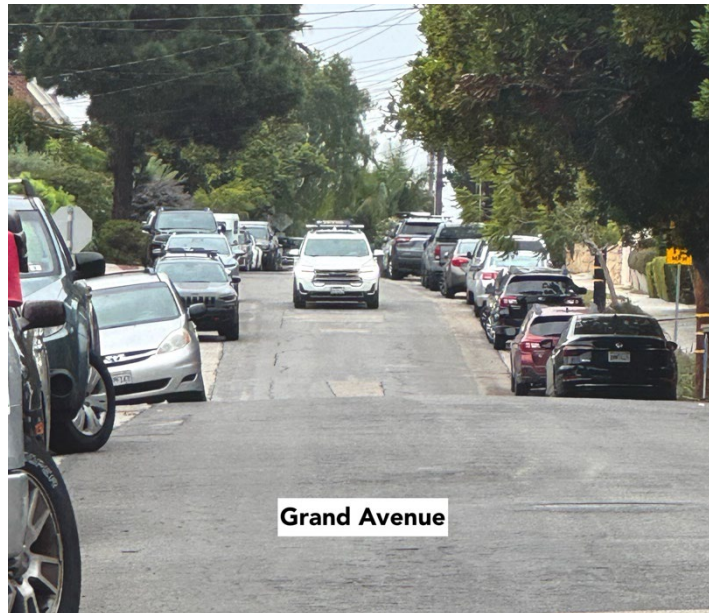
Source: SBC HMP; see also CWPP, Figure 9

In addition to the Project's individual and cumulative increase in vehicle traffic on California Street, the City's Project inconsistency analysis evidences other circulation hazards posed by the Project, including violation of objective requirements for parking spaces which will force residents to use Grand Avenue to park, further constraining Grand Avenue's evacuation capacity and emergency vehicle access. The Project's circulation hazards that could impact evacuation capacity and access include:

Lack of parking

The Project’s proposed parking spaces do not meet the objective 98-space requirement and the site does not meet long term bike rack requirements. The Project thus conflicts with policies regarding the use of public transit, making infeasible the connection for residents without cars to access public transit. The Projects’ violation of the space requirement also makes it less safe for residents and the community as residents and their visitors will be forced to park on the sides of Grand Avenue, which is an evacuation route.

The Project is inconsistent with the City’s General Plan Circulation Element: Development, section C8, which is entitled “Emergency Routes” and states: “It shall be a high priority to keep all emergency evacuation, response and truck routes free of physical restrictions that may reduce evacuation/response times.” The Project’s lack of parking will physically restrict Grand Avenue due to residents needing to park there, and will reduce evacuation access/response times.



On-site turnaround of proposed parking stalls

The Project plans currently do not indicate whether a vehicle, including emergency response and large delivery vehicles, can complete an onsite turnaround. The proposed parking stalls require multiple maneuvers and cannot complete ingress/egress in one forward movement as required by SBMC 30.175.090 and the City's Access and Parking Design Standards. This threatens increase hazards, such as possible accidents, a lack of ability to evacuate during an emergency, and an inability for emergency vehicles to access the site. This would result in inadequate emergency access and a significant impact.

Tandem and parallel parking

Tandem parking is not reported to be assigned to the same residential unit and parallel parking spots do not allow for ingress/egress in one forward movement. Due to this, there would most likely be excess Project occupant reliance on street parking which would constrain and conflict with the evacuation route. The parallel parking spots which require multiple movements would result in a lack of traffic flow and a possible pile up. Emergency vehicles may be blocked by a person pulling their car in and out of a spot. Additionally, tandem stalls are simply not compatible with swift evacuation, and create a material risk that residents' escape vehicles may become trapped, which would result in a failed evacuation in emergency situations and potential injury and loss of life. Tandem parking creates potentially significant impacts in this project that must both be prepared to evacuate on short notice under Tea Fire conditions, and whose emergency egress is constrained by the location on a major designated emergency evacuation corridor.

Loading and unloading and driveway apron

The Project's loading zones may not be able to accommodate anticipated vehicles. This means that traffic will be backed up during an evacuation on Grand Avenue. Emergency vehicles could have trouble reaching residents. The proposed 17.43% driveway slope exceeds the maximum allowed slope of 16% specified in SBMC 30.175.030 and the City's Access and Parking Design Standards. The driveway apron is not proposed to be large enough, possibly making maneuvering more difficult for exiting vehicles and emergency services, and impeding the current traffic circulation of the area. An analysis of the lines of sight for all vehicles, pedestrians and bicyclists is needed to determine whether the site may be safely evacuated.

The Applicant proposes to place low-income renters in harm's way by situating them on an evacuation route that will predictably clog and bottleneck in an emergency due to the addition of high-density residential projects. Moreover, the Project violates general plan requirements for

turning radius and residents' ability to ingress and egress from the property safely, further exacerbating an already fraught evacuation scenario.

Violation of State Fire Safety Codes

Article 2 of the State Minimum Fire Safe Regulations, Section 1273 pertains to the standards for "Ingress and Egress" roads and driveways. The intent of these standards is clearly stated: "Roads, and Driveways, whether public or private, unless exempted under 14 CCR §1270.03(d) shall provide for safe access for emergency wildfire equipment and civilian evacuation concurrently, and shall provide unobstructed traffic circulations during a wildfire emergency consistent with 14 CCR §§1273 through 1273.09."

For "roads," Section 12.73.01(a) of the Regulations require the following:

(a) All roads shall be constructed to provide a minimum of two ten (10) foot traffic lanes, not including shoulder and striping. These traffic lanes shall provide for two-way traffic flow to support emergency vehicle and civilian egress, unless other standards are provided in this article or additional requirements are mandated by Local Jurisdictions or local subdivision requirements. Vertical clearances shall conform to the requirements in California Vehicle Code section 35250.

Given the above violations of objective standards impacting circulation (apron, parking spaces, etc), the Project will create conditions that could potentially violate ingress and egress state fire safety codes. The Project's driveway ingress/egress is on California Street, which is so narrow that stopping or parking is disallowed on the Project side of the street. It is questionable whether California Street meets these standards even with parking only on one side of the street. If fire or emergency apparatus cannot adequately access the Project, it will likely be parked in the single lane of travel on either California Street or Grand Avenue, blocking all traffic flow. The City must address this violation as a potentially significant impact in the EIR.



Looking uphill



California Street, looking downhill, near Project's proposed driveway

In addition, the City has stated that, “The entire length of Grand Avenue has areas where its width is less than the required access routes that run along it,” and that “The entire length of Grand Avenue is considered existing non-conforming, in that street parking is allowed on both sides, which reduces its width to less than the required 20 feet, constraining the evacuation and emergency access routes that run along it.” Given Grand’s proximity to the Very High Fire Hazard Severity Zone, this could very well be a violation of Cal. Code Regs. Tit. 14§1273.01(a) which requires 20-foot-wide roadways.

The EIR must fully address the Project’s impacts on community and resident safety regarding wildfire evacuation route demand and capacity.

B. The Project Poses Significant Individual and Cumulative Impacts Relating to Traffic and Circulation

The area hillside winding roads serving the Project are not designed to accommodate high-density residential projects. The Project is nine times the zoning-allowed density, which if approved would cause an increase in traffic that must be studied and mitigated or avoided. Moreover, the nearby Bella Riviera (at 601 E Micheltorena St) includes approximately 111 residential units. The cumulative traffic impacts of the Project plus Bella Riviera alone would be significant and must be addressed in an EIR.

The Project Meets The City Traffic Thresholds' Significance Criteria

The City of Santa Barbara's Master Environmental Assessment Guidelines for Transportation Analysis provide guidance for determining the potential transportation impacts of development. It states:

“Consistent with OPR guidance, project conditions that may be presumed to have less than significant CEQA transportation impacts include the following:

- Small projects
- Projects located within ½ mile of an Existing Major Transit Stop or ¼ mile of an Existing High-Quality Transit Corridor
- Neighborhood serving retail
- Affordable housing
- Accessory building or Accessory Dwelling Units (ADU's) (MEA Guidelines for Transportation Analysis, Attachment 4, p. 3)”

The Project does not meet any of the criteria for these assumptions of less-than-significant impacts. The Project is not neighborhood serving retail, nor is it an ADU. While affordable housing is a component of the Project, it does not meet the exemption requirements of 100% affordable housing and remains above the threshold of the definition of a 'small project' when the number of affordable units are discounted.

“Affordable Housing

Projects that consist of 100% affordable housing may be presumed to have a less than significant CEQA transportation impact. If a project contains affordable housing units, the affordable housing units can be removed from the VMT assessments for the purposes of determining project size under the small project screening. For example, if a 40-unit project includes 10 affordable housing units, then the project's potential for small project screening would be based on the remaining 30 (market rate) units. (MEA Attachment 4, p. 7)”

Trip Generation

The MEA defines a small project as one that generates 250 or fewer daily net vehicle trips (MEA Guidelines for Transportation Analysis, Attachment 4, p. 3). Table A-1 of the MEA Guidelines for Transportation Analysis provides a daily trip generation rate of 6.74 trips per dwelling unit for multifamily dwellings in the City of Santa Barbara. The Project's proposed 53 units, even discounted to 42 for the 11 affordable housing units, exceed the maximum threshold for a small-sized project. These 42 units are projected to add 283.08 daily trips to an already congested neighborhood with potentially substandard road widths and emergency egress.

APPENDIX A – TRIP GENERATION RATES

The following are average daily trip generation rates for several land use types. These rates are to be used as a preliminary guide to determine a project's potential trip generation, for screening purposes. In the case of mixed-use developments, discounts for internal trip capture may be applied.

Table A-1: Daily Trip Generation Rates

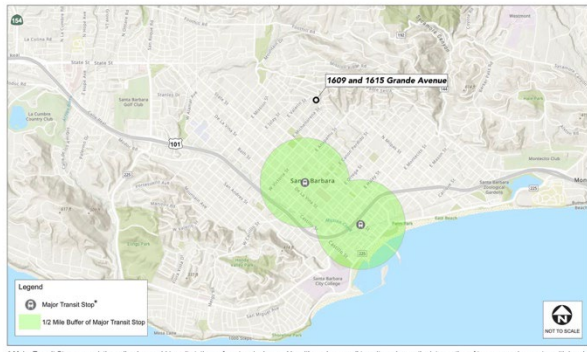
Land Use	Daily Trip Generation Rate	Maximum Threshold for Small-sized Project	Maximum Threshold for Medium-sized Project
Single-family Detached Housing	9.43 trips/du	26 units	106 units
Multifamily Housing	6.74 trips/du	37 units	148 units
Affordable Housing	4.81 trips/du	51 units	207 units
General Office	10.84 trips/tsf	23 tsf	92 tsf
Medical-Dental Office	36.00 trips/tsf	6 tsf	27 tsf
Retail (small plaza)	54.45 trips/tsf	4 tsf	18 tsf
Fast-food Restaurant (no drive-through)	450.49 trips/tsf	Does not qualify for small project exemption	2 tsf
High-Turnover (Sit-Down) Restaurant	107.20 trips/tsf	2 tsf	9 tsf
Supermarket	93.84 trips/tsf	2 tsf	10 tsf
Coffee/Donut Shop (no drive-through)	93.08 trips/tsf	2 tsf	10 tsf
Hotel	7.99 trips/room	31 rooms	125 rooms
Industrial	4.87 trips/tsf	51 tsf	205 tsf
Athletic Club	~45.00 trips/tsf*	~5 tsf	~22 tsf
Gas Station	172.01 trips/fueling station	1 fueling station	5 fueling stations
Drugstore/Pharmacy (no drive-through)	90.08 trips/tsf	2 tsf	11 tsf

du = dwelling unit; tsf = thousand square feet

* Daily trip rate estimated based on ITE peak hour rates, as no daily rates are provided for this land use category

The Project is not located within a half-mile of an existing major transit stop, nor is it within a quarter-mile of an existing high-quality transit corridor as identified in the 2023 MEA update. A

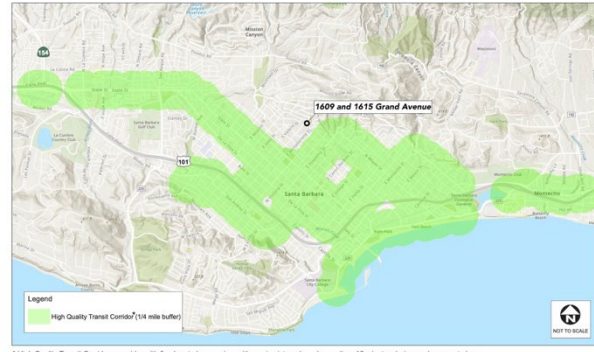
review of SBCAG’s Regional Transportation website showed no changes to these locations since that date.



* Major Transit Stop = an existing rail or bus rapid transit station, a ferry terminal served by either a bus or rail transit service, or the intersection of two or more bus routes with headways of 15 minutes or less during peak commuting periods

City of Santa Barbara
Master Environmental Assessment Guidelines for Transportation Analysis

Figure 2
Major Transit Stops



* High Quality Transit Corridor = corridor with fixed route bus service, with service intervals no longer than 15 minutes during peak commute hours

City of Santa Barbara
Master Environmental Assessment Guidelines for Transportation Analysis

Figure 1
High-Quality Transit Corridors

CEQA Analysis Required

MEA Guidelines for Transportation Analysis clearly state that should a project not meet these exemptions further study is required to comply with CEQA:

“A CEQA Transportation Analysis is required for any project undergoing review pursuant to CEQA, that is not otherwise exempt. A project may be presumed to have a less than significant impact on transportation if it meets one or more screening criteria. A project that does not meet screening criteria would require further study to determine potential significant impacts (MEA Attachment 4, p. 7)”

Potential traffic safety impacts of additional traffic on Grand Avenue and California Street can be identified through proper study, such as both streets are important corridors for both Roosevelt Elementary School located a half-mile to the west of the Project, and Santa Barbara High School located a third of a mile to the east. Children on e-bikes routinely use these narrow and congested routes for school transportation, and run serious risks of injury with additional vehicular traffic.

The EIR for the Project must address impacts related to the violation of traffic standards, including but not limited to the impact of the proposed 283 additional vehicle trips on city’s circulation and the extent of a lack of evacuation capacity for Grand Avenue and other nearby evacuation routes.

C. The Project Would Block Protected Scenic Views and Degrade the Visual Character of the Site

As currently proposed, the project consists of a new 6-story, 53-unit, multi-family residential development, with a two-level partially subterranean parking garage. The Project is **over three times the height** allowed under City Charter Section 1506 and the SBMC, TABLE 30.20.030.A. The allowable height is 30 feet. The Project proposes a height of over 92 feet. The Project is nearly **9 times the density allowed**. The General Plan's maximum density for the project site is 12 units per acre. The Project proposes to build at a density of **106 units per acre**. The Project would also violate SBMC TABLE 30.20.020, which limits multi-unit housing to 2 units per building. The Project proposes 53 units in one building. Moreover, the Project is inconsistent with General Plan Conservation Element, Policy 3.0 requiring that "New development shall not obstruct scenic view corridors, including those of the ocean and lower elevations of the City viewed respectively from the shoreline and upper foothills, and of the upper foothills and mountains viewed respectively from the beach and lower elevations of the City". The Project is inconsistent with the Environmental Resources Element, Aesthetics and Visual Resources, ER29: requiring that "New development or redevelopment shall preserve or enhance important public views and viewpoints for public enjoyment, where such protection would not preclude reasonable development of a property."

Under CEQA Guidelines, a project would have significant impacts if it would have a substantial adverse effect on a scenic vista or substantially degrade the existing visual character or qualify of the site and its surroundings.

The Project if built would sit atop a hillside in the Riviera, where its size, bulk, and scale will block public scenic views of the ocean and lower elevations of the City. At three times the allowable height and nine times the allowable density, the Project will stick out as a monolithic eye sore in a neighborhood known for its natural slopes, trees, and harmony between open space and development. Views from other parts of the city towards the Riviera hillside will be interrupted by a 6-story hulk of a building jutting up from over the tree-line.

The City must fully address these aesthetic impacts in an EIR.

D. The Initial Study must include a full, multi-season survey for habitat for the Crotch's Bumblebee

As addressed above, the project site is likely habitat for the protected candidate species of the Crotch's bumblebee. Biologist Mike Gonella, PhD has performed research and site

observations of the site and determined that “[g]iven the nearby recent observations of Crotch's bumblebee (upper Mission Canyon, Sept 1, 2025; and less recently in Parma Park), and the semi-natural grassland dominant on site that houses many rodent burrows which are prime niches for Crotch's bumble bee nests, it is in my opinion likely that this area is/was or will be used by this species; likely enough that a full, multi-season survey is needed.” Dr. Gonella’s letter-report is attached as Exhibit 1. Thus, the City must require such a survey to determine the Project’s potential impacts to the bee and its habitat.¹¹

Passerine birds have been observed using tree canopy on site as habitat (M. Chytilo, pers. observation) and thus bird surveys are required to determine the significance of populations present.

E. The Project may impact Tribal Cultural Resources

Cultural Resources Are At Risk

Despite the Project’s assertion in its Letter Report that no cultural resources exist on site, appropriate documentation of this claim is lacking. No reports of previous site disturbance, development or grading were provided, nor references provided within existing archaeological reports on neighboring properties. Surface survey alone of this location is inadequate, and a Letter Report insufficient for this Project and an EIR is warranted to properly ascertain the extent and type of potential cultural heritage resources.

Site Investigation Requirements

The City of Santa Barbara’s Master Environmental Assessment Guidelines for Archaeological Resources details the level and types of reports required for any project. Determination of the level of review report is stated to be “dependent on the Archaeological Resources Area in which the project site is located, **and the extent of vertical and horizontal ground disturbance** [emphasis added] (p. 12). Also, “The City has determined that 2,000 square feet of proposed ground disturbance generally represents the division between small projects, and medium or large projects (MEA, Table 1, #4, p. 13). The Project at 1609-1615

¹¹ See California Department of Fish and Wildlife Survey Considerations for California Endangered Species Act (CESA) Candidate Bumble Bee Species.

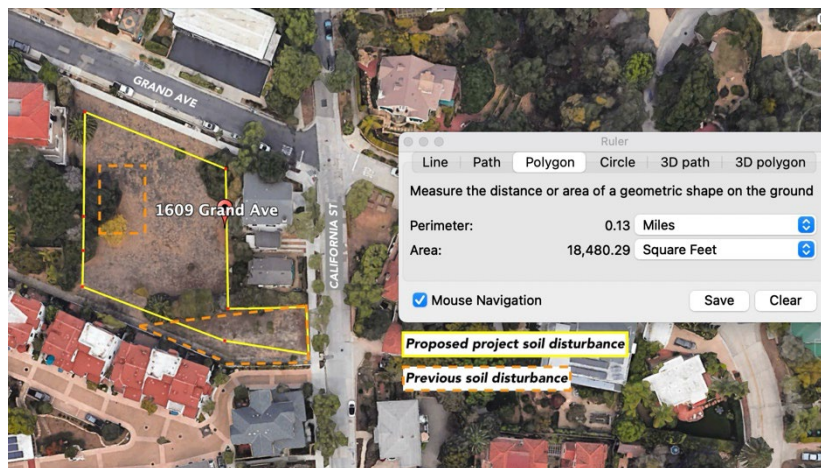
Grand Ave. proposes more than 18,000 square feet of surface disturbance and greater than 8,000 cubic feet of cut.

Previous Site Disturbance Does Not Exempt Project From Rigorous Review

Table 1 of the MEA Guidelines for Archaeological Resources allows for a Letter Report to suffice in place of a Phase 1 Archaeological Report in some circumstances:

“In some scenarios, a Letter Report may replace the requirement for a Phase 1 Report. Prior land modification, the amount of proposed disturbance, and the results of prior archaeological investigations should be considered in determining the appropriate report requirement... (MEA, Table 1, #3, p. 13)”

As seen below, the Project’s proposed graded soil disturbance is extensive, whereas the prior area of disturbance, identified through historic aerial photography, is significantly smaller.



A small house formerly occupied the northwestern portion of the Project and was present in a 1929 aerial photograph. As noted in Mr. Arredondo’s letter dated September 28, 2025, homes and structures of this time period were constructed with raised pier or perimeter foundations which preserve much of the soil strata and buried resources as opposed to modern concrete slab floors with extensive soil grading.

Inadequate Basis of Letter Report

The MEA Guidelines for Archaeological Resources waives the need for a Phase 1 Archaeological Study if:

- “• The proposed project’s parcel size is 5,000 square feet or smaller, and one or more Phase 1 Reports completed within 50 feet of the proposed project’s parcel yielded negative results; and/or
- The applicant obtains a letter from the CCoIC confirming that the previous Phase 1 Report on an adjacent property did not identify any archaeological resources. (p. 15)”

Neither of these conditions have been met.

The redevelopment of the neighboring former St. Francis Hospital into the Bella Riviera/St. Francis Workforce Housing Project predicated an EIR in 2006 and the creation of a Phase 1 Archaeological Report. As Mr. Arredondo pointed out, this report clearly identified areas of prehistoric significance even on lands with prior extensive disturbance, as project conditions stipulated the need for an archaeological monitor to be present for “all ground disturbing activities associated with the project...in the areas identified in the Phase 1 Archaeological Resources Report...dated 1992...” (Condition 6, City of Santa Barbara Planning Commission Resolution # 039-06).

A Letter Report, while brief in comparison to a Phase 1 Report, is still required to perform basic archival research to ascertain the likelihood of encountering archaeological resources:

“Letter Report. A letter report format may be appropriate for projects that are not expected to result in impacts to archaeological resources. A Letter Report includes background research consisting of archival research and literature review, fieldwork, and confirmation that archaeological resource impacts are anticipated to be less than significant...(MEA, Step 3., Determine the Archaeological Report Type and Requirements, p. 12)”

Mr. Arredondo noted the Letter Report did not identify or provide documentation to the extent of previous grading or soils modification as is required by the MEA, such as old grading plans, building plans, subdivision improvements, and the like. Further, no reference was made to any of the previous archaeological reports produced during the redevelopment of the adjacent St. Francis property.

Project is Inconsistent with the City of Santa Barbara General Plan’s Historic Resources Element

The City’s Historic Resources Element (2012) states:

Goal: Protection and Enhancement of Historic Resources

Continue to identify, designate, protect, preserve and enhance the City’s historical architectural and archaeological resources. Ensure Santa Barbara’s “sense of place” by preserving and protecting evidence of its historic past, which includes but is not limited to historic buildings, structures, and cultural landscapes such as sites, features, streetscapes, neighborhoods and landscapes.

Protection of Buildings, Structures, Sites and Features Policies

Policy and Implementation Strategies:

HR 1. Protect Historic and Archaeological Resources. Protect the heritage of the City by preserving, protecting, and enhancing historic resources and archaeological resources. Apply available governmental resources, devices, and approaches, such as the measures enumerated in the Land Use Element of this Plan to facilitate their preservation and protection.

Possible Implementation Actions to be Considered

HR 1.5 Protect archaeological resources from damage or destruction.

- b.** When making land use decisions, potential damage to archaeological resources shall be given consideration along with other planning, environmental, social, and economic considerations.

These parcels, largely undeveloped throughout the City’s history, has the distinct probability that undisturbed cultural resources are located beneath the soil surface. The Project’s construction of 53 apartment units with a subterranean parking structure will involve extensive land disturbance, both horizontally and vertically. Fragile archaeological resources cannot be replaced or reproduced, and as such, the goals, policies and actions noted above are best implemented through Project conditions and mitigation measures identified through an EIR.

F. The Project may impact Geology and Soils

The Project entails excavation of major volumes of soils from the steep site. The effect on the stability of surrounding structures and potential for landslides must be addressed. Guidelines App. G, § VII a-c.

G. The Project May Impact Hydrology and Water Quality

The Project introduces extensive impervious surfaces to a currently undeveloped site. The existing stormwater management facilities that gather and direct stormwater from the parcel to two small outfalls on California Street are undersized to manage site runoff, and it is unclear whether the downstream stormwater facilities are competent to manage the increased flows from the site in its proposed developed state. The Project may thus substantially increase the rate and amount of surface runoff in a manner that could result in flooding both onsite and off-site, and exceed the capacity of existing stormwater drainage systems. Guidelines App. G, § X c.

H. The Project May Impact Population and Housing

The Project will introduce substantial unplanned population growth to the Riviera. Guidelines App. G, § XIV a. The City's General Plan, infrastructure and facilities (including roads) were developed with an expectation of population growth in accordance with zoning standards. The massive increase in density on the site creates imbalances, incongruities and potentially significant impacts.

III. The Preliminary Application Was Defective and the Project Is Not Qualified as a Builders Remedy Project.

The Applicant submitted an incomplete Preliminary Application for the Project that lacked the required minimum elements of a Preliminary Application, and as such, the application is void and of no effect. Since the HCD has since approved the City Housing Element, a new Builders Remedy project Preliminary Application may no longer be filed.

Gov. Code § 65941.1 establishes the seventeen minimum, mandatory requirements for a complete Preliminary Application. Gov. Code § 65941.1(a)(13) requires the consent of the property owner if the applicant does not own the property. Gov. Code § 65941.1(a)(17) requires "the location" of any recorded public easement, such as easements for storm drains, water lines, and access.

The Project proposes to take access across lands they do not own for sewer and the sole vehicular access location. The Sale Trust 6/22/20 is the likely owner of record of the adjacent parcel, across whose lands the Project driveway is proposed. If access is proposed to be taken by easement, the applicant failed to timely provide the location of such easement as required by the

express terms of the statute. § 65941.1(a)(17). The applicant further failed to provide, as a required element of its preliminary application, the consent of the adjacent property owner, across whose lands vehicles will travel and under which sewage will be conveyed. § 65941.1(a)(13). The City’s March 27, 2025 Consistency Review noted that the Project proposes to connect across other individuals’ lands and connect to a private sewer system, rather than the sewer main directly, yet neither the easements nor the consent of the property owners was included in the preliminary application. See *id.*, Item # 22. Gov. Code § 65941.1(e) requires “all of the information required by subdivision (a)” while subdivision (a) only allows a preliminary application to be deemed submitted “upon providing all of the following information”. The applicant’s failure to provide all such information with their preliminary application renders such application incomplete and invalid. The adequacy of a preliminary application is entirely the applicant’s prerogative and responsibility, no City determination of adequacy is involved, Gov. Code § 65941.1(e)(3), and subsequent application completeness determinations and City processing of the application cannot cure this defect.

IV. Conclusion

For the reasons stated above, SAGE requests the City reject the applicant’s contentions that the City’s orderly procedures intended to achieve compliance with CEQA are not a bad-faith delay tactic, and further, to commence a process to scope the Project’s EIR broadly to fully disclose all potentially significant impacts including those relating to, *inter alia*, wildfire evacuation, transportation impacts, aesthetics, biological resources, tribal cultural resources, geology and soils, hydrology and water quality, population and housing, and cumulative impacts in each of these categories.

Sincerely,



Marc Chytilo
Law Office of Marc Chytilo, APC



Emilee Moeller
Venskus & Associates, APC

Exhibits

1. Letter-Report, Dr. Mike Gonella, local field biologist, September 30, 2025
2. Comment Letter, Frank Arredondo, Ksen~Sku~Mu, MLD, September 30, 2025
3. Santa Barbara County Multi-Jurisdictional Hazard Mitigation Plan, February 2023, at <https://content.civicplus.com/api/assets/ebc26205-512c-48d7-bca7-cfa0a18faa24>

Biological Assessment 1609-1615 Grand Avenue, Santa Barbara

Background

The proposed project site at 1609-1615 Grand Avenue entails a multi-family residential building housing 53 units and underground parking. This highly concentrated human habitation building would effectively eliminate the existing oak woodland and grassland that is likely an important habitat for the Crotch's bumble bee, listed as endangered by the State of California's Endangered Species Act (listed in 2022). Due to the nature of the sensitive oak woodland and grassland on site, and their importance to the Crotch's bumble bee, significant impacts to biological resources are likely and a full CEQA EIR is required that assesses the Project site for this species and others.

Habitat

This urban, empty lot is a mixture of native and non-native species, dominated by semi-natural grassland, oak woodland and ornamental plants. The property is significantly sloped, with a mostly south-southwestern aspect, receiving all day sun. There is a retaining wall $\frac{4}{5}$ of the way down the property, above which is a line of mostly ornamental and a few invasive plant species, some of which are the main flowering plants on site. The grassland areas are filled with rodent burrows, active and abandoned.

Survey Date

September 20, 2025

Species of Concern

- Crotch's bumble bee (*Bombus crotchii*) is native to California, being mainly observed in coastal areas of southern California. It is listed as a candidate species for listing under the California Endangered Species Act (2022) and according to the IUCN is declining and imperiled in its historic habitat.
- Coast live oak (*Quercus agrifolia*) woodland/grassland ecotonal edge, is a relatively diverse edge on the perimeter of environmentally sensitive habitats (ESH) and important as forage habitat for Crotch's bumble bee. In addition, neighboring grasslands to oak woodlands are prime nesting habitats.

Potential Direct Negative Impacts to Crotch's Bumble Bee

Crotch's bumble bee is a candidate species for listing under the California Endangered Species Act (2022) and is likely to either be on site or utilize this site seasonally. The survey revealed high quality habitat for nesting, with over 75% of the site covered with an open sunny semi-natural grassland (*Avena* sp.-*Bromus* sp. alliance), 10% cover of weeping bottlebrush (*Melaleuca viminalis*), 5% cover of coast live oak (*Quercus agrifolia*) and 5% of assorted non-native species (listed below).

- Potential Negative Impacts to Nesting Habitat: The proposed building site contains a semi-natural grassland housing numerous old rodent burrows and

cavities in loose, well-drained soils—these burrows serve as prime nesting habitat for Crotch’s bumble bees. Given the high quality habitat conditions for Crotch’s bumble bee on site and recent sightings on nearby Palomino Road (Sept 3, 2025 and April 11, 2025; and similar records from 1910) approximately 1.5 miles away, well within their known foraging flight abilities of 1.2-7 miles, there is solid potential that this site is utilized. To determine the extent of use of this site by the Crotch’s bumble bee, a multi-season study is required.

- Potential Negative Impacts to Foraging Habitat: The numerous flowering weeping bottlebrush plants, with their flower-dense inflorescences of nectar producing flowers are prime sources of forage for Crotch’s bumble bee. Removal of these during development may restrict the ability of this sensitive species to forage and reproduce within this region.

Potential Indirect Negative Impacts to Crotch’s Bumble Bee

Further reduction of open parcels of grasslands and habitat for the Crotch’s bumble bee, by development will no doubt accelerate their apparent decline, which goes directly against the mandate of the California Endangered Species Act, and would be considered “take” by modifying the habitat that could result in both population decline and the direct killing of individuals that are likely to occupy the site.

Potential Direct Negatives Impacts to Coast Live Oak Woodland

The understory plant community in oak woodlands observed on the proposed project site often includes native wildflowers and other shrubs that *Bombus crotchii* visits, including native and non-native forbs that frequently occur in or near oak woodland and grassland edges that provide prime floral foraging. Oak woodland protection (especially at the edges and in sunny openings) can benefit Crotch’s bumble bees by conserving floral resources and proximal habitat for nesting.

Native Plant Species Observed

Coast live oak (*Quercus agrifolia*)
Catalina Island Cherry (*Prunus ilicifolia* ssp. *lyonii*)
Doveweed (*Croton setiger*)

Non-Native Plant Species Observed

Bermuda grass (*Cynodon dactylon*)
Big leaf periwinkle (*Vinca major*)
California pepper (*Schinus molle*)
Canary Island Date Palm (*Phoenix canariensis*)
Cheatgrass (*Bromus* spp.)
Cheeseweed (*Malva parviflora*)
Chinese elm (*Ulmus parviflora*)
Crassula sp. (*Crassula*)
Creeping fig (*Ficus pumila*)
English ivy (*Hedera helix*)
Lemon gum (*Corymbia citriodora*)

Sweet Pittosporum (*Pittosporum undulatum*)
Weeping bottlebrush (*Melaleuca viminalis*)
Wild lettuce (*Lactuca* sp.)
Wild oats (*Avena* sp.)
Wisteria (*Wisteria* sp.)
Wormwood (*Artemisia absinthium*)
Yellow bamboo (*Phyllostachys aurea*)

Animals Observed

Anna's hummingbird (*Calypte anna*)
Common buckeye butterfly (*Junonia coenia*)
Honeybees (*Apis mellifera*)
Native bees (unidentified)
Skipper butterfly (*Hesperia comma*)
Western pygmy blue butterfly (*Brephidium exilis*)

References

Bumblebeewatch.org

CDFW CESA Petition Materials, 2018–2022.

Ceqanet.lci.ca.gov

County of Santa Barbara Zoning Administrator's Staff Report, March 2018.

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Hatfield, R. et al. (2015). *Bombus crotchii* Species Profile. Xerces / IUCN Red List.

Santa Barbara County, Article II Coastal Zoning Ordinance, Santa Barbara County Comprehensive Plan, County of Santa Barbara Planning Commission, February 2018.

Supplement, Santa Barbara County Comprehensive Plan, County of Santa Barbara Planning and Development, May 2009.

Thorp, R.W., Horning, D.S., & Dunning, L.L. (1983). *Bumble Bees and Cuckoo Bumble Bees of California (Hymenoptera: Apidae)*. University of California Press.

Xerces Society for Invertebrate Conservation (2018). *Petition to list four bumble bee species as Endangered under the California Endangered Species Act*.

Sincerely,

Michael P. Gonella

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Biological Consulting
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Santa Barbara, CA 93108
gonella@sbcc.edu
805-680-0496

Michael Gonella–Personal Qualifications

- B.S. Botany, U.C. Davis, 1985
- M.S. Environmental Studies, San Jose State University, 1992
- Ph.D. Botany, Miami University, Ohio, 2007
- Reviewed numerous EAs, EIRs, EISs as Public Lands Analyst, The Wilderness Society, 1990-91
- Implementation of Land Resource Management Plan & EIS mitigation plans, U.S.D.A. Forest Service, Big Bear Ranger District, 1992-96.
- Conducted botanical surveys in order to create numerous Environmental Assessments related to public use of Forest Service lands (Movie Sets, Off-Highway Vehicle Races, etc.), U.S.D.A. Forest Service, Big Bear Ranger District, 1992-1996.
- Conducted numerous botanical surveys and restoration plans for the Miami Tribe of Oklahoma, Miami, Oklahoma, 2002-Present.
- Conduct impact analyses reports for the Law Office of Marc Chytilo, 2016-Present.



Ksen' SKu' Mu' Chumash

Ksen~Sku~Mu
Frank Arredondo ~Chumash MLD~Tribal Chair
Po Box 161
Santa Barbara Ca, 93102

September 28th 2025

Barbara Burkhart
Project Planner
Julia Pujo, AICP
Project Planner, Environmental Analyst

RE: 1609 & 1615 Grade Ave.

Dear Barbara Burkhart, please accept this comment letter in regards to the proposed project at 1609 & 1615 Grade Ave.

The initial Archaeological study is a flawed preliminary analysis that fails to meet the overall objectives, which can compromise the entire research project and the preliminary environmental review for this project under the California Environmental Quality Act (CEQA).

The CEQA process, an Initial Study (IS) is a preliminary analysis to determine the potential environmental impact of a project. A poor initial study fails to provide a good-faith, objective evaluation, which can trigger additional scrutiny and legal challenges. The specific signs of a poor CEQA initial study for this project include:

- Unsupported conclusions: The study checklist is filled out, but there is no substantial evidence or supporting data to justify its findings.
- Incomplete data: The initial data collection strategies are incomplete, leading to a major challenge with missing data later on.
- Provincialism: The study's scope is too narrow—for instance, a limited geographic area or sampling method—which restricts the ability to produce meaningful and transferable results.
- Lacks sufficient evidence- This study cannot be fully determined without further testing to determine true and full environmental impact, before it can be approved as proposed project.

A fair argument can be made that not enough has been done to determine if the proper Letter report has been submitted for this project qualifies as Letter Report Confirming No Archaeological Resources. The current field surface studies are inconclusive for potential buried cultural resources. The current development proposal will remove all surface soils for the proposed project and avoidance or preservation will not be an option if this goes forward. So therefore, all preliminary efforts should be taken to fully determine if there is a potential for buried cultural resources.



Ksen' SKu' Mu' Chumash ksen_sku_mu@yahoo.com / facebook.com/ChumashMLD

Exhibit 2 to Sage



We provide for you the sections of the previous MEA, prior to the newly updated version. The same MEA version the current project would have used for its Archaeological studies report.

MEA- Page 15 – Step 4- Prior Reports Map-

“Check the Archaeological Resources Reports Location Map to ascertain whether previous archaeological reports have been completed within the same project area)i.e. on the same site). If previous archaeological reports have been completed within the same project area and similar impacts were proposed and the report included and the report indicated no archaeological resources were likely to be impacted, the case planner, in consultation with the Environmental Analyst, may determine that a Phase I Archaeological Resources Report will not be necessary.”

The current Letter Report Confirming No Archeological Resources does not specifically identify any reference to **Archaeological Resources Reports**, Step 4 of the MEA. It does mention Archaeological Resources Sensitivity Map (1997), City of Santa Barbara Planning desk. Archeological resources report Location Map.

MEA, Page 18 - Prior Landform Modification.

“If the applicant believes that the proposal project site has had extensive landform modification, the applicant is responsible for submitting appropriate documentation (in the form of old grading plans, building plans, subdivision improvements plans, etc) of the landform disturbance for the case planner to review.”

“ If documentation of prior landform modification is lacking, then a Phase I Archaeological Resources Report or Letter Report Confirming No Archaeological Resources may be required. Proceed to step 6.

The Current Letter Report Confirming No Archeological Resources does not include any appropriate documentation in the form of old grading plans, building plans, subdivision improvements plan for any review. We contend that the majority of the parcel is undisturbed from any development based on Aerial photo graph history. The only structure located on the parcel North/Western corner was a single-family home from the mid-century where foundation construction would have used a pier block system that leaves the ground surface untouched to extensive grading. This in terns leaves the heighten potential of buried subsurface resources.

Based on this specific reasoning the proposed project current assessment cannot assure that the proposed development will not encounter archaeological resources without further investigations.





MEA- Page 17 –Step 4- Prior Reports Map.

“In some instances where no-previously prepared archaeological resources reports cover the same area of disturbance for the currently proposed project, but adjacent areas have been surveyed the requirement for a Phase I Archaeological Resources Report may be waived under certain conditions.”

“An archaeological resources report or reports were completed for the areas within 50 feet from any side of the proposed projects’s parcel property lines and yielded negative results.

According to the 2006 FEIR Conditions of approval, a reference to a survey was conducted by Larry Wilcoxon and used as support for Archaeological Monitoring for the demolition of the St. Francis Hospital. The parcel that is located directly adjacent south of this proposed project property.

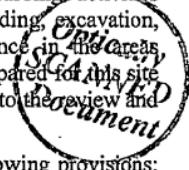
City of Santa Barbara Planning Commission Resolution # 039-06 required that;

“The all-ground disturbances activities associated with the project, including, but not limited to, grading, excavation, trenching vegetations or paving removal and ground clearances in the areas identified in the Phase I Archaeological Resources Report for the site by Larry Wilcoxon, dated 1992.”

This indicates that there was an initial reason for having specific locations monitored for that project. Not to mention “specific areas” requiring monitoring. The St. Francis Hospital was a developed parcel and would have various areas of disturbance, yet even with that, Larry Wilcoxon saw reason for Archaeological Monitoring to take place.

- 6. **Archaeological Monitoring Contract.** Submit to the Planning Division a contract with an archaeologist from the most current City Qualified Archaeologists List for monitoring during all ground disturbing activities associated with the project, including, but not limited to, grading, excavation, trenching vegetation or paving removal and ground clearance in the areas identified in the Phase 1 Archaeological Resources Report prepared for this site by Larry Wilcoxon, dated 1992. The contract shall be subject to the review and approval of the Planning Division.

The archaeologist’s monitoring contract shall include the following provisions: If cultural resources are encountered or suspected, work shall be halted or redirected by the archaeologist immediately and the Planning Division shall be notified. The archaeologist shall assess the nature, extent and significance of





Ksen' SKu' Mu' Chumash

In addition, the projects conditions included that an Archaeological Monitoring report be submitted to the Planning Commission within 180 days of competition of the Monitoring. This information is missing from the current Letter Report Confirming No Archeological Resources does not include any of this information.

8. **Archaeological Monitoring Report.** A final report on the results of the archaeological monitoring shall be submitted to the Planning Division within 180 days of completion of the monitoring or prior to the issuance of the Final Inspection, whichever is earlier. (CUL-1f)

This indicates that there are at least two archaeological reports that should be referenced in all future development projects for this location. The Phase I Archaeological Report by Larry Wilcoxon 1992 and the final monitoring report that would have been prepared by Larry Carbone.

(We know from firsthand knowledge that Larry was the archaeologist for the St. Francis Hospital demolition project because we had been working with Larry at the same time on the Goleta Slough restoration project for the Trust of Santa Barbara. In addition, Native Monitor Michael Lopez was also working on the project).

We feel that to provide an adequate assessment of the potential of archaeological resources for this project location further identification practices need to be carried out. They include a review and assessment of past archaeological reports, The Phase I Archaeological Report by Larry Wilcoxon 1992 and the final Monitoring report by Larry Carbone. After such, the use of subsurface techniques for all spaces areas of the project parcel for the determination of sensitive buried resources, and or presence or absence of buried resources to a discovery depth that exceeds to a stratigraphy level that predates potential prehistoric occupation. In this way adequate mitigation measure can be constructed to the specifics of any find.

I thank you in advance for your time.

Best wishes, Frank Arredondo
Ksen~Sku~Mu - Chumash
Chumash MLD- Tribal Chair
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Santa Barbara, Ca 93102

Email Ksen_Sku_Mu@yahoo.com



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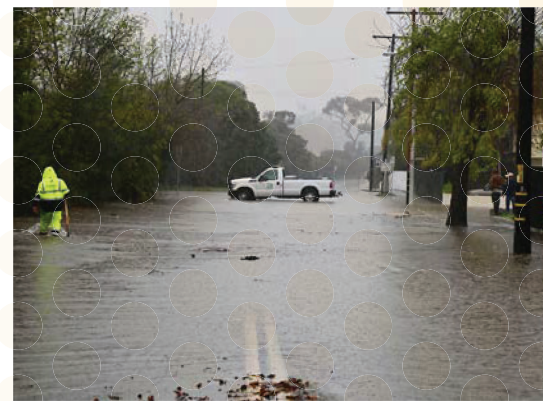
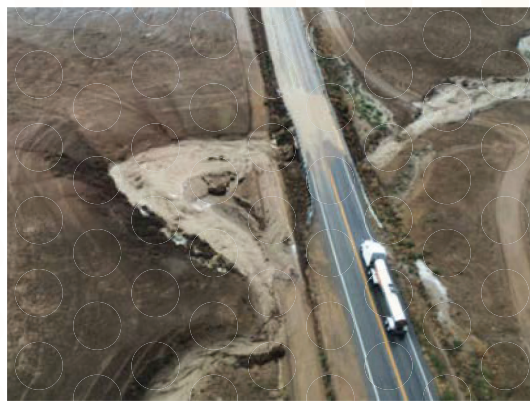
Exhibit 2 to Sage



SANTA BARBARA COUNTY MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN (MJHMP)

County of Santa Barbara, City of Buellton, City of Carpinteria, City of Goleta, City of Guadalupe, City of Lompoc, City of Santa Barbara, City of Santa Maria, City of Solvang, Cachuma Operations and Maintenance Board, Carpinteria Valley Water District, Montecito Fire Protection District, Montecito Water District, Santa Maria Valley Water Conservation District, Goleta Water District

February 2023



Prepared by:
**County of Santa Barbara Office of
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wood.

With Assistance from:
**Wood Environment &
Infrastructure Solutions, Inc.**
104 West Anapamu Street, Suite 204A
Santa Barbara, CA 93101

Exhibit 3 Excerpts - Sage

SANTA BARBARA COUNTY MULTI-JURISDICTIONAL HAZARD MITIGATION PLAN (MJHMP)

County of Santa Barbara, City of Buellton, City of Carpinteria, City of Goleta,
City of Guadalupe, City of Lompoc, City of Santa Barbara, City of Santa Maria, City of Solvang,
Cachuma Operations Maintenance Board, Carpinteria Valley Water District,
Montecito Fire Protection District, Montecito Water District,
Santa Maria Valley Water Conservation District, Goleta Water District

Submitted to CalOES and FEMA by:



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Prepared with assistance from:

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Wood Environment & Infrastructure Solutions, Inc.

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February 2023

**SANTA BARBARA COUNTY
MULTI-JURISDICTIONAL HAZARD
MITIGATION PLAN (MJHMP)**

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Sections 5.3 through 5.6 contain detailed hazard profiles for the identified hazards. This plan does not omit any natural hazards that are commonly recognized to affect Santa Barbara County. Each hazard profiled includes the following subsections:

- **Description of Hazard** – This section gives a description of the hazard and associated issues followed by details on the hazards specific to Santa Barbara County.
- **Location and Extent of Hazard in Santa Barbara County** – This section gives a spatial description of the potential location or areas of Santa Barbara County that the hazard is expected to impact. This section also describes the potential strength or magnitude of the hazard as it pertains to Santa Barbara County.
- **History of Hazard in Santa Barbara County** – This section contains information on historical incidents, including impacts where known. The Plan Update Guide worksheets provided by the MAC and LPT were used to capture the latest information from participating jurisdictions on past occurrences of hazards.
- **Probability of Occurrence** – The frequency of past events is used in this section to gauge the likelihood of future occurrences. Where possible, the frequency was calculated based on existing data. It was determined by dividing the number of events observed by the number of years on record and multiplying by 100. This gives the percent chance of an event happening in any given year (e.g., three droughts over 30 years equates to a 10 percent chance of a drought in any given year). The likelihood of future occurrences is categorized into one of the following classifications:
 - **Highly Likely** – Near 100 percent chance of occurrence in next year or happens every year.
 - **Likely** – Between 10 and 100 percent chance of occurrence in the next year or has a recurrence interval of 10 years or less.
 - **Occasional** – Between 1 and 10 percent chance of occurrence in the next year or has a recurrence interval of 11 to 100 years.
 - **Unlikely** – Less than 1 percent chance of occurrence in the next 100 years or has a recurrence interval of greater than every 100 years.
- **Climate Change Considerations** – This section describes the potential for climate change to affect the frequency, intensity, and location of the hazard in the future.

5.3 NATURAL AND DESTRUCTIVE HAZARDS

5.3.1 Wildfire

Description of Hazard

A **wildfire** is an unplanned fire that is fueled by natural areas or wildlands, such as the Los Padres National Forest, larger state parks, such as Gaviota State Park, or undeveloped rangeland, particularly in the Santa Ynez Mountains or San Rafael Mountains. Of critical concern is the wildland-urban interface (WUI), where wildfire can burn buildings and infrastructure. According to the National Fire Plan issued by the U.S. Departments of Agriculture and Interior, the WUI is defined

as “...the line, area, or zone where structures and other human development meet or intermingle with undeveloped wildland or vegetative fuels.” In WUI fires, the fire is fueled primarily by naturally occurring vegetation in the wildland and urban areas as well as the urban structural elements themselves. Wildfire directly threatens structures, vegetation, and life when ignition occurs in a WUI and also indirectly threatens human health from smoke and particulates, even when wildland fires are not a direct threat to a community.

In the county, this area of transition exists between open undeveloped public and private lands that support flammable vegetation and the county’s cities and unincorporated urban communities and small towns that support potentially vulnerable homes and businesses. WUIs vary in character throughout Santa Barbara County. WUI areas in the county include developed single-family neighborhoods immediately adjacent to the foothills of the Santa Ynez Mountains in the communities of Santa Barbara and Goleta and the Solomon Hills in Orcutt. Additional examples of WUIs include larger estate homes within the wildland areas in Montecito, Toro Canyon, and Carpinteria or ranchettes and larger ranches along the Santa Ynez Valley’s WUIs. A wildfire in the WUI could burn from wildlands into the urban area, which has happened during several prior fires in Santa Barbara County.

The majority of wildfires are caused by humans or lightning; however, once burning, wildfire behavior is based on three primary factors: fuel, topography, and weather. Fuel will affect the potential size and behavior of a wildfire depending on the amount present, its burning qualities (e.g., level of moisture), and its horizontal and vertical continuity. Topography affects the movement of air, and thus the fire, over the ground surface. The terrain can also change the speed at which the fire travels, and the ability of firefighters to reach and extinguish the fire.

The county’s mountainous terrain and limited road access to these areas can sometimes prevent easy access by firefighting equipment. Weather as manifested in temperature, humidity, and wind (both short- and long-term) affects the probability, severity, and duration of wildfires. High winds, in particular, can cause a wildfire to rapidly advance through already dry vegetation posing a major challenge to fire fighting and may even at times limit the safe use of aircraft, which can greatly reduce firefighting capacity. Certain conditions are typically present for a wildfire hazard to occur: a large source of fuel must be present, the weather must be conducive (i.e., generally hot, dry, and windy), and fire suppression sources may be unavailable or insufficient to easily suppress and control the fire, although in some instances of high winds (e.g., sundowner winds) and dry fuels such suppression may not be able to provide full protection.

Table 5-3 provides a summary of fire loss in dollars in Santa Barbara County in 2020. State fire suppression expenditures are expected to increase from \$691 million in the 2019-2020 fiscal year to an estimated \$1.3 billion for the 2020-2021 fiscal year (CAL FIRE 2021). Michele Steinberg, director of the Wildfire Division at NFPA, notes that “money spent on suppression means less money for prevention efforts, which is key to addressing the problem of wildfire losses,” (Roman et al. 2020). The popular weather forecasting service AccuWeather has predicted that costs for the 2020 wildfire season could total between \$130 and \$150 billion (Roman et al. 2020). Less understood are wildfire’s indirect costs associated with environmental cleanup, lost business and tax revenue, and property and infrastructure repairs

Table 5-3. Fire Loss (in Dollars) Within the County of Santa Barbara in 2020

Property Type	Loss in Dollars to Fire
Property or Structure	\$1,552,900
Vehicles and Vehicle Contents	\$199,600
Miscellaneous Property	\$110,867
Total Dollar Loss	\$1,863,367

Source: Santa Barbara County Fire Department 2021.

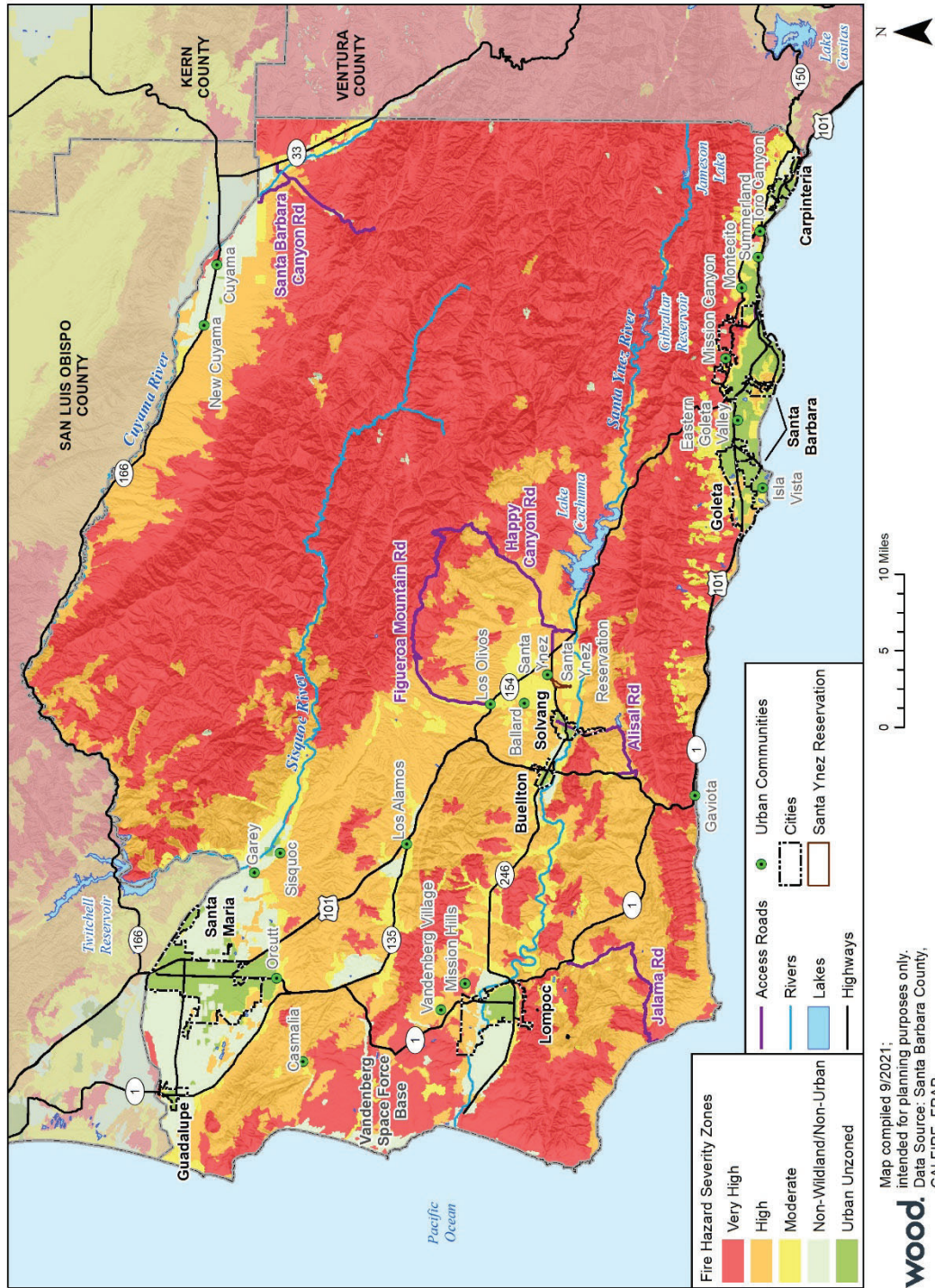
Note: The year 2020 is the only year for which this information is available although it should be noted that 2020 was a relatively calm fire year, and these losses are insignificant compared to fire losses from the Tea, Jesusita, and Paint fires.

Location and Extent of Hazard in Santa Barbara County

Wildfires are a regular occurrence in the state and county. The Mediterranean-type climate, topography, and vegetation of Santa Barbara County make the county especially prone and conducive to wildfires. Since 2012, Santa Barbara County has experienced drought and dry periods with only limited wet years. In addition to the 2012 through 2017 statewide drought emergency, the county is currently identified in the National Integrated Drought Information System (NIDIS) by the National Oceanic and Atmospheric Administration (NOAA) as an area in D3 – Extreme Drought condition (see Section 5.3.2, *Drought & Water Shortage*; NOAA 2021a). This drought condition dries out vegetation and exacerbates wildfire risk in the county.

The California Department of Forestry and Fire Protection (CAL FIRE) Fire and Resource Assessment Program (FRAP) provides high-quality spatial data, maps, and online data viewers which provide critical information on the health and risk factors associated with forest and range lands within the State of California. These maps include but are not limited to Fire Hazard Severity Zones, Wildland-Urban Interface (WUI), Communities At Risk, Fire Threat, and Fire Perimeters. Fire Hazard Severity Zones are areas of significant fire hazards based on fuels (vegetation), terrain, weather, and other relevant factors. These zones define the application of various mitigation strategies to reduce the risk associated with wildland fires. The most current Fire Hazard Severity Zone maps were created in 2007. Figure 5-1 shows the Fire Hazard Severity Zones located in Santa Barbara County. CAL FIRE’s FRAP also developed data that displays the relative risk from wildfire in areas of significant population density, known as the WUI. This data is created by intersecting residential housing unit density with proximate fire threat to give a relative measure of potential loss of structures and threats to public safety from wildfire. Figure 5-2 was generated using this data and shows the WUI areas in Santa Barbara County. This figure depicts areas where potential fuels treatments (e.g., controlled burns, vegetation thinning) should be prioritized to reduce wildland fire threats to population centers.

Figure 5-1. Santa Barbara County Fire Hazard Severity Zones



WUI data shown in Figure 5-2 was developed on a statewide basis and does not consider the precise location of local neighborhoods within or adjacent to these hazard zones. To account for this, the Santa Barbara County Fire Department has synthesized the data at a more local level to convey communities at risk. Further, to help protect people and their property from potential catastrophic wildfire, the National Fire Plan recommends that funding be provided for projects designed to reduce the fire risks to communities. A fundamental step in achieving this goal was the identification of communities that are at high risk of damage from wildfire. These high-risk communities identified within the WUI were published in the Federal Register in 2001. At the request of Congress, the Federal Register notice only listed those communities neighboring federal lands. The list represents the collaborative work of the 50 states and five federal agencies using a standardized process, whereby states were asked to submit all communities within their borders that met the criteria of a structure at high risk from wildfire. Beginning August 17, 2001, no new updates were being made to the Federal Register with states assuming responsibility for continued updates to their lists.

The following list contains the federally identified communities which adjoin federal lands most at risk within Santa Barbara County; however, risks between and within these communities vary substantially, with the WUI of Goleta, Santa Barbara, and Carpinteria along the foothills of the Santa Ynez Mountains perhaps having the greatest risk due to often dense highly flammable chaparral vegetation, steep topography, and exposure to sundowner winds:

- Carpinteria
- Gaviota
- Mission Hills
- Tajiguas
- Casmalia
- Goleta
- Orcutt
- Vandenberg Space Force Base (SFB)
- Cuyama
- Lompoc
- Santa Barbara
- Vandenberg Village

With the county's extensive WUIs bordering multiple communities, the list of communities extends beyond just those adjacent to Federal lands. After the 2000 fire season CAL FIRE, working with the California Fire Alliance, developed a list of communities at risk from wildfire using 1990 Census and U.S. Geological Survey (USGS) Geographic Names Information System data to identify populated places and CAL FIRE's FRAP fuel hazard data. In addition to the already-mentioned communities, they designated the following as WUI Communities at Risk. As with the above list, risks between and within these communities vary substantially, with communities such as forested Montecito being bordered by dense highly flammable chaparral vegetation, steep topography, and exposure to sundowner winds:

- Buellton
- Isla Vista
- Montecito
- Sisquoc
- Ventucopa
- Garey
- Los Alamos
- Santa Maria
- Solvang
- Guadalupe
- Los Olivos
- Santa Ynez
- Summerland

Combining both lists, there are 25 communities on the Communities at Risk List in Santa Barbara County. The California State Forester (CAL FIRE Director) has assigned the role of managing the list to the California Fire Alliance. In addition to the 25 state and federally recognized communities, the Santa Barbara County Fire Department identifies an additional 16 neighborhoods or small communities (Santa Barbara County Fire Department 2021) at risk of wildfire:

- Cebada Canyon
- Woodstock
- Miguelito Canyon
- Painted Cave
- Jalama
- Gobernador
- Toro Canyon
- Jonata Ranch/Bobcat Springs
- Mission Canyon
- Rosario Park
- Tepusquet Canyon
- El Capitan
- Hope Ranch
- Trout Club
- Refugio Canyon
- Paradise

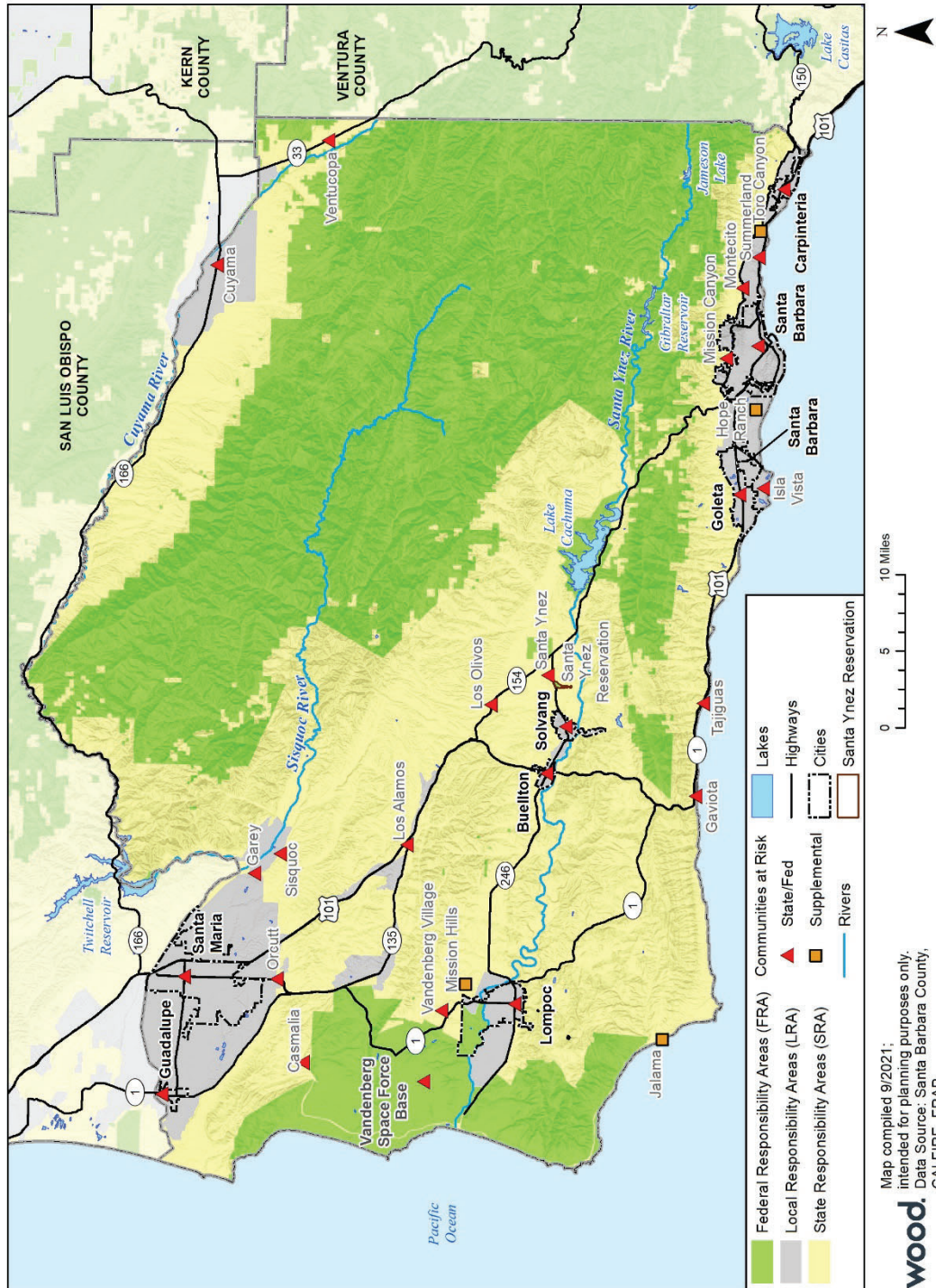
Many of the communities at risk listed above contain relatively old homes that reflect the building materials and/or codes in effect at the time of construction. As such, large numbers of homes are at increased risk of ignition due to structure vulnerabilities (e.g., wood shake roofs and siding, open eaves, unscreened crawlspace, and attic vents), which research has shown to be important in most home losses during wildfires. In addition to hazard reduction through fuel reduction, education of homeowners and mitigation of structure ignition vulnerabilities is therefore recognized as an important priority in these Communities at Risk. Programs that support retrofits to existing structures, combined with building codes that make future structures more fire-resistant, are needed in many fire-prone areas. Figure 5-3 provides an overview of the location of the Communities at Risk as well as the federal, state, and local wildfire responsibility areas.

History of Hazard in Santa Barbara County

Because Santa Barbara County is prone to wildfires, there is a long history of wildfires in the county. Table 5-4 lists the major wildfires (1,000 acres or greater) in Santa Barbara County from 1932-to 2021.

CAL FIRE's FRAP also compiles fire perimeters of wildfires and has established an ongoing fire perimeter data capture process. Figure 5-4 shows wildfire perimeters of significant wildfires (i.e., fires that burned more than 5,000 acres) within the last ~50 years (1970-2021) in Santa Barbara County. Some recent fires (e.g., Cave Fire) may not be shown on this figure if the total burned area was less than 5,000 acres. Fire perimeters provide a reasonable view of the spatial distribution of past large fires. These historic fires are organized by decade to show the evolution of fire behavior over the years. For example, over the last 10 years, Santa Barbara County has experienced nine major fires. Four of these fires (i.e., Thomas, Cave, Sherpa, and Whittier) directly threatened the heavily populated Santa Barbara front country. Three of these fires (i.e., Thomas, Sherpa, and Whittier) resulted in destroyed structures, with over 1,000 structures destroyed in the Thomas Fire, including many in Ventura County.

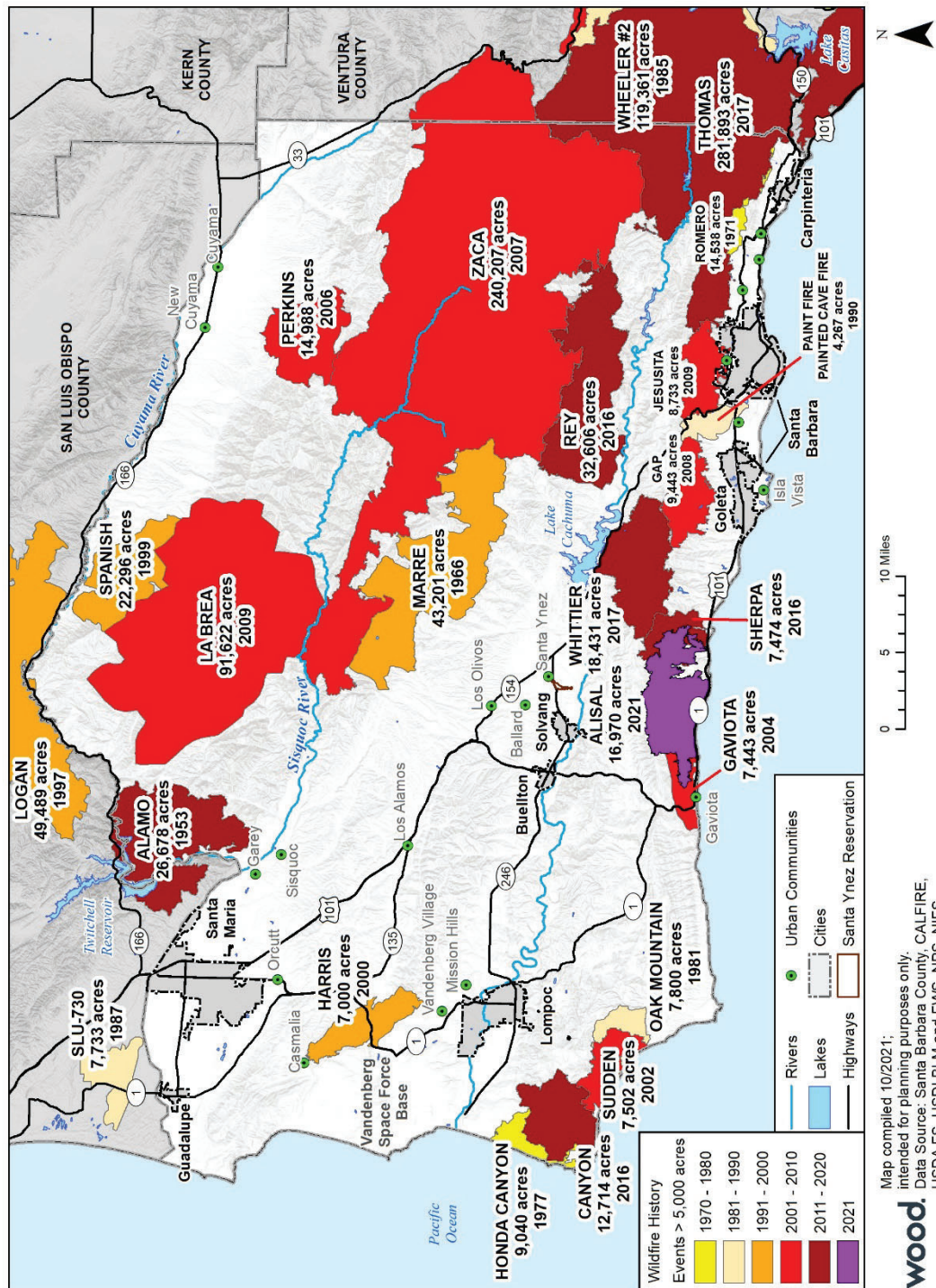
Figure 5-3. Santa Barbara County Fire Responsibility Areas and Communities at Risk



Map compiled 9/2021;
intended for planning purposes only.
Data Source: Santa Barbara County,
CALFIRE, FRAP



Figure 5-4. Santa Barbara County Fire History (1970-2021)



Recent fires have been burning faster and bigger due to drier vegetation related to recent drought conditions, potentially exacerbated by climate change (NOAA 2021a). These conditions allow for intense fires that can spread quickly and threaten urban areas (see *Climate Change Considerations* below for further discussion regarding the impact of climate change on wildfire within the county).

Table 5-4. Major Wildfires in Santa Barbara County

Year	Fire Name	Acres Burned	Year	Fire Name	Acres Burned
1932	North Shore	7,576	2002	Sudden	7,500
1971	Cielo	2,010	2004	Gaviota	7,197
1971	Romero	14,538	2004	Cachuma	1,115
1975	--	1,527	2006	Bald Fire	4,332
1977	Cachuma	2,250	2006	Perkins	14,923
1977	Hondo Canyon	8,526	2007	Zaca	240,807
1979	Wasioja	2,006	2008	Gap	9,443
1981	Rey	1,638	2008	Tea	1,940
1981	Oak Mountain	8,688	2009	Jesusita	8,733
1984	Minuteman	1,187	2009	La Brea	89,489
1985	Wheeler	122,687	2010	Bear Creek	1,252
1989	Cocheo	1,233	2013	White	1,984
1990	Paint	4,424	2016	Rey	32,606
1993	Marre	43,864	2016	Sherpa	7,474
1994	Aliso	3,244	2017	Alamo Fire	28,834
1996	Wasioja	2,812	2017	Whittier Fire	18,430
1996	Cuyama	1,400	2017	Thomas Fire	281,893
1997	Logan	49,490	2018	Front Fire	1,014
1997	Azaela	1,351	2019	Cave Fire	3,126
1997	Halloween	1,129	2020	Scorpion Fire	1,395
1998	Ogilvy	4,029	2021	Alisal Fire	16,970
2000	Harris	8,684			

Source: National Interagency Fire Center 2021.

Notes: Acreage represents total burned by fire; however, a number of these fires such as the Thomas Fire burned in other counties as well (e.g., Ventura County) so acreages burned in Santa Barbara County would be lower in some instances.

While more extensive discussion of previous wildfires in Santa Barbara County is available, the following information provides an overview and the location of the significant events (greater than 3,000 acres burned) since 2016:

- The **Alisal Fire** in 2021 burned 16,970 acres, shut down Highway 101, and forced dozens of people to evacuate. The fire destroyed 12 homes and damaged one other. OEM published the evacuations orders on behalf of the Sheriff's Office for about 300 residents in the Alisal Fire burn area (CBS Los Angeles 2021).
- The **Cave Fire** in 2019 burned over 3,000 acres near Painted Cave in the Los Padres National Forest for 21 days (National Interagency Fire Center 2021). Approximately 2,400 homes were placed under evacuation orders for areas north of Cathedral Oaks Road between Patterson

Avenue and Highway 154 and areas of Foothill Road between Highway 154 and North Ontare Road. A unified command consisting of multiple County agencies was assembled to assist with the fire (County Fire Department 2021). No homes were damaged (Santa Maria Times 2021).

- Before even larger fires in recent years, the **Thomas Fire** in 2017 was the largest California wildfire in modern California history, engulfing 281,893 acres, destroying or damaging more than 1,063 structures, primarily within Ventura County, and resulting in two fatalities. The Thomas Fire began on December 4, 2017 and was reported 100 percent contained on January 12, 2018 by the U.S. Forest Service. The fire was ignited north of Santa Paula in Ventura County and burned into Santa Barbara County through the Santa Ynez Mountains and parts of the upper Santa Ynez River watershed. It was one of the first wildfires to burn from inland Ventura County into the Santa Barbara front country of the Santa Ynez Mountains. The fire was active for 40 days and at one time involved more than 8,500 firefighters, 800 fire engines, and dozens of aircraft (National Interagency Fire Center 2021; Santa Maria Times 2021).

Incident Profile: The Thomas Fire

The 2017 Thomas Fire burned approximately 281,893 acres in Ventura and Santa Barbara counties, making it the largest California wildfire in modern history at the time. The fire was started by power lines coming in contact during high winds and remained active for 40 days. At one point, over 8,500 firefighters from all across the western U.S. were working the fire. The fire resulted in the destruction of 1,063 structures and the loss of one civilian and one firefighter.



Source: CALFIRE 2021; Ventura County Fire Department 2019. Photo: SB Bucket Brigade

- The **Alamo Fire** in 2017 started in San Luis Obispo County near Twitchell Reservoir off Highway 166. Due to hot weather, winds, and dry grass, the fire quickly grew and spread into Santa Barbara County, lasting a total of 15 days. The Alamo Fire burned nearly 29,000 acres in San Luis Obispo and Santa Barbara counties (National Interagency Fire Center 2021). The fire caused the evacuation of approximately 200 homes (CAL FIRE 2017). Thanks to a total of 1,664 firefighters, four fixed-wing planes, five helicopters, four bulldozer teams, 10 hand crews, and five water tankers, one home was destroyed and one additional building was damaged in the Alamo Fire. One of the factors that made fighting this fire so difficult was that the Whittier fire described below was going on at the same time, so resources were stretched thin. Fire crews from Los Angeles and Orange counties jumped in to help (Santa Maria Times 2021; The Tribune 2017).
- The **Whittier Fire** in 2017 burned over 18,000 acres above Camp Whittier on the north slope of the Santa Ynez near Lake Cachuma primarily within the Los Padres National Forest and

private ranchlands. The fire was active for 167 days. In total, 16 homes and 30 outbuildings were destroyed. One home and six outbuildings were damaged. Thousands of campers in and around the Cachuma Lake Recreation area and nearby Paradise Road had to flee, leaving eerie ghost towns of pitched tents and picnic lunches on the tables as they fled (Santa Maria Times 2021).

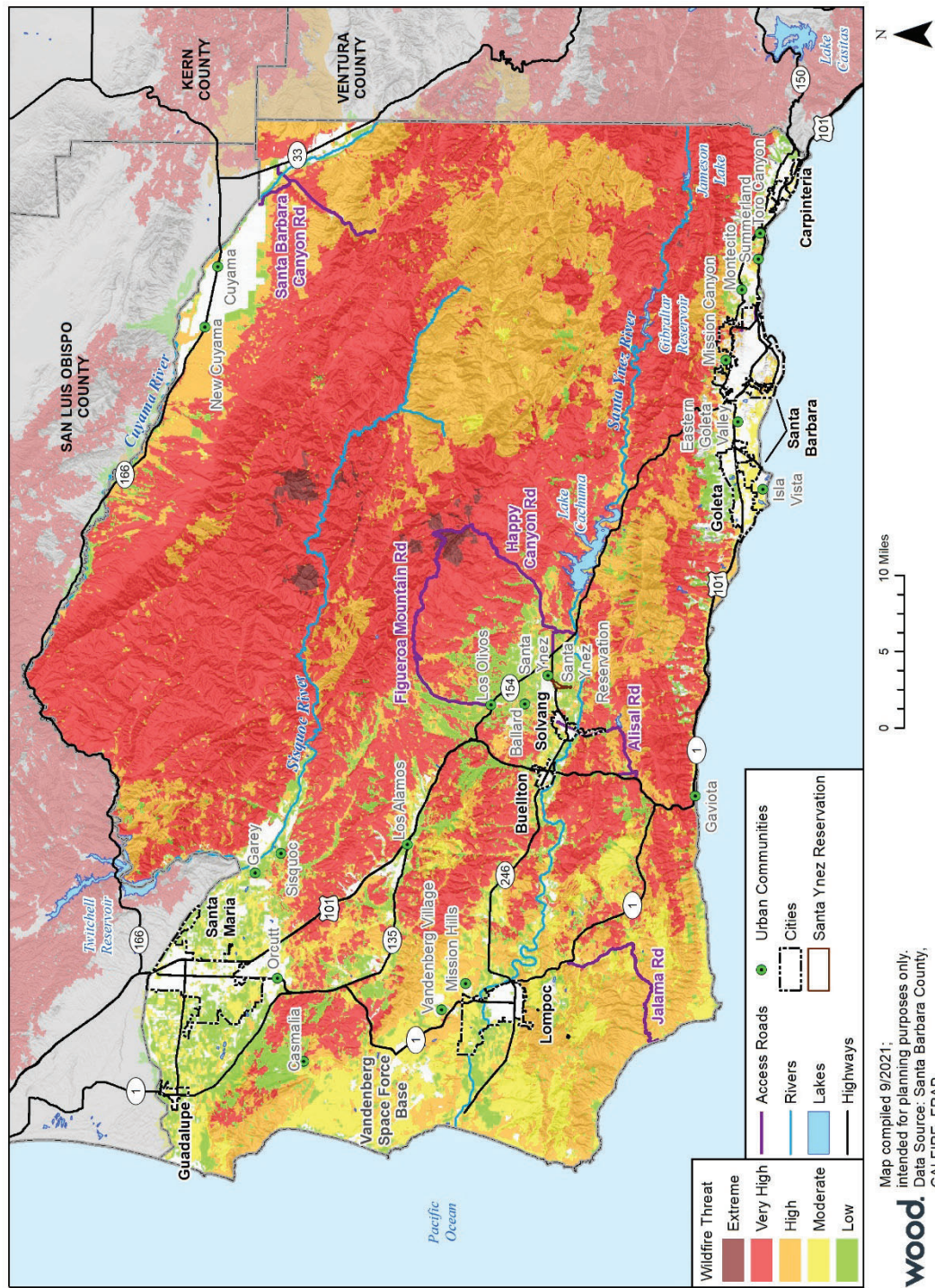
- The **Rey Fire** burned over 32,000 acres off of Highway 154 and Paradise Road, north of Santa Barbara for 29 days, requiring emergency evacuations (National Interagency Fire Center 2021). Over 10,000 of those acres were on Rancho San Fernando Rey itself and 19,752 were in the Los Padres National Forest. Over 300 people had to be evacuated from their campsites and residences. The fire was fought by 1,260 firefighters, 28 crews, 48 engines, 11 aircraft, two helicopters, and numerous bulldozers. No structures or homes were burned (Santa Maria Times 2021).
- The **Sherpa Fire** burned over 7,400 acres in Santa Barbara County, west of Goleta, for 27 days (National Interagency Fire Center 2021). The blaze prompted evacuation orders for El Capitan and Refugio State Beaches as well as for the ranches in El Capitan Canyon. The fire destroyed the water system for El Capitan State Beach, which remained closed for weeks. At the peak of the fire, 2,000 firefighters were on site to try to contain the fire (Santa Maria Times 2021).

Probability of Occurrence

Highly Likely - Vegetation and topography are significant elements in the identification of the fire threat zones, as well as areas subject to high winds such as sundowners (see Section 5.4.2, *Windstorm*). Santa Barbara supports extensive tracts of chaparral vegetation, a shrubland habitat of dense and scrubby brush that has evolved to persist in a fire-prone habitat. Chaparral plants will eventually age and die; however, they will not be replaced by new growth until a fire rejuvenates the area. Chamise, manzanita, and ceanothus are all examples of chaparral vegetation that are quite common in Santa Barbara County, particularly in the Santa Ynez Mountains, San Rafael Mountains, and even the Solomon Hills and Casmalia Hills.

Santa Barbara County was subject to 42 major wildfires over 88 years, resulting in a 48 percent chance of occurrence in any given year. In addition, Figure 5-5 shows the threat of fire to Santa Barbara County as mapped by CAL FIRE. Fire threat is a combination of two factors: 1) fire frequency or the likelihood of a given area burning, and 2) potential fire behavior. These two factors are combined to create four threat classes ranging from moderate to extreme.

Figure 5-5. Santa Barbara County Wildfire Threat



Map compiled 9/2021;
intended for planning purposes only.
Data Source: Santa Barbara County,
CALFIRE, FRAP



Climate Change Considerations

Based on research performed by the State of California Governor’s Office of Planning and Research (OPR) and as noted by fire protection specialists, climate change is now playing a significant role in increasing the frequency and severity of wildfires (Office of Governor 2019). Growing amounts of greenhouse gases (GHGs) coupled with population growth and development are expected to continue impacting California forests, natural resources, and residential neighborhoods. Likewise, the effects of climate change have the potential to impact wildfire behavior, the frequency of ignitions, fire management, and fuel loads. Increasing temperatures may intensify wildfire threat and susceptibility to more frequent wildfires in the county. The County’s CCVA estimates that the annual average acres burned is expected to increase to 23,040 acres per year (30 percent increase) by 2030, 25,782 acres per year (46 percent increase) by 2060, and 24,050 acres per year (36 percent increase) by 2100 due to higher annual average temperatures and the increased frequency and intensity of droughts.

Exactly how climate change will affect total precipitation is not clear, but models suggest that there is a tendency for wetter conditions in the northern part of the state and drier conditions in the south. Results are also likely to vary across the substantial precipitation gradient from south to north along the Central Coast, including the county. More northern higher precipitation areas may see decreased fire return intervals and higher severity, while areas to the south may ultimately see the opposite as warming increases climatic water deficit but also reduces vegetation growth rates and fuel loads. (California Natural Resources Agency 2018). The projected changed conditions from alternating wet years to more frequent, extended, and severe drought can create more fuel (vegetation) during wet years, followed by extending drying of such vegetation, increasing fuel loading and the flammability of such vegetation. Studies noted in California’s Fourth Assessment report note climate change impacts on wind patterns may trigger a conversion of forested areas to other types of vegetation (California Natural Resources Agency 2018). There is some evidence that increasing fire frequencies can cause coastal sage shrubs and chaparral to shift to grasses, including exotic grasses, and these shifts in ecosystems can have feedback on fire regimes since grasslands tend to promote more frequent fires. Climate impacts, particularly precipitation, also alter post-fire behavior, including the recovery trajectories and the rate of vegetation recovery following a fire, although these effects vary with fire severity, pre-fire species, and landscape characteristics. Forests and woodlands are also sensitive to variable precipitation events, as the 2012-2017 drought contributed to widespread tree mortality as warmer temperatures stressed trees and made them more susceptible to pests and pathogens (California Natural Resources Agency 2018).

Current scientific models expect California will be affected by increased numbers of wildfires with added intensity due to longer warmer seasons, reduced the distribution of biodiversity, lack of moisture, changes in ecosystems, drought impacts (e.g., pest diseases, and continued spread of invasive species), and other impacts in coming years. Wildfire behavior appears to be becoming more severe with fires burning hotter, moving more quickly, and even creating their own weather which in turn can cause firestorms that are difficult to contain. While wildfires are a natural part of California’s ecology, the fire season is getting longer every year—with most counties now experiencing extended fire seasons (e.g., 6 to 9 months) and several counties facing fire danger year-round. Warmer temperatures, variable snowpack, and earlier snowmelt caused by climate

change make for longer and more intense dry seasons, leaving forests more susceptible to severe fire.

The extension of the wildfire season into the winter months, coinciding with seasonal high wind patterns, has contributed to severe fires in recent years. Fifteen of the 20 most destructive wildfires in the state's history have occurred since 2000; 10 of the most destructive fires have occurred since 2015 (Office of Governor 2019). Anticipated growth and development in the county can also be expected to amplify these effects. As seen with the 2017 - 2018 wildfires, more damage occurred in developed areas like Montecito in Santa Barbara County, the City of Ventura in Ventura County, Santa Rosa in Sonoma County, and Paradise in Butte County.

The Thomas Fire also exhibited such increased wildfire severity with a total burn area of 281,893 acres; destroying 1,063 structures and resulting in one civilian and one firefighter fatality (Ventura County Fire Department 2019). The Thomas Fire, which occurred in December, was fueled by dry brush, 10 years of drought, and strong sundowner winds. More than 8,500 firefighters were assigned to the fire. Over 2,000 were in the South Coast communities and had been for three days prepping houses, laying lines, scouting escape routes, and becoming familiar with the landscape (Community Environmental Council 2020). Furthermore, large wildfires that burn hotter remove all vegetation and can melt surface soils creating hydrophobic soils which do not allow rainfall to percolate, increasing the threat of other disasters such as flooding and mud or debris flows. For example, the Thomas Fire was followed by the 2018 Montecito debris flows which severely damaged the community of Montecito, killed more than 20 residents, damaged or destroyed 400 or more homes, and led to a 3-week closure of Highway 101 and the Union Pacific Railroad (UPRR), severing connections between Santa Barbara and the rest of Southern California. Similarly, the Whittier Fire near Lake Cachuma exhibited extreme behavior and was followed by a strong downpour across the burn scar of the Whittier Fire which triggered a debris flow in Duval Canyon, clogging and damaging a culvert beneath Highway 154, shutting down this key north-south arterial for a month. Both of these fires illustrate the cumulative effects of climate change increasing wildfire severity lined with increased rainfall intensities to cause severe infrastructure damage. Fires in northern California, such as the Camp Fire which burned more than 153,330 acres and destroyed 19,000 homes and other structures as well as much of the Town of Paradise, also exemplify this trend of extreme fire behavior (Office of Governor 2019).

Large wildfires also have several indirect effects beyond those of a smaller, local fire. These may include air quality and health issues, road closures, business closures, and other forms of losses.

5.3.2 Drought & Water Shortage

Description of Hazard

A **drought** occurs when climactic and weather conditions are drier than normal for a long period, making less water available for people, agricultural uses, and ecosystems. Drought and water shortages are a gradual phenomenon and generally are not signified by one or two dry years. California's and the county's extensive system of water supply infrastructure (e.g., reservoirs, groundwater basins, and interregional conveyance facilities) generally mitigates the effects of short-term dry periods for most water users. However, drought conditions are present when a region receives below-average precipitation over an extended multiple-year period (e.g., 3 to 4 or more

Guadalupe (and surrounding communities) near the Garey Fault and Lions Head and the Cuyama Valley near the South Cuyama Fault, identified by the Center for Disease Control's (CDC's) Agency for Toxic Substances and Disease Registry (ATSDR). Some of the "frontline" communities identified by the County's Climate Change Vulnerability Assessment (CCVA) are also located near quaternary and late quaternary faults, including Isla Vista, Eastern Goleta Valley, El Sueno (a neighborhood in Eastern Goleta Valley), and western Carpinteria in the South Coast, near the Mission Ridge – Arroyo Parida Fault; southern Santa Ynez Valley near the Santa Ynez River Fault; and areas northwest of Santa Maria (near City of Guadalupe) (CDC/ATSDR 2021).

Populations most vulnerable to earthquake hazards would be those that rely on specific services or electrical power, which may not be available during or after a quake, such as health care patients, ADFN community members, and the elderly. Some residents would likely have a difficult time receiving emergency notifications or evacuating due to age or disability, houselessness, language barriers, or impact on energy and communications infrastructure. Such socially vulnerable and sometimes financially disadvantaged households may not have the financial resiliency to cope with both short-term post-earthquake issues such as paying for lodging and clean up as well as potentially lacking resources to address longer-term issues such as major structural repairs or replacement.

Historic, Cultural, and Natural Resources. Earthquake effects on the environment, natural resources, and historic and cultural assets could be very destructive depending on the type of seismic activity experienced and secondary/cascading effects from an event (e.g., wildfire). The biggest impact would likely be on older properties such as wooden or masonry buildings, though reinforced masonry structures would be much more resilient during earthquakes. However, an earthquake-triggered event such as a rockslide could impact natural foothill or mountain habitats.

Future Development. Future development in the county is not anticipated to significantly affect vulnerability to earthquakes when designed according to modern building codes. However future development would result in a slight increase in exposure of the population, building stock, and related infrastructure to earthquakes.

6.3 NATURAL AND DESTRUCTIVE HAZARDS

6.3.1 Wildfire

As described in Section 5.3.1, *Wildfire*, the county has extensive areas within mapped Fire Hazard Severity Zones and Wildland-Urban Interface (WUI) areas. These hazard areas generate vulnerability for life and structures, including critical facilities, throughout the county, but most severely within rural foothills areas where dry vegetation, steep slopes, and difficult access combine to create a high probability of wildfire.

Three measures were evaluated to assess wildfire vulnerability for critical facilities in the county:

- The first measure for wildfire vulnerability is whether a critical facility is within the Fire Hazard Severity Zone, as mapped by the California Department of Forestry and Fire Protection (CAL FIRE).

- The second measure for wildfire vulnerability is whether a critical facility is within the WUI. For this analysis, “within the WUI” represents those critical facilities that are in the geographical area where the three factors of “threat to people”, “communities at risk”, and “distance to developed areas” intersect. Therefore, the WUI is the potential treatment zone where mitigation could be implemented to reduce wildland fire threats to people
- The third measure for wildfire vulnerability is “Fire Threat.” Fire Threat is a combination of the factors of fire likelihood/frequency and potential fire behavior, which includes factors such as vegetation density and flammability (e.g., old-growth chaparral), topography, and susceptibility to high wind events (e.g., “sundowners”). The two factors are combined to create five threat classes ranging from “Little or No Threat” to “Extreme” (see Tables 6-26 and 6-27 for summaries of the total acreage of exposure to these three measures).

Table 6-26. Fire Threat by Planning Region

Threat Level	Planning Region	Fire Threat Acres	Total Planning Region Acres	Percent
Extreme Wildfire Threat	South Coast	1.1	77,020	0.001%
	Total	1	77,020	0.001%
Very High Wildfire Threat	Cuyama Valley	44,555	112,783	39.51%
	Lompoc Valley	38,169	195,287	19.55%
	Santa Maria Valley	37,949	178,146	21.30%
	Santa Ynez Valley	118,355	252,907	46.80%
	South Coast	13,604	77,020	17.66%
	Total	252,633	816,143	30.95%
High Wildfire Threat	Cuyama Valley	33,479	112,783	29.68%
	Lompoc Valley	72,430	195,287	37.09%
	Santa Maria Valley	35,500	178,146	19.93%
	Santa Ynez Valley	63,651	252,907	25.17%
	South Coast	8,668	77,020	11.25%
	Total	213,728	816,143	26.19%
Moderate Wildfire Threat	Cuyama Valley	2,418	112,783	2.14%
	Lompoc Valley	38,118	195,287	19.52%
	Santa Maria Valley	17,475	178,146	9.81%
	Santa Ynez Valley	6,411	252,907	2.53%
	South Coast	5,115	77,020	6.64%
	Total	69,538	816,143	8.52%
Low Wildfire Threat	Cuyama Valley	10,752	112,783	9.53%
	Lompoc Valley	28,814	195,287	14.75%
	Santa Maria Valley	35,015	178,146	19.66%
	Santa Ynez Valley	45,175	252,907	17.86%
	South Coast	6,524	77,020	8.47%
	Total	126,281	816,143	15.47%

Table 6-27. Fire Threat in Unincorporated Areas

Threat Level	Fire Threat Acres	Percent
Extreme Wildfire Threat	14,762	1.02%
Very High Wildfire Threat	704,633	48.51%
High Wildfire Threat	482,094	33.19%
Moderate Wildfire Threat	103,726	7.14%
Low Wildfire Threat	147,329	10.14%
Total	1,452,545	100.00%

Table 6-28. Fire Threat by City

Threat Level	Planning Region	Fire Threat Acres	Total Planning Region Acres	Percent
Extreme Wildfire Threat	Total	None	None	0%
Very High Wildfire Threat	Buellton	9	1,026	0.90%
	Carpinteria	1	1,643	0.07%
	Goleta	4	5,049	0.08%
	Santa Barbara	321	12,614	2.55%
	Santa Maria	41	15,002	0.27%
	Solvang	46	1,561	2.96%
	Total	423	36,895	1.15%
High Wildfire Threat	Buellton	63	1,026	6.12%
	Carpinteria	35	1,643	2.12%
	Goleta	52	5,049	1.02%
	Guadalupe	21	848	2.53%
	Lompoc	684	7,488	9.13%
	Santa Barbara	746	12,614	5.91%
	Santa Maria	427	15,002	2.84%
	Solvang	127	1,561	8.13%
	Total	2,154	45,231	4.76%
Moderate Wildfire Threat	Buellton	77	1,026	7.50%
	Carpinteria	148	1,643	9.04%
	Goleta	599	5,049	11.86%
	Guadalupe	68	848	8.04%
	Lompoc	1,666	7,488	22.25%
	Santa Barbara	942	12,614	7.47%
	Santa Maria	1,554	15,002	10.36%
	Solvang	99	1,561	6.37%
	Total	5,154	45,231	11.39%

Table 6-28. Fire Threat by City (Continued)

Threat Level	Planning Region	Fire Threat Acres	Total Planning Region Acres	Percent
Low Wildfire Threat	Buellton	99	1,026	9.64%
	Carpinteria	8	1,643	0.49%
	Goleta	267	5,049	5.28%
	Guadalupe	71	848	8.40%
	Lompoc	919	7,488	12.28%
	Santa Barbara	94	12,614	0.74%
	Santa Maria	2,317	15,002	15.45%
	Solvang	181	1,561	11.59%
	Total		3,956	45,231

Table 6-29. Santa Barbara County Properties at Risk to Fire Threat

Jurisdiction	Property Type	Extreme Parcel Count	Very High Parcel Count	High Parcel Count	Moderate Parcel Count	Low Parcel Count	Total Improved Parcel Count	Total Value	Population
Buellton	Agricultural	0	0	0	1	0	1	\$31,648	
	Commercial	0	0	0	5	3	8	\$20,234,206	
	Exempt	0	0	0	1	0	1	\$3,030	
	Industrial	0	0	0	3	9	12	\$68,976,330	
	Mixed Use	0	0	0	0	0	0	\$0	0
	Residential	0	0	0	115	62	177	\$165,242,040	487
	Improved Vacant	0	0	0	0	0	0	\$0	
	Total	0	0	0	125	74	199	\$254,487,254	487
Carpinteria	Agricultural	0	0	0	2	0	2	\$325,500	
	Commercial	0	0	0	1	0	1	\$130,660	
	Exempt	0	0	0	0	0	0	\$0	
	Industrial	0	0	1	0	0	1	\$138,693	
	Mixed Use	0	0	0	0	0	0	\$0	0
	Residential	0	0	47	80	28	155	\$88,158,491	425
	Improved Vacant	0	0	0	0	0	0	\$0	
	Total	0	0	48	83	28	159	\$88,753,343	425

Table 6-29. Santa Barbara County Properties at Risk to Fire Threat (Continued)

Jurisdiction	Property Type	Extreme Parcel Count	Very High Parcel Count	High Parcel Count	Moderate Parcel Count	Low Parcel Count	Total Improved Parcel Count	Total Value	Population
Goleta	Agricultural	0	0	0	1	2	3	\$1,126,116	
	Commercial	0	0	0	12	0	12	\$132,850,720	
	Exempt	0	0	0	3	2	5	\$2,520,690	
	Industrial	0	0	0	6	0	6	\$24,089,715	
	Mixed Use	0	0	0	0	0	0	\$0	0
	Residential	0	0	1	624	1	626	\$716,067,794	1,709
	Improved Vacant	0	0	0	0	0	0	\$0	
Total	0	0	1	646	5	652	\$876,655,035	1,709	
Guadalupe	Agricultural	0	0	0	0	0	0	\$0	
	Commercial	0	0	0	1	0	1	\$1,050,296	
	Exempt	0	0	0	0	0	0	\$0	
	Industrial	0	0	0	1	0	1	\$1,134,365	
	Mixed Use	0	0	0	0	0	0	\$0	0
	Residential	0	0	7	74	20	101	\$32,554,110	397
	Improved Vacant	0	0	0	0	0	0	\$0	
Total	0	0	7	76	20	103	\$34,738,771	397	
Lompoc	Agricultural	0	0	0	0	1	1	\$4,214	
	Commercial	0	0	0	0	0	0	\$0	
	Exempt	0	0	1	1	1	3	\$4,206,432	
	Industrial	0	0	0	0	3	3	\$17,281,255	
	Mixed Use	0	0	0	0	0	0	\$0	0
	Residential	0	0	59	49	63	171	\$62,617,740	498
	Improved Vacant	0	0	0	0	4	4	\$100,000	
Total	0	0	60	50	72	182	\$84,209,641	498	
Santa Barbara	Agricultural	0	1	0	0	0	1	\$90,528	
	Commercial	0	0	1	6	0	7	\$48,704,948	
	Exempt	0	0	1	3	0	4	\$4,194,834	
	Industrial	0	0	0	1	0	1	\$69,301,580	
	Mixed Use	0	0	0	0	0	0	\$0	0
	Residential	0	60	198	253	33	544	\$562,254,207	1,333
	Improved Vacant	0	0	3	1	0	4	\$2,935,184	
Total	0	61	203	264	33	561	\$687,481,281	1,333	

Table 6-29. Santa Barbara County Properties at Risk to Fire Threat (Continued)

Jurisdiction	Property Type	Extreme Parcel Count	Very High Parcel Count	High Parcel Count	Moderate Parcel Count	Low Parcel Count	Total Improved Parcel Count	Total Value	Population
Santa Maria	Agricultural	0	0	0	0	2	2	\$2,495,160	
	Commercial	0	0	5	25	12	42	\$551,198,784	
	Exempt	0	0	0	5	4	9	\$12,167,656	
	Industrial	0	0	2	12	27	41	\$297,281,323	
	Mixed Use	0	0	0	0	0	0	\$0	0
	Residential	0	0	77	267	720	1,064	\$542,399,237	3,969
	Improved Vacant	0	0	0	2	4	6	\$3,401,194	
	Total	0	0	84	311	769	1,164	\$1,408,943,353	3,969
Solvang	Agricultural	0	0	0	0	0	0	\$0	
	Commercial	0	0	0	2	1	3	\$184,772	
	Exempt	0	0	0	1	1	2	\$5,250,202	
	Industrial	0	0	0	0	0	0	\$0	
	Mixed Use	0	0	0	0	0	0	\$0	0
	Residential	0	0	55	62	139	256	\$217,296,242	612
	Improved Vacant	0	0	1	1	1	3	\$482,770	
	Total	0	0	56	66	142	264	\$223,213,986	612
Unincorporated	Agricultural	0	332	327	120	304	1,083	\$1,977,259,482	
	Commercial	0	5	10	12	12	39	\$90,536,808	
	Exempt	0	7	15	21	15	58	\$425,171,014	
	Industrial	0	0	0	2	7	9	\$16,238,123	
	Mixed Use	0	0	0	1	1	2	\$1,538,294	6
	Residential	1	767	1,496	1,102	1,635	5,001	\$6,115,866,432	14,403
	Improved Vacant	0	24	43	28	37	132	\$69,033,442	
	Total	1	1,135	1,891	1,286	2,011	6,324	\$8,695,643,595	14,409
Grand Total	1	1,196	2,350	2,907	3,154	9,608	\$12,354,126,258	23,837	

The majority of properties that occur in Fire Hazard Severity Zones are residential, however, properties in unincorporated territories also include agriculture properties. For example, 767 unincorporated residential properties and 332 unincorporated agricultural properties are located in Very High fire hazard zones. In the county's unincorporated territory, there are also 1,496 residential properties and 327 agricultural properties that are located in High fire hazard zones. The City of Santa Barbara is similarly vulnerable to wildfire, with 60 residential properties located in the Very High fire hazard zone. 198 residential properties in the City of Santa Barbara are located in High fire threat zones. The City of Carpinteria and City of Lompoc are both also vulnerable with 47 and 59 residential properties, respectively, located in the High fire hazard zone.

As shown in Table 6-30, 466,361 acres within the county are located within a High or Very High fire threat area, and one acre and one residential facility in unincorporated South Coast territory are located within an Extreme fire threat area. Table 6-31 shows the total number of properties located within fire hazard severity zones and estimated values. As shown therein, unincorporated territory and the City of Santa Barbara have the greatest number of parcels within High and Very High fire threat zones.

Table 6-30. Critical Facilities with Very High Fire Threat by Planning Region

Planning Region	Communications	Energy	Food, Water, Shelter	Hazardous Material	Health and Medical	Safety and Security	Transportation	Total Count	Total Value
Cuyama Valley	1	-	-	-	1	1	2	5	\$309,420
Lompoc Valley	1	-	-	-	-	-	2	3	\$0
Santa Maria Valley	3	-	-	-	-	-	5	8	\$0
Santa Ynez Valley	2	-	1	-	-	1	4	8	\$228,047
South Coast	-	-	-	-	-	1	3	4	\$1,208,931
Unincorporated	26	-	1	-	-	-	5	32	\$500,000
Total	33	0	2	0	1	3	21	60	\$2,246,398

Note: Unincorporated areas include Vandenberg SFB and Los Padres National Forest

Table 6-31. Critical Facilities with Very High Fire Threat by Jurisdiction

Jurisdiction	Communications	Energy	Food, Water, Shelter	Hazardous Material	Health and Medical	Safety and Security	Transportation	Total Count	Total Value
Buellton	-	-	1	-	-	-	-	1	\$228,047
Carpinteria	-	-	-	-	-	-	-	0	\$0
Goleta	-	-	-	-	-	-	-	0	\$0
Guadalupe	-	-	-	-	-	-	-	0	\$0
Lompoc	-	-	-	-	-	-	-	0	\$0
Santa Barbara	-	-	-	-	-	-	1	1	\$0
Santa Maria	-	-	-	-	-	-	-	0	\$0
Solvang	-	-	-	-	-	-	-	0	\$0
Unincorporated	33	-	1	-	1	3	20	58	\$2,018,351
Total	33	0	2	0	1	3	21	60	\$2,246,398

Table 6-32. Critical Facilities with High Fire Threat by Planning Region

Planning Region	Communications	Energy	Food, Water, Shelter	Hazardous Material	Health and Medical	Safety and Security	Transportation	Total Count	Total Value
Cuyama Valley	-	-	-	-	-	-	-	0	\$0
Lompoc Valley	6	-	1	1	-	8	17	33	\$1,346,760
Santa Maria Valley	1	1	1	-	-	5	5	13	\$3,929,072
Santa Ynez Valley	3	-	6	-	-	8	24	41	\$11,316,148
South Coast	1	1	1	-	-	1	8	12	\$1,167,943
Unincorporated	10	-	-	-	1	1	7	19	\$0
Total	21	2	9	1	1	23	61	118	\$17,759,923

Note: Unincorporated areas include Vandenberg SFB and Los Padres National Forest

Table 6-33. Facilities with High Fire Threat by Jurisdiction

Jurisdiction	Communications	Energy	Food, Water, Shelter	Hazardous Material	Health and Medical	Safety and Security	Transportation	Total Count	Total Value
Buellton	-	-	-	-	-	-	-	0	\$0
Carpinteria	-	-	-	-	-	-	-	0	\$0
Goleta	-	-	-	-	-	-	-	0	\$0
Guadalupe	-	-	-	-	-	-	-	0	\$0
Lompoc	-	-	-	-	-	-	1	1	\$0
Santa Barbara	-	-	-	-	-	-	-	0	\$0
Santa Maria	-	1	1	-	-	5	1	8	\$3,929,072
Solvang	-	-	1	-	-	-	-	1	\$535,623
Unincorporated	21	1	7	1	1	18	59	108	\$13,295,228
Total	21	2	9	1	1	23	61	118	\$17,759,923

Table 6-34. Facilities with Moderate Fire Threat by Planning Region

Planning Region	Communications	Energy	Food, Water, Shelter	Hazardous Material	Health and Medical	Safety and Security	Transportation	Total Count	Total Value
Cuyama Valley	-	-	-	-	-	-	-	0	\$0
Lompoc Valley	3	-	-	-	-	2	5	10	\$2,838,203
Santa Maria Valley	4	1	-	1	-	1	4	11	\$0
Santa Ynez Valley	-	-	1	-	-	-	5	6	\$736,483
South Coast	-	-	4	-	4	11	10	29	\$17,423,053
Unincorporated	5	-	1	1	1	-	2	10	\$0
Total	12	1	6	2	5	14	26	66	\$20,997,739

Note: Unincorporated areas include Vandenberg SFB and Los Padres National Forest

Table 6-35. Facilities with Moderate Fire Threat by Jurisdiction

Jurisdiction	Communications	Energy	Food, Water, Shelter	Hazardous Material	Health and Medical	Safety and Security	Transportation	Total Count	Total Value
Buellton	-	-	-	-	-	-	1	1	\$0
Carpinteria	-	-	-	-	-	-	-	0	\$0
Goleta	-	-	1	-	-	-	-	1	\$2,000,000
Guadalupe	-	-	1	-	-	-	-	1	\$0
Lompoc	-	-	1	-	-	-	1	2	\$0
Santa Barbara	-	-	1	-	1	-	4	6	\$0
Santa Maria	1	1	-	-	-	-	-	2	\$0
Solvang	-	-	-	-	-	-	-	0	\$0
Unincorporated	11	-	5	2	4	11	20	53	\$18,997,739
Total	12	1	9	2	5	11	26	66	\$20,997,739

As shown in the tables above, 60 critical facilities are located in very high fire hazard severity zones, 33 of which are communications and 21 are transportation, which include facilities such as cell towers, local roads, and state highways (e.g., SR 192). As shown in the tables above, 118 critical facilities are located in High fire threat zones, 61 of which are transportation, 23 are safety and security and 21 are communications. As shown in the tables above, 66 critical facilities are located in Moderate fire threat zones, 26 of which are transportation and 21 are communication. Critical facilities most at risk of damage in the event of a wildfire are communication facilities (e.g., FM Tower, Cellular towers, Paging towers) and transportation facilities, such as the State Route (SR) 1 at Ytias Creek Bridge and SR-154 at Alamo Pintado Creek bridge. All transportation critical

facilities that occur in High and Very High fire threat zones are bridges, the majority of which are located in unincorporated areas, including South Coast, Santa Ynez Valley, Santa Maria Valley, Lompoc Valley, and Cuyama Valley.

Figure 6-6 depicts the location of the county's critical facilities relative to Fire Hazard Severity Zones. Figure 6-7 depicts critical facilities and WUI Zones within the county. Figure 6-8 depicts the location of critical facilities relative to wildfire threat zones. Figure 6-9 depicts the location of critical facilities relative to emergency evacuation routes.

As depicted in Figures 6-6 and 6-8, the majority of Santa Barbara County is located within Very High or High Fire Hazard Severity Zones and Very High and High fire threat zones, meaning that in addition to critical facilities described above, homes and residential structures across the county are vulnerable to wildfire threat, especially those in Santa Ynez Valley, Cuyama Valley, and the South Coast, which are identified as high or severe vulnerabilities (Santa Barbara County 2021).

Further, as indicated by Figure 6-9, emergency access and evacuation can be constrained in hillside neighborhoods and rural communities where limited ingress and egress can slow and prevent the efficient movement of people and vehicles. This is particularly true in denser communities with larger populations served by narrow local roads such as the Riviera in the City of Santa Barbara, the Goleta foothills, and areas of the Santa Ynez Valley and Orcutt. This vulnerability may be exacerbated in the future under changing housing laws in California that incentivize additional density within existing neighborhoods, including allowances for accessory dwelling units (ADUs), as well as urban lot splits and duplexes under Senate Bill 9, which increase the service population. During an evacuation, additional residents would depend on the existing roadway network to flee and emergency responders would have additional residents to protect and serve. Further, in most cases, the same roads used for civilian evacuation to leave an area are also used by emergency responders to access the incident area.

County jurisdictions have established various communication pathways to inform the public of emergencies and recommended protective actions, such as evacuations and sheltering in place (see also, Chapter 4.0, *Community Profile and Capability Assessment*). These pathways are frequently used concurrently to amplify emergency information throughout the community and reach vulnerable individuals who may need additional information and resources to take action, including people with disabilities, access and functional needs, and commuters and visitors. Emergency notifications are primarily disseminated using Everbridge, a web-based mass notification platform that supports alerting through phone calls, text messages, email, TTY/TTD (for the deaf and hearing-impaired), Wireless Emergency Alerts (WEAs), and Emergency Alert System (EAS) messages.² Notifications may also be delivered directly to residents via door knocks and/or evacuation sirens on law enforcement vehicles. Incident information can also be posted on the County's emergency preparedness website www.ReadySBC.org, shared on social media platforms (e.g., Twitter,

² In acute or extreme hazard scenarios, notification using the FCC's Wireless Emergency Alerts (WEA) system is possible. WEA is a public safety system that allows customers who own compatible mobile devices to receive geographically targeted, text-like messages alerting them of imminent threats to safety in their area such as dangerous weather, missing children, and other critical situations. The EAS is a national public warning system commonly used by state and local authorities to deliver important emergency information, such as weather and AMBER alerts, to affected communities.

Figure 6-6. Critical Facilities in Fire Hazard Severity Zone

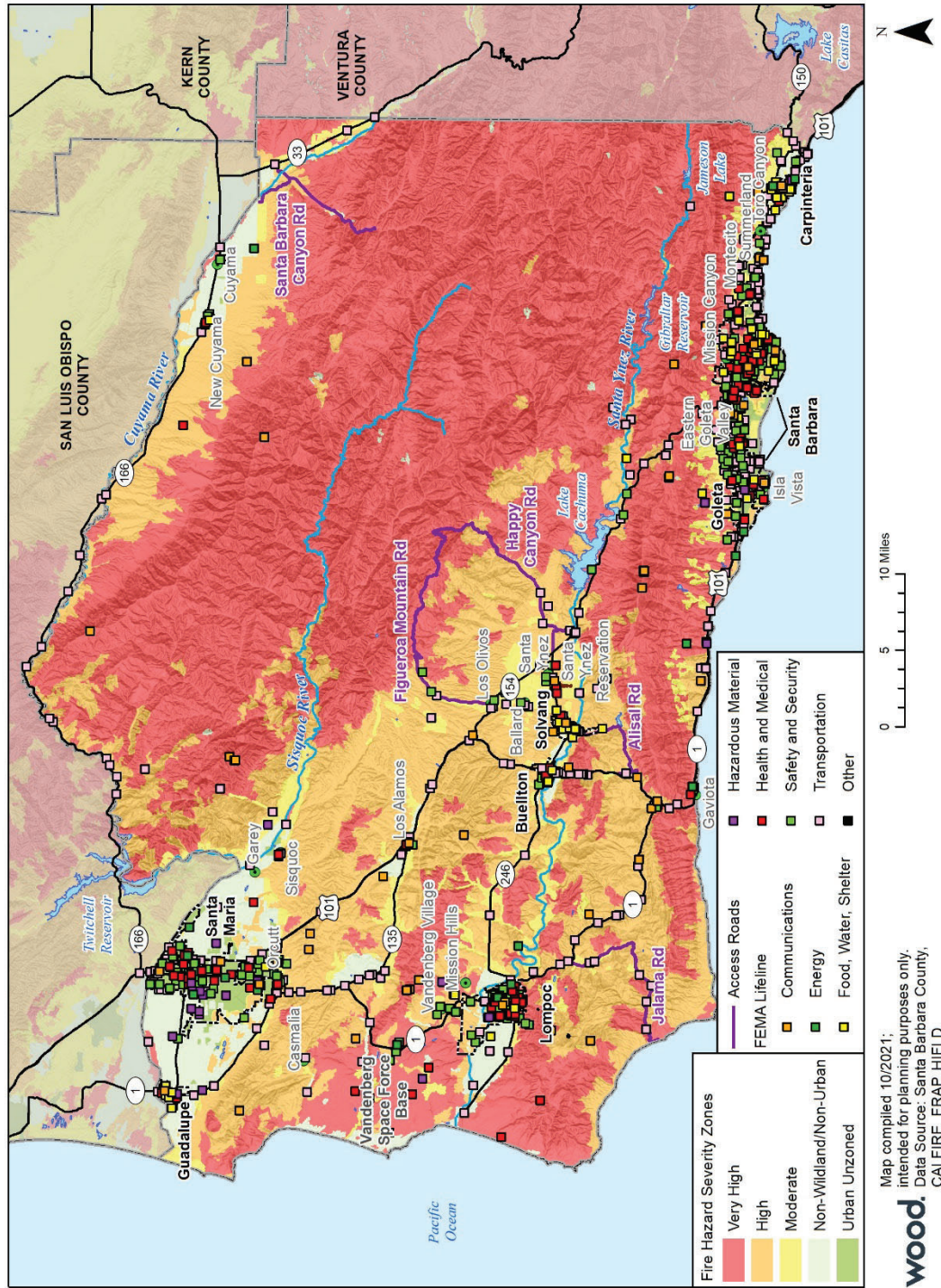


Figure 6-7. Critical Facilities in Wildland Urban Interface (WUI)

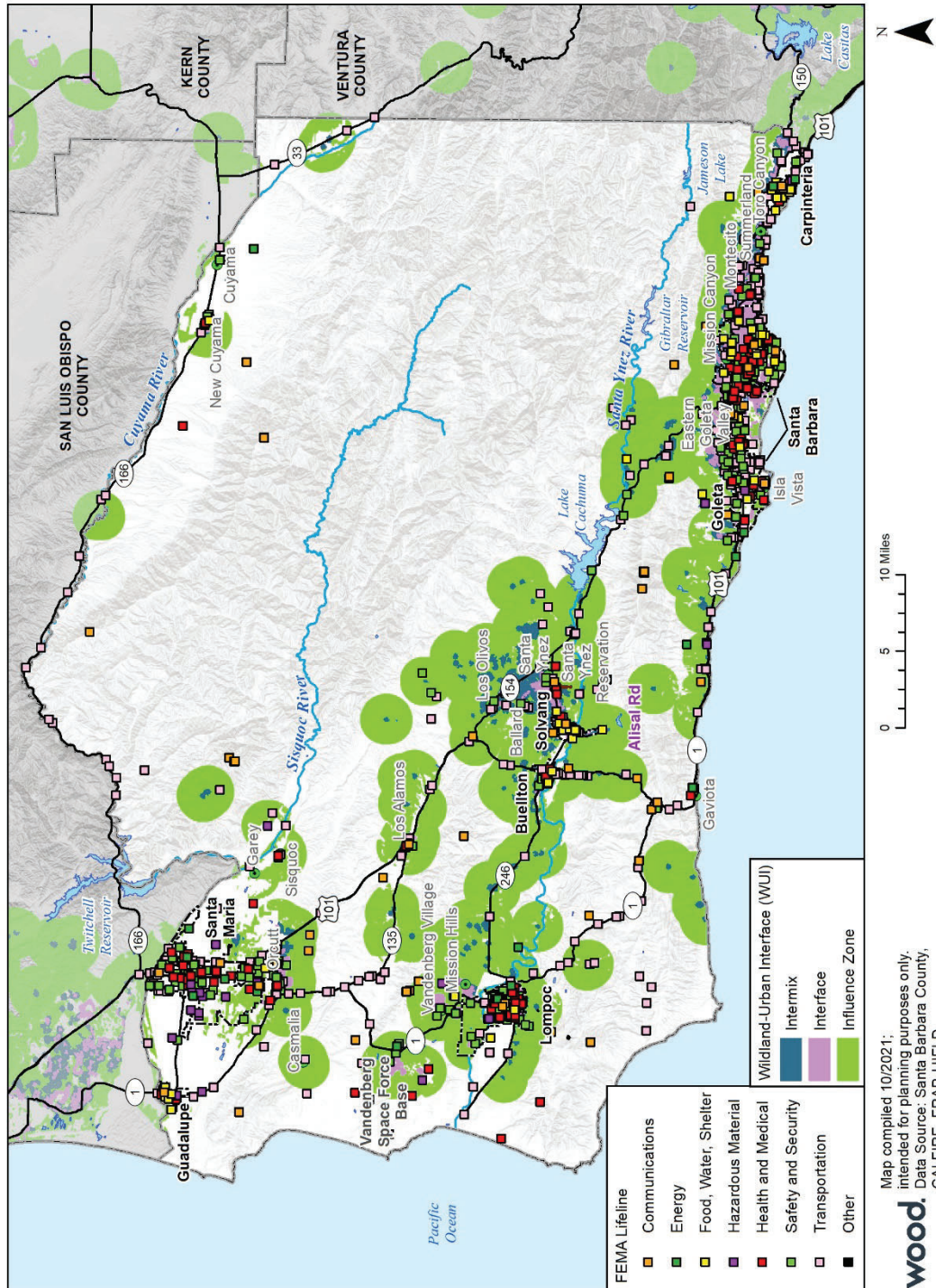


Figure 6-8. Critical Facilities in Fire Threat Zones

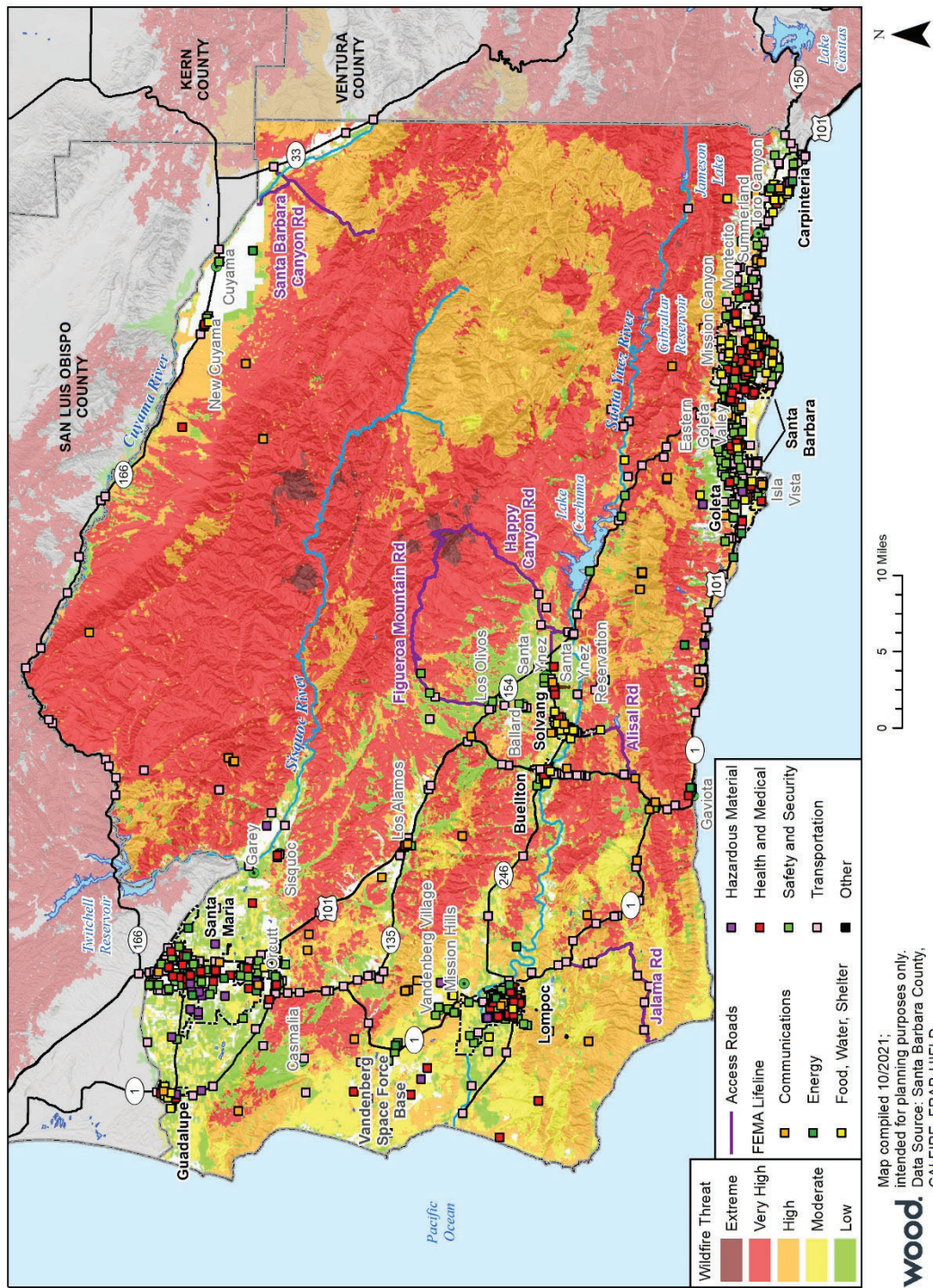
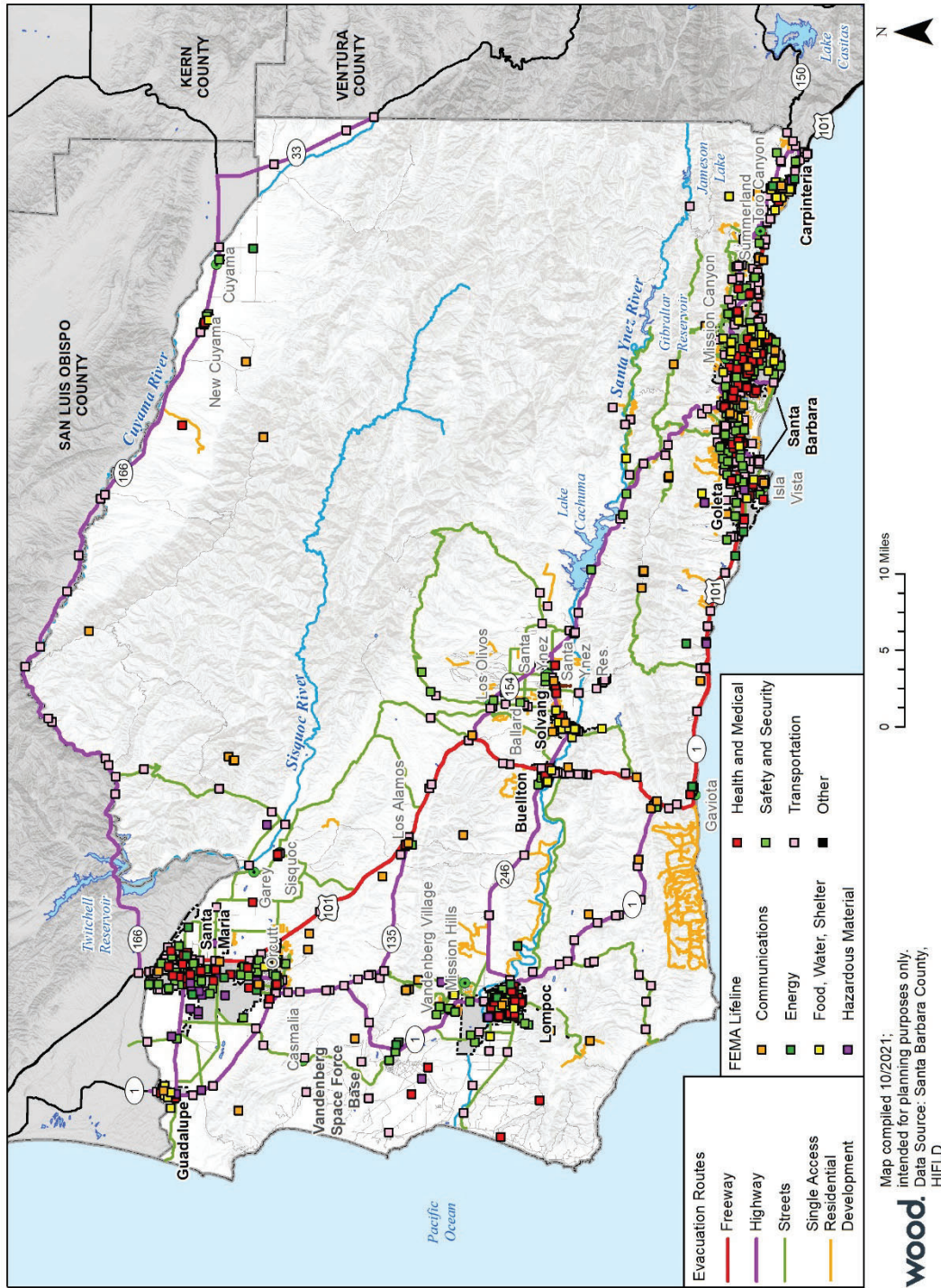


Figure 6-9. Evacuation Routes, Residential Areas with Single Access, and Critical Facilities



Map compiled 10/2021;
intended for planning purposes only.
Data Source: Santa Barbara County,
HIFLD



Facebook), through print, radio, and TV media, and accessed through 2-1-1 and Call Center hotlines. Most of these concepts rely on the availability of communications infrastructures, such as the internet, cell phones, landlines, and broadcast media; all of which can be impacted by natural hazards, such as wildfires. Additionally, populations with limited resources, existing social or economic disparities, language and communication barriers, may not have access to all the methods utilized for notifications, or may not trust messages from government programs, staff and officials, putting these populations at greater risk.

6.3.2 Drought & Water Shortage

As described in Section 5.3.2, *Drought and Water Shortage*, drought occurs cyclically in Santa Barbara County and is expected to become more frequent and severe under changing climate conditions. Recently, the historically severe 2012-2017 statewide drought was followed by limited wet years and several very dry years. According to the U.S. Drought Monitor, an estimate 423,895 people reside in drought areas in Santa Barbara County, including 297,824 residents in Extreme Drought areas (D3), 125,765 residents in Severe Drought areas (D2), and 304 residents in Moderate Drought areas (D1) as of September 2022.

The effects of drought affect both local surface water supplies and deliveries from the State Water Project. While such effects on surface water supplies are most visible in Santa Barbara County when looking at the current capacity and maximum storage of the water supply reservoirs, droughts can severely reduce or even halt deliveries from the State Water Project. Locally, drought can impact water reservoirs along the Santa Ynez River, particularly Lake Cachuma, the largest reservoir in the County. As of November 9, 2021, Cachuma Reservoir, a key water supply for the entire South Coast, was reported to be at 48.1 percent capacity, the Gibraltar Reservoir that supplies the City of Santa Barbara at a capacity of 4.3 percent, and the Jameson Reservoir that supplies the community of Montecito at a capacity of 58.6 percent (refer to Table 5-6). Information on Twitchell Reservoir capacity, which does not provide long-term storage but plays a key role in recharging the Santa Maria Groundwater Basin, is unavailable currently (Santa Barbara County Flood Control and Water Conservation District [County Flood Control District] 2021).

During droughts, groundwater basin overdraft (when groundwater recharge cannot keep up with groundwater extraction) can occur in the county. While sustained groundwater overdraft is related to long-term trends in the balance between groundwater withdrawals and recharge, droughts increase demand on groundwater basins while decreasing or even eliminating recharges and replenishment, sometimes for multiple years. Such droughts can delay the recovery of groundwater basins even during wet years and cause problems such as declines in water quality, drying of surface creeks and wetlands, etc. As described in Section 5.3.2, *Drought & Water Shortage*, the California Department of Water Resources (DWR) has identified five groundwater basins in the county as High or Medium priority basins subject to critical conditions of overdraft (refer to Table 5-6; DWR 2017):

- Carpinteria Groundwater Basin
- Montecito Groundwater Basin
- Santa Ynez River Valley Groundwater Basin
- San Antonio Creek Valley Groundwater Basin